Privacy Policy

Yona Capital Management

yonacap.com

Effective: July 9, 2026

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1. Introduction

Yona Capital Management ("Yona," "we," "us," or "our") respects your privacy and is committed to protecting the personal information you share with us. This Privacy Policy explains what information we collect, how we use it, how we share it, and the rights you have over your information when you interact with us through our website (yonacap.com), our SMS text-messaging programs, our WhatsApp Business account, our Fundlaunch360 investor portal, our Nextiva business communications, and any other channel we operate.

By using our services or providing your information to us, you agree to the terms of this Privacy Policy. If you do not agree, please do not use our services or provide us with your personal information.

2. Information We Collect

We collect personal information that you voluntarily provide to us, as well as limited information that is automatically collected when you interact with our services. The categories of information we collect include:

2.1 Information you provide directly

- Contact information: name, email address, mailing address, phone number.
- Investor and accreditation information: Social Security number or taxpayer ID, date of birth, employment, net worth, income, investment experience, and related financial information required to verify accredited-investor status under SEC Rule 501.
- Identity-verification information: government-issued ID, proof of address, and related documents required to satisfy KYC (Know Your Customer) and AML (Anti-Money Laundering) obligations.

- Banking and payment information: bank account details, wire instructions, and tax forms (W-9, W-8BEN, K-1 delivery address) needed to process capital calls, distributions, and tax reporting.
- Communications: messages you send us via SMS, WhatsApp, email, web form, or phone.
- Marketing preferences: whether you have opted in to receive SMS, WhatsApp, or email communications from us, and the specific topic(s) you have consented to.

2.2 Information collected automatically

- Device and connection information: IP address, browser type, operating system, device identifiers.
- Usage information: pages visited, time spent on pages, referring URLs, click patterns, and similar analytics collected via cookies and similar technologies.
- Communications metadata: timestamps, delivery status, and aggregate response patterns for SMS and WhatsApp messages (used to maintain service quality and prove consent).

3. How We Use Your Information

We use the personal information we collect for the following purposes:

- To provide, operate, and maintain our investment services, including fund offerings, capital calls, distributions, and investor reporting.
- To verify your identity and accredited-investor status, and to satisfy our legal obligations under KYC, AML, the Bank Secrecy Act, and applicable securities laws.
- To process capital commitments, subscriptions, wires, tax reporting, and other transactional communications.
- To send you SMS, WhatsApp, and email communications that you have affirmatively opted in to receive, in accordance with our SMS Disclosures and the Telephone Consumer Protection Act (TCPA).
- To respond to your inquiries, schedule meetings, and provide customer support.
- To send fund-launch announcements, webinars, and other promotional communications — only to recipients who have specifically opted in to marketing and promotional messages.

- To detect, prevent, and address fraud, security incidents, and other prohibited or illegal activities.
- To comply with applicable law, regulation, legal process, or enforceable governmental request.
- To enforce our Terms & Conditions and protect our rights, privacy, safety, or property, and that of our investors and counterparties.

4. How We Share Your Information

Yona Capital Management does not sell your personal information. We do not share, rent, lease, or trade your personal information to or with any third party for that third party's marketing purposes.

We share your personal information only with the following categories of recipients, and only to the extent reasonably necessary to operate our business, deliver our services, or comply with law:

4.1 Service providers

- Fund administrators, auditors, custodians, and transfer agents who help us administer our funds.
- Technology vendors — including our SMS / messaging providers (Nextiva), investor portal (Fundlaunch360), WhatsApp Business (Meta), scheduling providers, cloud hosting, and email delivery — who process information on our behalf under confidentiality and data-protection obligations.
- Banking and payment processors that facilitate capital calls and distributions.

4.2 Legal, regulatory, and securities compliance

- Federal and state securities regulators (including the SEC and state securities divisions), the Financial Industry Regulatory Authority (FINRA), the Internal Revenue Service (IRS), the U.S. Department of the Treasury, and other governmental authorities — as required by law, regulation, subpoena, or similar legal process.

4.3 Professional advisors

- Outside legal counsel, tax advisors, and compliance consultants acting on our behalf under professional duties of confidentiality.

4.4 Corporate transactions

- A successor entity in the event of a merger, acquisition, financing, reorganization, bankruptcy, or sale of all or part of our business — with the successor bound by obligations no less protective than this Privacy Policy.

4.5 With your consent

- Any other party where you have given us your explicit consent to share your information.

> **No-Sale / No-Share-for-Marketing Commitment**
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> Yona Capital Management does not sell, rent, lease, or otherwise share your personal information to any third party for that third party's marketing purposes. If we ever change this practice, we will update this Privacy Policy and provide you with a meaningful opportunity to opt out, in accordance with applicable law (including the California Consumer Privacy Act / CPRA, where applicable).

