

Elder tools LLC/Wzee.net

Privacy Policy

Last Updated: October 15, 2026

1. Introduction

This privacy notice applies to the processing activities performed by Wzee.net, under the ownership of Elder Tools LLC, to the personal data of its clients, prospective clients, and website visitors.

Your privacy is of the utmost importance to us. It is our policy to safeguard the confidentiality of information and respect the privacy of individuals.

Please see below for information about how we manage personal data, and for information about your rights with respect to the processing of your personal data.

2. Definitions

The following terms are defined as follows:

2.1 “AML” means anti-money laundering.

2.3 “Elder Tools LLC and Wzee.net”, “We”, “Us”, refers collectively to Elder Tools LLC.

2.4 “Personal data” refers to any information relating to or could be reasonably used to identify a natural person, including names, identification numbers, location data, an online identifier, or to one or more factors specific to the physical, economic, cultural, or social identity of a natural person.

2.5 “Estate Services” refers to collection, validation and accounting of personally Identifiable Information (PPI) and estate-specific assets, liabilities and other financial and personal properties.

3. Your Data Controller

Our products and services are provided through our operating entity known as Elder Tools LLC.

You are contracting with Elder Tools LLC as specified in Section 15 *Full Details of Data Controllers*.

4. How do we protect personal data?

Elder Tools LLC takes the security of personal data very seriously. Please see [here](#) for further detail about our information security practices.

5. Information we may collect about you

We obtain information about you in several ways through your use of our products and services, including through any of our websites, the account opening process, webinar sign-up forms, event subscribing, news and updates subscribing and from information provided in the course of on-going support service communications. In order to open an account with us, you must first complete and submit a “create account” form to us by completing the required information and providing the information requested. By completing this form, you are requested to disclose personal data in order to enable Elder Tools LLC to assess your application and comply with the relevant laws and regulations.

The information that we collect from you is as follows:

- Full entity name, full individual name, business, and residential address, contact details (e.g., email address, telephone number etc.), date of birth, gender, citizenship (“**Biographical information and contact information**”);
- Bank account information, details about the estate source and use of funds, and information relating to economic and trade sanctions lists (“**Financial information**”);
- Trading account balances, trading activity, your inquiries, and our responses (“**Trading information**”);
- Information on whether you (or someone close to you) holds a prominent public function (“**PEP information**”);
- Verification information, which includes information necessary to verify your identity such as a passport, driver’s license, selfie photos / videos, login credentials or Government-issued identity card (“**Verification information**”);
- Other personal data or commercial and/or identification information – Information we, in our sole discretion, deem necessary to comply with our legal obligations under various KYC/ AML obligations, such as under the U.S. Bank Secrecy Act (“**Other information**”).

Information we collect about you automatically:

- Browser information – Information that is automatically collected via analytics systems providers from your browser, including your IP address and/or domain name and any external page that referred you to us, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform (“**Browser information**”);
- Log information – Information that is generated by your use of Wzee.net -branded websites, applications, services, or tools operated by Elder Tools LLC that is automatically collected and stored in our server logs. This may include, but is not limited to, device-specific information, location information, system activity and any internal and external information related to pages that you visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website or App (including date and time, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page (“**Log information**”).
 - The provision of personal data is necessary for entering into the contract governing your use of our products and services. The minimum information required to be provided is biographical information and contact information, verification information, and financial information. Without this information, we cannot commence, or continue to perform our services or provide our products to you.
 - It is a statutory requirement to provide certain information in order for us to comply with our legal obligations in respect of anti-money laundering and crime and fraud prevention. At a minimum, this includes biographical information and contact information, financial information and verification information. Without this information, we cannot meet our legal obligations under anti-money laundering and crime and fraud prevention laws.

Information we receive about you from other sources.

We also receive information about you from third parties such as your payment providers and through publicly available sources. For example:

- The banks you use to transfer money to us will provide us with your basic corporate and/or personal data, such as your name and address, as well as your financial information such as your bank account details;
- Your business partners may provide us with your name and address, as well as financial information;
- Advertising networks, analytics providers and search information providers may provide us with anonymized or de-identified information about you, such as confirming how you found our website.

