

## Privacy Policy and Notice to EU Residents of Data Collection Processes

This Privacy Policy and Notice to EU investors explains the type of public nonpersonal Personal Data (as defined below) that Teucrium (as defined below) might collect from you, or which has been obtained about you from a third party, the purposes for which we process your personal data and your rights in respect of our processing of your personal data. has been adopted to comply with the General Data Protection Regulation ("Regulation (EU) 2016/678" or "GDPR"). The GDPR establishes additional privacy rights and protections than are required under US privacy laws and therefore this policy applies solely to all investors who reside in the EU ("consumers" or "you"). Any terms defined in the GDPR have the same meaning when used in this policy.

Teucrium Trading, LLC and Teucrium Investment Advisors, LLC ("Teucrium" or "We," "Us," or "Our") may obtain certain confidential or nonpublic information about you in the course of our business. We are committed to maintaining the confidentiality, integrity, and security of such information and to respecting the privacy of our current and prospective investors and other individuals whose personal information we collect and process ("Personal Data"). The Personal Data we collect comes from information that you provide to us in using our website and information collected from you automatically when you use our website. You are not required to supply any personal information. Please contact us to correct or amend Personal Data that you have already submitted. It is your responsibility to provide us with accurate data, and to provide us with updated Personal Data when it changes.

#### **Data Controller Contact Details**

Unless otherwise stated, Teucrium is a data controller for Personal Data processed subject to this Policy. If you have any questions about this Policy or if you believe that your Personal Data has been processed or disclosed in violation of this Policy, please contact us by sending an email to contact@teucrium.com, or a letter to:

Teucrium Trading, LLC Three Main Street Suite 215 Burlington, VT 05401

#### **How We Collect Personal Data**

All financial companies need to share customers' personal information to run their everyday business. Teucrium may collect or have access to Personal Data about current and former Fund investors for certain purposes relating to the operation of the Funds.

We may collect this information:

- Directly from you when you provide it to us;
- Automatically as you navigate through the Site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies. Please see Section entitled ("Cookies") below for more information about our use of cookies;
- Information we may receive from shareholders;
- Information about shareholder transactions with us and our service providers, or others;
- From our affiliates or non-affiliated partners such as our marketing and advertising partners or service
- From our affiliates or non-affiliated partners such as our marketing and advertising partners or service providers, including credit bureaus, affiliates, or other companies.

## **Cross- Border Data Collection**

Teucrium's website is hosted in the United States and any data provided to Teucrium is stored in the United States. If you choose to provide Personal Data from regions outside of the United States, then by your submission of such data, you acknowledge and agree that: (a) you are transferring your personal information outside of those regions to the United States

voluntarily and with consent; (b) the laws and regulations of the United States shall govern your use of the provision of your information, which laws and regulations may differ from those of your country of residence; and (c) you permit your personal information to be used for the purposes herein and in the Privacy Policy above.

All your data will be located and hosted on servers located in the United States. By providing any information, including Personal Data, on the Website, you consent to such use, storage, and processing.

If you are domiciled in the European Union, you have the option of requesting that Teucrium access, update, and/or delete your Personal Data at any time from our active databases, subject to the applicable laws and regulations of your jurisdiction. You may also have the right to object to Teucrium's processing of your data and/or request that Teucrium provide your data to another third party. If you believe Teucrium's processing of your data is inappropriate, you also have the right to lodge a complaint with a supervisory authority. If you request deletion, some or all your personal information may remain archived in back-ups for compliance with legal, regulatory, and other requirements. If you would like to access your data, update your data, object to processing, request provision of your data to a third party, and/or request that your personal information be deleted from our active databases, please contact us at <a href="maintenant-contact-

On the website, you may choose to give Teucrium permission to contact you to describe new developments and services that may be of interest to you, including through newsletters and other content. You can opt out of this communication in your account settings or by contacting us <a href="mailto:atcount-englished-legendre-lege

## **Categories of Personal Data Collected**

Teucrium generally collects Personal Data directly from you (electronically, in writing, or verbally). This Personal Data includes:

- Identifiers (contact information such as name, email address, mailing address, and phone number)
- Internet or other electronic network activity (data gathered by technology when you visit our website and allow cookies, including IP addresses, retargeting pixels, clear GIFs, device and browser types, and referral URLs)
- Geolocation data

Other types of data collected include:

- Commercial information (records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)
- Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account

## **Uses of Personal Data**

Investors' Personal Data, particularly information about investors' holdings and transactions in shares of the Funds, may be shared between and amongst all Teucrium entities and the Funds. An investor cannot opt-out of the sharing of Personal Data between and amongst Teucrium and the Funds. However, Teucrium will not use this information for any cross-marketing purposes. In other words, all investors will be treated as having "opted out" of receiving marketing solicitations from Teucrium other than the Fund(s) in which it invests.

