

Hedge Privacy Policy

Effective Date: July 15, 2023

Hedge takes privacy and security very seriously. This privacy policy ("Privacy Policy") describes how Hedge Capital Markets Inc. and its affiliates (collectively, "Hedge," "we," "our," and "us") collect, secure, use, retain, disclose, and otherwise process the information we collect about you when you access and use our website, mobile app, and other online services when you otherwise engage with us (collectively, our "Services"), and when you otherwise interact with us (for example, by contacting our customer service team). This Privacy Policy also describes the choices you can make with respect to the personal information we collect and process about you. In this Privacy Policy, we use "customer" and "you" to refer to anyone who accesses and uses our Services.

If you are a California resident, please view our "[Notice to California and Virginia Residents](#)" section below.

If you have a Hedge account, or if you have taken steps to register or apply for an account, you can also review the Hedge Pro [HP Financial Privacy Notice](#), for a summary of our practices regarding personally identifiable information we collect about you, which is covered by the Gramm-Leach-Bliley Act.

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1. INFORMATION THAT WE COLLECT

The personal information that we collect depends on how you interact with us, which of our Services you use, and the choices that you make. We collect information in a number of ways and from a variety of sources when you use our Services, which include without limitation information that you may provide to us directly, information that is collected automatically, information sourced from third-party data providers, and data that we infer or generate from other data.

A. INFORMATION THAT YOU PROVIDE

We collect personal information that you may provide us with when you use our Services, or otherwise engage, interact, or communicate with us as described below.

- **Profile Data**, such as access details (including without limitation your username or account number in combination with a password), identifiers, and other information we may collect, generate, or infer, such as your knowledge assessment results, your interests, preferences, feedback, and survey responses;
- **Contact Information**, such as your name, phone number, email address, and your home and mailing addresses;
- **Investment Profile**, such as your tax status, investment horizon, risk tolerance, investing goals, investment experience, and in order to use certain portions of our Services additional information such as your net worth, liquid net worth, and liquidity needs;

- **Financial Data**, such as your bank account, routing number, and credit or debit card information, as well as information about your income, transaction activity and history, credit history, account balances, tax information, and credit scores;
- **Stored Content**, such as photos from your mobile phone gallery or the names and contact information from your address book (ie. from your mobile device or email accounts), which is collected with your permission and may be required to access certain portions of our Services;
- **Employment Information**, such as current or previous employment status, job title, job description, employer information, and salary information for you and other persons you are related or affiliated with (e.g., we are required by law to ask you to disclose if you or any family member is a director, executive, 10% or greater shareholder, or control person of any publicly traded company in order to protect against insider trading).
- **Communications**, such as audio or electronic information, records of your communications with us (ie. we may keep copies of your correspondence with us on our website, app, chat features, and other channels), and any other information and additional data that you may provide to us via focus groups, survey responses, in-app feedback, data provided with or attached within the notes, memo, or appended message section of any transaction requests or proposals you send, receive, or initiate using our Services, contests, customer support, events, curated interactions or experiences, sweepstakes, and other promotional events, and correspondence with our customer service team.
- **Transactional Information**. When you receive, send, submit, initiate, or complete a transaction with our Services, we collect information about that transaction, including without limitation the transaction amount or notional value, the type or nature of the transaction, which security or other form of asset you are buying or selling when applicable, and the ascribed time and date of the transaction.
- **Community Information**. Our Services allow you to participate in (i.) an online network of various communities of investors ("Communities"), which are organized into the overarching Hedge community, (ii.) a public social feed (the "Feed"), and (iii.) direct and group messaging services ("Chat"). The Hedge Communities, Feed, and Chat services are together referred to as the "Hedge Community", "Community Features", or "Social Features". You may provide us with personal information should you choose to participate in the Hedge Community. For example, you provide us with personal information when you send and receive messages on our platform, when you share content or view or interact with content posted by others, and when you join and/or follow other Hedge customers, users, companies, or Communities on the platform.
- **Other Information You Provide**. We may collect additional personal information that you provide to us when interacting with us, applying for, signing up, and using or otherwise interacting with our Services such as profile data, access details, photograph, contact list details, and other related information. In order to comply with the laws, rules, and regulations of federal, state, and various other regulatory bodies, and in order to offer certain features of our Services (including without limitation the Hedge Social Features, Hedge Groups, and the Group Investing portion of our Services), we may also collect, generate, or infer information (such as name, email address, phone number, identifiers, and other related information) from you about the intended recipients of any invitations, proposals, messages, referrals, and any other communications or actions you request us to make. For example, when you open an account with Hedge and access the Hedge profile page, or elect to create a profile with Hedge, you provide us, and in certain cases instruct us to provide to our affiliates on your behalf, with your profile data and access information (described under Profile Data in this "Information That You Provide" section), an optional profile picture and profile bio, and other related information you may provide to us when setting up, using, or interacting with your profile. If you do choose to upload your photograph to our service, please note that all images must adhere to our App Use Standards, which you are required to comply with in order to use any of the Hedge Services.
- **Identity Information**, such as your name, date of birth, tax status, social security number, biometric identifiers, and other similar data including without limitation:
 - **Government ID**, such as any government-issued identifiers like your driver's license, passport number, social security number, or other similar data from government-issued identity documents;
 - **Sensitive Demographic Data**, such as citizenship and visa information, some of which may be protected classifications, marital status, and date of birth;
 - **Biometric Data**, such as photo identification or personal photos that are analyzed to verify identification;
 - **Investment Profile**. Such as your tax status, risk tolerance, investment goals, and investing experience;

