

Follow's Privacy Notice

Effective Date September 1, 2022

When you use Follow ("Follow", "us," "we"), we collect and process information about you. Follow recognizes that you entrust us with your personal and financial information, and we understand that protecting and safeguarding this information is important. This policy explains what information we collect, why we use it, who we share it with, and how we protect it, along with what rights you may have in connection with your personal information.

Follow may offer certain products, programs or services that have unique or additional terms, privacy notices and/or consent forms that explain how Follow processes information. For details on any product-specific features, notices or terms, please review the terms for those products and services.

How We Collect Your Information

- **From you.** We may collect personal information and other information when you use or interact with our Services or communicate with us.
- **When you create an account.** We collect personal information from you when you create an account with us or sign up for a subscription.
- **Automatically from devices you use to connect with us or use our services.** We collect information when you interact with our online services. For more information about this, please see our "Cookies and Other Technologies" section below.
- **From publicly available sources.** This includes personal information we collect from public sources including, but not limited to websites that enable social sharing, social media sites, and from our service providers, security and fraud prevention vendors and suppliers, our affiliates, or other individuals and businesses.

Information We Collect

Depending on how you interact or use our products and services, we may collect the following information:

- **Contact Information** such as name, email address, zip code, phone number, and home address.
- **Payment Information** such as credit card or debit card information.
- **Biographical and Identifying Information** such as date of birth, details on where you reside, and Social Security Number.
- **Financial Information** such as your income, accounts with us and other financial institutions, net worth and liquidity needs, as well as other financial details.
- **Professional or Employment-Related Information** such as information about your occupation, title, employer information, employment history, industry affiliations, directorships and other titles.
- **Internet Usage Information** such as browsing history, search history, information regarding your interaction with our online services or advertisements, IP address, browser type, and operating system.
- **Device information.** Along with the information you give us directly, we collect a variety of information automatically as you use our service like the browsers and devices you use to access our online services. The

data we collect includes browser or device model and settings, operating system, unique identifiers, and the version of the app you're using.

- **Inferences** such as inferences drawn from any of the personal information we collect to better understand your preferences.
- **Account Information** such as information you provide when you create an account with us, like username and password.
- **Transaction Information** such as information needed to complete your transactions, such as your bank account information, and your transaction history.

If you submit any personal data relating to other people to us, such as information about other account holders or beneficiaries, you represent that you have the authority to do so and to permit us to use the information in accordance with this policy.

How We Use Your Personal Information

We process personal information to provide you services and operate our business. Generally, we use personal information to:

- **Provide, market, and develop our products and services.** Follow collects information to provide our services, maintain our websites and mobile applications, and better understand the interests of our customers and visitors who use our services and products.
- **Process transactions and administer your account.** We may use your information to process your transactions and requests or otherwise administer your account with us.
- **Communicate with you.** We may use your information to respond to your inquiries and send you communications, including our subscriber-based emails, regarding our products and services.
- **Develop new products and services and quality assurance.** We may use personal information to study, develop, and improve our products and services. We may also aggregate, anonymize, and/or de-identify personal information we collect and use it for any purpose, including product development and improvement activities.
- **Security and fraud prevention.** We may use personal information to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- **Debugging.** We may use your personal information to secure our online services including our network and websites and to debug our online services.
- **Comply with law.** We may use personal information to comply with our legal and regulatory obligations, to defend ourselves in litigation and investigations, and to prosecute litigations.
- **Internal business purposes.** We may use personal information for our internal business purposes, such as data analysis, audits, and enhancing our services. We may also use inferences drawn from personal information to create a profile reflecting your preferences so we can tailor our services to you.

Information We Disclose

We may disclose personal information in the following ways:

- **With our affiliates.**
- **At your direction.** We will share your information at your direction, such as when you direct us to share your information with another financial institution to process a transaction.

