CLIENT PRIVACY POLICY

Client Privacy & Confidential Information Protection Policy

Halcyon Strategy Partners

> *Protecting Your Information. Respecting Your Confidence. Safeguarding Your Business.*

Issued by: Halcyon Capital Partners LLC, doing business as Halcyon Strategy Partners

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OUR COMMITMENT

1. Our Commitment to Your Privacy & Confidentiality

> At Halcyon Strategy Partners, we recognise that meaningful strategic conversations require trust.

Whether you are making an initial enquiry, participating in a Strategy Consultation or engaging us to provide management consulting or business coaching, you may share information that is commercially valuable, confidential or personally sensitive.

We understand the importance of protecting that information.

Our commitment is to handle information entrusted to us responsibly, use it for legitimate and authorised purposes, and apply safeguards appropriate to its sensitivity.

This Policy explains how we approach the collection, management, protection, use and disclosure of client and prospective client information.

It applies from your first interaction with Halcyon and continues throughout any subsequent professional relationship, subject to applicable contractual and legal requirements.



2. Information We May Receive

Depending on the nature of your enquiry or engagement, we may receive:

Business & Commercial Information

Business plans, strategic objectives, revenue information, profitability, operating costs, pricing structures, commercial forecasts and other business performance information.

Operational & Organisational Information

Organisational structures, management reports, operating processes, internal systems, staffing arrangements and business improvement initiatives.

Client & Commercial Relationship Information

Customer and supplier information, commercial agreements, client concentration data, service delivery arrangements and business development information.

Personal & Professional Information

Names, contact details, professional roles, employment information and other information relating to identifiable individuals.

Confidential Strategic Information

Proprietary methodologies, intellectual property, commercially sensitive plans, internal management discussions and other non-public business information.

> We seek to collect information relevant to the purpose of the enquiry or engagement and avoid unnecessary collection.

3. Protection Begins With Your First Enquiry

> You do not need to become a paying client before Halcyon treats the information you provide with appropriate care.

Information submitted through our website, correspondence, booking systems or preliminary consultations is handled in accordance with our published Privacy Policy and applicable law.

During an initial enquiry, we generally require only sufficient information to understand your business and determine whether our services may be appropriate.

> We recommend that prospective clients avoid submitting highly confidential documents, personal financial account details, government identification documents or other sensitive personal information through general enquiry forms.

Where detailed information is required, we can agree on an appropriate method of exchange before it is provided.

An initial enquiry or Strategy Consultation does not automatically create a formal consulting engagement or the contractual confidentiality obligations that accompany one.



USE OF INFORMATION

4. How We Use Your Information

Information provided to Halcyon may be used to:

- Respond to your enquiry and arrange consultations.
- Understand your business and its circumstances.
- Assess whether our services are appropriate.
- Prepare proposals and engagement documentation.
- Perform agreed consulting, coaching or advisory services.
- Develop business assessments, recommendations and deliverables.
- Maintain necessary client records and communications.
- Administer contractual, invoicing and legal obligations.
- Protect our systems, information and legitimate legal rights.

> We will not knowingly use identifiable confidential client information in public marketing, testimonials or case studies without appropriate authorisation or another lawful basis.

Our website Privacy Policy also describes broader business purposes, including marketing, analytics, research and service development. Those activities remain subject to applicable privacy laws, contractual confidentiality obligations and any required permissions.

SAFEGUARDS

5. How We Protect Confidential Information

Halcyon seeks to apply reasonable administrative, technical, organisational and contractual safeguards appropriate to the nature and sensitivity of the information.

Depending on the systems and circumstances involved, safeguards may include:

Access Management

Restricting access to information to personnel and authorised service providers with a legitimate business requirement.

Secure Information Systems

Using business technology, document management and communication systems with appropriate security capabilities.

Authentication & Account Protection

Applying password, authentication and account-access safeguards appropriate to the relevant systems.

Confidentiality Obligations

Establishing appropriate confidentiality responsibilities for personnel, contractors and professional service providers.

Controlled Information Sharing

Limiting disclosure to authorised purposes and recipients.

Information Retention & Disposal

Retaining information only for appropriate business, contractual and legal purposes, followed by deletion, destruction or de-identification where appropriate.

These measures are intended to reduce the risk of unauthorised access, disclosure, loss, misuse or alteration.

> No electronic system or method of transmission can provide an absolute guarantee against security incidents.

ACCESS

6. Who May Access Your Information?

> Access to client information is intended to be limited to those who reasonably require it for an authorised purpose.