There are certain Services that we offer that require us to perform a "know your customer" (herein referred to as "KYC") check by law. In order to conduct this check, we collect personal information from you, which includes, without limitation, sensitive personal identifying information ("PII") and other related personal information, such as your full name, date of birth, home address, contact details, and government-issued identifiers, such as tax identification numbers (ie. SSN). We may require additional information in order to verify your

account or to evaluate applications for certain advanced permissions or features of our Services, which may include your government-issued identification with a photo. We reserve the right to request additional information at any time, to re-run verification checks of any kind on these details on an ongoing basis, and to immediately terminate, suspend, limit, or restrict your access to our Services should the results of any check, risk assessment, or review we conduct be deemed to be unsatisfactory, which is determined at our sole discretion and is not subject to appeal or disclosure. We further reserve this right to immediately suspend, limit, restrict, or terminate your access to our Services in their entirety or in any portion thereof, should you refuse to provide information that we feel, at our sole discretion, is required to (i.) continue to offer our Services to you, and or any of our other customers or potential customers, (ii.) verify or re-confirm your identity, (iii.) detect and prevent suspicious activity, fraud, and/or bad actors, (iv.) for transaction surveillance and verification purposes, (v.) to evaluate an application, or (vi.) for any similar purpose without limitation that is deemed by us at our sole discretion as necessary to continue to provide our Services. In any of these cases, Hedge shall not be liable for any losses, damages, jury awards, fines, fees, costs, attorneys fees, anguish, or any other form of negative outcome, consequence, or other similar resulting circumstance, without limitation, that may arise, directly or indirectly, from any actions taken in accordance with these reserved rights to terminate, suspend, restrict, or limit your access to our Services in their entirety or in any portion thereof, regardless of the nature, outcome, or context of the situation, circumstance, consequences born, reason for taking such an action, or the outcome of any investigation that may or may not be conducted in accordance with any of these actions being taken.

B. INFORMATION THAT WE COLLECT AUTOMATICALLY

As is true of many digital platforms, we automatically collect certain information about you, which may include, without limitation, personal information, when you use our Services, some of which is based on your Internet or other electronic network activity, as described below. For example:

- **Usage Information.** We collect information about your engagement, usage, interaction with, and activity on our Services, such as device identification information (ie. IP address or mobile device identifiers), information about the pages or features you use, features or buttons you use, notifications you receive and view, date and time of access, and other related usage information. We also use tools to capture your session, engagement, and interactions with our Services, and to analyze this information in order to help us improve our Services and your experience.
- **Device Data.** We receive information about the device and software you use to access our Services, such as IP address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.
- **Location Information.** We may infer your approximate location information by using your internet protocol (IP) address. We may also collect the GPS location of your mobile device in accordance with your device permission. You may stop the collection of precision location information (see the section designated, "Your Control", below for additional information) at any time. Google uses certain technologies and services to approximate your location, such as your IP address. Please visit Google's privacy policy [G Privacy Policy](#) [– Privacy & Terms – Google](#) for further details.
- **Information Collected Through Tracking Technologies.** We and our service providers also utilize tracking technologies, such as cookies and web beacons, that automatically collect certain usage and device information when you use or Services or interact with our emails. From these technologies, we collect information such as your IP address, internet service provider, device type and identifiers, platform, operating system, device, and browser types, device and account unique identifiers (or UUIDs), date and time stamp, engagement information, usage data, and other similar information. Please consult the "Your Control" section below for additional information on the options available to you in regard to how we process this information.

C. INFORMATION WE CREATE OR GENERATE

As is true of many digital platforms, we may also infer new information about you from the data that you provide and the other data that we collect, including, without limitation, using automated methods to generate data about your likely preferences and other various characteristics (herein, "inferences"), such as inferring your location (localized to city, state, and country), from your device's IP address.

D. INFORMATION WE RECEIVE FROM OTHER SOURCES

As is true of many digital platforms, we may also collect or receive information about you from other sources, including, without limitation, those described below.

