Rivo Alto Capital Funding LLC — Privacy Policy

Last updated and effective: November, 2026

This Privacy Policy describes how Rivo Alto Capital Funding LLC ("**Rivo Alto**," "**we**," "**us**," or "**our**") collects, uses, shares, and protects personal information when you visit rivoalto.com or any other website, borrower portal, or online service that links to this Privacy Policy (the "**Sites**"), apply for or inquire, or otherwise interact with us. It also explains your choices and how to reach us.

Rivo Alto is an affiliate of New Wave Loans Residential, LLC. Information you provide in a loan application is also governed by your loan documents and any privacy notice delivered with them, which control if they conflict with this policy. Your use of the Sites is also subject to our Terms of Use.

Information We Collect

We collect information directly from you, automatically when you use the Sites, and from third parties.

Context	Types of information	Primary purpose
Account registration and portal access	Name, email address, phone number, username, password, and loan or account number	To administer your account, authenticate you, and communicate about your loan
Loan inquiries and applications	Contact details; borrower entity, principal, and guarantor information; property address and details; loan amount and purpose; and financial information such as bank statements, tax returns, and schedules of real estate owned	To evaluate, underwrite, close, and service loans
Inquiries, comments, and feedback	Name, email address, telephone number, and anything else you send us	To respond to and follow up on your request
Mailing lists	Email or postal address and your communication preferences	To send information about Rivo Alto and our loan programs
Broker and referral partners	Business contact details and information about the borrowers and properties you refer	To manage referral relationships and evaluate referred loans
Website interactions	Links clicked, pages viewed, and information you enter into online forms, plus device and browser information	To improve the Sites, understand your interests, and detect and prevent fraud
Cookies, pixels, and web logs	IP address, device identifiers, browser type, operating system, internet service provider, approximate location, referring URL, pages visited, and date/time stamps	To operate, secure, and analyze the Sites
Third-party sources	Credit reports (with your authorization), public records, property, title, appraisal, and insurance data, identity verification, and anti-money laundering, sanctions, and background-check results	To underwrite loans and comply with law

Sensitive information. We collect Social Security numbers, government ID numbers, and bank account details only when needed to underwrite, close, or service a loan, and only through secure channels such as our portal or an encrypted upload link. Please do not send them through website contact forms or ordinary email.

How We Use Information

In addition to the purposes above, we use personal information to:

- Operate, maintain, secure, and improve the Sites and our borrower portal.
- Evaluate, underwrite, price, close, fund, service, and collect loans.
- Verify identity and perform know-your-customer, anti-money laundering, sanctions, and fraud checks.
- Communicate with you about inquiries, applications, and your loan.
- Send information, marketing, and promotional materials, subject to your choices.
- Conduct analytics and understand how visitors use the Sites.
- Detect, prevent, and respond to fraud, security incidents, wire fraud, and other illegal or harmful activity.
- Debug and repair errors that impair the Sites' intended functionality.
- Comply with legal, regulatory, tax, audit, and recordkeeping obligations.
- Establish, exercise, or defend legal claims, and enforce our loan documents and agreements.
- Sell, participate, assign, or finance loans, and evaluate or complete corporate transactions.
- Carry out internal administration, risk management, and relationship management.
- Any other purpose disclosed when we collect the information, or with your consent.

Technology tools. We may use software, including artificial-intelligence-enabled tools from vetted service providers, to help process information for these purposes. Those providers are bound by confidentiality and security obligations and may not use your personal information to train their own models.

How We Share Information

We do not sell personal information for money, and we do not share borrowers' nonpublic personal information with unaffiliated companies for their own marketing. We may disclose personal information to:

- **Affiliates.** New Wave Loans Residential, LLC, funds and vehicles it manages or advises that may fund or hold loans, and other companies under common control.
- **Service providers.** Loan servicers, title and closing agents, escrow agents, appraisers, inspectors, insurance providers, credit bureaus, identity-verification providers, banks, auditors, IT, cloud hosting, portal, CRM, and email providers. They may use the information only to provide services to us.
- **Loan participants and financing counterparties.** Co-lenders, participants, warehouse and other lenders, and actual or prospective purchasers or assignees of loans, under confidentiality obligations.
- **Brokers.** The mortgage broker or referral source involved in your loan, as needed to process it.
- **Professional advisers.** Our lawyers, accountants, compliance consultants, and insurers.

- **Legal and regulatory recipients.** Regulators, tax authorities, law enforcement, courts, and others when we believe disclosure is required by law or legal process, or is needed to protect our rights, property, or safety, or those of others.
- **Corporate transactions.** A buyer, successor, or financing source in connection with a merger, acquisition, reorganization, or sale of assets, including during negotiations.
- **Others at your direction.** Your representatives, advisers, or other parties when you ask or consent.

Cookies, Analytics, and Advertising

We and our service providers may use cookies, pixels, web beacons, tags, scripts, and server logs (together, "**cookies**") when you visit the Sites or open our emails. We use them to make the Sites work, keep you signed in securely, measure performance, understand how visitors use the Sites, and, where described below, for advertising.

