

Tradesk Securities, Inc. US Online Privacy Policy

Effective February 3, 2025

Introduction

As a valued customer, we understand that the privacy and confidentiality of your personal information is of the utmost importance to you. We respect and share your desire to maintain that confidentiality. In an attempt to assuage any fears you may have with respect to sharing that information, this document sets forth Tradesk's policy and commitment to you regarding the types of information we collect, our use of that personal information, and our efforts undertaken to protect that information.

The purpose of this policy is to govern the treatment of nonpublic personal information about consumers by Tradesk Securities, Inc. This policy:

- (1) Requires Tradesk to provide notice to customers about its privacy policies and practices;
- (2) Describes the conditions under which Tradesk may disclose nonpublic personal information about consumers to nonaffiliated third parties; and
- (3) Provides a method for consumers to prevent Tradesk from disclosing that information to most nonaffiliated third parties by "opting out" of that disclosure, subject to certain exemptions.

Background

We collect and retain certain personal and financial information pertaining to you because we reasonably believe such information will enable our Brokerage to deliver those services necessary to meet your goals. That information may include sensitive financial data, which is protected under the Gramm-Leach-Bliley Act governing the use and collection of such information for financial and real estate settlement purposes. In addition, we may request other personal information from you that is not publicly available.

We do not sell any personal information about you. During the normal course of our business, however, we may need to share your personal information with legitimate third-parties. For example, we may share this information when: (1) the information is necessary for the completion of a transaction, (2) in order to verify the condition of your credit status or accounts with that third-party, (3) in order to comply with a governmental agency or pursuant to a court order, (4) upon your consent for personal reasons, or (5) as permitted or authorized by law

1. THE INFORMATION WE COLLECT

FROM YOU:

- Identity data such as your full name, date of birth, address, social security number or TIN, passport number, date of birth, marital status
- Contact data such as email, phone number, mailing address

- Financial data such as bank account details, information about your income, account balances, investment experience and goals, tax information
- Profile data such as username and password, purchases or orders, knowledge assessment results, preferences, feedback and survey responses
- Additional data you provide via survey responses, customer support, or other interactions with us
- Content such as photos and contacts in your mobile device or email (collected with your consent)
Information we collect automatically
- Usage information such as device identifiers, operating system and version, carrier and carrier type, pages or features you use, time and date of access, and other similar usage information
- Transactional Information such as purchases and sales, amount, type of transaction, date and time of transactions
- Geolocational data from your mobile device, IP addresses, although you may control the collection of precise geolocational data from user settings on your device
- Tracking data collected using cookies and web beacons, pixels, web server logs, and similar data collection and tracking technologies, such as IP, browser, type, internet service provider, platform type, device type
Information we collect from other sources
- Service providers and partners, such as identity verification, credit records, fraud risk assessments and protections, payment processing information, ad campaign information, data from other users
- Publicly available data, such as contact information, public records, and information you have designated as publicly available on other sites
- Social media and connected services, for example when you connect to Tradesk via link, Google, or Apple
- Third-party analytics services, such as demographic data, mobile and internet usage, analysis of performance metrics, reports of your activity and use of the App

2. INFORMATION WE OBTAIN FROM OTHER SOURCES

We gather information about you from various external sources, as outlined below:

- Vendors and Business Partners: We collect details like your name, contact information, preferences, attributes, and fraud risk insights from identity verification and fraud prevention partners, as well as companies we work with.
- Financial Account Linking: We may receive details about your financial accounts from third-party providers, such as your financial institutions. For example, Tradesk uses Plaid, Inc. ("Plaid") to offer account linking and aggregation services. Your use of Plaid is governed by Plaid's End User Privacy Policy and Services Agreement.
- Connected Services: If you link, connect, or sign in to your Tradesk Account through a third-party service (e.g., Google, Apple), that service may share profile information with us. The data we receive depends on the service and your privacy settings.
- Publicly Available Data: We may gather publicly available information, including contact details, social media interactions, and other data from public websites.
- Advertising Data: We collect information related to our ad campaigns across other platforms, such as which ads you click on and other interactions you have with our ads.
- Data from Other Users: If another user shares their contact list with us, we may collect your contact details and information about your relationship with that user.

