

# Privacy Policy

## THE SURGE COLLECTIVE PRIVACY POLICY

Effective Date: February 27, 2026

At The Surge Collective LLC (“Surge Collective,” “we”, “us”, or “our”), we are committed to protecting your privacy and ensuring transparency regarding the collection, use, and sharing of your Personal Information. This Privacy Policy outlines how we collect, use, and disclose your Personal Information, as well as the rights you have under applicable law, including your rights to access, delete, or opt-out of the sale of your Personal Information. Please carefully review this Policy as it relates to your use of the Surge Collective website, your inquiry regarding Surge Collective workshops, and your visits to our in-person events (collectively, our “Services”). We are also a “financial institution” for purposes of the Gramm-Leach-Bliley Act (“GLBA”) and in some instances, process “nonpublic personal information” (“NPI”). Our collection and processing of NPI in our role as a financial institution is not covered by this Privacy Policy. For more information on our data processing practices, please review our GLBA Privacy Notice.

By using our Services, you agree to the collection, use, and disclosure of your Personal Information as described in this Privacy Policy. If you do not agree, please do not use our Services. Further, your use of the Surge Collective website is governed by our Terms, which is a contract between you and Surge Collective. Your continued use of the website constitutes your acceptance of these terms.

For purposes of this Policy, “Personal Information” refers to information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you, and includes “personal data” or similar terms as defined in applicable law.

### 1. **Notice at Collection of Personal Information**

We collect the categories of Personal Information identified below. As indicated in the chart, some of these categories we disclose to service providers for business purposes, or “sell” or “share” (as such terms are defined in U.S. law) for marketing and advertising purposes to business partners and third parties, such as data analytics providers, advertising technology vendors, third-party advertising networks, and social media platforms.

#### 1. ***Categories of Personal Information We Collect***

**Category Collected**

**Disclosed for Business Purpose?**

**Identifiers/biographical information**, including name, postal and email address, phone number.

Yes – Service Providers

· online identifiers, Internet Protocol (“IP”) address, and other similar identifiers.

**Personal information categories listed in the [California Customer Records statute](#)**, such as your credit or debit card number.

Yes – Service Providers

**Characteristics of protected classifications under [California or Federal law](#)**, including marital status, age and sex.

Yes – Service Providers

**Commercial information**, including items purchased, obtained, or considered and other purchasing or consuming histories or tendencies.

Yes Service Providers

**Internet or other electronic network activity information**

Yes – Service Providers

**Geolocation data non-precise and up to 1850 feet.**

Yes – Service Providers

**Audio, electronic, visual, thermal, olfactory, or similar information**

Yes – Service Providers

**Professional or employment-related information**

Yes – Service Providers

**Inferences**, meaning inferences drawn from the above-listed categories of Personal Information to create a consumer profile reflecting consumer preferences or characteristics.

Yes – Service Providers

**Sensitive Personal Information**, means Personal Information that reveals social security, driver’s license, state identification card, account log-in, financial account, debit card, or credit card, financial information, precise geolocation, email, and text messages unless the business is the intended recipient of the communication.

Yes – Service Providers

*We do not use or disclose such information for the purpose of inferring characteristics about you or for any purpose other than the limited permissible purposes set forth in applicable U.S. law. Such purposes include providing our Services and verifying, maintaining the quality of, and improving our Services.*

*To the extent that we use or disclose “sensitive Personal Information” or “sensitive data” as those terms are defined in applicable U.S. laws, we limit our use or disclosure of the sensitive Personal Information for permitted business purposes.*

We do not knowingly sell or share Personal Information about persons under the age of 18. Please [click here](#) to opt out of the sale or sharing of your Personal Information, including targeted advertising. You may also choose to enable online, where available, a universal tool that automatically communicates your opt-out preferences, such as the Global Privacy Control (“GPC”). We will process the GPC signal as a request to opt out.

1. ***The Business and Commercial Purposes for Which We Collect and Use Your Personal Information***

We may use the Personal Information we collect for the following purposes:

- To provide, maintain, and improve our services.
- To process transactions and send related communications, including customer service and order confirmations.
- To monitor, protect, and maintain the security and integrity of our Services and our business, such as protecting against and preventing fraud, unauthorized transactions, claims and other liabilities.
- To protect our rights, privacy, safety, property and/or those of others.
- To personalize your experience and provide targeted advertising and content.
- To communicate with you regarding updates, promotions, or offers.
- To comply with legal obligations and enforce our terms of service.
- To detect, prevent, and address fraud or security issues.