- **Vendors and Third-Party Partners.** We obtain or collect information about you from third parties that we do business with to operate and maintain the Services, such as name, contact information, inferences about you and your preferences and attributes, information about inferred fraud and risk, and other similar data points. For instance, we may receive information about you from our identity verification and fraud prevention partners, which may include without limitation sensitive personal information, in order to verify your identity, prevent fraud, comply with various regulatory compliance and legal obligations (ie. anti-money laundering laws), and to protect the safety and security of our Services, business, and customers. This may also include, without limitation, information from data brokers and aggregators from which we obtain additional information to supplement the data we collect.
- **Marketing Partners & Advertising.** We may collect or receive information from the various partners with which we engage in joint-marketing activities or co-sponsor events, as well as any information we collect through our advertising campaigns surfaced on other platforms, such as which ads you viewed, clicked on, shared, or otherwise interacted with, and the various other interactions you may have with any of our ads or promotional content.
- **Linked Services.** Wherever available, should you choose to connect, link, or log in to the Hedge platform or your Hedge Account using a third-party service (ie. Google, Apple, etc.), we may receive certain identifiers and your profile information from that service. This information varies depending on the service in question and is controlled by that service or as authorized by you via your privacy settings at the third-party service.
- **Service Providers.** Service providers that collect or provide information in connection with work they do on our behalf, for example, companies that determine your device's location based on its IP address.
- **Data from other users.** If you are in another user's contact list and they choose to share that list with us, then we will collect the contact details and the association you share with that user.
- **Publicly Available Data.** Includes your contact information, any interactions you have with our social media platforms, and other information from publicly available sources and websites.
- **Financial-Account Linking and Payment Processing.** Hedge offers account linking and aggregation services through Plaid Inc. ("Plaid"), which allows you to link your bank account to our Services and process payments. In order to confirm their identity and provide their services, Plaid may provide us with data about you from your banking institutions. By utilizing these services, you acknowledge and agree to the terms of Plaid's Privacy Policy, which is currently located at [Privacy and security policies | Plaid](#) and governs Plaid's use of such information, and you consent to Plaid's Privacy Policy. Further, you expressly grant Plaid the right, power, and authority to access and transmit your information as reasonably necessary for Plaid to provide its services, and for Hedge to receive, process, store, and use this data to provide its Services.

2. HOW WE USE YOUR INFORMATION

We use the information we collect for various purposes which are described within this Privacy Policy, or as otherwise disclosed to you. We utilize and combine the information that we collect from different sources for a number of purposes, which include, without limitation, the following:

- **Provide, Maintain, and Deliver our Services,** including, without limitation, troubleshooting, repairing, and supporting our Services, for example, to facilitate and enable orders, purchases, transactions, payment, and communications, to process and record transactional information, enable account management and billing, secure our systems, improve safety on our Services, service customer requests, process account applications, combat fraud, and to verify your identity and authenticate personal information and documents, which includes, without limitation, verification programs and protocols such as those for our "Know Your Customer" ("KYC") and "Customer Identification Program" (herein, "CIP") programs, for our "Office of Foreign Assets Control" (herein, "OFAC") screening and any ongoing surveillance and reviews we may conduct, and for our anti-money laundering (herein, "AML") detection program and fraud prevention protocols;
- **Provide and Improve the Safety and Security of our Services, systems, business, and customers,** such as investigating and combating illicit and criminal activity, including without limitation both financial crimes and other unlawful activity (ie. detecting, reporting, and protecting against fraud and money laundering), and detecting, monitoring, and preventing abuse, manipulation, or misuse of our Services;
- **Monitor and Improve our Services,** including, without limitation, analyzing usage, research, and development efforts, such as developing new features, products, or services, analyzing how you interact with, access, utilize, and otherwise engage with us and our

Services, improving internal operations and protocols;

- **Communicate offers, content, and other things we think you may be interested in**, such as sending product updates, announcements, newsletters, and ads, notifying you about upcoming, ongoing, or past promotions, contests, sweepstakes, and partner offerings, or communicating with you about new services, offers, promotions, events, sweepstakes, contests, rewards, upcoming offers, and other related information;
- **Facilitating promotional offers, sweepstakes, contests, and rewards**, such as processing and authenticating information to verify entrants, and delivering rewards;
- **Personalize our Services**, to better understand you and your preferences, and to enhance your experience and enjoyment using our Services, such as by suggesting or tailoring the content, information, marketing materials, and suggestions;
- **Protect or exercise our legal rights or defend against legal claims or actions**, including, without limitation, taking any and all actions that may be necessary, which you agree is to be determined at our sole discretion, in order to enforce and carry out our contracts and agreements as intended, respond to legal inquiries, claims, requests, and actions, and to enforce and pursue any legal actions, legal filings, registrations, and any and all other contractual or other legal obligations;
- **Comply with applicable laws and legal obligations**, including, without limitation, any and all regulatory requirements, rules, federal, state, national, international, and regional laws, and all other compliance obligations imposed by applicable industry regulators, or otherwise associated with being a regulated broker-dealer;
- **Operate our business**, such as for billing and accounting systems;
- **Communications and Support**, such as sending you invoices, bills, statements, confirmations (ie. for purchases or orders), security alerts, push notifications, two-factor authentication messages (ie. to verify your phone number and email), message notifications, updates, support, including, without limitation, sending and receiving correspondence in relation to your feedback, responses, customer support requests, and answering any questions you may have, and for administrative messages and other related communications, each of which will be sent through one or more designated methods of communication which may include, without limitation, email, text message, in-app messages, alerts, push notifications, online chat, or messages on third-party platforms.