3. TRANSMISSION OF PERSONAL INFORMATION

- (a) Electronic Mail – Any and all electronic mail containing Personal Information communicated to any legitimate third-party shall be done in such a manner as to avoid the interception of that communication. Specifically, Tradesk shall take such steps as are reasonable to ensure that any e-mail transmitted is to the correct third-party, and contains the following language “The contents of this e-mail are private and confidential. To that end, if you believe you have received this email in error, you are advised to immediately delete this e-mail and contact the sender.”
- (b) Third-Parties – With respect to any third-party, Tradesk shall ensure that prior to transmittal of personal information that third-party has consented to be bound by the terms of this document or is already bound by its equivalent.

4. WE WILL USE YOUR INFORMATION TO:

- • Open new account(s), which includes identity verification, anti-money laundering checks extension of credit, and other due diligence processes
- Maintain and provide the Services, including to process account applications, authenticate your identity, repair our Services, support, process and record transactional information, and handle billing and account management;
- • Send you transactional information such as statements and confirmations, margin calls, notices, customer support responses
- • Fulfill legal and regulatory requirements
- • Communicate with you about offers and other things we think you will be interested, such as newsletters, product announcements, partner offerings, surveys, contests or sweepstakes, events
- • Monitor, support, and improve our services by analyzing usage, research and development
- • Help prevent fraud or other unlawful activity
- • Protect or exercise our legal rights or defend against claims

**5. WE WILL SHARE YOUR INFORMATION **

- • With companies in which you hold securities
- • With our affiliates, including those in jurisdictions other than the United States, when doing so helps improve our services to you
- • With Legal or regulatory authorities as required by the law or legal process
- • As part of the sale or transfer of our business
- • To protect the rights, interest, safety of Tradesk, its customers, or the public
- • To other third parties, provided that you request or authorize the disclosure
- • As otherwise permitted by applicable law, or with your consent We may also aggregate or otherwise de-identify your personal information so that it does not reasonably identify you and share such information with third parties

6. HOW WE PROTECT YOUR INFORMATION

Tradesk uses reasonable, industry standard security measures to protect information under our control from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. We maintain appropriate physical, electronic, and procedural safeguards, including restricting access to personal information on a need-to-know basis, and limiting the amount and type of information available for downloading and transmittal. We also regularly conduct audits to ensure the effectiveness of our systems. Please understand, however, that no security system is impenetrable. We cannot guarantee that our security measures will prevent hackers from illegally obtaining this information, or that our database and/or systems will not be subject to cyber-attack. Tradesk retains your personal information for as long as necessary to accomplish the purpose for which it was collected, to meet our legal and regulatory requirements, including compliance with our records retention practices, and as permitted to meet our legitimate interests.

7. TRANSFERS OF YOUR INFORMATION

The use of Tradesk's App is currently limited to United States residents. All customer information is stored in the United States. If you are a US resident but located outside the United States, by using our App you agree to have your data transferred to and processed in the United States.

8. DISCLOSURES OF INFORMATION

We are committed to maintaining your trust, and we want you to understand when and with whom we disclose information about you. We disclose information about you in the instances described below.

- Authorized vendors: We disclose information about you with third-party vendors and service providers who perform services for us, such as identification verification, fraud prevention, advertising, mailing services, tax and accounting services, contest fulfillment, web hosting, and analytics services
- Marketing Partners: We disclose information about you to third-party advertising and analytics services, including as described in Third-Party Tracking and Online Advertising. For example, we may share personal data such as your hashed email address or your device ID with marketing partners to help us market Tradesk products to you across third-party websites and online services.

