



## PRIVACY POLICY

### 1. INTRODUCTION

This policy (“**Privacy Policy**” or the “**Policy**”) discloses the privacy practices of LGO SAS, LGO Europe SAS, and LGO Markets LLC (collectively, “**LGO**” and referred to herein as “**we**,” “**us**,” and “**our**”) and the LGO website (collectively, the “**Website**” located at <https://lgo.group>). The following depicts the information LGO collects from you and how LGO protects and uses that information.

*LGO is committed to protecting your privacy and will never sell your information to anyone. LGO keeps any personal data it collects in accordance with the applicable privacy and data protection laws and regulations, including the General Data Protection Regulation (“GDPR”), its successors or implementing texts as well as equivalent legislation.*

**Last Updated:** July 17, 2020

#### 1.1 Scope

LGO offers its services and products through entities registered in France and the United States. LGO Europe SAS is a simplified joint-stock company having its registered office at 110 rue du jardin public, 33000 Bordeaux, France. LGO Markets LLC is registered in Delaware with its principal place of business at 221 River St., 9th Floor, Hoboken, New Jersey 07030.

LGO Markets and LGO Europe are wholly-owned subsidiaries of LGO SAS, which is a simplified joint-stock company having its registered office at 675 route du Puy d'Or 69760 Limonest, France. This Policy applies to all business lines of LGO.

For purposes of applicable data protection laws, the respective LGO entity with whom you have registered or contracted is the “controller” of your personal data. “Personal data” means any information that, directly or indirectly, identifies an individual (a “data subject”). Any other terms not defined in this Policy will have the meaning given to them in the GDPR, other applicable law or regulation, or LGO’s Terms of Use and Service, as applicable.

#### 1.2 Purpose

The purpose of this Privacy Policy is to describe:

- The types of information we collect and how it may be used or retained;
- The Website’s use of cookies and similar technology;
- How and why we may disclose your personal data to third parties;
- The transfer of your personal information;

*The content of this presentation is proprietary and confidential information of LGO SAS and its subsidiaries (collectively “LGO”). It is not intended to be distributed to any third party without the written consent of LGO.*



- Your statutory rights concerning your information; and
- The security measures we use to protect and prevent the loss, misuse, or alteration of your personal information.

### 1.3 Acceptance of the Privacy Policy

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY ACCESSING OR USING THE LGO WEBSITE, LGO SERVICES, LGO ACCOUNT, OR LGO PLATFORM (INCLUDING THE LGO API AS SUCH EXISTS AND MAY EXISTS IN THE FUTURE), YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE BOUND TO ALL THE TERMS OF THIS PRIVACY POLICY AND THE LGO TERMS OF USE AND SERVICE.

### 1.4 Changes to Privacy Policy

LGO reserves the right to modify this Policy at any time. If we decide to change this Policy, we will post those changes online or any other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

## **2. INFORMATION WE COLLECT**

The type of information that we collect depends on the product or service being provided. LGO may collect information from you passively when you visit the Website, engage with online content, or otherwise access the LGO Services. LGO also collects personal data from you directly when you provide it to us and from third parties who help us provide, improve, maintain, or expand the LGO Services (including affiliates, partners, service providers, banks, etc.).

### 2.1 Information Collected from Website Users

*LGO is committed to taking all reasonable steps to safeguard the privacy of visitors to the Website. We, or third parties authorized on our behalf, may collect certain data from Website visitors (anonymised and/or aggregated data that does not identify a specific individual, like the URL of websites visited, browser type, or IP address) through use of electronic tools like cookies, pixel tags, or web beacons.*

**Data Tracking Cookies:** A “cookie” is a small text file that is stored on a user’s computer for record-keeping purposes which contains information about that User. Cookies are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site, like which pages you visited and what links you clicked on.

Most browsers automatically accept cookies, but you may be able to modify your browser settings to decline cookies. Please note that if you decline or delete these cookies, some parts of



the Website may not work properly. More information on cookies and their use can be found at [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

**Other Tracking Devices:** Pixel tags and web beacons are tiny graphic images placed on certain pages on a website or in emails that allow us to determine whether you have performed a specific action. When you access these pages or open or click an email, pixel tags and web beacons generate an anonymized notice of that action.