5. Cookies, Tracking, and Analytics

Our website uses cookies, web beacons, and similar technologies to operate the site, remember your preferences, measure traffic, and improve our services. You can control cookies through your browser settings. Disabling certain cookies may affect site functionality.

We use privacy-respecting analytics that do not sell your data. We do not use third-party advertising cookies on our website.

6. SMS Text Messages and WhatsApp Communications

Our SMS and WhatsApp programs are governed by our SMS Disclosures, which are presented to you and explicitly agreed to before any message is sent. In summary:

- Yona Capital Management sends SMS and WhatsApp messages only to recipients who have provided affirmative, opt-in consent.
- Message frequency and topic are disclosed at the time of consent (e.g., up to 8 messages per month for investment-related updates; up to 12 messages per month for active fundraise / capital-call periods on Fundlaunch360).

- Message and data rates may apply. Carriers are not liable for delayed or undelivered messages.
- You may reply STOP at any time to opt out of all future messages, or reply HELP for support.
- We retain consent records, including the exact disclosure text shown at the time of consent, the timestamp, IP address, and page URL, for at least four (4) years.
- We do not transmit sensitive personal information (such as full SSN, full bank account, or wire details) in the body of any SMS or WhatsApp message; sensitive payloads are sent via secure portal links only.

WhatsApp messages are additionally governed by WhatsApp's Terms of Service and Privacy Policy. We do not control how WhatsApp / Meta processes message content on its platform; please review Meta's privacy documentation for details.

Sample Opt-Out Language (for inclusion in every message)

"Reply STOP to opt out of all future messages from Yona Capital Management. Reply HELP for support. Message and data rates may apply."

7. Data Security

Yona Capital Management implements reasonable administrative, technical, and physical safeguards designed to protect your personal information from unauthorized access, use, disclosure, alteration, or destruction. These safeguards include encryption in transit (TLS) and at rest, access controls based on role and need-to-know, vendor due diligence, and employee training.

No system is perfectly secure. We cannot guarantee absolute security of your information. If we become aware of a security incident affecting your personal information, we will notify you and applicable regulators as required by law.

8. Data Retention

We retain personal information for as long as necessary to provide our services, comply with our legal and regulatory obligations (including SEC, FINRA, and IRS recordkeeping rules that require retention of investor and transactional records for periods typically ranging from 5 to 7 years after the end of the relationship), resolve disputes, and enforce our agreements.

Consent records, including the exact disclosure text shown and the timestamp / IP at which consent was given, are retained for at least four (4) years from the date of consent.

9. Your Privacy Rights

You have rights over your personal information. Depending on your state of residence, these rights may include the right to:

- Access the personal information we hold about you.
- Correct inaccurate or incomplete information.
- Delete personal information we have collected from you, subject to legal exceptions.
- Opt out of the sale or sharing of personal information (we do not sell or share for cross-context behavioral advertising — see §4).
- Limit the use and disclosure of sensitive personal information.
- Non-discrimination for exercising any of your privacy rights.
- Appeal a decision we make regarding your privacy request.

To exercise any of these rights, contact us at the address in §13. We will respond to verifiable requests within the timeframes required by applicable law (typically 30–45 days).

9.1 SMS / WhatsApp opt-out

To stop receiving SMS or WhatsApp messages from us at any time, reply STOP to any message you receive from us, or contact us at the email or phone number in §13. We will process your opt-out promptly and confirm.

10. Children's Privacy

Our services are intended for adults engaged in investment, business, or real-estate activities. We do not knowingly collect personal information from anyone under the age of 18. If we learn that we have collected personal information from a child under 18, we will delete it as soon as possible. If you believe a child under

18 has provided us with personal information, please contact us at the address in §13.

11. International Users

Yona Capital Management is based in the United States. If you are visiting our website or interacting with us from outside the United States, please be aware that your information will be transferred to, stored, and processed in the United States. By using our services, you consent to the transfer of your information to the United States, which may have data-protection rules different from those of your country of residence.

12. Third-Party Links and Services

Our website and communications may contain links to third-party websites or services (for example, Fundlaunch360, WhatsApp, Nextiva, custodians, and regulators) that we do not control. We are not responsible for the privacy practices of those third parties. We encourage you to read the privacy policy of every site and service that collects your personal information.

13. Contact Us

If you have any questions about this Privacy Policy, our data practices, or your privacy rights, please contact us at:

Company	Yona Capital Management
Mailing address	529 W 41st St Ste 472, Miami Beach, FL 33140
Privacy Policy URL	https://www.yonacap.com/privacy-policy
Terms & Conditions URL	https://www.yonacap.com/terms

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, our services, or applicable law. The "Effective" date at the top of this policy indicates when it was last revised. Material changes will be communicated to you (for example, by email or by a notice on our website) and, where required by law, we will provide you with a meaningful opportunity to opt out or, if necessary, re-consent.