

**Covey Advisors LLC**  
**Covey Legends App and Services Privacy Policy**

March 29, 2023

Covey Advisors LLC (collectively, “Covey Advisors,” “we,” “us,” or “our”) know that data privacy is very important to you. We have created this privacy policy (the “Privacy Policy”) to describe what kinds of personal information we may obtain through our mobile application (the “Covey Legends App” or “App”), which is accessible through tablets, smart phones, and other devices; the Services (as defined below); and when you interact with us in any other way.

By accessing or using the Covey Legends App, you may access or use our investment advisory, brokerage, investment, and trading services (collectively, the “Services”). Our Services are only available to individuals aged 18 or older. If you are under the age of 18, you may not use our Services.

By clicking “I AGREE,” or otherwise manifesting your assent to this Privacy Policy when you sign up to access and use the Covey Legends App, you agree to be bound by this Privacy Policy. If you are accepting this Privacy Policy on behalf of your employer or another organization, you hereby certify that you are authorized to bind such party to the terms of this Privacy Policy. If you do not agree to (or cannot comply with) all of the terms of this Privacy Policy you may not access or use the Covey Legends App or the Services.

Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use.

This Privacy Policy will help you understand the following:

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## **I. INFORMATION WE COLLECT AND/OR RECEIVE**

In the course of operating the Covey Legends App, providing the Services, and/or interacting with you, Covey Advisors collects and/or receives the following types of information, which may include personal information.

### **1. Contact Information.**

We collect contact information through our Services, which typically includes name, phone number, e-mail address, and any information provided in messages to us (“Contact Information”). We use Contact Information for purposes such as providing information about the Services, responding to your inquiries, sending you e-mail alerts (including marketing emails), or providing the Services.

### **2. Covey Advisors Accounts.**

To access and use the Services, you will need to download the Covey Legends App (available on iOS and Android), and open an account (each an “Covey Advisors Account”). In order to open a Covey Advisors Account, you will be required to provide certain information in addition to Contact Information such as your date and country of birth, nationality, passport numbers (or numbers associated with other government issued identification), Social Security Number or Tax ID, gender, marital status, photo, employer name and address, financial information such as bank account and payment card details, suitability information, income, net worth, and other sources of funds, account balance, credit scores, tax information and other information about financial situation, investment objectives, and risk preferences and tolerance.

If your application for a Covey Advisors Account is approved you will be required to enter into a Customer Agreement with Covey Advisors, and agreement with Alpaca Securities and Alpaca Crypto (if your account will hold crypto). We reserve the right to accept or decline any application(s) for Covey Advisors Accounts in our sole and absolute discretion. If you have a Covey Advisors Account, or have taken steps to apply for one, you may review our Regulation SP Privacy Notice ([covey.io/legends](http://covey.io/legends)) for a description of our processing and disclosure activities regarding the non-public personal information that we collect from and about you in connection with opening and servicing Covey Advisors Accounts.

### **3. Payment Information.**

In order to purchase Services, you may be required to provide our third-party payment processor(s) (“each a “Payment Processor”) with certain credit or debit card information, ACH transfer information, or wiring instructions (collectively, the “Payment Information”). We do not obtain access to the Payment Information. Our Payment Processor(s) will collect on our

behalf information about your payment for Services (“Transaction Information”). By using the Services, you acknowledge and agree that if and to the extent your Payment Information, Transaction Information, and/or any other information is collected by or transferred to any of our Payment Processor(s), such information will be governed by its applicable privacy policy, and that you expressly agree to the terms of such privacy policy. You hereby expressly grant us the right, power, and authority to access and transmit your information as reasonably necessary for the Payment Processor(s) to provide its services to you in connection with your use of our Services.

4. Information obtained automatically from your online activity.

When you access or use the Covey Legends App or any of our Services, we use browser cookies, pixels, web server logs, web beacons, and similar technologies (collectively, “Tracking Technologies”) to collect or receive automatically certain standard technical information and other data sent to us by your computer, mobile device, tablet, or any other device. We may also evaluate your computer, mobile phone, or other access device to identify any malicious software or activity that may affect the availability of the Services. When you access or use any of the Services, advertising companies, analytics networks, and providers, and other third parties may use Tracking Technologies to collect information about your online activities over time and across different websites, apps, online services, App, and devices. The information collected or received is used by us and such third parties (1) to personalize your experience with the Services, understand how you use the Services, maintain a persistent session, and improve and further develop our Services, and (2) to serve targeted advertising and custom experiences across other sites, apps, online services, and devices.

The Tracking Technologies used on the Services include the following, among others:

Cookies, a commonly used Tracking Technology, consist of small packets of data that a website or device stores on browser, hard drive, or device so that your device will “remember” information about your visit. In addition to collecting information, cookies are used to help us authenticate users, provide content of interest to you, analyze which features you use most frequently, and measure and optimize advertising and promotional effectiveness. To do this, we may use both session cookies, which expire once you close your web browser, and persistent cookies, which stay on your computer until you delete them. If you do not want cookies placed on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your internet browser’s documentation for information on how to do this. However, if you decide not to accept cookies or other Tracking Technologies, the App and the Services may not function properly.