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9.. MANAGING YOUR INFORMATION

You may manage the information received, maintained, and processed by Tradesk.

- • You may review, update, amend, or otherwise change information on your account(s) using the App
- • You may disconnect our App's access to certain stored device information through your device's settings. For example, you can withdraw permission for the App to access your contact list or photo gallery.
- • You can stop receiving promotional emails from us by clicking "unsubscribe" in those emails. We will still send you service-related or other non-promotional communications, such as account notifications, confirmations, statements, and other transactional messages

10. THIRD PARTY SITES

This Privacy Policy does not apply to the privacy practices of companies that we do not own or control, such as companies that advertise on our App or with whom we partner for certain services. We are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policies and terms of use when visiting any other website.

11. CALIFORNIA RESIDENTS

Under the California Consumer Privacy Act ("CCPA"), residents of California have additional privacy-related protections. The CCPA, however, does not apply to non-public personal information collected by financial institutions like Tradesk, so much of the CCPA does not apply to us.

- California residents (and their households) have the right to request certain information about whether we collect, use, disclose, and sell personal information about them, and to request to know the personal information we have. To make such a request, please contact us by email at compliance@tradesk.co. We will verify all such requests prior to providing any personal information via email.
- California residents may request the deletion of their personal information we have collected from you. To make such a request, please contact us at compliance@tradesk.co. We will verify all such requests via email prior to any deletion.
- California residents have the right to opt out of the "sale" of personal information to third parties, as those terms are defined by California Civil Code Section 1798.140. We do not sell information about you to third-parties.
- We do not discriminate against California residents who exercise their privacy rights.
- California residents may use an authorized agent to make requests on their behalf. We require the authorized agent to provide us with proof of the California resident's written permission (for example, a power of attorney) that shows the authorized agent has the authority to submit a request to the California resident. In addition, to providing this proof, the authorized agent must follow the appropriate process described above to make a request.
- We do not share your personal information with other businesses or third-parties for their own direct marketing purposes.
- We do not take any action with respect to "do-not-track" signals

12. NEVADA RESIDENTS

We do not sell your covered information for monetary consideration as defined in Chapter 603A of the Nevada Revised Statutes. However, if you are a Nevada resident, you have the right to submit a request directing us not to sell your personal information. To submit such a request, please email us at compliance@tradesk.co.

10. CHANGES TO THIS PRIVACY POLICY

13. CHANGES TO THIS PRIVACY STATEMENT

This Privacy Statement will evolve with time, and when we update it, we will revise the "Effective Date" above and post the new statement and, in some cases, we provide additional notice (such as adding a statement to our website or sending you a notification). To stay informed of our privacy practices, we recommend you review the statement on a regular basis as you continue to use our Services.

14. Opt-Out Rights

You have the right to opt out of certain data collection practices and communications. If you do not want to receive marketing emails, personalized ads, or have your data shared with third parties, you can exercise your opt-out options in the following ways:

- **Marketing Communications:** You can unsubscribe from our marketing emails by clicking the "unsubscribe" link at the bottom of any promotional email we send you. Alternatively, you can adjust your email preferences through your account settings.
- **Targeted Advertising:** If you wish to opt out of targeted advertising, you can do so by visiting the ad preferences or opt-out page of the relevant ad network
- **Data Sharing:** You can request that we do not share your personal data with third-party vendors for marketing purposes by contacting us at support@tradesk.co
- **Account Settings:** You can update your privacy preferences or restrict certain data collection practices by logging into your account and adjusting your settings.

If you have any questions or need further assistance, please contact us at support@tradesk.co

Please note that opting out may affect your ability to use some features of our services, as certain data is necessary for the operation and personalization of your experience.

15. HOW TO CONTACT US

You may contact us at any time with any questions, comments, or suggestions about this Privacy Policy and your personal information. Contact us by phone at (888) 820-9887 or via email at support@tradesk.co.