NOTICE OF DATA BREACH and Complimentary Credit Monitoring

Dear [Client Name],

We are writing on behalf of StartEngine Primary, LLC ("StartEngine") to inform you of a security incident involving your StartEngine account, explain our response, and offer complimentary credit monitoring.

What Happened

On September 15, 2026, we identified unauthorized access to certain StartEngine accounts during September 11–14, 2026. Our investigation indicates that your account was among those accessed.

The activity involved the use of login credentials obtained from sources outside StartEngine.

What Information Was Involved

The information accessible through your account included your name, email address, date of birth, mailing address, and investment account information, including your stated income, net worth, employment information, investment experience and objectives, and your holdings and transaction history on the StartEngine platform.

Social Security numbers maintained by StartEngine were encrypted at rest. Based on our investigation, your Social Security number was not exposed in readable form.

What We Are Doing

We disabled access to affected accounts and sent password-reset instructions.

We are also rolling out additional account-security measures, including multi-factor authentication, expected in the coming weeks.

Complimentary Credit Monitoring

As a courtesy and not as an admission of liability, we are offering you 12 months of identity monitoring through Kroll, an independent service provider, at no cost to you. Your services include Single Bureau Credit Monitoring, $1,000,000 Identity Fraud Loss Reimbursement with a $0 deductible underwritten by an A.M. Best A-rated carrier, Fraud Consultation, and Identity Theft Restoration.

To enroll:

- Visit enroll.krollmonitoring.com/redeem
- Enter your Activation Code: [code] and Verification ID: [ID]
- Complete enrollment by deadline: January 7, 2027
- For enrollment assistance, visit the Kroll enrollment website. If you run into any issues during activation, Kroll will provide you with a support phone number and email address to help you complete the process.

To receive credit monitoring services, you must be over 18, have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file. By enrolling, you enter into a direct relationship with Kroll, governed solely by Kroll's own terms of service and privacy policy, not by any agreement with StartEngine.

If you cannot enroll because of your location or another eligibility restriction, contact us at 1-800-317-2200 or contact@startengine.com for assistance.

About the Monitoring Service

StartEngine is making this service available solely as a courtesy and monitoring tool to help you identify potentially suspicious credit activity. It is not an admission that any particular harm has occurred or will occur, and it does not prevent identity theft, detect every form of fraud, or replace your own review of your financial accounts.

Kroll independently operates the monitoring software and service, and the identity-fraud reimbursement coverage offered as part of this service is underwritten by an independent insurance carrier, under Kroll's and that carrier's own applicable terms and policies. StartEngine does not operate the software, underwrite the insurance, or guarantee the accuracy,

availability, security, or effectiveness of either. Any claim related to the monitoring service or the reimbursement coverage must be directed to Kroll or the underwriting carrier, not StartEngine.

To the extent permitted by applicable law, StartEngine is not liable for errors, omissions, interruptions, or failures attributable to the provider's software, service, or the underlying insurance coverage. This statement does not exclude liability that cannot lawfully be excluded, limit StartEngine's legal obligations concerning this incident, or require you to waive any rights or claims. Enrolling in or declining the service does not waive your rights against StartEngine.

What You Can Do

Please reset your StartEngine password using our verified account-recovery process. Choose a unique password, change it on other services where you reused it, and enable multifactor authentication where available. Contact us if you need help restoring access securely.

Review your investment and bank statements and report suspicious activity to us immediately. Be alert for unexpected messages requesting passwords, verification codes, payments, or personal information.

Periodically obtain and review your credit reports from Equifax, Experian, and TransUnion. Free reports are available through AnnualCreditReport.com or 1-877-322-8228. Dispute fraudulent entries and request their removal.

Equifax: 1-800-685-1111, P.O. Box 740256, Atlanta, GA 30374

Experian: 1-888-397-3742, P.O. Box 9554, Allen, TX 75013

TransUnion: 1-800-916-8800, P.O. Box 2000, Chester, PA 19016

A fraud alert tells potential creditors that you may be a victim of identity theft and that they should take additional steps to verify your identity. You can request a free initial fraud alert from any one of the three nationwide credit bureaus, which will notify the other two. You can also request a free security freeze separately with each bureau to restrict access to your credit report.

For instructions and credit-bureau contacts, visit the Federal Trade Commission's IdentityTheft.gov. We encourage you to report suspected identity theft there. Additional government guidance is available at USA.gov/identity-theft.

For More Information

Please contact our Investor Services team:

Telephone: 1-800-317-2200

Email: contact@startengine.com

Additional Information for Residents of Certain States

For Massachusetts residents: This notice does not describe the specific nature of the breach or state the total number of Massachusetts residents affected, consistent with Massachusetts law.

For New York, North Carolina, Maryland, and Rhode Island residents: You may obtain information from your state Attorney General about steps to protect against identity theft:

- New York Attorney General, Consumer Frauds Bureau: 1-800-771-7755, ag.ny.gov
- North Carolina Attorney General: 1-877-566-7226, ncdoj.gov
- Maryland Attorney General: 1-888-743-0023, marylandattorneygeneral.gov
- Rhode Island Attorney General: 401-274-4400, riag.ri.gov

For residents of all states: You have the right to place a security freeze on your credit report, free of charge, by contacting each of the three nationwide credit bureaus listed above.

We regret this incident and the concern it may cause.

Sincerely,

Investor Services

StartEngine Primary LLC