3. DISCLOSURES OF INFORMATION

We do not take the trust our customers put in us lightly, and want you to understand when, and with whom, we share information about you. We disclose personal information at times when it is necessary to complete your transactions, provide the Services, or with your consent when required by applicable law. In addition, we may share the information described herein within this Privacy Policy to the categories of recipients and business purposes that are described below:

- **Authorized Service Providers.** We share information about you with authorized third-party vendors, service providers, or agents working on our behalf for the purposes detailed within this Privacy Policy, which includes, without limitation, data and cloud service providers, identity verification, fraud prevention, advertising, tax and accounting services, transaction processing, promotion fulfillment, mailing, and information technology customer support, marketing, and analytics services. For example, we use an identification service provider to match photos or a “selfie” you submit, to any government identification documents you provide for identity verification purposes.
- **Hedge Affiliates.** Where appropriate and necessary to offer our Services, we share information about you across our affiliates, which are entities owned or controlled by Hedge, for example, where we share common data systems or where access helps us to provide our Services and operate our business.
- **Financial Service Providers.** We will disclose payment information and transactional details when you make a transaction to banks and to other entities as necessary to process payments, collect analytics, reduce credit risk, prevent fraud, and as a part of our anti-money laundering detection programs or other related financial services.
- **Substantial corporate transactions.** We may share information about you in connection with a substantial corporate transaction, a merger, consolidation, reorganization, bankruptcy, financing, dissolution, or a transfer, divestiture, change in control, or acquisition of all or a portion of our business by a third party.
- **Companies whose securities you hold.** We may share your name, address, email, and the security positions you hold to requesting companies in which you hold securities.

- **With other users of our Services.** We may disclose information about you with the other users of our Services, such as our Social Features or Group Investing features, for which you may not have enrolled yet. Though the specific information disclosed varies based on the feature or portion of our Service in question, in these cases, we will share your profile picture, username, full name, and year joined, as well as any other information available on your profile and the transaction history between you and the other Hedge user viewing it, with other Hedge users. Pertaining to the aforementioned features, for example, this helps users ensure they're sending messages and proposals to the intended recipient and helps users receiving these messages identify the sender. Your Hedge Investor Profile and Social Profile will be visible to anyone on Hedge unless you adjust your profile visibility settings. You may opt out of profile visibility at any time, however, this is required for certain portions of our Services, such as Hedge's Group Investing feature, to ensure users know who they form groups with. Similarly, Hedge Groups may require a clearly identifiable profile picture, full name, regional location (city, state, and country only), and limited portions of your investor profile (e.g., investment experience and risk tolerance) and other information to be disclosed to other prospective group members prior to forming a group to protect against bad actors and prevent any user impersonating or otherwise representing themselves to be anyone other than themselves to other users that they may be considering forming a new Hedge Group with.
- **Legal purposes.** We reserve the right to access, disclose and preserve any and all information you provide, or that we otherwise collect, generate, receive, infer, or obtain about you, should we believe that the disclosure is (i.) in accordance with, or required by, any applicable law, rule, regulation, compliance obligation or valid legal process, including without limitation those from federal, state, and industry regulators, as well as law enforcement and other government agencies, or (ii.) necessary, prudent, or otherwise warranted as is determined in our sole discretion to protect and defend the rights, interests, safety, and well-being of Hedge, our customers, or the public. This also includes, without limitation, disclosing information if we deem, at our sole discretion, for it to be necessary to protect our customers and others (ie. prevent fraud, spam, loss of life or serious injury), operate and maintain the security of our Services (e.g., prevent or stop an attack on our systems, network, or other component of our Services), and protect the rights and property of ourselves or others (e.g. enforcing agreements, terms, policies, community guidelines, etc.)
- **With your consent.** We also share information about you in accordance with any other purpose that may be disclosed to you with your consent.

Social Features. By using the Social Features of our Services, you may also choose to share information with other users. For example:

