

Privacy Policy

1. Introduction

Hedge Scout, LLC, hereafter referred to as "Hedge Scout," registered in Greenwich, CT, has implemented the following privacy policies and procedures to safeguard personal and nonpublic confidential information. Hedge Scout complies with applicable U.S. privacy laws, including but not limited to the Children's Online Privacy Protection Act (COPPA), and the General Data Protection Regulation (GDPR) requirements across the EU. For California residents, please see our separate California Consumer Privacy Act (CCPA) Privacy Notice at www.hedgescout.com/ccpa. This notice explains what personal data is collected, the purposes for which it is used, the third parties to whom it may be disclosed, and how individuals can exercise their rights in relation to their personal data.

2. Personal Data That We Process

We may monitor site conduct for compliance; if data from a child under 13 is collected without consent, we delete it and notify the parent/guardian.

2.1 About Us

Hedge Scout produces research products for the hedge fund industry. We process the personal data of the following categories of data subjects:

Group	Description
Subscribers	Subscribers to Hedge Scout
Prospective Subscribers	Potential customers of our subscription products or services, events or webinars
Participants	Owners, employees or associated individuals of entities listed in our research products who provide information about those entities
Prospective Employees	Individuals who have applied to work for Hedge Scout

Group	Description
Industry Participants	Individuals or entities working in the alternative asset management industry
Website Visitors	Anyone visiting any Hedge Scout website

2.2 Subscribers

What Personal Data Do We Process

- Salutation, full name, and contact details (email address, phone number, physical address)
- Employment information (company name, employer, job title, legal representative)
- Company size
- Billing and transaction details (payment method identifiers, transaction IDs)

How We Collect It

- During account registration and subscription sign-up on our website
- Through payment processing workflows (e.g., Stripe integration)
- Via direct communications (email or phone support) when updating billing or account information

What We Use It For

- Performing our contract with you (account set-up, payment processing, delivery of subscription content and updates)
- Fulfilling our legitimate interests in record-keeping, tax and regulatory compliance, and billing-dispute resolution
- Monitoring security and service performance to maintain and optimize your account experience
- Communicating product announcements, service enhancements, and administrative notices

2.3 Prospective Subscribers

What Personal Data Do We Process

- Salutation, full name, and contact details (email address, phone number, physical address)
- Employment information (company name, employer, job title, legal representative)
- Company size

How We Collect It

- Via website sign-up forms (newsletter, demo requests)
- Through telephone inquiries or email outreach conducted by our sales team

What We Use It For

- Engaging in business development activities, including product demonstrations and outreach
- Assessing prospective interest and tailoring follow-up communications
- Supporting legitimate interests in expanding our subscriber base and enhancing lead management

2.4 Participants

What Personal Data Do We Process

- Salutation, full name, and contact details (email address, phone number, physical address)
- Employment information (company name, employer, job title) and company size
- Publicly available profiles (social media URLs, blogs, articles)
- Professional records (directorships, shareholdings, education history)

How We Collect It

- From public-domain sources (company web sites, filings, news alerts)
- Voluntary contributions via surveys and interviews
- Responses to Freedom of Information Act (FOIA) requests

What We Use It For

- Compiling and publishing research products and industry intelligence
- Analyzing trends in the alternative asset management sector

- Fulfilling our legitimate interests in producing accurate, up-to-date market insights for subscribers

2.5 Prospective Employees

What Personal Data Do We Process

- Application materials (resumes, cover letters)
- Background information when required (criminal history, immigration status)

How We Collect It

- Through email submissions or internal application portals
- From background-check providers when necessary for compliance roles

What We Use It For

- Evaluating candidate qualifications for open positions
- Meeting legal or regulatory obligations related to hiring and employment
- Retaining records for potential future hiring considerations and legal compliance

2.6 Industry Participants

What Personal Data Do We Process

- Salutation, full name, and contact details (email address, phone number, physical address)
- Employment information (company name, employer, job title) and company size
- Publicly available profiles and records (social media URLs, blogs, articles, directorships, shareholdings, education history)

