

## Legal Disclaimer (Globally Applicable)

### 1. General Information

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### 2. Not an Offer or Solicitation

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### 3. Forward-Looking Statements

Certain statements on this website may constitute “forward-looking statements” as defined under the U.S. Private Securities Litigation Reform Act of 1995 or other applicable laws. Such statements involve risks, uncertainties, and assumptions that could cause actual results to differ materially from those anticipated. Vector Parallax Capital has no obligation to update or revise any forward-looking statements.

### 4. No Warranties and Disclaimer

Vector Parallax Capital makes no express or implied warranties regarding the accuracy, completeness, timeliness, or suitability of the website content. To the maximum extent permitted by law, we disclaim liability for any loss (direct, indirect, incidental, consequential, or punitive) arising from the use of or

reliance on information from this website.

## 5. Limitation of Liability

To the fullest extent permitted by applicable law, Vector Parallax Capital, its affiliates, officers, directors, employees, and agents shall not be liable for any loss, including but not limited to loss of profits, goodwill, or data, arising from access to or use of this website (including third-party links).

## 6. Third-Party Links

This website may contain links to third-party websites. We are not responsible for their content, privacy practices, or operations. Access is at your own risk.

## 7. Intellectual Property

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## 8. Governing Law and Dispute Resolution

This Legal Disclaimer shall be governed by and construed in accordance with the laws of the State of Colorado, USA, without regard to conflict of law principles. Any dispute shall first be resolved through good-faith negotiation; if unsuccessful, it shall be submitted to the exclusive jurisdiction of the competent courts in Colorado. EU users may, however, bring proceedings in their member state under Article 79 of the GDPR.

## 9. Amendments

We reserve the right to modify this Legal Disclaimer at any time. Material changes will be notified via website announcement or email at least 30 days in

advance. Continued use constitutes acceptance of the updated version.

#### 10. Conflicts of Interest Policy Summary

We have implemented a conflicts of interest management framework to ensure that the interests of employees and management do not conflict with those of our clients. An internal control and compliance monitoring system is in place.

#### 11. Anti-Money Laundering (AML) Compliance Statement

We comply with global AML/CTF regulations, including but not limited to the U.S. Bank Secrecy Act, EU Anti-Money Laundering Directives (AMLD4/AMLD5), and conduct customer due diligence, sanctions screening, and transaction monitoring.

#### 12. Client Complaint Handling Mechanism

Clients may submit complaints via email. We will acknowledge receipt and provide a substantive response within 30 calendar days.

#### 13. Data Protection Impact Assessment (DPIA) Statement

Prior to processing high-risk personal data, we conduct a Data Protection Impact Assessment (DPIA) to ensure that privacy risks are identified and adequately mitigated.

### Privacy Policy (Global Tiered Compliance Version)

#### 1. Scope and Tiered Principles

This policy applies globally. Depending on your place of residence or access location, the highest applicable privacy protection standards will automatically be triggered.

## 2. U.S. Users

Subject to U.S. federal law, Colorado state law, and the Gramm-Leach-Bliley Act (GLBA).

Contact for rights exercise: [privacy.us@vpciglobal.com](mailto:privacy.us@vpciglobal.com)

## 3. EU, EEA, and UK Users

Fully compliant with the General Data Protection Regulation (GDPR) and UK GDPR.

Data Controller: Vector Parallax Capital Inc, 1312 17th Street Suite 692, Denver, CO 80202, USA

Data Protection Officer (DPO): [dpo@vpciglobal.com](mailto:dpo@vpciglobal.com)

You have full data subject rights: access, rectification, erasure, restriction of processing, data portability, objection (including to automated decision-making), and withdrawal of consent at any time.

Legal bases: contract performance, legal obligations, legitimate interests (following LIA assessment).

International transfers safeguarded by the EU-U.S. Data Privacy Framework (DPF), Standard Contractual Clauses (SCC), and supplementary measures.

## 4. Users in Other Jurisdictions

Mandatory privacy laws of your country or region apply. Where local law provides a higher standard, that standard shall prevail.

## 5. Information We Collect (Globally Uniform)

Identity: name, date of birth, nationality, ID/passport

Contact: email, phone, mailing address

Financial: bank account, transaction records, tax residency

KYC/AML: proof of identity, source of funds documents

Technical: IP address, device identifiers, browser fingerprint, access logs

Cookies and tracking technology data

## 6. Purposes of Use (Globally Uniform)

Provision of asset management and investment services

Conducting KYC, AML/CFT, and sanctions screening

Fulfilling tax reporting obligations (FATCA, CRS)

Risk management and fraud prevention

Product and service improvement (anonymized)

Marketing communications (with explicit consent)

## 7. Data Sharing (Strictly Controlled)

Shared only with:

Regulated custodian banks, payment processors, auditors

Regulators and law enforcement (when legally required)

Successors in business (mergers/acquisitions)

We do not sell, rent, or share your data with third parties for direct marketing.

## 8. Data Security

We implement bank-grade AES-256 encryption, TLS 1.3 transmission, zero-trust architecture, multi-factor authentication, regular penetration testing, and an ISO 27001-certified security management system.

## 9. Data Retention

Data is retained only for the minimum period necessary to fulfill the collection purpose or legal requirements. KYC records are kept for up to 5 years after the end of the regulatory retention period. Marketing consent may be withdrawn at any time.

## 10. Your Global Contact Methods

General privacy inquiries: [privacy@vpciglobal.com](mailto:privacy@vpciglobal.com)

EU Data Protection Officer: [dpo@vpciglobal.com](mailto:dpo@vpciglobal.com)

U.S. compliance line: [privacy.us@vpciglobal.com](mailto:privacy.us@vpciglobal.com)

Mailing address: 1312 17th Street Suite 692, Denver, Colorado 80202, United States of America

We are committed to protecting your privacy with the highest standards, no matter where you are located.

Vector Parallax Capital Inc Legal & Compliance Team

Official Website: [www.vpciglobal.com](http://www.vpciglobal.com)