

PRIVACY POLICY

Effective: July 16, 2025

Omen Advisory, LLC (our registered investment adviser), welcomes you. We refer to Omen Advisory, LLC and any future affiliates as “Omen” in this Privacy Policy. This Privacy Policy (“Privacy Policy”) is written to apply to Omen Advisory, LLC and any future affiliates.

We at Omen created this privacy and security policy (“Policy”) to explain how we collect, use, protect, and disclose information and data when you use our online services (“Services”).

We respect your privacy.

This Privacy Policy relates to the information collection and use practices of Omen in connection with our online services (collectively, the “Services”). Our Services are or will be available to you through a variety of platforms, including but not limited to, our website located at www.agentomen.com (“Website”) or any other websites, messaging application accessible by any US-based cellular subscriber via SMS and MMS, or products, services and/or mobile applications owned or operated by Omen (collectively with the Website, the “Platform”).

Description of Users and Acceptance of Terms

This Privacy Policy applies to visitors to the Platform, who view only publicly-available content (the “Visitors”) and Clients who have signed up to access and use the Services offered by Omen through the Platform (the “Clients”). By visiting or browsing the publicly accessible areas of the Sites or the App, Visitors are acknowledging that they have read, understood, and agree to be legally bound by this Privacy Policy and our Terms of Use. If you do not agree to any of the terms in this Privacy Policy or the Terms of Use, you may not access or use the Sites or the App.

By signing up, accessing, or using our Services, each Client is agreeing to the terms of this Privacy Policy, the Terms of Use, and any applicable Client agreements.

Information We Collect or Receive

In the course of operating the Platform and providing the Services, we collect or receive the following types of information:

1. Personal Information

When you register to become a Client, you will be asked to provide us with certain information about you, such as, your name, date of birth, Tax ID number, citizenship, visa information, home address, telephone number, email address, bank account number, bank routing number, bank account login credentials, bank name, employer name, employment status, job position, whether you are a “politically exposed person,” whether you are a “control person” (pursuant to FINRA Rule 3210), annual income range, total net worth range, and other information as

appropriate for our legitimate business needs (collectively and together with information referenced in Sections 2-6 below, the “Personal Information”). We may also collect Personal Information when you voluntarily provide us with Personal Information as a Visitor, such as when you use our “Contact” form.

2. Nonpublic Personal Information

When you register to become a Client and at certain times following initial registration during the provision of our Services to you, we will also collect your nonpublic personal information which means (i) any information you provide to us to obtain a financial product or service from us, (ii) any information about you resulting from any transaction involving a financial product or service between us and you, or (iii) any information we otherwise obtain about you in connection with providing a financial product or service to you (“Nonpublic Personal Information” or “NPI”). NPI is a subset of Personal Information and shall be considered Personal Information under this Privacy Policy. We may also collect Nonpublic Personal Information from Visitors, who are consumers of our Platform.

3. Initial Questionnaire Information

When you register as a Client, you will be asked to provide information about yourself such as, your name, age, etc., (collectively, the “Initial Questionnaire Information”). Initial Questionnaire Information may be updated or modified following initial registration during the provision of our Services to you. Initial Questionnaire Information is a subset of Personal Information and shall be considered Personal Information under this Privacy Policy.

4. Card and Bank Information

Certain features of the Services will allow you to link your bank account(s), credit card, and debit card to your Omen account(s) by providing your account number, billing address and similar information (collectively, the “Card and Bank Information”). Card and Bank Information may be collected and processed by one or more third parties pursuant to the terms and conditions of their respective privacy policies and terms of use. Card and Bank Information is a subset of Personal Information and shall be considered Personal Information under this Privacy Policy. To the extent that Omen stores your Card and Bank Information and uses it as set forth in this Privacy Policy.

5. Transaction Information

When Clients wish to make a purchase, sale or any other transaction through the Platform, they must provide us with certain information about the transaction they are seeking to execute. Such information is collectively called the “Transaction Information.” Transaction Information is a subset of Personal Information and shall be considered Personal Information under this Privacy Policy.

6. Geolocational Information

Certain features and functionalities of the Services may be based on your location. In order to provide these features and functionalities while you are using a mobile device, we may, with your consent, automatically collect geolocation information from your mobile device, wireless carrier, or certain third-party service providers. Such information is collectively called the “Geolocational Information.” Collection of such Geolocational Information occurs

only when the App is running on your mobile device. You may decline to allow us to collect such Geolocation Information, in which case Omen will not be able to provide certain features or functionalities to you.

