

Shaping Wealth Privacy Policy

Effective Date/Last Updated: September 25, 2026

This Privacy Policy describes how Northcenter Ventures, LLC d/b/a Shaping Wealth ("Shaping Wealth," "we," "us," or "our") collects, uses, discloses, and protects personal information in connection with the www.shapingwealth.com website, the Compass platform at compass.shapingwealth.com, the Lydia artificial intelligence assistant (wherever accessed, including through Compass or through any authorized partner platform, integration, or embedded experience), and any related applications, integrations, or services that link to this Privacy Policy (collectively, the "Services"). Capitalized terms not defined here have the meanings given in our Terms of Use.

By accessing or using the Services, you acknowledge that you have read and understand this Privacy Policy. We may update this Privacy Policy from time to time. Changes will be effective when posted, and the "Last Updated" date above will be revised. If we make material changes, we will notify you by posting a notice on the Services or by e-mail before the changes take effect.

1. Scope

This Privacy Policy applies to personal information we collect in connection with the Services, including Lydia, whether you access Lydia through Compass or through an authorized partner platform, integration, or embedded experience. When you access Lydia through a partner platform, the partner's own privacy policy also governs the partner's collection and use of your information within its platform, and we are not responsible for the partner's practices. Where we process personal information on behalf of an enterprise customer, partner, or other organization under a written agreement in which we act as a "service provider" or "processor," we process that information in accordance with that agreement, which will control to the extent of any conflict with this Privacy Policy, and the organization's privacy notice will also apply.

2. Information We Collect

Information you provide to us

- **Account and profile information:** name, e-mail address, company or firm name, job title or role, password or single sign-on credentials, and preferences.
- **Lydia Inputs:** prompts, questions, messages, files, and other materials you submit to Lydia, along with the Outputs Lydia generates in response and any ratings or feedback you provide on Outputs.
- **Transaction information:** if you purchase a Lydia subscription, subscription and billing details, such as plan, purchase history, and billing address. Payment card information is collected and processed directly by our PCI DSS-compliant third-party payment processor; we do not store full payment card numbers.
- **Communications:** information you provide when you contact us, register for events or webinars, respond to surveys, or subscribe to our newsletters and other communications.

Information we receive from partners and third parties

- **Partner platforms:** if you access Lydia through an authorized partner platform or your firm's enterprise account, we may receive account identifiers, your name and e-mail address, and limited contextual information (such as de-identified client profile attributes) needed to provide relevant coaching content.

- **Single sign-on and integrations:** if you sign in through a third-party identity provider or connect an integration, we receive the information you authorize that provider to share.
- **Business and marketing sources:** we may receive business contact information from event partners, referral partners, and publicly available professional sources.

Information collected automatically

When you use the Services, we and our service providers automatically collect information such as IP address, device identifiers, browser type and settings, operating system, referring URLs, pages visited, features used, session length, approximate geographic location derived from IP address, and logs of your interactions with the Services, including Lydia usage metadata (such as timestamps, feature usage, and usage counts used to apply free usage thresholds). We collect this information using cookies, pixels, local storage, and similar technologies, as described in Section 8.

3. Client Information and Restricted Information

Lydia is designed to help financial professionals without requiring personal information about their clients. As described in our Terms of Use, you should not submit client Social Security numbers, taxpayer identification numbers, account numbers, government identification numbers, credentials, account statements, portfolio holdings, or other nonpublic personal information or sensitive personal information to Lydia unless expressly permitted in a separate written agreement with us. If you include information about another person in your Inputs, you are responsible for having any necessary rights, consents, or notices. If we learn that we have received Restricted Information in violation of our Terms, we may delete it.

4. How We Use Information

We use personal information for the following purposes:

- to provide, operate, and maintain the Services, including generating Lydia Outputs in response to your Inputs;
- to create and administer free accounts, track Lydia usage against free usage thresholds, process subscriptions and payments, and provide customer support;
- to personalize your experience, such as tailoring Compass content and Lydia coaching to your role and preferences;
- to monitor, evaluate, troubleshoot, and improve the quality, safety, accuracy, and performance of the Services, including Lydia, generally using de-identified or aggregated data where practicable;
- to detect, investigate, and prevent security incidents, fraud, abuse, misuse of AI Features, and violations of our Terms of Use;
- to communicate with you about the Services, including service announcements, updates, security alerts, and administrative messages;
- to send marketing communications and interest-based advertising, subject to your choices described in Section 10;
- to conduct research and analytics on usage trends and behavioral finance topics, using de-identified or aggregated data;
- to comply with legal and regulatory obligations, respond to lawful requests, and establish, exercise, or defend legal claims; and
- for any other purpose disclosed to you at the time we collect the information or with your consent.

