

Privacy Policy

Palm Beach Hedge Fund Association

Effective Date: February 5, 2026

Last Updated: February 5, 2026

Introduction

The Palm Beach Hedge Fund Association ("PBHFA," "we," "us," or "our") is committed to protecting the privacy and security of personal information collected through our website at www.pbhfa.org (the "Website"). This Privacy Policy describes how we collect, use, disclose, and protect your personal information in accordance with applicable privacy laws, including the California Online Privacy Protection Act (CalOPPA), the California Consumer Privacy Act (CCPA), the General Data Protection Regulation (GDPR), and other relevant privacy regulations.

By accessing or using our Website, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree with this Privacy Policy, please do not use our Website.

About the Palm Beach Hedge Fund Association

The PBHFA is a nonprofit organization founded in 2013 with a mission to unite the diverse hedge fund, financial, and investor community of Palm Beach County and South Florida. We provide networking and educational opportunities for our members and selected guests, as well as a forum for mutually beneficial information sharing and professional development.

Information We Collect

Personal Information You Provide

We collect personal information that you voluntarily provide to us when you:

- Register for membership or create an account on our Website
- Register for events, networking opportunities, or educational programs
- Make donations or payments
- Subscribe to our newsletters or email communications
- Submit contact forms or inquiries
- Participate in surveys or provide feedback
- Apply for membership benefits or access to member-only content

The types of personal information we may collect include:

- Name and contact information (email address, phone number, mailing address)
- Professional information (company name, job title, industry sector)

- Payment and financial information (credit card details, billing address)
- Demographic information (professional interests, investment focus areas)
- Login credentials (username and password)
- Communications and correspondence with us
- Any other information you choose to provide

Information Collected Automatically

When you visit our Website, we automatically collect certain information about your device and browsing behavior, including:

- IP address and geographic location
- Browser type and version
- Operating system and device information
- Pages visited, time spent on pages, and navigation patterns
- Referring website or source
- Date and time of access
- Clickstream data and user interactions

Cookies and Tracking Technologies

We use cookies, web beacons, pixels, and similar tracking technologies to enhance your experience on our Website, analyze usage patterns, and deliver personalized content. These technologies help us:

- Remember your preferences and settings
- Authenticate users and prevent fraudulent activity
- Analyze Website traffic and user behavior
- Deliver relevant content and advertisements
- Measure the effectiveness of our communications

Types of cookies we use:

- **Essential cookies:** Necessary for Website functionality and security
- **Performance cookies:** Collect anonymous data about Website usage (e.g., Google Analytics)
- **Functional cookies:** Remember your preferences and enhance user experience
- **Marketing cookies:** Track your browsing activity to deliver targeted content

You can control cookie preferences through your browser settings. However, disabling certain cookies may limit your ability to use some features of our Website.

Third-Party Analytics and Services

We use third-party service providers to help us understand how users interact with our Website. These services may include:

- **Google Analytics:** Collects anonymous usage data to help us improve Website performance
- **Payment processors:** Process donations and membership payments securely
- **Email service providers:** Manage our email communications and newsletters

- **Event management platforms:** Facilitate event registration and attendee management
- **Customer relationship management (CRM) systems:** Maintain member records and communications

These third-party providers may collect and process personal information on our behalf in accordance with their own privacy policies and applicable privacy laws.

How We Use Your Information

We use the personal information we collect for the following purposes:

Membership and Services

- To process and manage membership applications and renewals
- To provide access to member-only content and resources
- To facilitate networking opportunities and connections among members
- To organize and manage events, conferences, and educational programs
- To communicate important updates about membership benefits and services

Communications

- To send newsletters, event invitations, and educational content
- To respond to inquiries, requests, and correspondence
- To provide customer support and assistance
- To notify you of changes to our policies or services
- To send administrative information related to your membership

Financial Transactions

- To process donations, membership fees, and event registrations
- To manage billing, invoicing, and payment records
- To prevent fraud and ensure transaction security
- To comply with financial reporting and tax requirements

Website Improvement and Analytics

- To analyze Website usage patterns and user behavior
- To improve Website functionality, design, and user experience
- To troubleshoot technical issues and ensure Website security
- To conduct research and develop new features or services
- To measure the effectiveness of our communications and marketing efforts

Legal and Compliance

- To comply with legal obligations and regulatory requirements
- To enforce our Terms of Use and protect our rights and property
- To prevent fraud, security breaches, and illegal activities
- To respond to legal requests, court orders, or government inquiries
- To protect the safety and rights of our members, staff, and the public

Legal Basis for Processing (GDPR)