7. Other Information.

We may automatically collect or receive additional information about you, your use of our Platform, your interactions with us and our advertising, as well as information regarding your computer or other devices used to access our Platform (collectively, the “Other Information”). Such Other Information may include, but is not limited to, the following:

A. From Your Activity

- IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device;
- Browser type and language;
- Referring and exit pages and URLs;
- Date and time; and
- Details regarding your activity on the Platform, such as search queries and other performance and usage data.

B. About Your Device

- Type of device;
- Universally Unique Identifier (“UUID”);
- Advertising Identifier (“IDFA” or “AdID”);
- Operating system and version (e.g., iOS, Android or Windows);
- Wireless carrier; and
- Network type (WiFi, 3G, 4G, or LTE).

C. From Cookies, Web Beacons, and Other Similar Tracking Techniques

In operating the Platform, we may also use data collection and tracking tools such as web beacons, pixel tags, embedded links, cookies, and other similar tracking techniques. A cookie is a piece of information that the computer that hosts our Platform gives to your browser when you access the Platform. Our cookies help provide additional functionality to the Platform and help us analyze the Platform usage more accurately. For example, our Platform may set a cookie on your browser that allows you to access the Platform without needing to remember and then enter a password more than once during a visit to the Platform. In all cases in which we use cookies, we will not collect Personal Information unless we obtain your permission. On most web browsers, you will find a “help” section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. If you do not want Omen to place cookies in your browser, you can opt out by setting your browser to reject cookies or to notify you when a website tries to put a cookie in your browser software. If you choose to disable cookies in your browser, you can still use the Platform, although your ability to use some of the features may be affected.

D. Third-Party Analytics

We may use third-party analytics services (for example, we may use Google Analytics, and others) to evaluate your use of the Platform, compile reports on activity, analyze performance metrics, and collect and evaluate other information relating to the Platform and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. You consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. For more information on these third parties, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Platform.

Surveys

We may, from time to time, ask you to participate in surveys on our Sites. Participation in these surveys is completely voluntary. These surveys may be conducted by our third-party service providers. Such third-party service providers are authorized to use your information only as necessary to provide these services to us. We will use survey results to continue to improve the Platform and the Services. We will use your personal information from our surveys to send you information about our products and services and about third-party products and services. We may combine your survey information with other data we have about you. We may also anonymize and aggregate the survey information and sell it to third parties.

Information Collected by or Received from Third-Party Sources

We may also collect Personal Information and information about your transactions with us and those you engage in with our affiliates, unaffiliated third parties, banking verification services and information from consumer reporting agencies. We may further collect information about you from third-party data sources, such as brokers, banks and government databases. We may combine data we collect about you from third-party data sources with data we collect from you and may use and share such data as described in this Privacy Policy. All information we collect and/or receive from such third-party sources is collectively referred to as “Third-Party Information.”

Information Collected by or Through Third-Party Advertising

We may share Other Information about you with third parties that Omen has selected and approved for ad distribution and ad optimization (defined as the tailoring, targeting (i.e., behavioral, contextual, and retargeting), analyzing, managing, reporting, and optimizing of ads). These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and other technologies to collect Other Information for such purposes. Pixel tags enable us and these third-party advertising companies to recognize a browser’s cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site. In addition, we may receive Other Information from advertisers and/or their service providers such as advertising identifiers, IP addresses, and post-conversion data. You may choose to opt-out of this type of tracking and sharing of information at any time by selecting the specific partners you wish to exclude from these websites: <http://www.aboutads.info/choices>

and <http://optout.networkadvertising.org/>.

How the Information is Used and Shared

You authorize us to use the Personal Information, the Third-Party Information, and the Other Information (collectively, the “Information”) to provide and improve our Platform and Services; to help us improve the content and functionality of our Platform and Services; to provide trade recommendations; to advise you about your portfolio; to solicit your feedback; and to inform you about our products and services and those of third parties.

You also authorize us to use and/or share Information as described below.

