

WEBSITE PRIVACY POLICY

Effective Date: July 16th 2026

Introduction

This Privacy Policy describes how Liberty Forge LLC, doing business as Civic Financial ("Civic Financial," "we," "us," or "our"), collects, uses, discloses, and protects personal information in connection with our website located at civicfinancial.com (the "Website"). Civic Financial is a financial advisory firm, and the Website is provided primarily for informational purposes regarding our services. By using the Website, you acknowledge the practices described in this Policy.

Who We Are

Civic Financial is a Massachusetts limited liability company registered with the Securities and Exchange Commission as an investment adviser with a principal business address at 20 Newbury St, Floor 3, Boston, MA 02116. For privacy-related inquiries, you may contact Nick Allsop, Chief Operating Officer for Civic Financial nick@civicfinancial.com or 617-239-9347

Personal Information We Collect

We collect personal information that you voluntarily provide to us when you submit an inquiry through the "Contact Us" feature on the Website, including your name, telephone number, email address, and the contents of your message.

Information Collected Automatically

When you visit the Website, certain information may be collected automatically through cookies and similar technologies, including device and browser information, IP address, and usage data, as described in the "Cookies and Tracking Technologies" section below.

Sensitive Information and Children

We do not collect sensitive or special categories of personal information (such as health, biometric, racial or ethnic origin, religious beliefs, sexual orientation, or political opinions) through the Website. We do not knowingly collect personal information from children under the age of 13 (or under 16 where applicable). If you believe a child has provided us with personal information, please contact us so we can delete it.

How We Use Personal Information

We use the personal information you submit through the "Contact Us" feature to respond to your inquiry and, where you have submitted your information, to add you to our marketing and outreach list and to communicate with you about our services. We use automatically collected information to operate, maintain, secure, and improve the Website and to understand how visitors use it. We do not

use personal information for automated decision-making, profiling, or to train artificial intelligence or machine learning models.

Cookies and Tracking Technologies

The Website uses strictly necessary cookies and analytics cookies. We use Google Analytics 4 and Microsoft Clarity to understand Website usage. We do not use advertising, retargeting, or marketing pixels. Before non-essential analytics cookies are activated, visitors are presented with a consent banner managed through Complianz. You can manage your cookie preferences through that banner. We honor "Do Not Track" and Global Privacy Control (GPC) signals.

How We Share Personal Information

We may share personal information with service providers that support our website operations, website hosting, analytics, and other business functions. These service providers are contractually obligated to use personal information only to provide services on our behalf and not for their own marketing purposes.

We may also disclose personal information to law enforcement or other parties to the extent legally required or in response to lawful requests. In the event of a merger, acquisition, or sale of assets, personal information may be transferred as part of that transaction. We do not sell personal information, and we do not "share" personal information for cross-context behavioral advertising as those terms are defined under the California Consumer Privacy Act, as amended (CCPA/CPRA).

SMS Communications Privacy

If you opt in to receive SMS communications from Civic Financial, we collect your mobile phone number and your consent to receive text messages. We use this information solely to provide the communications you have requested, including appointment reminders, service updates, account notifications, and other business-related communications.

We do not sell, rent, share, or disclose mobile phone numbers or SMS consent information to third parties or affiliates for marketing or promotional purposes. SMS opt-in data, consent records, and associated mobile numbers are not shared with any third parties for marketing purposes.

You may opt out of SMS communications at any time by replying STOP to any text message. For assistance, reply HELP or contact us using the information provided below. Message frequency varies based on your relationship with Civic Financial and the services you request. Message and data rates may apply to SMS communications, depending on your mobile carrier and service plan.

International Data Transfers

Our analytics providers may process data in the United States and other jurisdictions. Where applicable, we rely on appropriate contractual and technical safeguards in connection with such processing.

Data Retention

We retain personal information for as long as necessary to fulfill the purposes described in this Policy, including responding to inquiries, conducting marketing and outreach, and complying with our legal, regulatory, and recordkeeping obligations.

Data Security

We maintain administrative, technical, and physical safeguards designed to protect personal information, including access controls, staff training, secure website hosting, HTTPS/TLS encryption for data transmitted through the Website, and vendor security controls as applicable. No method of transmission or storage is completely secure, and we cannot guarantee absolute security.

Data Breach Notification.

We maintain incident response and notification procedures designed to comply with applicable legal and regulatory requirements. In the event of a data breach involving non-public information, we will notify affected clients without undue delay.

Your Privacy Rights

Depending on your jurisdiction, you may have rights regarding your personal information, such as the right to access, correct, or delete your information, to opt out of certain processing, and to withdraw consent. To exercise any available rights, please contact us using the information at the bottom of this notice.

Marketing Opt-Out

You may opt out of our marketing communications at any time by using the unsubscribe mechanism included in our newsletter emails. We do not automatically generate marketing leads from Website traffic; we only add individuals to our marketing list when they contact us through the Website.

Third-Party Links and Content

The Website may link to or reference third-party sites and content, including our custodian, Altruist, as well as our LinkedIn and Instagram pages. We are not responsible for the privacy practices of these third parties, and we encourage you to review their privacy policies.

Changes to This Policy

We may update this Policy from time to time. Changes will be posted on the Website with an updated effective date. Material changes may be communicated through additional notice where appropriate.

Contact Us

If you have questions about this Policy or our data practices, please contact Nick Allsop, Chief Operating Officer for Civic Financial nick@civicfinancial.com or 617-239-9347, 20 Newbury St, Floor 3, Boston, MA 02116.