- **Necessary and functional.** Required for page navigation, security, and access to the borrower portal. These are always active. Blocking them may cause parts of the Sites to stop working.
- **Analytics.** We use Google Analytics to understand which pages are visited, how often, and from where. Learn how Google uses this data at www.google.com/policies/privacy/partners and opt out at tools.google.com/dlpage/gaoptout.
- **Session and form analytics.** Some tools record how you navigate pages, including clicks, scrolling, and information typed into forms, to help us improve usability and detect fraud.
- **Advertising.** Google and other partners may use cookies to measure our campaigns and show you ads about our loan programs on other sites, based on your activity over time and across websites.
- **Email.** Our emails may contain pixels that tell us whether a message was opened or a link clicked.

Your consent. By continuing to use the Sites, and if we use cookies, you consent to our use of cookies and the related collection of information described in this Privacy Policy, including by our service providers. Where the law requires opt-in consent, we will ask for it through our cookie banner.

Your Choices

- **Promotional emails.** Unsubscribe using the link in any marketing email. We will still send communications about your application or loan.
- **Cookies.** You can set your browser to refuse or delete cookies, or to alert you when one is set. Doing so may prevent parts of the Sites from working.
- **Interest-based ads.** You can opt out of many advertising networks at optout.aboutads.info and optout.networkadvertising.org.
- **Global Privacy Control.** Where required by law, we treat a Global Privacy Control browser signal as a request to opt out of the sale or sharing of personal information for targeted advertising for that browser.
- **Do Not Track.** We do not currently respond to "Do Not Track" browser signals.

- **Text messages.** If you agree to receive text messages from us, you can opt out at any time by replying STOP. Message and data rates may apply. **We do not share your mobile number or text-messaging consent with third parties or affiliates for their marketing purposes.**
- **Account information.** You can review and update certain account information in the borrower portal, or contact us to correct it.

Borrowers and Guarantors

Our loans are made for business or investment purposes and are not consumer loans. If we make a loan primarily for personal, family, or household purposes, we will provide the privacy notice required by the Gramm-Leach-Bliley Act, which will govern that information. We obtain and use consumer reports about borrowers, principals, and guarantors only with authorization and as permitted by the Fair Credit Reporting Act.

How We Protect Information

We maintain administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, use, alteration, or destruction. These include access controls, encryption where appropriate, oversight of service providers, secure disposal, and an incident response plan. You are responsible for keeping your portal password confidential. No method of internet transmission or electronic storage is completely secure, and we cannot guarantee absolute security.

If an incident involves your personal information, we will notify you as required by applicable law, including Florida law, electronically, in writing, or by telephone where permitted.

Wire fraud warning. We will never change wire, payoff, or payment instructions by email alone, and we will never ask for your password by email or text. Before sending loan payments, payoffs, or closing funds, confirm instructions by calling us at a number you already know. Report suspicious messages that appear to come from us to info@rivoalto.com.

Data Retention

We keep personal information as long as needed for the purposes in this Privacy Policy, including for the life of your loan, and for any longer period required or permitted by law, such as lending, anti-money laundering, tax, and litigation-hold requirements. When information is no longer needed, we delete, de-identify, or securely dispose of it.

International Users

Rivo Alto is based in the United States, and the Sites are intended for U.S. users. If you access the Sites from outside the United States, your information will be transferred to, stored, and processed in the United States, where data protection laws may differ from those in your country.

State Privacy Rights

Depending on where you live, you may have rights under state privacy laws, such as the right to know what personal information we hold, to obtain a copy, to correct or delete it, and to opt out of the sale or sharing of personal information for targeted advertising. Many of these laws do not apply to us, or

exempt information governed by the Gramm-Leach-Bliley Act, information about business borrowers and contacts, or businesses below certain size thresholds. Where a law applies, we will honor your rights as it requires.

To make a request, email info@rivoalto.com or call 305-512-1123. We will verify your identity before acting. An authorized agent may submit a request on your behalf with written permission. If we deny your request, you may appeal by replying to our decision. We will not discriminate against you for exercising your rights. Some information must be kept to service your loan or comply with law, even after a deletion request.

California residents may also request information, once per year, about disclosures of personal information to third parties for their direct marketing purposes. We do not make such disclosures. **Nevada residents** may submit a request to opt out of the sale of covered information, although we do not sell it.

Third-Party Sites

The Sites may link to websites, services, and content we do not own or control. Their privacy practices are governed by their own policies, and we are not responsible for them.

Children

The Sites are intended for adults and are not directed to anyone under 18. We do not knowingly collect personal information from children under 18. If you believe a child has provided us information, contact us and we will delete it.

No Commitment to Lend

Information on the Sites is not a commitment to lend or an offer of credit. Any loan is subject to underwriting, approval, and definitive loan documents.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will post the revised version on the Sites and update the “Last updated” date above. If we make material changes to how we use previously collected personal information, we will notify you or obtain your consent where required by law.

Contact Us

For questions, comments, or complaints about our privacy practices, or to exercise your choices or rights, contact us:

Rivo Alto Capital Funding LLC
Attn: Privacy
1835 NE Miami Gardens Dr, #217, North Miami Beach, FL 33179
info@rivoalto.com · 305-512-1123

If you have a disability and need this Privacy Policy in an alternative format, contact us using the details above.