## 2.2 Information Provided When Registering for an LGO Account

*LGO is required to obtain certain personal information in order to open an LGO Account, provide the LGO Services, verify your identity, or otherwise comply with our legal, regulatory, or contractual requirements.*

### **Information from Individuals and Businesses:**

- Financial Account Information: External bank account data, financial institution name, account name, account type, branch number, account number, routing number, international bank account number (“*IBAN*”), passwords, authentication questions, materials or other content, transaction and available balance information;
- Financial Data of Your Account and Our Partner Banks: Transaction data and transaction history, including but not limited to ACH, Wire and card transactions, available account balance, card data, loan and debit amounts, loan types, payment plan, loan balance, linked bank accounts, salary and other income, sources of wealth, and other assets;
- Due Diligence or Background Check Data: Credit and criminal checks, supporting research, and screenings to the extent required or permitted by local law; and
- Recipients’ or Senders’ Data: Name, address, telephone number, IP address, date of birth, and financial account information to the extent applicable based on the service or product being provided.

### **Information from Individuals:**

- Full legal name, any aliases or nicknames, date and country of birth, country of citizenship;
- Residential address (physical address);
- Phone number and email address;
- Identification number:
  - For U.S. persons: Social security number for U.S. persons (U.S. citizens); or
  - For Non-U.S. persons: Passport number and country of issuance (may include taxpayer I.D. number, alien identification card number, or the number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photo or similar safeguard).

*The content of this presentation is proprietary and confidential information of LGO SAS and its subsidiaries (collectively “LGO”). It is not intended to be distributed to any third party without the written consent of LGO.*

**Documents from Individuals:**

- Government-issued identity document (such as a passport, driver's license, national I.D., state I.D., etc.); and
- Proof of residential address (utility bill, rental agreement, etc.).

**Information from Institutions:**

- Entity legal name (must appear on bank account), “doing business as” name (if different from legal name), legal form;
- Date and jurisdiction of formation;
- Physical business address (no P.O. boxes), principal place of business and registered address (if different from physical business address);
- Tax identification or registration number;
- Nature of business activity, assets under management, and source of funds;
- Phone number and email address of primary contact;
- Link to website or social media (if any);
- Regulating entity(ies) and license or registration number if applicable; and
- Certification of beneficial owners (with ownership stake, copy of valid I.D. or passport, and proof of residential address dated within 3 months), controlling parties, and authorized traders (copy of valid I.D. or passport, and proof of residential address dated within 3 months).

**Documents from Institutions:**

- Articles of incorporation, articles of organization, bylaws, or relevant agreement (partnership, venture, etc.);
- List of authorized signatories (with a copy of valid I.D. or passport) and corporate resolution or mandate of delegation (if required);
- Shareholder structure, cap table, or organizational chart showing ownership percentages;
- Proof of physical business address (utility bill, rental agreement, etc.);
- Source of funds documentation (financial statements, tax return (last two taxable years), bank, accountant, or brokerage letter, standardized statement or proof of balance from an exchange, or bank and/or equities statement);
- Form W-8 or Form W-9 (or equivalent for non-U.S. applicants);
- Government-issued business licenses, registrations, or certificate of good business standing (KBIS for French companies dated within 3 months); and
- Any other similar corporate documents.

### 2.3 Information Collected While Using the LGO Services

*LGO collects additional information throughout your use of the LGO Services, Platform, and Account. This information may be recorded on a public blockchain, a decentralized network, or*



*third-party system not controlled or operated by LGO. We may not be able to erase, modify, or alter your data from such networks.*

**Account Information:** LGO maintains information related to your LGO Account, including name, address, date and place of birth, nationality, email address, phone number, username, photograph, account numbers, account types, details of funding instruments associated with the account, details of payment transactions, details of commercial transactions, customer statements and reports, and details of identity collected as part of our KYC procedures.

**Additional Verification:** If we cannot verify certain information that you provide, or if you request a withdrawal to an account or digital wallet not previously used by you, we may ask you to upload or send us additional confirmations or to answer additional questions online to help verify your information.

**Communications:** When you communicate with us for customer service, onboarding, or other purposes (e.g., by emails, phone calls, tweets, etc.), we retain such information and our responses to you for record keeping, administrative, and other purposes.