- We will access, use, and share the Information as required to fulfill our contractual obligations to you or subsequent requests for support by you
- To track your purchases, match your purchases with the other Information we have about you and provide suggestions to you about potential product recommendations, services recommendations, trade recommendations, saving money, and other financial services and offers that we believe may help you;
- Omen, like many businesses, sometimes hires other companies to perform certain business-related functions on our behalf. Examples of such functions include website hosting, mailing information, maintaining databases, ID verification, processing applications, processing payments and completing transactions. When we employ another company to perform a function of this nature, we only provide it with the information that it needs to perform its specific function. These companies are authorized to use your Information only as necessary to provide these services to us;
- We may share some or all of your Information with any other companies that we control, are controlled by, or are under common control with us;
- As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, launch of a new subsidiary, dissolution, or similar event, the Information may be part of the transferred assets and you will be notified via email and/or a prominent notice on our Platform of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information;
- In an ongoing effort to better understand our Clients, the Platform, the Services, and the products and services of Omen, we may analyze certain Information to compile information about our Client demographics, interests and behaviors and to create data analytics on an aggregate basis. This aggregate information does not identify you personally. We may share this aggregate information with our affiliates, agents, business partners, and other third parties. We may also disclose aggregated user statistics in order to describe the Platform, the Services and our products and services to current and prospective business partners and investors and to other third parties for other lawful purposes;
- Omen may disclose your Information if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Omen, (iii) act in urgent circumstances to protect the financial security of users of the Platform or the public against fraud or other harm, or (iv) protect against legal liability;
- Omen may from time to time enter into agreements with third parties, such as

employers or affiliate membership groups, pursuant to which the third-party may pay a portion or all of fees of its employees or members, and may on occasion make direct or indirect contributions to the Omen account of its employees or members. This is generally implemented by distributed "promotional codes" that are sponsored by the employer or affiliate membership group. If you use the benefit provided by an employer or affiliate group, you consent to additional anonymized reporting with respect to the participation, contribution rates, engagement, etc., of the employees or members, and consent to personalized reporting (i.e., where you may be specifically identified) solely and exclusively to (x) confirm your use of Omen to your employer or affiliate membership group, and (y) if the employer or affiliate membership group makes a contribution to your Omen account, to confirm receipt of the specific amounts contributed. In addition, if the benefit the employer or affiliate group provides includes embedding the Omen experience in a broader experience hosted by the employer or affiliate, by using such benefit you consent to Omen embedding the Omen experience in the hosted experience, and understand that your Personal Information may be shared in order to implement the hosted experience; and

- We may share your Information with third parties, including but not limited to third-party market research firms for analysis purposes and to help such third parties generate market research data for us which will not identify you personally. Such third parties will provide us market research data to help us better segment our Client base and understand what products and services would likely work best for our Clients.

If you would like to opt-out of Omen's sharing of your Information with affiliates and third parties, please contact us at team@agentomen.com. We will use your Information for our internal business purposes, including but not limited to, creating user state modeling and comprehensive behavioral profiling.

If Omen intends on using your Personal Information in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Information is collected.

Sharing of Your Information with Non-affiliated Third Parties

We will not share your Information with non-affiliated third parties that may use your Information to market to you, without obtaining your opt-in consent. For example, we may offer you with a product opportunity that requires us to share your Information with non-affiliated third parties that may use your Information to market to you. We will obtain your opt-in consent to such sharing of your Information when we present you with the terms of such offer.

If you have opted-in for this kind of sharing of your Information, then you may: (i) choose to opt-out of such sharing by contacting us at team@agentomen.com; or (ii) request certain information regarding our disclosure of your Information to such non-affiliated third parties by contacting us at team@agentomen.com.

Accessing and Modifying Information Communication Preferences

If you have provided us any Personal Information, you may access, remove, review, and/or make changes, by making the change(s) in your registered account settings page. If you experience difficulties, please contact customer support at team@agentomen.com. We will respond to your request as soon as possible. Please note that customer service is not able to make changes on your account.

Communication Preferences

When you sign up for our Services or newsletter(s), we will send periodic emails to you regarding the Services or to tell you about services we believe will be of interest to you.

If at any time you wish not to receive any future newsletters or marketing communications or you wish to have your name deleted from our mailing lists, please follow the unsubscribe instructions included in these emails or contact us at team@agentomen.com. We will use commercially reasonable efforts to process such requests in a timely manner. Note however that as a user of the Services we and/or our custodian(s) will send you administrative and transactional communications that are reasonably necessary to provide the Services, such as billing, brokerage or service notifications and you cannot opt out of receiving such communications.