Depending on the engagement, this may include:

- Authorised Halcyon personnel.
- Approved contractors assisting with service delivery.
- Technology and cloud service providers.
- Administrative, accounting and operational service providers.
- Independent legal or other professional advisers where appropriately authorised or legally permitted.

Third-party providers handling personal information on Halcyon's behalf are expected to operate under appropriate contractual or legal protections.

We do not permit providers processing personal information on our behalf to use that information for unrelated purposes except where independently permitted by law and appropriately disclosed.



TECHNOLOGY

7. Technology, Cloud Storage & Artificial Intelligence

Halcyon may use professional technology systems to support document management, communications, analysis, administration and service delivery.

These may include cloud platforms, customer relationship management systems, video conferencing, transcription, analytics, automation and artificial intelligence-enabled software.

Where personal or confidential information is processed through such systems, Halcyon seeks to assess and apply safeguards appropriate to the information's sensitivity and the intended purpose.

The use of external technology may involve processing by third-party providers, including providers located outside your country.

Clients may request clarification about proposed technology use or raise particular confidentiality requirements before supplying sensitive information.

> Any specific restrictions concerning artificial intelligence, recording, transcription, data hosting or external processing should be agreed in writing where required.



INTERNATIONAL

8. International Information Handling

Halcyon serves clients across multiple jurisdictions, including the United States, Canada and Australia.

Our business operations and technology providers may involve information being stored, accessed or processed internationally.

This may include the United States and other countries in which our authorised providers operate.

Where applicable law requires safeguards for international information transfers, Halcyon will take steps appropriate to those requirements.

These may include contractual protections, data-processing arrangements and other recognised mechanisms.

Privacy protections and government access requirements can differ between jurisdictions.

> Clients with specific data residency or international transfer requirements should notify Halcyon before providing the relevant information so that suitable arrangements can be assessed.

SENSITIVE INFORMATION

9. Sensitive Personal Information

> Certain information requires particular care because of its potential impact on individuals.

Depending on applicable law, this may include health information, government identifiers, financial account credentials, biometric information and information concerning an individual's personal circumstances or protected characteristics.

Halcyon does not ordinarily require this type of information to conduct an initial Strategy Consultation.

> We ask that you do not provide sensitive personal information unless it is necessary, has been appropriately requested and can be handled through a suitable process.

Where sensitive personal information is required, its collection, use and disclosure will be subject to applicable legal requirements, including consent where necessary.



10. Confidentiality During a Formal Engagement

Once a consulting or coaching engagement is established, the applicable agreement may contain additional confidentiality and information-handling obligations.

These may address:

- The definition of confidential information.
- Permitted uses and disclosures.
- Information access and security requirements.
- Engagement-specific restrictions.
- Return or disposal of information.
- Confidentiality obligations following termination.
- Procedures for authorised third-party involvement.

Where additional protection is appropriate, a separate Non-Disclosure Agreement or Data Processing Agreement may be considered.

> This Policy does not replace those agreements or independently create all the contractual protections that may be appropriate for a particular assignment.

11. Disclosure of Information

> Halcyon does not sell personal information to third parties in exchange for monetary payment.

Information may nevertheless be disclosed where reasonably necessary and legally permitted, including to:

- Authorised service providers and contractors.
- Independent professional advisers.
- Government authorities, regulators or courts where required or permitted by law.
- Other recipients authorised by the client.
- Parties involved in certain legitimate corporate transactions, subject to applicable protections.

> Some advertising or analytics disclosures may be classified as a sale, sharing or targeted advertising under particular US privacy laws even where no monetary payment is received. Applicable opt-out rights will be respected.

Confidential business information will be subject to any additional restrictions established in the relevant engagement agreement.



RETENTION

12. Retention & Disposal of Information

Halcyon retains information for periods reasonably necessary to fulfil the purposes for which it was collected and to satisfy legitimate legal and business requirements.

Retention periods may depend on:

- The nature and sensitivity of the information.
- Whether an engagement proceeds.
- Contractual obligations.
- Accounting and taxation requirements.
- Legal limitation periods.
- Dispute resolution and record-keeping requirements.
- Applicable privacy laws.

When information is no longer reasonably required, it may be securely deleted, destroyed or de-identified, subject to applicable legal obligations and technical limitations.

> Clients may request deletion of eligible personal information, although some records may need to be retained for lawful purposes.

13. Responding to Privacy & Security Incidents

If Halcyon becomes aware of a suspected incident involving personal or confidential information, we will seek to assess the circumstances and take appropriate steps to contain and investigate the matter.

Depending on the nature of the incident, these steps may include:

1. Identifying the information and systems affected.
2. Taking appropriate containment and remediation measures.
3. Assessing the potential consequences.
4. Determining applicable notification obligations.
5. Notifying affected parties or authorities where required.
6. Reviewing relevant safeguards and corrective actions.