- **Your Profile, Portfolio, and Transactions.** When you open an account with Hedge, you create a Hedge profile page. You provide us with your username, account password, and an optional profile picture and profile description. This profile takes two forms on our Services and is made up of (i.) your "Social Profile", which is used to interact with the broader Hedge Community and with our Social Features, and (ii.) your "Investor Profile", which is a trimmed-down version of your Hedge Social Profile that includes your username, profile picture, a profile description (your "Bio"), and limited investor profile details (e.g., risk tolerance, investment experience, date joined), which are visible to the other customers of the Services and allows users to find each other and send proposals for Hedge's Group Investing features. Certain aspects of your Hedge investment portfolio and activity may also be visible to other customers of the Services; for more details on your choices in this matter see the [Your Information Choices](#) section of this Privacy Policy.
- **No Dollar Amounts.** For your privacy and protection, we do NOT make specific dollar amounts visible to other users for your Personal Account, transactions, or any of your investments. Please be advised that when you form a Hedge Group with other users, both you and the other users are able to view the total balance or "group aum", which is the combined sum of all Members' assets in the group ONLY (your group members cannot see any information about your Personal Account balance).
- **Sharing Content.** Our Services include the Hedge community, which is made up of a broader network of Hedge Communities. The Hedge community and its Hedge Communities allow investors to you can find, enjoy and share content through various mediums and social channels, which include, without limitation, (i.) a public Hedge community feed (the "Feed"), (ii.) individual Hedge Communities you join from the network of communities offered by our Services, or (iii.) direct messaging and group chat channels between users. When you post content to the Hedge Feed, any customer of our Services will be able to see this content and details about you as the party sharing this content which may include, without limitation, your name, username profile picture, and other information about you and the profile associated with the content, the date and time you submitted the content, any other information associated with you and any other users or content referenced within or associated with your post in any way without limitation that is publicly available on our Services. Hedge Communities have various privacy settings that are controlled by community admins, moderators, and other community leaders, and may either be entirely public (to Hedge users), like the Hedge Feed, or have varying levels of privacy settings. Under no circumstances is information permitted to be shared in such a way that may cause it to be viewed as communications with the public from Hedge Pro LLC as described in and regulated under FINRA Rule 2210, or that may cause Hedge Pro LLC to become

entangled with or to have adopted any content, views, opinions, or posted information that is available, posted, or shared on any third-party platforms, including, without limitation other social media platforms (e.g., Twitter, Instagram, TikTok, Facebook, Threads, etc.), websites, forums, discussion channels, or other communication mediums without limitation.

- **Hedge Members Only.** Hedge Communities, the Feed, and the other Social Features are NOT visible to the general public and are restricted to Hedge customers. Hedge users, or “Hedge Members” (this is used here as another name for Hedge users and is not to be confused with the members of a Hedge Group), are required to be at least 18 years of age, and US citizens or permanent residents, who have applied for or been approved to open a brokerage account with Hedge, and who also entered into a separate relationship with us by signing up for our Social Features. Please note that only users who are approved to open a brokerage account with us are eligible to interact with our Social Features or join gated Hedge Communities, however, users may be able to view content while we are processing their brokerage application and prior to account opening.
- **Social Networks and Other Online Services.** Our Services may allow you to, at your direction, post content from Hedge to other social networking services, such as Twitter and Instagram. You understand and agree that the use of your information by any social networking websites will be governed by the privacy policies of these third-party platforms and your settings on that platform. We encourage you to review such companies' privacy policies. You can learn more about Twitter's practices [here](#) and Instagram's practices [here](#). Under no circumstances is information permitted to be shared in such a way that could cause Hedge Pro LLC to become entangled with or to adopt the content on third-party platforms.

Analytics and Advertising Providers. We use certain third-party advertising and analytics services to better understand your online activity and serve you targeted advertisements and tailored content. For instance, we utilize Google Analytics which has provided information about how Google analyzes and processes the information that it collects at the following link: [G How Google uses information from sites or apps that use our services – Privacy & Terms – Google](#).

- These third parties may collect information through our website and mobile application, including identifiers and device information (e.g., device IDs, IP address, cookie IDs), web browser, mobile network information, pages viewed, time spent, links clicked, conversion data, geolocation data, usage data, and inferences based on and associated with that information, or combine this data across multiple sites to improve analytics for the purposes of themselves or other entities.
- As is the case for many digital technology companies, we utilize this data along with our third-party partners to, among, other things, analyze and track data, ascertain insights into customer preferences and the popularity of certain content, features, and pages, and in order to improve our abilities to deliver targeted advertisements and content tailored your interests on our Services and other platforms, as well as to provide services to use related to advertising (e.g., market research, attribution, analytics, statistical analysis, reporting). Certain data disclosures to these providers might be considered a “sale” or “sharing” of personal information as these terms are defined under the laws of California and other U.S. states.
- Please see the [Your Information Choices](#) and [Notice to California and Virginia Residents](#) sections below for more details. Please also note that some of our Services may include integrations, references, or links to services provided by third parties whose privacy practices differ from ours. If you provide information or otherwise allow us to disclose information to any of these third-parties you understand, acknowledge, and agree that the use, storage, and sharing of such data is governed by the privacy statements of these third-parties.
- To learn more about interest-based ads and your options for opting out of having your web browsing information used for targeted advertising purposes, please visit www.aboutads.info/choices, and review your mobile device controls and settings for features that may allow you to opt-in/out of having certain information collected for behavioral advertising purposes.

PLEASE NOTE, AS A SELF-DIRECTED BROKER-DEALER, HEDGE PRO LLC DOES NOT ADVERTISE ON BEHALF OF SPECIFIC SECURITIES OR INVESTMENT OPTIONS ON OUR SERVICES. HEDGE PRO LLC DOES NOT PROVIDE INVESTMENT ADVICE OR MAKE INVESTMENT RECOMMENDATIONS. LIKEWISE, NO OWNER, AFFILIATED PERSON, OFFICER, DIRECTOR, STAKEHOLDER, REGISTERED PRINCIPAL, EMPLOYEE, OR CONTRACTOR OF HEDGE PRO LLC, NOR THOSE OF ITS PARENT OR AFFILIATES PROVIDE INVESTMENT ADVICE OR MAKE RECOMMENDATIONS. AS SUCH, ANY STATEMENT, POST, MESSAGE, QUOTE, LETTER, SPEECH, OR OTHER FORM OF COMMUNICATION OF ANY KIND WITHOUT LIMITATION FROM ANY SUCH INDIVIDUAL OR ENTITY SHOULD NEVER BE CONSIDERED AS INVESTMENT ADVICE OR AN INVESTMENT RECOMMENDATION.