6. Disclosure of your personal data

As part of processing your personal data for the purposes set out above, Elder Tools LLC may disclose your personal data to any members of the Elder Tools LLC company group, and to third parties in the normal course of business. For example, Elder Tools LLC may disclose your personal data to any of our service providers and business partners, for business or other legitimate purposes, such as specialist advisors who have been contracted to provide us with administrative, financial, legal, tax, compliance, insurance, IT, debt-recovery, analytics, research or other services.

If Elder Tools LLC discloses your personal data to service providers and business partners, in order to perform the services requested by clients or to comply with our legal and regulatory obligations, such providers and partners may store your personal data within their own systems. We require them to protect the confidentiality of this personal data and comply with all relevant privacy and data protection laws.

7. Where we store your personal data

Our operations are supported by a network of computers, servers, other infrastructure and information technology, and third-party service providers. We and our third-party service providers and business partners store and process your personal data in the United States of America and elsewhere in the world. Courts, law enforcement and security agencies of these jurisdictions may be able to use legal processes to access your personal data.

8. Data retention

When personal data is no longer necessary for the purposes for which it may lawfully be processed, we will remove any details that will identify you, or we will securely destroy the relevant records. We may need to maintain records for a significant period of time after you cease being our client for legal or regulatory reasons, for example when we need to retain information to help manage a dispute or legal claim. Additionally, we are subject to certain anti-money laundering laws which may require us to retain the following for a period (e.g., 5 years) after our business relationship with you has ended:

- A copy of the records we used in order to comply with our client due diligence obligations;
- Supporting evidence and records of transactions with you, and your relationship with us.

If you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

We may keep your personal data for longer than 5 years if we cannot delete it for legal, regulatory, or technical reasons.

10. Cookies

When you use our products and services or visit our websites, we may place tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, “Cookies”) on your computer or other devices used when engaging with us. We use cookies to help us recognize you as a customer, collect information about your use of our products and services, to better customize our services and content for you, and to collect information about your computer or other access devices to ensure our compliance with our U.S. Bank Secrecy Act and AML obligations.

11. Your rights regarding your personal data

The rights that are available to you in relation to the personal data we process are outlined below. You may request to exercise these rights subject to any limitations provided for under applicable data protection laws.

Access

You can ask us to confirm whether we are processing your personal data and, if so, what information we process and to provide you with a copy of that information.

Rectification

It is important to us that your personal data is up to date. We will take all reasonable steps to make sure that your personal data remains accurate, complete and up-to-date. Please inform us if your personal data changes. If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have disclosed your personal data to others, we will let them know about the rectification where possible. If you ask us, and if possible and lawful to do so, we will also inform you with whom we have shared your personal data.

You may inform us at any time that your personal details have changed by emailing us at info@wzee.net. Subject to applicable law, Elder Tools LLC will change your personal data in accordance with your

instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof i.e. personal data that we are required to keep for regulatory or other legal purposes.

Erasure

You can ask us to delete or remove your personal data in certain circumstances. Such requests may be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations. If we have disclosed your personal data to others, we will let them know about the erasure request where possible. If you ask us, and if possible and lawful to do so, we will also inform you with whom we have shared your personal data.

Processing restrictions

You can ask us to block or suppress the processing of your personal data in certain circumstances such as if you contest the accuracy of that personal data or object to us processing it. It will not stop us from storing your personal data. If we have disclosed your personal data to others, we will let them know about the restriction of processing if possible. If you ask us, and if possible and lawful to do so, we will also inform you with whom we have shared your personal data.

Data portability

In certain circumstances you may have the right to obtain personal data you have provided to us, in a structured, commonly used, and machine-readable format, and to re-use it elsewhere or ask us to transfer this to a third party of your choice, where technically feasible.

Objection

You can ask us to stop processing your personal data, and we will do so, if we are:

- Relying on our own or someone else's legitimate interests to process your personal data except if we can demonstrate compelling legal grounds for the processing or for the establishment, exercise, or defense of legal claims;
- Processing your personal data for direct marketing; or
- Processing your personal data for research unless we reasonably believe such processing is necessary for the performance of a task carried out for reasons of public interest (such as by a regulatory or enforcement agency).

Automated decision-making and profiling

If we have made a decision about you based solely on an automated process (e.g. through automatic profiling) that affects your ability to access our products and services or has another significant effect on you, you can request not to be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us. Even if a

decision is necessary for entering into or performing a contract, you may contest the decision and require human intervention. We may not be able to offer our products or services to you, if we agree to such a request (i.e. end our relationship with you).

