



**High
Circle** | Ventures

HIGH CIRCLE VENTURES LLC ONLINE PRIVACY POLICY

EFFECTIVE DATE: MAY 27, 2026

This High Circle Ventures LLC (“High Circle Ventures”) Online Privacy Policy applies to any websites, investor portals, or digital platforms owned or operated by High Circle Ventures LLC, and its subsidiaries, special purpose vehicles (SPVs), and affiliates (each, a “Site”). This policy governs how we collect, use, and protect information when you interact with our platform as an investor, accredited member, or partner (collectively, “we,” “us,” or “our”).

Please read this Privacy Policy carefully to understand our practices regarding your information. By accessing or using our Site, you agree to the terms outlined in this Privacy Policy.

1. Information We Collect

As an SPV-based venture capital firm, we collect information necessary to verify investor status, maintain regulatory compliance, and facilitate private market investments. We collect personally identifiable information (“Personal Information”) from the following sources:

- **Investor Profile & Application Data:** Information you provide when creating an account, including your investment goals and accredited investor verification details.
- **Subscription & Fund Documentation:** Information provided via subscription agreements, investor questionnaires, and onboarding paperwork, including full legal name, tax identifiers (EIN/SSN), and banking details for capital calls or distributions.

- **Compliance & Identity Verification:** Data collected for Know Your Customer (KYC) and Anti-Money Laundering (AML) screenings to comply with applicable federal financial regulations.
 - **Investment & Transaction Activity:** Capital commitments, transaction history, portfolio performance metrics, and asset allocations across our private equity and venture capital funds.
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2. How We Use Your Information

We use the information we collect to manage your investment portfolio and fulfill our obligations as an investment adviser:

- **To Process Investments:** Evaluating investor eligibility, executing subscription agreements, and managing capital allocations across our SPVs.
 - **Fund Administration & Operations:** Integrating with third-party fund administration platforms (such as Carta) to securely manage accounting, issue year-end tax documents (Schedule K-1s), and provide portfolio visibility via the LP portal.
 - **Communications:** Sending legal disclosures, financial reporting updates, and notifications regarding new private equity or venture capital opportunities.
 - **Data Aggregation:** We may de-identify or aggregate information to evaluate platform effectiveness, improve financial services, or analyze market trends, to the extent permitted by applicable law.
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3. Information Sharing and Third-Party Integrations

We do not sell your personal data. We disclose your information only to specific, trusted third parties as necessary to operate our business:

- **Service Providers:** We share information with essential partners—including fund administrators (e.g., Carta), legal counsel, tax preparers, and banking and treasury service providers—to execute fund operations and regulatory filings.

- **Regulatory & Legal Requirements:** We may disclose information to federal, state, or financial regulatory bodies (such as the SEC or state securities authorities) to maintain our reporting compliance status or respond to legal obligations.
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4. Security and Safeguards

We maintain robust administrative, technical, and physical safeguards designed to protect your sensitive financial and personal data against unauthorized access, loss, or alteration.

- **Encryption & Portals:** Access to investment documentation, banking data, and subscription agreements is protected via multi-factor authentication (MFA), secure login portals, and SSL encryption protocols.
 - **Platform Safety:** Digital transactions, capital calls, and document retention utilize encrypted infrastructure to protect institutional and individual private equity holdings.
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5. Cookies, Web Beacons, and Tracking

Cookies and web beacons are used on our platform to track site activity, authenticate active sessions, and provide a seamless login experience across your investor dashboard.

- **Session & Persistent Cookies:** We use session cookies (which expire upon closing your browser) and persistent cookies (which remain on your device to recall settings for future visits) to improve site performance and security.
 - **Do-Not-Track Signals:** While you may adjust your browser settings to disable tracking technologies, our system architecture does not alter its operational practices in response to “Do Not Track” signals transmitted via HTTP headers.
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6. Children’s Privacy

Our investment services are strictly designed for adult accredited investors and corporate entities. We do not knowingly market to or collect personal information from individuals under 13 years of age.

7. Links to Other Websites

Our platform may contain links to external websites, co-investment partners, or industry platforms. We are not responsible for the privacy practices or data handling of non-affiliated third-party platforms, and we encourage you to review their applicable privacy policies independently.

8. Text Messaging Policy

Mobile information and text messaging originator opt-in data will not be shared with third parties or external affiliates for marketing or promotional purposes. If you opt into receiving SMS updates regarding capital calls or portfolio notifications, you may opt out at any time by replying STOP or UNSUBSCRIBE.

9. Questions and Contact Information

If you have any questions regarding this Privacy Policy, your investment data, or our regulatory disclosures, please contact us directly:

Entity: High Circle Ventures LLC

Address: 550 Reserve St, Suite 190 & 250, Southlake, TX 76092

Email: info@highcircleventures.com

Telephone: +1 (682) 549-4117