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1. ***Retention***

We will retain your Personal Information for as long as reasonably necessary to provide you with our Services that you request, for marketing purposes unless you opt out as described in this Privacy Policy, or otherwise where permitted or required in accordance with applicable law. We will retain and use your Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. What this means in practice will vary between different types of information, and when we consider our approach we take into account ongoing business or legal needs for the information, for example in relation to tax, health and safety, and potential or actual disputes or investigations.

1. **The Personal Information We Collect**

We collect Personal Information as listed in the Notice at Collection as follows:

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1. ***Information You Provide***

- Information You Provide When You Inquire About Our Workshops. We collect Personal Information from you when inquire about our events or Services.

- When You Attend Our In-Person Events. We collect Personal Information when you attend our in-person consumer events or sign up for our workshops.

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### **1. *Information We Automatically Collect***

When you visit and interact with our Services, we or our third-party advertising and analytics partners and service providers may use a variety of technologies, such as cookies, tags, SDKs or scripts, to collect certain information regarding your activity. To learn more about your choices regarding the automatic collection and use of your information as you browse our Services, please see the Your Privacy Choices and Rights section below.

The specific types of information that we and our partners and service providers may automatically collect when you visit and interact with our Services include:

- Device and Browser Information. This includes your device's IP address and/or other unique identifiers, browser type, device type, internet service provider, and operating system.
- Location Information. When you access our Services from a mobile device, your device's approximate location (derived from your device's IP address or other signals) may be collected.
- Usage Information. When you interact with our Services, certain information may be collected by us or our third party vendors, including the date and time of your visit, the pages you view immediately before and after you access our Services, the areas or pages of our Services that you visit, the amount of time you spend viewing or using our Services, items placed or left in your shopping cart on the Site or App, keystrokes, mouse movements, form field entries, recordings of chat sessions or your use of and inputs to other AI-supported tools, and other use and overall engagement with our Services.
- Marketing Information. If you receive an email from us, information may be collected about your interactions with the message (e.g., whether you opened, forwarded, or clicked through to our Site).
- Third-party analytics technologies. We may use third-party analytics tools to better understand who is using our Services, how people are using them, and how to improve their effectiveness as well as the effectiveness of any related content. We may collect your email.

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### **1. *Information We Receive From Third Parties***

We may receive Personal Information from other sources. Our third-party sources may include:

- Our Business Partners. We receive some Personal Information about you from our business partners, including companies that co-sponsor our promotions.
- Our Marketing/advertising and analytics partners. We may receive information from third parties, including online advertising networks and analytics providers.
- Other Companies. We may receive Personal Information from other companies to supplement what we already know about you, including data aggregators.

#### 1. **How We Share Your Personal Information**

We may disclose each category of your Personal Information that we collect to the following categories of recipients:

- Service Providers. We may share your Personal Information with third-party service providers who help us operate our business, such as hosting services, payment processors, marketing agencies, and data analytics companies.
- Our Research Partners. We disclose your Personal Information to our research partners, including those that administer surveys or conduct research projects in partnership with us or on our behalf.

Additionally, we may share your Personal Information with third-parties for various purposes, including but not limited to:

- Business Transfers. In the event of a merger, acquisition, or sale of all or a portion of our business, your Personal Information may be transferred as part of the transaction.
- Legal Compliance and Protection. We may share your information when we believe it is necessary to comply with applicable laws, regulations, legal processes, or governmental requests; to protect the rights, property, or safety of our company, employees, or others; or to enforce our agreements and policies.
- Advertising and Marketing Partners. We may share or sell Personal Information with advertising networks, social media platforms, or other third parties for targeted advertising purposes.
- Affiliates. We may share your Personal Information with affiliates within our corporate group for purposes consistent with this Privacy Policy.

#### 1. **Privacy Choices and Rights**

##### 1. ***U.S. State Privacy Rights***

Residents of California, Oregon, and Minnesota, or any other state with an applicable privacy law have certain rights relating to the collection, use, disclosure, and other processing of their Personal Information. The exact scope of these rights may vary by state.

- Right to Know. You may have the right to know what Personal Information we have collected about you, including the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we disclose Personal Information, the categories of Personal Information disclosed to third parties, and the specific pieces of Personal Information we have collected about you. Please note that we may not be required to respond to your requests “to know” or access specific pieces of Personal Information more than twice in any 12-month period.
- Right to Request Specific List of Third Parties. You may have the right to request a list of the specific third parties to whom we have disclosed your Personal Information.
- Right to Data Portability. You may have the right to access your Personal Information in a portable format.
- Right to Delete. You may have the right to request that we delete Personal Information that we have collected from or about you, subject to certain exceptions.
- Right to Correct: You may have the right to correct inaccurate Personal Information that we may maintain about you, subject to appropriate verification.
- Right to Opt Out of Certain Types of Personal Information Uses and Disclosures: We use and disclose to third parties Personal Information for analytics and advertising purposes. Accordingly, you may have the right to opt out of the “sale” or “sharing” of your Personal Information, or the use and disclosure of your Personal Information for “targeted advertising” (as these terms are defined in applicable law).

