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## **COOKIE POLICY**

**USA**

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**Version 1.0**

**Policy Reference No: PRI-11.23/1.1-26**

**April 8, 2026**

Legal, Regulatory and Governance Office

**Notice of Copyright**

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**REVISION HISTORY**

<b>VERSION</b>	<b>DATE</b> <b>MM/DD/YYYY</b>	<b>AUTHOR/ REVIEWER</b>	<b>REVIEWER/ APPROVER</b>	<b>DESCRIPTION</b>
1.0	06/15/2023	RD	B. Beck	
1.0	09/07/2023	R. Graham	B. Beck	
1.0	04/08/2024	R Graham	B Beck	Annual review; No changes
1.0	04/08/2025	R Graham	B Beck	Annual review; No changes
1.0	04/08/2026	D Dennis / M Bolt	B Beck	Annual review;

**RELATED DOCUMENTS**

<b>Reference</b>	<b>Document Title</b>
Privacy	Website Cookie Disclaimer and Acceptance
PRI-01.11 USA	The Gramm Leach Bliley Act Privacy Policy

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PRI-02.11 CAD	Privacy Policy Canada
PRI-02.13 USA	California Financial Information Privacy Policy
PRI-06.19 UK	GDPR Privacy Policy
Privacy	Direct Marketing Practices
Canada	Canada's Anti-Spam Legislation (CASL)
USA	CAN-SPAM Act
UK	Privacy and Electronic Communications Regulations (PECR)
UK	General Data Protection Regulation (GDPR)

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## 1. PURPOSE

AscendantFX Capital Inc.'s and its affiliate websites may use cookies. This policy describes how and why we use cookies, including how such cookies may constitute personal information under applicable U.S. privacy laws and the rights available to users in relation to such data.

## 2. POLICY DETAILS

### 2.01 How We Use Cookies

We use cookies for a variety of reasons detailed below. Our site gives users the ability to decline cookies. If declined, a single cookie will be used within the browser to remember the users preference not to be tracked. Necessary cookies cannot be shut off as they are required for the website to function.

Where required by applicable law, including the California Consumer Privacy Act as amended by the California Privacy Rights Act (CCPA/CPRA) and other U.S. state privacy laws, we obtain user consent prior to placing non-essential cookies.

We may use cookies and similar technologies to collect information that may be considered personal information, including IP address, device identifiers, browsing behavior, and interactions with our website.

Some cookies may enable the sharing or selling of personal information to third parties for cross-context behavioral advertising.

### 2.02 Disabling Cookies

Because we respect your right to privacy, you can choose not to allow some types of cookies. You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Blocking some types of cookies may negatively impact your experience on the site and limit the services we are able to provide.

### 2.03 The Cookies We Set

#### NECESSARY COOKIES

These cookies are necessary for the website to function and cannot be disabled in our system. These cookies are deployed based on our legitimate business purposes and do not require user consent under applicable law. [Learn more about necessary cookies.](#)

#### FUNCTIONALITY COOKIES

We use a set of cookies that are optional for the website to function. They are usually only set in response to information provided to the website to personalize and optimize your experience. These cookies are only placed with user consent where required by law and may process personal information. [Learn more about functionality cookies.](#)

#### ADVERTISEMENT COOKIES

We use cookies to make our ads more engaging and valuable to site visitors. Some common applications of cookies are to select advertising based on what's relevant to a user; to improve reporting on ad campaign performance; and to avoid showing ads the user has already seen. [Learn more about advertisement cookies.](#)

#### ANALYTICS COOKIES

These cookies help us to understand how visitors engage with the website. We may use a set of cookies to collect information and report site usage statistics. These cookies may collect personal information and may involve disclosure to third-party service providers. [Learn more about analytics cookies.](#)

### 2.04 Cookies We May Use

Name	Source	Purpose	Expiration
Google Analytics	Google	Used to monitor website behavior	Up to 26 months
Hubspot	Hubspot	Utilizes necessary, analytics, functional, and advertisement cookies for the website. Please see above for description.	Varies (session to 2 years)
Ascendant	Ascendant	Used for necessary and functional purposes on the website.	Session / Persistent
BugHerd	BugHerd	Functional cookie used to track website bugs.	Session

### 2.05 User Rights Under U.S. Privacy Laws

Depending on your state of residence, you may have the following rights:

- Right to know what personal information is collected
- Right to access your personal information
- Right to delete personal information
- Right to correct inaccurate information
- Right to opt out of the sale or sharing of personal information

**2.06 Data Retention**

We retain cookie data only for as long as necessary to fulfill the purposes described in this policy.

**2.07 Third-Party Disclosures**

We may share information collected via cookies with third-party service providers and advertising partners.