Aggregated and De-Identified. We share information with others in an aggregated or otherwise de-identified form that does not reasonably identify you, in accordance with applicable law. When we do so, we have various methods and internal processes in place that

are designed with the intention of preventing this information from being tied back to you in order to allow the recipients of this data to maintain and use de-identified information in accordance with applicable law.

4. THIRD-PARTY TRACKING, ANALYTICS, AND SERVICE PROVIDERS

As a supplement to the description provided under “Analytics and Advertising Providers”, which can be found in the preceding section **Disclosures of Information**, we have provided information here to educate you about third-party tracking technologies and explain how these technologies are used with our Services.

As is typical of digital technology providers, we use cookies, mobile analytics (e.g., Google Analytics, as mentioned above) and advertising IDs, web beacons, and other similar technologies to collect information about how our Services are being used and about those who use them. This includes, without limitation, information such as device type, device ID, device information, usage data, and other information which is outlined within this Privacy Policy and collected for the purposes described herein.

Cookies are very small files with limited text that a website can place on your device for your browser to store, and then can then recall and read when you reconnect to the web server at a later date. Cookies can sometimes contain universal unique identifiers (“UUID”) for users that websites can use to authenticate and remember a user when they return to a user without requiring a login.

Mobile analytics and advertising IDs are very similar to cookies, but instead of being generated by a website on a computer, they are generated by the operating system (“OS”) of a user’s mobile device. App developers, like us, will include certain software that allows the application to access these mobile IDs and send analytics and other information back to the server.

Web beacons are electronic images contained within a website or email. When a browser opens a webpage or email that contains a web beacon, it will automatically connect to the web server that hosts the image and provide a way for that server to collect information about the visitor’s session activity, device, and device cookies.

As is typical for digital technology providers, we, along with our analytics and advertising partners, use mobile analytics, advertising IDs, web beacons, cookies, and other similar technologies to collect information about what pages you visit, the links you click on, device identifiers, and how you use our Services, both during your session, as well as over extended periods of time. This helps us infer your preferences and settings, enables us to authenticate the devices you sign into your account with, analyze the effectiveness and popularity of our content and Services, and help us combat fraud, suspicious activity, theft, deceptive activity, bad actors, illegal activities, bad actors, and fulfill other legitimate purposes. We may share the data we collect or infer with third-parties for these purposes, as is described within the **Disclosure of Information** section.

Please see the “Your Information Choices” section for additional information.

5. DO NOT TRACK

Certain web browsers may transmit “do-not-track” signals to websites or applications. Please be advised, we currently do not take action in response to these signals.

6. YOUR INFORMATION CHOICES

We provide a variety of methods for you to provision the usage of the information that we collect about you, including choices about how we use that information in jurisdictions where this is required by law.

Should you choose to exercise any of your rights or information choices to restrict, limit, prevent, or impede our access, collection, verification, or receipt of certain information you acknowledge, agree, and assume full liability for any and all impairments to user experience, service interruptions, any restriction, limitation, or termination of your access to our Services in their entirety to any portion thereof that may be incurred by this decision. You are hereby advised and duly informed that certain features may not work as intended without certain information sharing and other related permissions. For example, we use certain information to protect you from a bad actor accessing your account and, as such, any limitation or restriction of any of the data or information we use to monitor, identify, and prevent unauthorized access to your account would limit our ability to provide these services.