Teucrium does not sell Personal Data to any third parties. Teucrium primarily uses investors' Personal Data to complete financial transactions that may be requested but may disclose investors' Personal Data to third parties under one or more of the following circumstances:

- To complete financial transactions;
- To fulfill the purpose for which you provide it;
- To companies that act as service providers in connection with the administration and servicing of the Funds, which may include attorneys, accountants, auditors and other professionals; maintain shareholder accounts, and in connection with the servicing or processing of transactions of the Trusts or the Funds;
- For any other purpose disclosed by us when you provide the information.
- With the consent or at the direction of the investor;
- To comply with any court order, law, or legal process, including a response to a government or regulatory request;
- To enforce or apply our terms of use and other agreements, including for billing and collection purposes;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Teucrium's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by Teucrium about our investors is among the assets transferred;
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our investors, or others;
- Contact you by post, telephone or electronic mail, in response to your request(s);
- Provide you with information concerning products and services offered by Teucrium, including our newsletter; and
- Measure the performance of our website and improve its performance.

Non-affiliated companies that assist Teucrium in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your Personal Data only in the course of providing such services and only for the purposes that we dictate.

## **Cookies**

We collect information about how you use our website by using cookies. A cookie is a small text file, generated by a website that is stored in the website user's internet browser or computer or mobile device hard drive, on a temporary or permanent basis. Cookies allow a website to identify a user's device whenever that user returns to the website. This provides the user with a more stable and enriching experience and allows a website owner to gather usage information. You can find more detailed information about cookies and how they work at www.aboutcookies.org/.

You can configure your internet browser preferences to limit the acceptance and storage of cookies, but blocking all cookies may limit your browsing experience on our and other websites.

## **Your Rights**

You have the following rights in relation to the personal data we hold about you:

- Access to your personal data (commonly known as the "right of access"). This enables you to receive a copy of the personal data we saved about you and to check that we are lawfully processing it.
- Right to rectify, correct or update the personal data we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure of personal data**. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to erase or remove personal data if you have exercised your right to object to processing (see below).
- **Right to restrict the processing of your personal data.** This enables you to ask us to suspend the processing of your personal data (e.g. if you want us to establish its accuracy or the reason for processing).
- Right to data portability of the personal data provided by you in machine-readable form.
- **Right to object to certain types of processing** in certain circumstances, including direct marketing, processing based on legitimate interests, or the performance of a task carried out in the public interest or in the exercise of official authority, and processing for research or statistical purposes.

You may access your Personal Data and/or exercise the rights listed above by emailing us at <a href="mailto:com">contact@teucrium.com</a>. Please include your name, address, and/or email address when you contact us.

It is possible that you may be denied access to your Personal Data. For instance, access can be denied when: giving one-person access would compromise another's privacy rights; disclosure is likely to interfere with the safeguarding of national security, defense, or public security; and disclosure could interfere with law enforcement or legal actions. These are only examples, and access may be denied in other situations in compliance with applicable laws.

If the processing of your personal data is based on the legitimate interests of the Company, as described *in Annex 1*, or if decisions about you are based solely on automated processing, you may object to *the processing of your personal data*. The exercise of these rights is not absolute and may be subject to certain conditions and exceptions under the GDPR.

## **Retention of Data**

We will retain your Personal Data only for as long as reasonably necessary to fulfill the purposes for which Personal Data is collected as stated herein and to comply with legal and statutory obligations, such as in tax, trade, and corporate laws. When we no longer need your Personal Data for our purposes, we will destroy, delete, or erase that Personal Data or convert it into an anonymous form. For the avoidance of doubt, data will not be destroyed before any regulatory retention period expires, or during a pending investigation, whether legal or regulatory. The same personal data about you may be included in more than one record and used for more than one purpose, each of which may be subject to different retention periods.