We may de-identify or aggregate personal information so that it no longer reasonably identifies you, and we may use and disclose de-identified or aggregated information for any lawful purpose. We will maintain and use de-identified information in de-identified form and will not attempt to re-identify it, except as permitted by law.

5. Artificial Intelligence and Lydia

How Lydia processes your information. When you use Lydia, your Inputs are processed by Shaping Wealth's systems together with our proprietary behavioral finance content, and are transmitted to third-party AI model providers that generate Outputs on our behalf. These providers act as our service providers and are contractually required to process your information only to provide services to us, to protect it with appropriate security measures, and not to use it for their own purposes.

No training of third-party models. We do not permit our third-party AI model providers to use your Inputs or Outputs to train or improve their general-purpose models. We do not sell your Inputs or Outputs.

Service improvement. We may use Inputs, Outputs, feedback, and usage data to evaluate and improve Lydia's quality, safety, and performance, such as by reviewing aggregated usage patterns, testing new features, and addressing errors. Where practicable, we de-identify or aggregate this information first. Access to identifiable Lydia conversations by Shaping Wealth personnel is limited to authorized personnel with a business need, such as providing support you request, investigating misuse or security issues, or complying with law.

No automated decisions about you. We do not use Lydia or other AI Features to make decisions about you that produce legal or similarly significant effects.

Conversation history. Lydia may retain your conversation history so that you can refer back to prior sessions and so that Lydia can provide continuity. Retention of Lydia data is described in Section 9.

6. How We Disclose Information

We do not sell, rent, or lease personal information to third parties for monetary consideration. We disclose personal information in the following circumstances:

- **Service providers and subprocessors:** with vendors that perform services on our behalf, such as cloud hosting and infrastructure, AI model providers, payment processing, customer relationship management, e-mail delivery, analytics, customer support, and security services. These providers are bound by contractual obligations to protect personal information and use it only to provide services to us.
- **Your organization:** if your account is provided or managed by your firm or another organization, we may share information about your account and use of the Services with that organization's administrators.
- **Partners at your direction:** with partner platforms and integrations that you choose to connect or use to access the Services.
- **Advertising and analytics partners:** with third parties that provide analytics and interest-based advertising services, as described in Section 8. Under some state laws, this may be considered "sharing" of personal information for cross-context behavioral advertising or "targeted advertising," which you can opt out of as described in Section 11.
- **Professional advisors:** with our lawyers, accountants, auditors, and insurers as needed to obtain professional services.

- **Legal and safety:** with law enforcement, regulators, courts, or other third parties when we believe disclosure is required by law, legal process, or regulatory inquiry, or is necessary to protect the rights, property, or safety of Shaping Wealth, our users, or others, or to enforce our Terms of Use.
- **Business transfers:** in connection with, or during negotiations of, any merger, acquisition, financing, reorganization, sale of assets, or bankruptcy, in which case personal information may be transferred to the successor or acquirer, subject to this Privacy Policy or a notice we provide.
- **With your consent:** with other third parties when you direct or consent to the disclosure.

7. Financial Services Data

Shaping Wealth provides behavioral coaching and educational technology to financial professionals and is not a bank, broker-dealer, or investment adviser. To the extent we receive nonpublic personal information from a financial institution customer under a written agreement, we process that information only as a service provider to that financial institution, for the purposes of performing the contracted services, and consistent with the confidentiality, security, and incident-notification obligations in that agreement, including those required of service providers under the Gramm-Leach-Bliley Act and Regulation S-P, as applicable.

8. Cookies, Analytics, and Interest-Based Advertising

We and our partners use cookies and similar technologies to operate the Services, remember your preferences, keep you signed in, understand how the Services are used, and deliver and measure advertising. "Session" cookies expire when you close your browser, and "persistent" cookies remain until they expire or you delete them. We use analytics services, such as Google Analytics, to measure usage of the Services; you can learn about Google's practices at www.google.com/policies/privacy/partners and opt out using the Google Analytics Opt-out Browser Add-on. We also work with third-party advertising partners that use cookies and similar technologies to show you ads for our Services on other websites based on your activity.

You can set your browser to refuse or delete cookies, although some features of the Services may not function properly without them. You may opt out of interest-based advertising from participating companies at optout.aboutads.info and optout.networkadvertising.org. Our Services do not currently respond to "Do Not Track" browser signals. Where required by applicable law, we treat Global Privacy Control (GPC) signals as a valid request to opt out of the sale or sharing of personal information and targeted advertising for the browser or device sending the signal.