5. Information obtained from third-party sources.

*Service Providers:* We may collect or receive your personal information from third-party service providers such as credit bureaus and service providers (e.g., providers of Anti-Money Laundering (“AML”) or Know Your Customer (“KYC”) services).

*Government and Public Sources:* As permitted by applicable law, we may also collect or receive your personal information from publicly available government records, directories, and

sources such as courts, tax authorities, government agencies, regulatory authorities, and law enforcement.

6. Information obtained from third-party analytics services.

We use third-party analytics services (such as Google Analytics) to evaluate your access and use of the Covey Legends and the Services, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to device and internet usage such as: the type of device, the advertising identifier, the operating system and version, carrier and network type; IP addresses (which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device); browser type and language; referring and exit pages and URLs; date and time of access; the content viewed; the amount of time spent on particular pages; what features of the App and/or the Services are used or visited; details of any purchases; click stream information; and precise geolocation data. These third party analytics services use cookies and other Tracking Technologies to collect, analyze, and provide us with the data and related analytics. By accessing or using the Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. The information used by such analytics services is generally at the aggregate level. Google may associate such data with visitation information collected from our Services.

We may add to or change these third-party analytics services from time to time. For more information on our analytics services, including how to opt out from certain data collection, please visit the sites below. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the App or the Services. If you have any questions, or to request a current list of our third-party analytics services, please contact us as set forth in Section XIII (“How to Contact Us”).

For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>.

7. The Information Collected by or Through Third-Party Advertising Companies.

We may share Other Information about you with third parties that we have selected and approved for ad distribution and ad optimization (defined as the tailoring, targeting (*i.e.*, behavioral, contextual, and retargeting), analyzing, managing, reporting, and optimizing of ads). These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect Other Information for such purposes. Pixel tags enable us and these third-party advertising companies to recognize a browser’s cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site. In addition, we may receive Other Information from advertisers and/or their service providers such as advertising identifiers, IP addresses, and post-conversion data. You may choose to opt-out of this type of tracking and sharing of information at any time by selecting the specific partners you wish to exclude from this website <http://www.aboutads.info/choices>. You can also limit this type of tracking through the Do Not Track functionality in your web browser and a “Limit Ad Tracking” setting on iOS devices or a setting to “Opt out of Interest-Based Ads” on Android.

## II. INFORMATION USE AND SHARING

We may use and share your personal information as set forth below:

- To onboard you as a customer for the Services;
- When you use the Services, for identity verification, credit, AML, KYC checks, or other due diligence efforts. We use Plaid, Inc. (“Plaid”) for identity verification services. Any information that you provide to Plaid will be processed by Plaid in accordance with its privacy policy available at <https://plaid.com/legal/#end-user-privacy-policy>.
- To provide the Services including servicing, maintaining, and protecting your Covey Advisors Accounts, and processing transactions in your Covey Advisors Accounts;
- To monitor, support, analyze, and improve the Services;
- To communicate with you regarding the Services and your Covey Advisors Accounts;
- To fulfill your requests for information regarding new or improved products and services;
- To engage in marketing, advertising, and tracking activities, and evaluate the efficacy of our efforts; provided that, where required under applicable law, we will obtain your prior opt-in consent to send electronic marketing communications and/or our newsletter;
- To engage research, project planning, troubleshooting problems, and detecting and protecting against error, fraud, or other criminal activity;
- To protect the safety and security of our Services, businesses, and customers;
- To third-party contractors and service providers that provide services to us in the operation of our business and providing the Services, such as technical support for our App and Services, servicing Covey Advisors Accounts, and providing services such as administrators, custodial services, marketing and advertising companies, payment processors, consulting service organizations, and IT and cloud service providers, among others;
- To disclose aggregated, anonymous, user statistics and other information to (1) affiliates, agents, business partners, and other third parties; (2) describe the Services to current and prospective business partners; and (3) other third parties for lawful purposes;
- To share some or all of your information with our parent company, subsidiaries, affiliates, or other companies under common control with us;
- To fulfill our legal and regulatory requirements;
- To comply with applicable law, such as to comply with a subpoena, or similar legal process, and when we believe in good faith that disclosure is necessary to

protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;

- To assess or complete a corporate sale, merger, reorganization, sale of assets, dissolution, investment, or similar corporate event where we expect that your personal information will be part of the transferred assets; and
- Otherwise, with your consent.

We will take reasonable measures (*e.g.*, by contract) to require that any party receiving any of your personal information from us, including for purposes of providing the Services, undertakes (1) to retain and use such information only for the purposes set out in this Privacy Policy; (2) not to disclose your personal information except with your consent, as permitted by applicable law, or as permitted by this Privacy Policy; and (3) generally to protect the privacy of your personal information. Additionally, certain services may be provided through independent third parties, including but not limited to, clearing houses, that are not affiliated with Covey Advisors, and may operate under their own privacy policies.

