

HCap Strategy L.L.C Privacy Policy

As of January 1st, 2026

We are strongly committed to protecting the privacy of our customers, and we know that you care about how the information you provide to us is used and shared. This Privacy Policy describes the ways in which we collect, use, disclose and transfer certain information.

This Privacy Policy governs your use of www.hcapstrategy.com (the “Website”), our Doable Benefits mobile application, known as (the “App”). By using our Website or App, you agree to be bound by this Privacy Policy. We welcome your feedback, so if you have any questions about your privacy, please email us at support@hcapstrategy.com.

Information We Collect

When you interact with us, we may collect both personal and non-personal information. The term “personal information” is used in this Privacy Policy to reference the information that can be used to uniquely identify or contact you. The term “non-personal information” is used to reference the information that cannot be directly associated with you. We collect both personal and non-personal information in the following ways:

Information that you provide to us:

Examples of information you provide to us include your name, email address, physical address, zip code, and telephone number. This information is collected in a number of ways, including, but not limited to, use of our Website and App, interactions with customer service, marketing promotions, and surveys.

Our privacy policy does not permit for the sharing or selling of end user information to third parties and affiliates.

If applicable, any payment or billing information you provide will be generally processed and captured by third-party vendors, such as payment processors, and we, to the fullest extent possible, will make an effort not to capture or retain this information ourselves. Third-party vendors who assist us in any of our business functions will also be doing so pursuant to their own terms and conditions, including privacy policies and terms of use.

Information that we collect automatically:

There are some forms of information that we collect automatically, including:

- Information about your interactions with and use of our Website and Apps.
- Details about your interactions with customer support, such as the times and dates of interactions, the details of the interactions, and live-chat transcripts.
- Device identifiers such as the type of device you use, the version of your browser, your operating system and identifiers that can be used to uniquely identify your device.
- Standard web-logging information such as page views, referral URLs, ad data, IP addresses, connection information, browser versions, and operating system versions.
- Information collected via the use of cookies, web beacons and other technologies.

- Information from advertising network partners about the types of ads you have viewed or interacted with.

Information obtained from other sources:

We may supplement the information collected with information we obtain from other sources, both online and offline. This additional information may include examples such as demographic information or Internet browser behavior information. We use this data to better understand our past, current and future members and to improve the Website and/or App, email list subscriptions, and our Services.

How We Use Your Information

We use the personal information that you provide in a manner that is consistent with this Privacy Policy. We use the information we collect to provide you with the most efficient and enhanced personalized service and attention, to solicit your feedback, and for some marketing initiatives. For example, we may use the information to determine locally available products and discounts or for other local marketing efforts, to detect, prevent or investigate fraudulent uses of our Website or Services, or to send you service- or marketing-related emails or push notifications.

We may collect, use, disclose, and transfer non-personal information for any purpose. For example, we may use aggregate anonymous information collected from your use of our Website, App or Services to improve the content and functionality our Services, including evaluating potential partnerships.

Our Disclosure of Your Information

We do not sell your information. There are, however, certain circumstances in which we may share your information with certain third parties without further notice to you, such as in the following examples:

Service Providers:

We use other reliable companies and contractors (“Service Providers”) to perform services for us or to assist in marketing, research, advertising, communications, infrastructure, and IT services in the course of providing our Services to you.

Business Transfer:

We may transfer your information due to any reorganization, restructuring, merger, sale or other transfer of assets. We reserve the right to transfer our information, including your personal information, provided that the receiving party agrees to respect your personal information in a manner that is consistent with our Privacy Policy.

Social Media:

If you choose to connect and share information from our service to a social media network, the information you share is then subject to the social media service’s privacy policy.

Legal Requirements:

We may disclose your information if required to do so by law or in the good faith belief that such

action is necessary to comply with a legal obligation, to protect our rights or property, to protect the personal safety of users or to protect against legal liability.

Your Choices

If you don't want to receive email from us, you can simply "Unsubscribe" via a link in the email. We, however, manage email lists through a list management system, so unsubscribing from one list will not necessarily remove the user from all publication email lists. Further, there are certain administrative emails from which you can't unsubscribe, such as service notifications and emails related to your financial transactions with us. You may, however, opt out of informational updates and from the weekly electronic delivery of our meal plans.