- **Account Information.** You can update your password, name, email, phone number, investment objective, and trusted contact by visiting the “Account Settings” page of the Hedge mobile application.
- **Your Profile.** By default, your Hedge Social Profile and Investor Profile, some transaction activity (dollar amounts are never made public), and limited portions of your investor profile details provided during the account opening and application process are each publicly visible to other customers of the Services who visit your Hedge profile page. You can change some of these to “private” using the “Account Settings” page of the Hedge mobile application, but may lose access to certain portions of our Services should you choose to do so. You may also edit your username, picture, bio, header image, and location by visiting the “Edit Profile” section of your profile within the Hedge mobile application.
- **Device Data.** Using your device’s settings, you can withdraw permission for Hedge to access your contacts and other information stored on your device by navigating to “Account Settings” and disconnecting access permissions from our mobile application. Doing so may negatively impact your experience with our Services or render certain features unable to function as intended.
- **Communications preferences.** You can choose whether to receive email and/or SMS message promotional communications from us. Using your device’s settings, you can unsubscribe from push notifications by choosing the “Notification Settings” button in “Settings.” To unsubscribe from any email or SMS messages you receive from us, please follow the directions included in the message or reach out to us at support@hedge.io. These choices do not apply to certain informational communications including important information and documentation relating to your account, and we may still send you service-related or other non-promotional communications, such as account notifications, receipts, security notices, and other transactional or relationship messages. Many of these messages are required by law and are not optional.
- **Cookies.** Most browsers accept cookies by default. You may change your browser settings to delete or reject cookies, but this may adversely affect certain features or aspects of our Services.
- **Mobile & Advertising UUIDs.** Mobile operating systems provide options to limit tracking and/or reset the advertising IDs.
- **Data Sharing.** You can limit how we share your data with marketing partners. When disabled, we will no longer share any of your personal information with these partners for these purposes. In certain cases, you may be able to limit sharing between Hedge affiliates. Please see our [Financial Privacy Notice](#) for further information.
- **Data Deletion Following Account Closure.** We are required by the rules, regulations, laws, and provisions, such as those set by federal, state, and industry regulators, to retain information for an extended period of time, even after you close your account, for legal, regulatory, and security purposes. This is not optional and cannot be opted out of. We are required to maintain some information for as many as 7 years after your account is closed (which can be done by visiting the “Settings” page of your Hedge mobile application). Please note that we may have internal policies that require us to hold this information for longer than the legally mandated preservation periods. We will not consider or acknowledge data deletion requests prior to the expiration of any and all applicable preservation periods, both those deriving from internal mandates and from regulatory requirements.

Other than automated decision-making and controls that produce a legal or similarly significant effect, which some privacy laws afford a right to opt-out from, should you send us a request to exercise your rights or these choices, then to the fullest extent permitted under applicable law, we reserve the right to charge a fee or decline requests in certain cases (e.g., we will decline your request if granting it would be prohibited by law, adversely affect the privacy or other rights of another person, reveal a trade secret or confidential information, interfere with a legal, regulatory or business obligation that requires retention or use of the data, if we are unable to authenticate you as the person to whom the data that is being requested relates to, if the request is unreasonable, excessive, or would place an undue burden on our operations, or wherever else may be otherwise permitted by applicable law).

7. US CONSUMER PRIVACY LAWS

The Gramm-Leach-Bliley Act (the “GLBA”) is a federal law that governs nonpublic personal information collected from customers by financial institutions (like Hedge). State privacy laws do not apply to personal information that is subject to the GLBA. As a result, if you have applied for or opened an account with Hedge, then the personal information you provide to us may be governed by the GLBA and not your applicable state laws.

8. NOTICE TO CALIFORNIA AND VIRGINIA RESIDENTS

****PLEASE NOTE THAT CERTAIN PROVISIONS OF THE CCPA ARE SUBJECT TO FINANCIAL PRIVACY LAWS AND DO NOT APPLY TO NONPUBLIC PERSONAL INFORMATION COLLECTED BY FINANCIAL INSTITUTIONS (LIKE HEDGE). SIMILARLY, THE VCDPA DOES NOT APPLY TO ANY HEDGE ENTITIES THAT ARE CLASSIFIED AS FINANCIAL INSTITUTIONS. AS A RESULT, THE CCPA AND VCDPA DO NOT APPLY TO MOST OF THE PERSONAL INFORMATION THAT WE COLLECT.**

Subject to limitations and exceptions, the CCPA and VCDPA do provide California and Virginia residents with certain rights. Depending on your current state of residency, you may be afforded certain rights such as to confirm if Hedge processes your personal information, correct inaccuracies, request details (in a readily readable format about the categories and specific elements of personal information we collect, opt out of any sales, sharing, targeted advertising, or profiling for decisions (as these terms are defined in the CCPA and/or VCDPA); and to not be discriminated against for exercising these rights. However, should you choose to exercise your rights, you acknowledge, agree, and assume full liability for any impairments to user experience or interruptions, restrictions, or limitations of your usage of our Service incurred by this decision, and are advised that certain features may not work as intended without certain permissions (e.g., you are required to share your name, username, city/state, and other non-sensitive personal details with other users in order to use our Group Investing features, and will be unable to use this portion of our Services should you choose not to do so).

We do not sell any sensitive personal information about you to third parties. We do allow third-parties to collect information through our Services (e.g., Google Analytics) to help us better understand your preferences, tailor our Services and content to you, and advertise and market our Services on other platforms. Please see the [Third Party Tracking, Analytics, and Service Providers](#) and the [Your Information Choices](#) sections above for additional information on third-party tracking and your choices.

Category of Information	Example of Information Hedge Collects
Identifiers	e.g., Name, email address, IP Address, device IDs, internet service provider, etc.
Network Activity & Usage Information	e.g., Your engagement with promotional messages and ads, links clicked, session duration, internet or other electronic network activity information
Inferences	e.g., Gender from your first name

For California residents, the information categories in the above table reflect Hedge's processing within the past 12 months. For more details, such as the categories and sources of this information, please visit the [Information We Collect](#) section above, or for information on how we may share information we collect from you, please visit the [Disclosure of Information](#) section above.