For users located in the European Economic Area (EEA), United Kingdom, or Switzerland, we process your personal information based on the following legal grounds:

- **Consent:** You have given explicit consent for specific processing activities
- **Contractual necessity:** Processing is necessary to fulfill our membership agreement or provide services you requested
- **Legitimate interests:** Processing serves our legitimate business interests (e.g., improving services, preventing fraud) while respecting your privacy rights
- **Legal obligation:** Processing is required to comply with applicable laws and regulations

How We Share Your Information

We do not sell, rent, or trade your personal information to third parties for their marketing purposes. However, we may share your information in the following circumstances:

Service Providers and Business Partners

We share personal information with trusted third-party service providers who assist us in operating our Website and delivering services, including:

- Payment processing companies
- Email and communication service providers
- Website hosting and cloud storage providers
- Event management and registration platforms
- Customer relationship management (CRM) systems
- Analytics and data analysis providers
- IT support and security services

These service providers are contractually obligated to protect your information and use it only for the purposes we specify.

Member Directory and Networking

With your consent, we may include your basic professional information (name, company, job title) in member directories or networking platforms accessible to other PBHFA members to facilitate professional connections and networking opportunities.

Event Sponsors and Partners

When you register for events that include sponsors or partners, we may share your registration information with those sponsors or partners as disclosed at the time of registration. This enables them to provide relevant information and networking opportunities related to the event.

Legal Requirements and Protection

We may disclose your personal information when required by law or when we believe disclosure is necessary to:

- Comply with legal obligations, court orders, or government requests
- Enforce our Terms of Use or other agreements
- Protect the rights, property, or safety of PBHFA, our members, or others
- Prevent fraud, security breaches, or illegal activities
- Respond to claims or investigations

Business Transfers

In the event of a merger, acquisition, reorganization, or sale of assets, your personal information may be transferred to the successor organization. We will notify you of any such change and provide information about your choices regarding your personal information.

Aggregated and De-Identified Data

We may share aggregated, anonymized, or de-identified information that cannot reasonably be used to identify you for research, analytics, reporting, or other business purposes.

Data Retention

We retain your personal information for as long as necessary to fulfill the purposes described in this Privacy Policy, unless a longer retention period is required or permitted by law.

Retention periods vary based on:

- The type of information collected
- The purpose for which it was collected
- Your ongoing relationship with PBHFA (active member, former member, event attendee)
- Legal, regulatory, tax, and accounting requirements
- Legitimate business needs (e.g., dispute resolution, enforcement)

General retention guidelines:

- **Active member data:** Retained for the duration of membership plus seven years
- **Financial transaction records:** Retained for at least seven years for tax and accounting purposes
- **Event registration data:** Retained for three years after the event
- **Email communications:** Retained until you unsubscribe or request deletion
- **Website analytics data:** Typically retained for 26 months (Google Analytics default)

When personal information is no longer needed, we securely delete or anonymize it in accordance with our data retention and disposal policies.

Your Privacy Rights

Depending on your location and applicable privacy laws, you may have the following rights regarding your personal information:

Universal Rights

- **Access:** Request access to the personal information we hold about you
- **Correction:** Request correction of inaccurate or incomplete information
- **Deletion:** Request deletion of your personal information, subject to legal exceptions
- **Opt-out of communications:** Unsubscribe from marketing emails and newsletters
- **Cookie preferences:** Control cookie settings through your browser

California Residents (CCPA/CPRA Rights)

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA):

- **Right to know:** Request information about the categories and specific pieces of personal information we collect, use, disclose, and sell
- **Right to delete:** Request deletion of your personal information
- **Right to opt-out:** Opt-out of the sale or sharing of your personal information (Note: PBHFA does not sell personal information)
- **Right to correct:** Request correction of inaccurate personal information
- **Right to limit use of sensitive personal information:** Limit our use of sensitive personal information
- **Right to non-discrimination:** Exercise your privacy rights without discriminatory treatment

European Economic Area (EEA), UK, and Swiss Residents (GDPR Rights)

If you are located in the EEA, UK, or Switzerland, you have additional rights under the General Data Protection Regulation (GDPR):

- **Right to access:** Obtain confirmation of whether we process your personal data and access to that data
- **Right to rectification:** Request correction of inaccurate personal data
- **Right to erasure:** Request deletion of your personal data in certain circumstances
- **Right to restrict processing:** Request restriction of processing in certain situations
- **Right to data portability:** Receive your personal data in a structured, machine-readable format
- **Right to object:** Object to processing based on legitimate interests or for direct marketing purposes
- **Right to withdraw consent:** Withdraw consent at any time where processing is based on consent
- **Right to lodge a complaint:** File a complaint with your local data protection authority

Exercising Your Rights

To exercise any of these rights, please contact us using the information provided in the "Contact Us" section below. We will respond to your request within the timeframe required by applicable law (typically 30-45 days).