### **III. ACCESSING AND MODIFYING INFORMATION AND COMMUNICATION PREFERENCES**

If the personal information we have for you changes, or if you no longer desire our Services, you may correct or update it by making the changes in your Covey Advisors Accounts, or by contacting us under Section XIII (“How to Contact Us”) of this Privacy Policy.

You cannot opt out of receiving transactional e-mails related to your Covey Advisors Accounts. You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” hyperlink located on the bottom of any of our marketing emails. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to remove completely or modify information in our databases. We will retain and use your information as necessary to comply with our legal and/or regulatory obligations, resolve disputes, and enforce our agreements.

### **IV. HOW WE PROTECT YOUR INFORMATION**

We take commercially reasonable steps to protect your information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from the Services may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

### **V. CHILDREN’S PRIVACY**

Our App and Services are only available to individuals aged 18 or older, and we do not knowingly collect personal information from any person under the age of 18. If an individual under the age of 18 has provided us with personal information, a parent or guardian of that child

may contact us and request that such information be deleted, and we will endeavor to delete that information from our databases.

## **VI. EXTERNAL WEBSITES AND THIRD PARTIES**

Certain Services offered through the App are provided by independent third parties. Brokerage, custodial, and securities payment transactions for Covey Advisors Accounts are provided by Alpaca Securities, LLC (“Alpaca Securities”) and Alpaca Crypto, LLC (“Alpaca Crypto”). Alpaca Securities and Alpaca Crypto are not affiliated with Covey Advisors. Neither Alpaca Securities nor Alpaca Crypto makes recommendations or offers investment, financial, legal, or tax advice. Covey Advisors may collect your personal information, and then transfer such information to Alpaca Securities and Alpaca Crypto to enable provision of the Services.

Unless explicitly stated otherwise, our Privacy Policy addresses only our use and disclosure of information we collect from and/or about you in your interactions with Covey Advisors, the Covey Legends App, and the Services. If you disclose information to third parties, or we transfer your personal information to Alpaca or other third parties in accordance with this Privacy Policy, the use and disclosure restrictions contained in this Privacy Policy will not apply, as we do not control the privacy policies of such third parties, nor are we subject to them. For more information on the privacy practices of the above-mentioned third parties, please go to:

Alpaca Securities: [https://files.alpaca.markets/disclosures/privacy\\_notice.pdf](https://files.alpaca.markets/disclosures/privacy_notice.pdf)

The App and the Services may also contain hyperlinks to other third-party websites or apps (“Linked Sites”). We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites to which we provide hyperlinks. As such, we are not responsible for the content or the privacy policies of those Linked Sites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

## **VII. DO NOT TRACK**

As discussed above, third parties such as advertising networks and analytics providers may collect information about your online activities over time and across different websites when you access or use the App or the Services. Currently, various browsers offer a “Do Not Track” option, but there is no standard for commercial websites. At this time we do not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

## **VIII. RETENTION OF YOUR INFORMATION**

We will retain your personal information for as long as it serves the purpose(s) for which it was initially collected as stated in this Privacy Policy or subsequently authorized. We will also retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If your customer relationship with Covey Advisors ends, we will not destroy your Information unless required or permitted by law. We

will continue to treat your personal information in accordance with this Privacy Policy and applicable laws.

Information connected to you that is no longer necessary and relevant to provide our Services may be de-identified or aggregated with other non-personal information to provide insights that are commercially valuable to Covey Advisors, such as statistics of the use of the Services.

## **IX. NOTICE TO CALIFORNIA RESIDENTS**

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the preceding calendar year, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. If you wish to submit a request pursuant to Section 1798.83, please contact us via email at [insert email address].

## **X. NOTICE TO NEVADA RESIDENTS**

We do not sell your personal information as defined under Nevada law. Nonetheless, if you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties. You can exercise this right by contacting us at [insert email address] with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your Covey Advisors Account.

## **XI. IMPORTANT NOTICE TO NON-U.S. RESIDENTS**

The App and the Services are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us will be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your country of origin. If you are located outside the United States and choose to use the App and/or the Services, you consent to any transfer and processing of your personal information in accordance with this Privacy Notice, and you do so at your own risk.

## **XII. UPDATES TO THIS PRIVACY POLICY**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may update this Privacy Policy from time to time and without prior notice to you to reflect changes in our privacy practices. We will indicate at the top of this Privacy Policy when it was most recently updated, and we encourage you to revisit this page periodically to stay aware of any changes. By accessing the App or the Services after we change this Privacy Policy, you are deemed to have accepted such changes.



### **XIII. HOW TO CONTACT US**

If you have any questions or comments about this Privacy Policy or our privacy practices, please email us at [info@coveylegends.io](mailto:info@coveylegends.io).