Our App will prompt you to opt in to receive push notifications. If you later decide you don't want to receive push notifications, you can disable them on the devices receiving the notifications.

If you voluntarily make your personal information available for viewing by third parties online, such as on blogs, message boards, emails, forums, or in chat areas, the information you share also can be seen, collected, and used by third parties. We are not responsible for any unauthorized third party use of such information that you voluntarily share.

Right to Access Your Information

You have access to and the ability to update a broad range of your personal information through the Preferences section in our App inside your secure subscription or by emailing our customer support team at support@hcapstrategy.com. We will try to accommodate any requests related to the management of Personal Information in a timely manner. However, it is not always possible to completely remove or modify information in our databases as, for example, we may have a legal obligation to keep it for certain timeframes.

Cookies

Our Website may use cookies in order to deliver a better experience for you. Cookies are small pieces of data that a website stores on your computer's or mobile device's hard drive so that certain information about your visit and web-browsing preferences will be recognized upon a return visit. Cookies serve functions such as "remembering" log-in names and passwords, or enabling or saving shopping cart contents. Like many websites, we may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us improve the experience you have with our Website. Cookie information is only used when communicating with users as per their indicated preferences and as needed for service-related communications.

Most web browsers have a function that allows you to delete existing cookies on your device or you can set your browser options so that your device does not receive or accept cookies.

While not a normal business practice, we reserve the right to allow third-party advertisers that are presenting ads on our behalf to set and access cookies on your web browser. The advertisers' use of cookies or tracking pixels is subject to their own privacy policy, not this Privacy Policy.

Exclusions

This Privacy Policy does not apply to any Personal Information we collect other than the Personal Information collected through our Website or App. It does not apply to any unsolicited information you provide us through this service or any other means, which includes, but is not limited to, information posted to any public areas of the Website or to related forums or social media sites. All unsolicited information is deemed non-confidential and we will be free to reproduce, use, and disclose such information without limitation or attribution.

Children

We do not knowingly collect Personal Information from children under the age of 13. If you are under the age of 13, please do not download our app. If we learn that we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete the information.

Information Security

We use standard industry practices internally and with our Service Providers to protect your personal information against theft, loss, and unauthorized access. Unfortunately, no security system can be guaranteed to be 100% secure, and therefore, we cannot guarantee the security of your personal information and do not assume liability for improper access to it. Any information that you provide to us via email should be treated with extra caution, as we cannot control the level of security available through email providers.

California Privacy Rights

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business with whom the California resident has an established business relationship, certain information with respect to the types of personal information the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To request a copy of the information disclosure provided by the Company pursuant to this provision, please contact us via email at support@hcapstrategy.com.

California Do Not Track Notice

Consistent with our policies described above, we collect information from our visitors on our website and across third party websites where applicable, to provide relevant content and advertising. We do not support Do Not Track (“DNT”) signals of web browsers.

DNT is a setting in your web browser that informs websites that you do not want to be tracked. You can enable or disable DNT through the Preferences or Settings options of your web browser.

Visitors Outside the U.S.

Our Website and the servers that make this Website available worldwide are located in the United States. The Internet laws in the United States govern all matters relating to this Website. Any information you provide in subscribing to or visiting our Website will be transferred to the United States. By visiting our Website and submitting information, you authorize this transfer, processing, and use.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time as necessary to protect our users and to comply with a changing environment. Please review the Privacy Policy when you visit our Website and/or use our App to remain updated on our current policy. We have no intention of making any changes to our Privacy Policy and practices to make them less protective of personal information collected in the past. By accessing the Website and App and/or using our Services after making 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 the information. You are advised to review this Privacy Policy periodically for any changes. Whenever we make changes to this Privacy Policy we will update the date at the top.

Contact Us

If you have any questions about this Privacy Policy, please contact us via email at support@hcapstrategy.com with “Privacy Policy” in the subject line.