If you are interested in exercising one or more of the rights outlined above, please contact us at [surgecollective@surgeu.com](mailto:surgecollective@surgeu.com) . Please put the statement “Your Privacy Rights” in the subject field of your email. Except for your opt out right, we may take steps to verify your identity before responding to your request by asking you a series of questions about your previous interactions with us.

Please note that, where permitted under applicable law, we may decline a request (other than for opt outs) if we are unable to verify your identity (or an agent’s authority to make the request) and confirm the Personal Information we maintain relates to you.

Depending on your U.S. state of residence, you may have the right to appeal a decision we have made in connection with your privacy rights request. You may file an appeal by contacting us as described in Section 8 of this Policy.

If an agent would like to make a request on your behalf as permitted under applicable law, the agent may use the submission methods noted in this section. Not all kinds of requests can be made by authorized agents in all states. As part of our verification process, we may request that the agent provide, as applicable, proof concerning their status as an authorized agent. In addition, we may require that you verify your identity as described in this section or confirm that you provided the agent permission to submit the request.

Submitting a privacy request does not require you to create an account with us.

We will not discriminate against you if you decide to exercise your privacy rights.

### **1. *Opt-Out Requests***

You may request to opt out of the sale or share of your Personal Information, or of targeted advertising, at any time by sending us an email at [surgecollective@surgeu.com](mailto:surgecollective@surgeu.com).

Alternatively, you can use certain preference signals to exercise your sale and sharing and targeted advertising opt-out right automatically with all businesses that you interact with online, including Surge Collective. If you enable a browser-based opt-out preference signal, such as Global Privacy Control (GPC), upon receipt or detection, and where technically available, we will treat the signal as a valid request to opt out of the sale or sharing of Personal Information, or use for targeted advertising, linked to that browser and any consumer profile we have associated with that browser. Please note that if you use different browsers or browser profiles, you may need to enable the signal on each browser or profile.

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### **1. *Unsubscribing From Marketing and Promotional Communications***

Surge Collective may send promotional emails or text messages to our subscribers. By subscribing to Surge Collective, you consent to receive messages from The Surge Collective LLC. Surge Collective will send subscribers text messages regarding new content and event promotion, this includes but is not limited to event registration, event alerts, and post event follow up. Surge Collective may also request volunteer support for their events. Message and data rates may apply. Carriers are not liable for delayed or undeliverable messages. Some of the text messages we send may include links to websites. To access these websites, you will need a web browser and internet access.

If you no longer wish to receive promotional and marketing emails or text messages from us, you may opt out of such communications at any time by following the opt-out instructions included in any promotional or marketing email you receive from us, or by sending us an email at [surgecollective@surgeu.com](mailto:surgecollective@surgeu.com). You can opt out of Text/SMS message communications at any time by replying to any message sent to you from the Company using the word STOP. You may also stop text messages by emailing us at [surgecollective@surgeu.com](mailto:surgecollective@surgeu.com).

### **1. Children's Privacy**

The Company does not knowingly collect Personal Information from children under the age of 18. If the Company obtains knowledge that it has personally identifiable information about a child under 18 in retrievable form in its files, the Company will delete the information from our existing files.

### **1. Security**

We implement reasonable administrative, technical, and physical safeguards to protect the Personal Information we collect. However, please be aware that no security measures are completely secure, and we cannot guarantee the absolute security of your Personal Information.

### **1. SMS Communications**

By providing your mobile number and opting in, you consent to receive SMS messages from Surge Collective, which may include event reminders, registration confirmations, promotional offers, and customer support communications. Message frequency varies. Message and data rates may apply.

You may opt out at any time by replying STOP to any message. For assistance, reply HELP.

SMS opt-in consent and phone numbers are not shared with third parties or affiliates for marketing purposes.

### **1. Updates to this Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our practices, legal obligations, or technology. If we change the Privacy Policy in a material way, we will provide appropriate notice to you. Such notice may be provided via a temporary banner on our Site, an email sent to users for whom we have an email address, or by temporarily noting "UPDATED" next to the Privacy Policy link on the footer of our Site.

### **1. Contact Us**

If you have any questions or concerns about this Privacy Policy or the privacy practices of The Surge Collective LLC please contact us at:

**Email:** [surgecollective@surgeu.com](mailto:surgecollective@surgeu.com)

**Mailing Address:** 2511 Corporate Way, Palmetto FL 34221