How We Collect It

- From publicly accessible sources in the hedge fund and alternative asset management industry
- Via voluntary submissions when participants engage with our research activities

What We Use It For

- Aggregating and publishing industry-wide data in our research products

- Supporting legitimate interests in delivering comprehensive market intelligence and analysis
- Enabling subscribers to benchmark and compare industry practices

2.7 Website Visitors

What Personal Data Do We Process

- Technical and usage data (IP address, browser and operating-system details, visit timestamps)
- Cookie and tracking identifiers (Google Analytics, Stripe cookies)

How We Collect It

- Automatically via web-server logs and site-analytics tools integrated into our website
- Through essential cookies set to enable payment flows and service functionality

What We Use It For

- Monitoring and improving website performance, security, and user experience
- Facilitating payment transactions and preventing fraud
- Analyzing geolocation and usage patterns to optimize content delivery and site operations

2.8 Marketing & Communications Data

Preferences and consent for email communications, non-essential cookies, and email tracking

3. Data Hedge Scout May Store

We may collect, use, store, process, and transfer the following kinds of personal data:

- **Identity data** including first names, last names, job titles, usernames, or similar identifiers.
- **Contact data** including billing addresses, delivery addresses, email addresses, and telephone numbers.
- **Transaction data** including details about payments made to and from users and other details of products and services our customers have purchased from us.
- **Technical data** including internet protocol (IP) addresses, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating

system and platform, and other technology on the devices used to access this website or our services or products.

- **Profile data** including feedback and survey responses.
- **Usage data** including information about how our websites, products, and services are used.
- **Marketing and Communications data** including personal preferences in receiving marketing from us and our third parties and any communication preferences.

4. Purposes of Processing

Personal data that you or your company provide on the Site, or that we otherwise obtain in relation to you, is processed to complete your user trial or subscription and for the following specific purposes:

- To enhance your experience with this website.
- To save your preferences and account information.
- To provide you with the services, products, or information that you request.
- To communicate with you (e.g., about updates to your registrations or accounts, products, or services, or to provide information about products or services in which you have indicated an interest).
- To conduct research and analysis (e.g., analyze and compile statistics about your use of this website or Hedge Scout Products or Services, and produce data analytics and reports).
- To track and monitor your usage of Hedge Scout products using third-party software to prevent unauthorized reproduction or dissemination.
- To provide information, special offers, and promotions to you regarding products and services offered by us, our affiliates, or non-affiliated third parties.

For EU-based clients, under GDPR we are only able to use your personal information if we have a legal reason or basis for doing so. EU regulations require that we have a legal basis so that your privacy is protected. Most commonly we will use your information in the following ways:

- We have a contract with you. For example, we have agreed to provide access to our Products and Services to you through your acceptance of our Terms of Use at the time of a voluntary registration and review of this Privacy Policy.

HEDGE SCOUT

- We have a legal obligation. We need to use your personal information to comply with laws that assist in the prevention of financial crime and to comply with regulatory obligations. For example, this might include confirming your identity and source of wealth, as well as ensuring we provide you with necessary information so you understand the risk of the financial services we can provide.
- We have a legitimate interest in processing the information and your interests and fundamental rights do not override those interests. For example, processing your information to develop our products and services and grow our business, while ensuring your privacy rights are respected.

We set out directly below all the ways we plan to use your personal information and the legal bases we rely on to do so. We also explain what our legitimate interests are where appropriate.

Purpose	Lawful Basis for Processing including our Legitimate Interests
To onboard you as a new customer	To fulfill our contract with you.
To contact you about other products and services we think you may be interested in	Necessary for our legitimate interests – to develop our products and services and grow our business, balanced against your right to opt out.
To use data to improve our products or services	Necessary for our legitimate interests – to understand how our customers interact with our products or services, and to prevent unauthorized dissemination and reproduction of our products and services, balanced against your privacy rights.
Maintain proper records	We retain our records for up to 6 years for our internal records and for legal requirements, tax, and regulatory compliance purposes.
Technical, Product or Account issues	Necessary for our legitimate interests – to serve our customers and further develop our products and services and grow our business.