## **Security of Data**

Teucrium will take reasonable steps to protect your Personal Data in our possession from loss, misuse, unauthorized access, disclosure, alteration, and destruction. For example, we use security measures including safeguarding and monitoring our network, controlling access to our files, equipment, and buildings.

This includes restricting access to such information, requiring third parties to follow appropriate standards of security and confidentiality, and maintaining physical, technical, administrative, and procedural safeguards. We use reasonable best efforts to require that any person or institution to which we disclose personal data will protect the confidentiality of that information and use the information only for the purposes for which we disclose the information to them. In addition, we restrict access to nonpublic personal data to those employees who need to know that information in the course of their job responsibilities. When we no longer need your Personal Information for our purposes, we will destroy, delete, or erase that Personal Data or convert it into an anonymous form.

#### Children's Privacy

We do not knowingly collect Personal Data from children under the age of sixteen (16), nor are our services designed for or directed at children. By providing Personal Data to us, you represent that you are age sixteen (16) or over. If you are a child under sixteen (16) years of age, you should not send any Personal Data about yourself to us. If you believe that a child may have provided his or her Personal Data to us, please contact us using the contact information at the end of this Policy. In the event that we become aware that we have collected Personal Data from a child under the age of sixteen (16), we will dispose of that Personal Data immediately.

# **Scope / Teucrium Entities and Affiliates**

This Privacy Policy (the "Policy") applies to the non-public personal information, as well as personal data of investors who are individuals and who obtain financial products or services from Teucrium, primarily for personal, family, or household purposes. This Privacy Policy applies to both current and former Fund(s) investors; Teucrium will only disclose nonpublic personal information about former investors to the same extent as for current investors, as described below.

# **Dissemination of and Changes to Privacy Policy**

This Policy is dated November 1, 2024. Teucrium reserves the right to amend this privacy policy at our discretion and at any time. Teucrium will not make any change affecting Fund(s) investors without sending investors a revised Privacy Policy describing the change. When we make changes to this policy, we will post the updated policy on the Website and update its effective date. In any case, as required by federal law, Teucrium sends investors a copy of Teucrium's Privacy Policy annually along with end-of-year financial statements, which are sent by mail.

Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

## **Contact Us**

If you have any questions about this privacy policy, please contact us through our website <a href="https://teucrium.com/contact-us">https://teucrium.com/contact-us</a> or via one of the following methods:

Email contact@teucrium.com

Toll Free Call 802-540-0019

Website www.teucrium.com

Via Mail
Teucrium Trading, LLC
Three Main Street
Suite 215
Burlington, VT 05401

## Annex 1: Categories of personal data and legal basis

The company will use the following categories of data based on the following legal basis:

- 1. Personal data required for the fulfilment of your employment contract with the company in accordance with Art. 6 para. 1 lit. b) GDPR in conjunction with § 26 BDSG (contract fulfilment):
  - a) Contact details and identity data (First name, surname, gender, work and private contact data, gender, date of birth, place of birth, personal e-mail address, driving licence data, identity card data, nationality/citizenship, name of child, date of birth of child, place of birth of child, name of spouse);
  - b) Remuneration and billing (Surname, first name, address, date of birth, date of employment, employee identification number, basic salary, bonus, benefits, marital status, tax characteristics, social security characteristics, religion, salary frequency, occupational group, currency, salary reviews, bank details, working hours including holiday and other absence records, holiday status, working hours and overtime);
  - c) Employment Data;
  - d) Biometric information;
  - e) Sensory data (Audio, electronic, of visual, information);
  - f) Internet or other electronic network activity (Including, but not limited to, browsing history, search history, and information regarding a Personnel's interaction with an internet website application, or advertisement, account login, password, or credentials allowing access to an account).
- 2. Personal data processed to the extent necessary for the pursuit of the company's legitimate interests in its operation and the security of its property, its customers, employees and third parties (Art. 6 para. 1 lit. f GDPR; legitimate interest)

In addition to the data outlined above, Teucrium collects data such as:

- E-mail communication
- Telephone monitoring
- User ID
- Instant messaging communication
- System passwords
- 3. Personal data required to fulfil the company's legal obligations.
  - Income tax and social security information
  - Documentation and reporting obligations

The categories of personal data collected may include:

- National insurance number / Social security number
- Marital status
- Driving license
- Data of the identity card
- Nationality / Citizenship
- Passport data
- Visa data