California and Virginia residents may make a request to exercise rights under the CCPA and VCDPA, respectively, that are not otherwise exempt under applicable law, by contacting Hedge support with "Download Personal Data" or "Request Data Deletion" in the subject. We will require verification of your identity and authorization directly from you should you choose to appoint an authorized agent to act on your behalf.

In the event that Hedge is unable to meet your request, if you are a Virginia resident, you may contact our support email with the subject line "APPEAL - Download Personal Data" or "APPEAL - Request Data Deletion" to appeal our decision. CCPA and VCDPA requests involving information that is covered under financial privacy laws and thus exempt from the CCPA and VCDPA will not be acknowledged, unless required under applicable laws.

The CCPA broadly protects personal information collected from California consumers. HOWEVER, AS A FINANCIAL INSTITUTION, MOST OF THE INFORMATION THAT IS COLLECTED BY HEDGE IS SUBJECT TO FINANCIAL PRIVACY LAWS AND NOT THE CCPA. Notwithstanding the foregoing, California customer rights are listed below for your reference:

CCPA Right	Description
Notice at Collection	At or before the time of collection, you have a right to receive notice of our privacy policy and practices, including the categories of personal information and sensitive personal information to be collected (see Information We Collect , above), the purposes for which such information is collected or used (see How We Use Your Information , above), whether such information is sold or shared (see

	How We Use Your Information , above), and how long such information is (see Your Choices , above). You can find those details in this Privacy Policy
Right to Know	You have a right to request that we disclose to you the personal information we have collected about you and to request additional details about our collection, use, disclosure, or sale of this personal information, which is provided within this Privacy Policy. You may email us at support@hedge.io to make such a request, and are required to follow the email instructions detailed within this Privacy Policy.
Right to Request Correction or Deletion	To correct inaccuracies or request deletion of personal information you may email us at support@hedge.io , though there are a vast number of exceptions as this data is governed under financial privacy laws, not the CCPA.
Right to Opt-Out / "Do Not Sell or Share My Personal Information"	You may opt-out of future "sales" or "sharing" of personal information, as defined by the CCPA.
Right to Limit Use and Disclosure of Sensitive Personal Information	You may limit our use of your sensitive personal information to the services you request or that are otherwise permitted by law.

Please note that the CCPA's definitions of "sell", "share", and "personal information" are notoriously broad and that some of the data sharing described herein may be considered "sharing" under these definitions. We do not sell personal information as defined under the CCPA and have not done so within the past 12 months. We may have shared Internet or Electronic Network Activity (Network Activity & Usage Information, in the table detailing the categories of personal information in this [Notice to California and Virginia Residents](#) section). Please review the [Your Information Choices](#) section of this Privacy Policy for additional information on your options with respect to the "sharing" of "personal information", as defined by the CCPA.

Under California's "Shine the Light" law, California residents who provide personal information to businesses that they have established a business relationship for personal, family, or household purposes ("California Customers") may request information about whether or not the business has disclosed any personal information to any third parties for the direct marketing purposes of these third parties.

Please be aware that we do not disclose personal information to any third parties for their direct marketing purposes as defined by this law.

California customers may request further information about our compliance with this law by emailing support@hedge.io. Please note that businesses are required to respond to one request per California Customer each year and may not be required to respond to requests made by means other than through the designated email address.

9. THIRD-PARTY LINKS, NO ADOPTION OR ENTANGLEMENT

Our Service may contain links to third-party platforms, websites, forums, or other products or services which this Privacy Policy does not apply to. We are not responsible for any such information, or the third-party products or services on which this information is posted, or how any information you may disclose to these third parties is used. We encourage you to read their privacy policies before providing any information to them. Sharing information in any such way that may cause us to become entangled with or to have adopted (as defined by applicable FINRA and SEC guidance on these topics) any content, views, opinions, or posted information that is available, posted, or shared on any third-party platforms, including, without limitation other social media platforms (e.g., Twitter, Instagram, TikTok, Facebook, Threads, etc.), websites, forums, discussion channels, or other communication mediums is strictly prohibited.

10. LIMITS ON INFORMATION WE COLLECT

Hedge does not knowingly collect, maintain, or use personal information from children under 13 years of age. Our Services are directed to US adults, ages 18+ only, and are in no way directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at support@hedge.io. Please include "Children's Privacy" in the subject line to ensure correct processing of your report.

Our Services are intended to be used in the United States only. If you use our Services from another jurisdiction, your information may be processed in the United States or another jurisdiction that might not provide the level of data protection you are afforded in your jurisdiction, or that you would otherwise be afforded in the jurisdiction where our Services are intended to be used.

11. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy will evolve and be updated over time to reflect changes in our Services, how we collect, use, or otherwise process information, or the applicable law. When we publish such changes, we will revise the "Effective Date" above. To stay informed of our privacy practices, we recommend you review this Privacy Policy on a regular basis as you continue to use our Services.

12. CONTACT US

If you have any questions, comments, or concerns about our processing activities, please email us at support@hedge.io.