We will only use your personal information for the reason for which we collected it. We will only use it for another reason if we believe that the new reason is compatible with the original

purpose. If we need to use your personal information for a non-related purpose, we will notify you and explain the legal basis which allows us to do so.

5. Email Tracking

We may collect information about how you interact with our email communications and newsletters, including whether you open emails and which links you click on. This data helps us understand your interests and improve our communications.

5.1 What Data We Collect

- **Email opens:** We track if and when you open our emails.
- **Email clicks:** We monitor the links you click within our emails.

5.2 Purpose of Data Collection

We collect this information to:

- Measure engagement with our email content.
- Improve the relevance and quality of our communications.
- Personalize your experience with our services.

5.3 How We Use Your Data

- Analyze trends and user behavior.
- Optimize email content and delivery times.
- Share insights with our marketing and content teams.

6. Recipients of Data

We may disclose your personal data to recipients in connection with the above purposes, including:

- Auditors, or other competent regulatory authorities and bodies as requested or required by law.
- Other third parties who we engage to provide services to us, such as IT service providers, monitoring and tracking services which may handle personal data confidentially on our behalf, and graphic arts specialists who design artwork for our website, publications, or services.

7. Google Analytics

We use Google Analytics to understand how our visitors interact with www.hedgescout.com. Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the data collected to track and examine the use of our website, prepare reports on its activities, and share them with other Google services.

7.1 Data Collected by Google Analytics

Google Analytics collects information such as how often users visit our website, what pages they visit, and what other sites they used prior to coming to our website. The data collected includes the IP address of the user's device, but not personal identifying information such as names or email addresses. The data collected by Google Analytics is used to analyze the performance of our website and improve the user experience.

7.2 Usage of Data

The information collected through Google Analytics helps us understand how our website is used. This allows us to:

- Monitor and analyze website traffic and user behavior.
- Identify trends and patterns in how visitors navigate the website.
- Improve the functionality and content of our website.

7.3 Cookies and Tracking

Google Analytics uses cookies to collect data. These cookies store information such as the time of your visit, whether you have been to the site before, and what site referred you to the web page. You can control the use of cookies at the individual browser level. If you choose to disable cookies, it may limit your use of certain features or functions on our website. For more information, see our Cookies Policy at www.hedgescout.com/cookies.

7.4 Opting Out

You can opt out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on. This add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visit activity. The add-on is available at tools.google.com/dlpage/gaoptout.

7.5 Further Information

For more details on how Google handles the data collected, please refer to the Google Analytics Privacy Policy at policies.google.com/privacy. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

8. How Ghost Helps Protect Your Privacy

Hedge Scout uses Ghost as its content management system (CMS) for managing and publishing content on our website. Ghost is designed with privacy and security in mind, offering several features and practices that help protect your personal information.

- **1. Data Minimization and Control:** Ghost is built to collect minimal personal data. It allows us to control what data is collected and ensures that we only collect information necessary for providing our services.
- **2. Secure Hosting:** Ghost (Pro) uses robust security measures and provides end-to-end encryption and regular security audits to ensure data protection.
- **3. Encrypted Communications:** Ghost uses HTTPS to encrypt all data transmitted between your browser and our website. This ensures that your personal information, such as login credentials and contact details, are protected from interception by third parties.
- **4. Regular Security Updates:** As an open-source platform, Ghost benefits from a community of developers who regularly update the software to patch vulnerabilities and improve security features. We ensure our Ghost installation is always up-to-date with the latest security patches.
- **5. Limited Access:** Access to the Ghost admin panel is restricted to authorized personnel only. We use strong authentication methods to protect access and ensure that only those with the necessary permissions can access sensitive information.
- **6. Privacy-Focused Design:** Ghost is designed with privacy in mind, minimizing the amount of data it collects by default. It does not include intrusive trackers or unnecessary data collection features, which helps in maintaining user privacy.
- **7. User Rights and Transparency:** Ghost allows us to comply with privacy regulations such as GDPR by providing tools to manage user data efficiently. Users can request access to their data, correction, or deletion, and we can easily respond to such requests using Ghost's built-in tools.