We may also deliver notifications to your phone or mobile device. You can disable these notifications by deleting the relevant service or by changing the settings on your mobile device.

By providing your phone number you consent to Omen calling or texting you using an automated telephone dialing system and/or prerecorded messages, even if you incur charges for receiving such communications. For example, we may send you informational text messages to your mobile device. You can revoke your consent to receiving informational text messages at any time by replying “STOP” or following any other instructions included in these text messages or you can contact us at +14236535724.

How We Protect Your Information

The security of your information is important to us. When you enter sensitive information (such as bank account information) in our Platform, we encrypt the transmission of that information using secure socket layer technology (SSL). We and our custodian also use third-party ID verification to ensure our users’ true identities are validated.

We take commercially reasonable technical, administrative, and physical safeguards to protect information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such information, nor can we guarantee that the information you supply will not be intercepted while being transmitted over the Internet. In particular, email sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via email. If you have any questions about security on our website, you can contact us at team@agentomen.com.

Retention of Your Information

We will retain your Information for as long as it serves the purpose(s) for which it was initially collected as stated in this Privacy Policy, or subsequently authorized. We will also retain and use your Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Exclusions

This Privacy Policy does not apply to any Personal Information collected by Omen other than Personal Information collected through the Platform and/or Services. This Privacy Policy shall not apply to any unsolicited information you provide to Omen through the Platform, or through any other means. This includes, but is not limited to, information posted to any public areas of the Platform (collectively, "Public Areas"), any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, "Unsolicited Information"). All Unsolicited Information shall be deemed to be non-confidential and Omen shall be free to reproduce, use, disclose, distribute and exploit such Unsolicited Information without limitation or attribution.

Suspicious Email

We do not email you or send you other electronic communications to request nonpublic information or account information (such as username and password). If you receive an unsolicited email or other electronic communication that appears to be from Omen but you suspect it may be from some other source or fraudulent, please email us at team@agentomen.com.

Children

INDIVIDUALS UNDER THE AGE OF 18 ARE NOT PERMITTED TO SUBSCRIBE TO ANY OF OUR SERVICES.

We do not knowingly collect Personal Information from children under the age of 13 through the Platform. If you are under 13, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Policy by instructing their children never to provide Personal Information through the Platform without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will endeavor to delete that information from our databases.

Links to Other Websites and Integration of Third-Party Content

This Privacy Policy applies only to the Platform. The Platform may contain links to other websites or services not operated or controlled by Omen (the "Third-Party Sites"). The policies and procedures we describe here do not apply to the Third-Party Sites. The links from the Platform do not imply that Omen endorses or has reviewed the Third-Party Sites. We suggest contacting those sites directly for information on their privacy policies.

In addition, we may integrate third-party content from other websites, such as YouTube videos, into the Platform. Our use of YouTube's API services subjects you to Google's Privacy Policy available at <http://www.google.com/policies/privacy> when you access YouTube content through our Services and you agree to certain of your information being collected by YouTube as applicable and in accordance with such privacy policy.

Federal Privacy Notice

Omen is required by federal law to provide consumers with information regarding our collection and sharing of nonpublic personal information. Please see our Privacy Notice for more information.

California Residents

Omen does not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals.

Former Clients

If your Client relationship with Omen ends, we will not destroy your Information unless required or permitted by law. We will continue to treat your Personal Information in accordance with this Privacy Policy and applicable laws.

Other Important Notices

The Platform and the Services are intended for natural persons who are citizens or other lawful residents of the United States and who are located in the United States. The Platform, the Services and their servers are controlled and operated in the United States. Please be aware that your Information may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your country of origin. If you are located outside the United States and choose to use the Platform and/or the Services, you do so at your own risk.

Changes to Omen's Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes to this Privacy Policy we will notify you by email (sent to the email address specified in your account) or by means of a notice on the Platform prior to the change becoming effective. By visiting and/or using the Platform after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect such information. We encourage you to periodically review this page for the latest information on our privacy practices.

Contacting Omen

Please feel free to contact us if you have any questions about Omen's Privacy Policy or our information practices at team@agentomen.com.