Complaints

You have the right to complain to a competent data protection authority. Contact details are set out in our Terms of Use. We ask that you first contact info@wzee.net to give us an opportunity to address any concerns.

Withdraw consent

You have the right to withdraw consent to processing based on consent at any time. Note this will not affect the lawfulness of processing based on consent prior to the withdrawal of consent or on grounds where consent is not required.

12. Changes to this privacy notice

Our privacy notice is reviewed regularly in light of new regulations, technologies, and any changes to our business operations. Any personal data we process will be governed by our most recent privacy notice. We will update the “Last updated” date accordingly at the beginning of this privacy notice. Please review this privacy notice from time to time. We will announce any material changes to this privacy notice on our website.

13. Our products and services are not available to children

Per our Terms and Conditions, persons under the age of 18 (herein, “Children”, “Child”) are not permitted to use Wzee.net and we do not knowingly collect personal data from children. If we learn that we have inadvertently processed personal data from a child, we will take legally permissible measures to remove that data from our records. Elder Tools LLC will require the child user to close his or her account and will not allow the use of our products and services. If you are a parent or guardian of a child, and you become aware that a child has provided personal data to us, please contact us at info@wzee.net.

14. Contact information

Any questions, complaints, comments and requests regarding this privacy notice are welcome and should be addressed to info@wzee.net . You can also contact our Data Protection Officer at info@wzee.net .

15. Full details of Data Controllers

You are contracting with Elder Tools LLC group company, as follows:

- You are contracting with Elder Tools LLC 58 Barlow Lane, Rye, New York 10580
- The company you are contracting with is your Data Controller, and is responsible for the collection, use, disclosure, retention and protection of your personal data in accordance with our global privacy standards, this Privacy Notice, as well as any applicable national laws. We process and retain your personal data on our servers in multiple data center locations in the United States of America.

Addendum

6. Our legal justification for processing personal data

Why we process your personal data

Legal justification

Categories of personal data

Why we process your personal data	Legal justification	Categories of personal data
To provide our products and services, including payment processing and to enable the completion of the client on -boarding process	Performance of a contract	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information and other information.
To conduct or arrange for the conducting of credit or identity checks	Legal obligation to comply with “Know your customer” and customer due diligence regulatory obligations. Such processing is also in our legitimate interest to prevent potential crime and/or fraud and to protect our business.	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information and other information.
For the purposes of identity verification, compliance with court orders, tax laws or other reporting obligations and antimoney laundering controls.	Legal obligation to comply with anti-money laundering laws, financial services laws, corporation laws, privacy laws, tax laws and other relevant laws. Supervisory authorities’ rules and regulations also apply to us.	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information and other information.

Why we process your personal data	Legal justification	Categories of personal data
To administer our products and services, to provide you with information in respect of our products and services and review your ongoing needs, to troubleshoot our products and services, to improve our products and services and to develop new products and services.	In order to ensure effective provision of our products and services and to meet our clients’ needs it is in our legitimate interest to administer our products and services, to provide you with information about our products or services, to troubleshoot our products and services and to review our clients’ ongoing needs. It is also in our legitimate interest to improve our products and services, including support services and to develop and market new products and services.	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information and other information.
To pay affiliates (our partners that promote Instacoins and drive new business leads)	It is in our legitimate interest to use affiliates to engage new business leads and pay those affiliates if the leads generate revenue.	Anonymized trading information
To market our products and services	Consent	Biographical information and contact information, trading information, other information, browser information and log information