- **Service Providers.** We may provide personal information to vendors, contractors, business and service partners, or other third parties who provide services to us including analysis firms, custodians, brokerage firms, advertisers, and others. These disclosure may be to provide necessary business services to client accounts. Only the private client information necessary for them to perform their functions is disclosed, and service providers are required to safeguard information.
- **Collaborators.** We may share personal information with collaborators with whom we jointly develop or promote our services.
- **Government, regulatory, or law enforcement agencies.** We reserve the right to disclose your information to respond to valid information requests from government authorities and judicial requests, to investigate potential fraud, or where otherwise required by law. We may disclose your personal information where we believe the disclosure is necessary or appropriate to comply with regulatory or legal requirements or to protect the safety, rights, or property of ourselves and others and to exercise, establish, or defend our legal rights.
- **In connection with a merger, acquisition, or business transfer.** If we sell all or a part of our company, your information may be transferred to the buyer.

We do not sell personal information or transfer personal information to third parties to use for their own benefit; however, we allow certain companies to place tracking technologies like cookies on our websites. Those companies receive information about your interaction with our websites that is associated with your browser or device and may use that data to send you relevant ads on our websites or others. Except for this kind of sharing, we do not sell any of your information.

We may also disclose aggregated, anonymized or de-identified information that is not personally identifiable to third parties.

Your Marketing Preferences

If you no longer wish to receive promotional marketing materials from us, you may opt-out of receiving such materials. You may unsubscribe from receiving marketing or other commercial emails from Follow by following the instructions included in the email. We will work to comply with your request promptly.

However, even if you opt out of receiving such communications, we may need to continue to send you certain non-marketing communications (such as information about your transactions, changes to our Privacy Policy or Terms of Use).

Your Privacy Rights and Choices

Depending on where you reside, you may have certain rights and choices regarding our processing of your personal information. These include:

- The right to know the categories and/or specific pieces of personal information collected about you, including whether that personal information is sold or disclosed and with whom it was shared;
- The right to access a copy of the personal information we retain about you;
- The right to request deletion of your personal information; and
- The right to correct your personal information.

We will verify your identity in connection with any requests and take steps designed to ensure that only you or your authorized representative can exercise these rights. If you are an authorized agent making a request, we may require and request additional information to verify you are authorized to make the request, which may include requesting proof of authorization or power of attorney.

There may be situations where we cannot grant your request. Where we deny your request in whole or in part, we will take steps to inform you of the denial and provide an explanation of our actions and the reasons for the denial.

We will not restrict or deny you access to our products and services because of the choices you make in connection with your personal information, but please note, certain choices may affect our ability to deliver our services. For example, if you ask Follow to delete your email address, we will not be able to send you emails about offers and events.

You may exercise any of your rights in relation to your personal information by contacting us using the details provided in the “Contact Us” section below.

Cookies and Other Technologies

Our online services, interactive applications, and advertisements may use cookies and other technologies such as web beacons. We use this information to better understand, customize and improve user experience with our websites, services and offerings as well as to manage our advertising. This information can make your use of our services easier and more meaningful by allowing Follow to provide better service, customize sites based on consumer preferences, compile statistics, provide you with more relevant advertisements based on your interests, analyze trends and otherwise administer and improve our products and services. If we have collected your personal information, Follow may associate this personal information with information gathered through these tools.

Like many companies, we place advertisements where we think they will be most relevant to customers. One way we do so is by allowing network advertising companies with whom we work to place their own tools when an individual visits Follow websites. This enables the network advertising company to recognize individuals who have previously visited Follow websites and to serve you ads based on your web browsing activity, purchases, interests and/or other information—a practice commonly referred to as interest-based advertising or online behavioral advertising.

These advertising companies may also use these types of technologies to recognize you across the devices you use, such as a mobile phone or a laptop, and serve you ads on websites you visit and applications you use.