9. Data Retention

We retain personal information for as long as reasonably necessary to fulfill the purposes described in this Privacy Policy, including to provide the Services, maintain your account, comply with legal, tax, and accounting obligations, resolve disputes, and enforce our agreements. Lydia conversation history is retained while your account is active so that you can access it, unless you delete it or your organization's agreement specifies otherwise. When your account is closed, we delete or de-identify personal information within a reasonable period, except where we are required or permitted by law to retain it or it is maintained in routine backups that are overwritten in the ordinary course. Enterprise customers' data retention is governed by their agreements with us.

10. Your Choices

- **Account information:** you may review and update your account information at any time through your account settings or by contacting us.
- **Lydia history:** where available, you may delete individual Lydia conversations through the Services.
- **Marketing communications:** you may opt out of marketing e-mails by following the unsubscribe instructions in any such e-mail or by contacting us. We may still send you transactional and service-related messages.
- **Cookies and advertising:** you may manage cookies and interest-based advertising as described in Section 8.

11. Your U.S. State Privacy Rights

Depending on your state of residence (including, for example, California, Colorado, Connecticut, Virginia, Texas, Oregon, and other states with comprehensive privacy laws), and subject to applicable exceptions, you may have the right to:

- confirm whether we process your personal information and access the personal information we hold about you, including the categories and specific pieces of information collected;
- correct inaccuracies in your personal information;
- delete personal information we have collected from you;
- obtain a copy of your personal information in a portable and, where technically feasible, readily usable format;
- opt out of the sale of personal information, the sharing of personal information for cross-context behavioral advertising, targeted advertising, and profiling in furtherance of decisions that produce legal or similarly significant effects; and
- limit the use of sensitive personal information, where applicable (we do not use sensitive personal information for purposes that would trigger this right).

To exercise these rights, contact us at hello@shapingwealth.com with the subject line "Privacy Request." To opt out of sharing for targeted advertising, you may also enable a Global Privacy Control signal in your browser. We will verify your request by matching information you provide with information in our records, and we may request additional information for verification. You may use an authorized agent to submit a request on your behalf, and we may require proof of the agent's authority and verification of your identity. If we deny your request, you may appeal our decision by replying to our response with the subject line "Privacy Request Appeal," and we will respond within the time required by law. If your appeal is denied, you may contact your state attorney general. We will not discriminate against you for exercising any of these rights.

California Shine the Light. California residents may request information about our disclosure of certain categories of personal information to third parties for their direct marketing purposes during the preceding calendar year under California Civil Code Section 1798.83. We do not disclose personal information to third parties for their own direct marketing purposes.

Information for California residents. In the preceding twelve (12) months, we have collected the following categories of personal information: identifiers (such as name, e-mail address, and IP address); commercial information (such as Lydia subscription and purchase history, if applicable); internet or other electronic network activity information; approximate geolocation; professional or employment-related information (such as firm name and role); inferences drawn from your use of the Services to personalize content; and the content of your Lydia Inputs and

communications with us. We collect this information from the sources described in Section 2, use it for the purposes described in Sections 4 and 5, and disclose it to the categories of recipients described in Section 6. We do not sell personal information for monetary consideration. We may "share" identifiers and internet activity information with advertising partners for cross-context behavioral advertising. We do not knowingly sell or share the personal information of consumers under sixteen (16) years of age.

12. Information Security

We maintain administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, use, alteration, and disclosure, including encryption of data in transit and at rest, role-based access controls, authentication controls, logging and monitoring, and vendor security reviews. However, no data transmission over the Internet or method of electronic storage can be guaranteed to be 100% secure, and we cannot guarantee absolute security. You are responsible for keeping your credentials confidential. If we become aware of a security incident affecting your personal information, we will notify you and any applicable authorities as required by law and by our agreements.

13. Children's Privacy

The Services are not directed at children or anyone under eighteen (18) years old, and we do not knowingly collect personal information from them. If we learn that we have collected personal information from someone under eighteen (18), we will delete it. If you believe we have collected such information, please contact us.

14. Sensitive Information

We do not intend to collect sensitive personal information (such as government identification numbers, financial account numbers, health information, or precise geolocation) through the Services, and we ask that you not submit it, including through Lydia.

15. Location of Processing

The Services are intended for use in the United States. We and our service providers process and store personal information in the United States. If you access the Services from outside the United States, you understand that your information will be transferred to, processed, and stored in the United States, where data protection laws may differ from those of your jurisdiction.

16. Third-Party Websites and Services

The Services may contain links to or integrations with third-party websites, platforms, and services, including partner platforms and social media pages. We are not responsible for the privacy practices of those third parties, and this Privacy Policy does not apply to them. We encourage you to review their privacy policies.

17. Contact Us

If you have questions or concerns about this Privacy Policy or our privacy practices, or wish to exercise your privacy rights, please contact us at:

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