Why we process your personal data	Legal justification	Categories of personal data
To administer our products and services, to provide you with information in respect of our products and services and review your ongoing needs, to troubleshoot our products and services, to improve our products and services and to develop new products and services.	In order to ensure effective provision of our products and services and to meet our clients' needs it is in our legitimate interest to administer our products and services, to provide you with information about our products or services, to troubleshoot our products and services and to review our clients' ongoing needs. It is also in our legitimate interest to improve our products and services, including support services and to develop and market new products and services.	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information and other information.
To pay affiliates (our partners that promote Instacoins and drive new business leads)	It is in our legitimate interest to use affiliates to engage new business leads and pay those affiliates if the leads generate revenue.	Anonymized trading information
To market our products and services	Consent	Biographical information and contact information, trading information, other information, browser information and log information
Why we process your personal data	Legal justification	Categories of personal data
To conduct surveys	It is in our legitimate interest to send you surveys and conduct such surveys in order to gather information on how our products and services are working for our clients and how to improve our products and services.	Biographical information and contact information, trading information, other information, browser information and log information
To conduct data analysis. Our website pages and emails may contain web beacons or pixel tags or any other similar types of data analysis tools that allow us to track receipt of correspondence and count the number of users that have visited our webpage or opened our correspondence. We may aggregate your personal data with the personal data of our other clients on a de-identified basis (that is, with your personal identifiers removed), so that more rigorous statistical analysis of general patterns may lead us to providing better products and services.	If your personal data is completely anonymized, we do not require a legal basis as the information will no longer constitute personal data. If your personal data is not in an anonymized form, it is in our legitimate interest to continually evaluate that personal data to ensure that the products and services we provide are relevant to the market and our clients.	Biographical information and contact information, financial information, trading information, other information, browser information and log information

Why we process your personal data	Legal justification	Categories of personal data
For internal business purposes and recordkeeping	We have legal obligations to keep certain records. Such processing is in our legitimate interest for internal business and research purposes as well as for record keeping purposes. It is also in our legitimate interest to keep records to ensure that you comply with your contractual obligations pursuant to the agreement ("Terms of Service") governing our relationship with you.	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information, other information, browser information and log information
To enforce and defend our rights including initiating legal claims, preparing our defense in litigation procedures, addressing legal or administrative proceedings whether before a court or a statutory body and to investigate or settle issues, enquiries and/or disputes.	It is in our legitimate interest to enforce and defend our rights and to ensure that issues, enquiries and/or disputes are investigated and resolved in a timely and efficient manner.	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information, other information, browser information and log information
To comply with applicable laws, subpoenas, court orders, other judicial process, or the requirements of any applicable regulatory authorities	Legal obligation. We will disclose personal data where we receive a legally binding request to disclose personal data from law enforcement or other bodies or where we have a legitimate interest in assisting law enforcement or other agencies in respect of an investigation.	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information, other information, browser information and log information

Why we process your personal data	Legal justification	Categories of personal data
To notify you of changes to our products or services and/or to laws and regulatory rules and regulations	Legal obligation. Often the law requires us to advise you of certain changes to products or services or laws. We may need to inform you of changes to the terms or the features of our products or services. We need to process your personal data to send you these legal notifications. You will continue to receive this information from us even if you choose not to receive direct marketing information from us. Where such notification is not legally required, it may be in our legitimate interest to notify you of such changes.	Biographical information and contact information, financial information, trading information, PEP information (where relevant) and other information
To administer our business effectively such as through means and processes we undertake to provide for our IT and system security, preventing potential crime and to ensure asset security and access controls	It is in our legitimate interest to protect our assets and systems and to prevent potential crime and/or fraud and to ensure security.	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information, other information, browser information and log information

Why we process your personal data	Legal justification	Categories of personal data
To update and verify your personal data in accordance with relevant anti -money laundering compliance frameworks.	Legal obligation. Such processing is also in our legitimate interests to prevent potential crime and/or fraud and to protect our business.	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information, other information, browser information and log information
To better customize our services and content for you and to recognize you as a client.	When we collect personal data for these purposes through the use of cookies, we will rely on your consent. It is also in our legitimate interest to customize our services and content for clients and to recognize clients, in order to ensure that clients receive the services and content that are appropriate to them.	Other information, browser information and log information
To communicate with you	It is in our legitimate interest to communicate with our clients or potential clients to ensure the effective delivery of our products and services and to administer our business.	Biographical information and contact information, financial information, trading information and other information

Why we process your personal data	Legal justification	Categories of personal data
To receive services from third parties including services such as administrative, legal, tax, compliance, insurance, IT, debt -recovery, analytics, credit reference, identity verification, research or other services	It is generally in our legitimate interest to receive such services from third parties to ensure the effective delivery of our products and services and to administer and protect our business.	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information, other information, browser information and log information
For any purpose not specified above, but for which you direct us to process your personal data	Consent	Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information, other information, browser information and log information

To the extent legitimate interest or performance of a contract is not a recognized legal justification in your jurisdiction , we rely on consent (express or implied, as appropriate) where consent is required.