Your web browser can be set to allow you to control whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to your browser. If your browser is set to reject cookies, websites that are cookie-enabled will not recognize you when you return to the website, and some website functionality may be lost. The Help section of your browser may tell you how to prevent your browser from accepting cookies. To find out more about cookies, visit www.aboutcookies.org. Also, certain versions of the iOS operating system permit you to “[Limit Ad Tracking](#)” in the system settings, and certain versions of the Android operating system allow you to “[Opt-out of Interest-Based Ads](#)” in the system settings. Options you select are browser and device specific.

Some browsers have Do Not Track (“DNT”) features that allow you to tell a website not to track you. These features are not all uniform, and some browsers may not be set up to honor such requests. At this time, we do not look for or respond to DNT signals.

How We Safeguard Your Information

We maintain reasonable physical, electronic, and procedural safeguards to protect the confidentiality of all personal information we have about you. Follow protects your privacy in a manner that is consistent with the principles outlined in this notice.

We take steps to secure our websites and applications; however, the confidentiality of information transmitted over the Internet cannot be guaranteed. We urge you to exercise caution when transmitting personal information over the Internet, as no method of Internet transmission or data storage can provide guaranteed protection to your information.

Children’s Data

Our services are not targeted to children, and we do not knowingly collect personal information from children under 18 years of age.

Transfer of Personal Information Between Countries

Follow is based in the United States. Any information you provide to us through use of our products and services may be stored and processed, transferred between and accessed from the United States and other countries which may not guarantee the same level of protection of personal information as the one in which you reside. We may need to send your personal information overseas as part of our normal business operations. Please be assured that we take reasonable steps to ensure that your privacy is protected.

Data Retention

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

Please note that we often need to retain certain data for recordkeeping purposes, for purposes connected with the establishment, exercise or defense of legal claims and/or to complete any transactions that you began prior to requesting a change or deletion.

Third Party Sites

We may provide links to websites and other third-party content that is not owned or operated by Follow. The websites and third-party content to which we link may have separate privacy notices or policies. Follow is not responsible for the privacy practices of these websites.

If you provide any personal information through a third-party site, your interaction and your personal information will be collected by and controlled by the privacy policy of that third party site. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties, which are not governed by this Privacy Policy.

Contact Us

If you have questions about your personal information, please contact us by phone at (707) 563-1896 or email at help@follow.co.

How Will I Know Whether Follow Has Updated This Policy?

Follow reserves the right to amend, change, modify, add, or remove portions of this Privacy Policy at any time. We will post notice of changes to this Privacy Policy on this page. You must check this page periodically for changes. Changes will become effective as of the date listed at the top of the page.

FACTS**WHAT DOES FOLLOW DO WITH YOUR PERSONAL INFORMATION?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security Number;
- Income;
- Name;
- Home address;
- Date of birth; and,
- Transaction history.

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Follow chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Follow share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	No
For our affiliates to market to you	Yes	No
For nonaffiliates to market to you	No	N/A

To limit our sharing

- Call (707) 563-1896.
- Email us online: help@follow.co

Please note:

When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

Questions?

Call (707) 563-1896 or go to our website www.Follow.co

Who we are	
Who is providing this notice?	Udon RIA Sub LLC, d/b/a Follow or Follow RIA
What we do	
How does Follow protect my personal information?	To protect your personal information from unauthorized access and use, we maintain reasonable administrative, technical and physical safeguards designed to protect your personal data against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.
How does Follow collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ■ Sign up for and use our investment or brokerage services, including when you choose to provide us with your information on our mobile applications; ■ Interact with our website and mobile applications; ; and/or ■ Create a brokerage account and trade securities . <p>We also collect your personal information from others, such as our service providers, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness; ■ affiliates from using your information to market to you; and ■ sharing for nonaffiliates to market to you. <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Our affiliates include a Publishing Company</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Our non affiliates include a broker dealer and custodian.</i>
Joint marketing	<p>A formal agreement between non affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Our joint marketing partners include categories of companies such as brokerage companies.</i>
Other important information	