By utilizing Ghost, we ensure that our website operations are aligned with our commitment to protecting your personal information. If you have any questions about how we use Ghost to protect your privacy, please contact us at info@hedgescout.com.

9. Transfers Abroad

We collect information globally and primarily store that information in the United States. We may transfer, process, and store your information outside of your country of residence, to

wherever we or our third-party service providers operate for the purpose of providing you with services. Whenever we transfer your information, we take steps to protect it.

10. How Do We Protect Your Information?

We implement a variety of security measures to maintain the safety of your personal information, including encryption for data transmission, access controls to limit data access to authorized personnel, and regular security audits. For online-based transactions, all supplied sensitive/credit information is provided by the customer directly to Stripe, a third-party that processes credit card payments. For online transactions, Hedge Scout does not have access to customer credit card numbers; we can only access the last four digits of your credit card number for verification of research subscription transactions. Upon completion of a transaction, the customer receives a receipt from Stripe, and Hedge Scout receives notification of payment to begin the delivery of products or services. In rare circumstances, customers placing orders over the phone to Hedge Scout may have their payment information relayed to the online Stripe payment processing website by Hedge Scout. Orders received via physical mail delivery will be processed similarly to orders placed over the phone. Following the completion of a mail or phone transaction, Hedge Scout immediately destroys any customer credit card information.

CUSTOMERS CAN LEARN MORE ABOUT THE PRIVACY POLICY AND SECURITY MEASURES STRIPE USES AT <https://stripe.com/docs/security>.

In addition to credit card payments, Hedge Scout also accepts ACH (Automated Clearing House) and wire transfers for payment. For ACH and wire transfers, customers will be provided with the necessary banking information to complete the transfer. Hedge Scout will only have access to the information required to verify the transaction, such as the transaction ID and the amount. Once the payment is confirmed, Hedge Scout will proceed with the delivery of products or services. As with all transactions, we ensure that the customer's financial information is handled with the utmost security and confidentiality.

11. Do We Use Cookies?

We use cookies to enhance user experience and track interactions. You can manage cookie preferences through our Cookies Policy at www.hedgescout.com/cookies, which includes instructions for opting out of non-essential cookies.

12. Your Rights

Hedge Scout is dedicated to protecting your privacy. Under GDPR, EU residents have specific rights in relation to their personal information, and we extend similar rights to all users where applicable. To exercise these rights, please email us at info@hedgescout.com with your request,

including your name, contact details, and the specific right you wish to exercise. We will respond within 30 days, as required by GDPR. These rights include:

- Requesting access to your personal information.
- Requesting correction of your personal information.
- Requesting the erasure of your personal information.
- Objecting to the processing of your personal information.
- Requesting a restriction on the processing of your personal information.
- Requesting the transfer of your personal information.
- The right to withdraw consent.

12.1 Right to Complain

You also have the right to lodge a complaint about our processing of your personal information with your local data protection authority.

12.2 Contact Information

If you have any questions or comments regarding this policy or if you want to review or modify any information we have received from you, please contact us at info@hedgescout.com.

13. Your Choices

In addition to the general privacy practices detailed above, Hedge Scout also tracks email interactions to enhance user engagement and optimize our communications. This involves collecting information about email opens and clicks. If you prefer not to have your email activity tracked, you can opt-out by requesting to opt-out via email: info@hedgescout.com. You can also manage cookie preferences, including opting out of non-essential cookies, through our Cookies Policy at www.hedgescout.com/cookies.

14. Data Retention

We retain email interaction data for 5 years to help us improve our services. Other personal data, such as identity, contact, and transaction data, is retained for up to 6 years to comply with legal, tax, and regulatory requirements, or until you request deletion, whichever is shorter.

15. Security

We use industry-standard measures to protect your data, including encryption for data in transit and at rest, multi-factor authentication for access to sensitive systems, and regular security



audits to identify and address vulnerabilities. These measures ensure your privacy and protect against unauthorized access.

16. Update

This Privacy Policy was last updated on June 1, 2025.