Notification requirements differ between jurisdictions and may depend on the nature of the information, the seriousness of the incident and applicable law.

> Where an engagement agreement establishes additional incident notification obligations, those provisions will also be considered.

YOUR RIGHTS

14. Your Privacy Rights

Depending on the laws applicable to your information, you may have rights to:

- Request access to personal information held about you.
- Request correction of inaccurate information.
- Request deletion of eligible personal information.
- Withdraw consent where processing depends on consent.
- Object to or restrict certain processing activities.
- Opt out of applicable marketing or advertising activities.
- Request information about certain disclosures.
- Lodge a privacy complaint.

These rights may be subject to legal exceptions and verification requirements.

> Halcyon will respond to valid requests within applicable statutory timeframes.

15. United States, Canadian & Australian Privacy Requirements

Halcyon recognises that privacy obligations vary according to the location of the individual, the nature of the information and the activities undertaken.

United States

Where applicable, Halcyon will observe relevant federal and state privacy requirements, including the California Consumer Privacy Act as amended and other applicable state privacy legislation.

These laws may provide rights concerning access, correction, deletion, disclosure and certain uses of personal information.

Canada

Where applicable, Halcyon will observe the Personal Information Protection and Electronic Documents Act (PIPEDA) and relevant provincial privacy legislation, including applicable requirements in Québec, British Columbia and Alberta.

These requirements may address meaningful consent, appropriate purposes, information safeguards, access, correction and breach notification.

Australia

Where applicable, Halcyon will observe the Privacy Act 1988 (Cth), the Australian Privacy Principles and relevant requirements concerning overseas disclosures and notifiable data breaches.

The precise application of these laws depends on the circumstances of the information processing and the legal entities involved.

> This Policy is intended to support compliance with applicable requirements but does not represent that every jurisdiction's requirements are identical.

16. Your Responsibilities When Sharing Information

We encourage clients and prospective clients to take reasonable care when providing information.

In particular, please:

- Share information relevant to the enquiry or engagement.
- Avoid unnecessary disclosure of sensitive personal information.
- Confirm that you have authority to share information belonging to your organisation or third parties.
- Identify documents requiring special confidentiality arrangements.
- Notify Halcyon of applicable contractual or regulatory information-handling restrictions.
- Use agreed communication and document-sharing methods.
- Inform us promptly if information has been provided in error.

> Where your organisation provides personal information relating to employees, customers or other individuals, it remains responsible for ensuring that the disclosure is lawful and that any required notices or permissions have been addressed.



CONTACT

17. Questions, Requests & Privacy Complaints

If you have questions about the handling of your information, wish to exercise a privacy right or want to raise a confidentiality concern, please contact:

Halcyon Strategy Partners

Operated by Halcyon Capital Partners LLC

Privacy Contact:	Joel Hewish	
Business Location:	30 N Gould Street Ste R, Sheridan, WY, USA	
Website:	https://halcyonsp.com	
Phone:	+1 332 334 8898	
Privacy Enquiries:		Through the contact details published in our website Privacy Policy.

> Please identify your correspondence as a *Privacy Request* or *Privacy Complaint*, where appropriate.

We will seek to review concerns fairly and respond in accordance with applicable law.

You may also have the right to contact a relevant privacy regulator.

18. Relationship With Our Website Privacy Policy

This document provides additional client-focused information about how Halcyon handles commercially sensitive and confidential information.

It should be read together with our full website Privacy Policy:

https://halcyonsp.com/privacy-policy

The website Privacy Policy provides further information about website activity, cookies, marketing communications, personal information processing, international transfers and jurisdiction-specific privacy rights.

Where a separate engagement agreement, confidentiality agreement or Data Processing Agreement applies, those documents may establish additional or more specific obligations.

> Nothing in this document limits rights or protections that cannot lawfully be excluded.

19. Our Commitment to Your Confidence

We recognise that the decision to share confidential business information with an external adviser is not taken lightly.

You may be disclosing information about challenges, opportunities and commercial circumstances that are not known outside your organisation.

We respect the confidence placed in us when that information is shared.

Our objective is to establish a professional environment in which you can discuss your business openly, understand how your information may be handled and make informed decisions about the level of disclosure appropriate to your circumstances.

> **Your information deserves care. Your commercial confidence deserves respect. And your trust deserves to be earned through professional conduct, responsible information management and accountability.**



Halcyon Strategy Partners

Designed to Attract. Designed to Scale. Designed to Compound.

End of Client Privacy & Confidential Information Protection Policy