When submitting a request, please provide:

- Your full name and contact information
- A description of your request and the right you wish to exercise
- Sufficient information to verify your identity
- Any relevant account or membership information

We may request additional information to verify your identity before processing your request to protect your personal information from unauthorized access.

Data Security

We implement reasonable administrative, technical, and physical security measures designed to protect your personal information from unauthorized access, disclosure, alteration, and destruction. These measures include:

- Secure Socket Layer (SSL) encryption for data transmission
- Encryption of sensitive data at rest
- Access controls and authentication mechanisms
- Regular security assessments and vulnerability testing
- Employee training on data protection and privacy practices
- Secure data backup and disaster recovery procedures
- Contractual safeguards with third-party service providers

However, no method of transmission over the internet or electronic storage is completely secure. While we strive to protect your personal information, we cannot guarantee absolute security. You are responsible for maintaining the confidentiality of your account credentials and for any activities that occur under your account.

If we become aware of a data breach that affects your personal information, we will notify you and relevant authorities as required by applicable law.

International Data Transfers

PBHFA is based in the United States. If you access our Website from outside the United States, please be aware that your personal information may be transferred to, stored, and processed in the United States or other countries where our service providers operate.

These countries may have data protection laws that differ from those in your country of residence. By using our Website, you consent to the transfer of your information to the United States and other countries as described in this Privacy Policy.

For users in the EEA, UK, or Switzerland, we implement appropriate safeguards to protect your personal information when it is transferred internationally, including:

- Standard Contractual Clauses (SCCs) approved by the European Commission

- Adequacy decisions recognizing equivalent data protection standards
- Other legally recognized transfer mechanisms

Children's Privacy

Our Website and services are not directed to children under the age of 16, and we do not knowingly collect personal information from children under 16. If we become aware that we have inadvertently collected personal information from a child under 16, we will take steps to delete that information as soon as possible.

If you are a parent or guardian and believe that your child has provided personal information to us, please contact us immediately using the information provided in the "Contact Us" section.

Third-Party Websites and Links

Our Website may contain links to third-party websites, services, or resources that are not operated or controlled by PBHFA. This Privacy Policy does not apply to those third-party websites or services.

We are not responsible for the privacy practices or content of third-party websites. We encourage you to review the privacy policies of any third-party websites you visit before providing personal information.

Links to third-party websites do not constitute an endorsement by PBHFA of those websites or their content.

Do Not Track Signals

Some web browsers include "Do Not Track" (DNT) features that signal to websites that you do not want your online activities tracked. Our Website does not currently respond to DNT signals or similar mechanisms. However, you can control cookies and tracking technologies through your browser settings as described in the "Cookies and Tracking Technologies" section above.

Nevada Residents

If you are a Nevada resident, you have the right to opt-out of the sale of your personal information. PBHFA does not sell personal information as defined under Nevada law. However, if you wish to exercise this right or have questions, please contact us using the information provided in the "Contact Us" section.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or other operational needs. When we make material changes, we will:

- Update the "Last Updated" date at the top of this Privacy Policy
- Post the revised Privacy Policy on our Website

- Notify you via email (if you have provided an email address) or through a prominent notice on our Website
- Obtain your consent if required by applicable law

We encourage you to review this Privacy Policy periodically to stay informed about how we protect your personal information. Your continued use of our Website after we make changes constitutes your acceptance of the updated Privacy Policy.

Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact us at:

Palm Beach Hedge Fund Association

P.O. Box 2911

Palm Beach, FL 33480

United States

Phone: (561) 349-7300

Email: [Insert privacy contact email, e.g., privacy@pbhfa.org or info@pbhfa.org]

Website: www.pbhfa.org

For GDPR-related inquiries, you may also contact our Data Protection Officer (if applicable) at the address above.

We will make reasonable efforts to respond to your inquiry within 30 days. If you are not satisfied with our response, you have the right to lodge a complaint with your local data protection authority (for EEA, UK, or Swiss residents) or the California Attorney General's office (for California residents).

Consent and Acknowledgment

By using our Website, you acknowledge that you have read, understood, and agree to the collection, use, and disclosure of your personal information as described in this Privacy Policy.

If you do not agree with this Privacy Policy, please do not use our Website or provide any personal information to us.

This Privacy Policy was last updated on February 5, 2026.