**Service Usage Information:** Through your use of the LGO Services, we also monitor and collect tracking information related to usage such as access date & time, device identification, operating system, browser type, geolocation information, and IP address. This information may be directly obtained by LGO or through third parties. This service usage data helps us our systems to ensure that our interface is accessible for users across all platforms and can aid during criminal investigations.

**Transaction Information:** We collect and maintain transaction information related to LGO Accounts and transactions effectuated through the LGO Services, which may include, but not be limited to, deposit and withdrawal information, wallet addresses, transaction hashes, account balances, and trade history.

**Blockchain Data:** Transaction data may be recorded on a public blockchain, which by its nature may be immutable. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data.

## 2.4 Information from Other Sources

We may also collect information about you from other third-party sources, including from another LGO entity, business partners, banks, other exchanges, recipients and senders of funds, data providers, identity verification providers, credit bureaus, and other parties to the extent permitted by applicable law.



For example, in connection with your creation of an account, we may collect information about you from identity verification service providers in order to verify your identity, including your prior addresses, names, and a photo that you provide through a mobile app (i.e. a selfie) and a photo or scan of your face as it appears on an identification document for facial verification purposes.

### **3. USE OF INFORMATION**

*We only process your data where we are legally required to, where processing is necessary to perform any contracts we entered with you (or to take steps at your request prior to entering into a contract with you), for our legitimate interests to operate our business (process transaction, maintain accounts, or comply with compliance policies), or to protect our or your, property, rights, or safety, or where we have obtained your consent to do so.*

#### 3.1 Use of Information from Website Users

**Improve Services:** LGO will use data collected from Website Users to assist us in better understanding visitor use and behavior and improving the Website. We use cookies to facilitate and customize your visitor experience, save you time while using the Website, remind us who you are, and track and target your interests. By using the Website, you consent to cookies being stored on your device.

**Remarketing:** Remarketing is a way to connect with users, based upon your past interactions with the Website. Third-party marketing vendors may be hired by LGO to perform remarketing services. As a result, third-party vendors, including Google, may show LGO ads on sites on the internet and use cookies to serve ads based on a user's prior visits to the LGO Website.

Users may opt out of Google's use of cookies by visiting the Google advertising opt-out page [here](#). This information is used only for remarketing purposes and will not be used by them for any other purpose.

**Advertising:** We may disclose non-personally identifiable information with advertisers. For example, we may share aggregated demographic information (which does not include any personal data) with “Third Party Advertisers” or “Third Party Advertising Companies” and other parties as provided below:

- We use Third Party Advertising Companies to serve ads when you visit our Website. These companies may use certain data about your visits to this and other websites in order to provide, through the use of network tags, advertisements about goods and services that may be of interest to you.



- Some of these Third Party Advertising Companies may be advertising networks that are members of the Network Advertising Initiative (“*NAI*”). If you would like more information about any NAI member company, or you would like to opt-out of targeted advertising from any NAI member company, click [here](#).
- We also use third party service providers to track and analyze usage and volume statistical information from our Users to administer our Website and constantly improve its quality. We may also publish this information for promotional purposes or as a representative audience for Advertisers. Please note that this is not personal data, only general summaries of the activities of our Users. Such data is collected on our behalf, and is owned and used by us.

### 3.2 Use of Personal Information

We use the information we collect to operate our business, provide our Services, for other purposes as permitted or required by law, and to provide you with a smooth, efficient, and customized experience. Specifically, we may use your information to:

- Provide, maintain or improve the LGO Services (including identity verification, customer support, and fraud prevention);
- Process transactions and send notices about your transactions;
- Resolve disputes, perform accounting, auditing, invoicing, reconciliation and collection activities, and troubleshoot problems;
- Communicate with you about our business and to inform you of matters that are important for your account and/or use of the Website and respond to any questions, comments or requests you submit to us;
- Perform analysis and risk management, including comparing information for accuracy and verify it with third parties and ensuring the security of our networks and information systems;
- Comply with applicable laws, regulation, or court order and cooperate with law enforcement pursuant to a lawful request;
- Establish, exercise and defend legal claims and enforce contractual terms, including LGO’s Terms of Use and Service as such are posted on the Website;
- Monitor and report compliance issues, including monitoring for suspicious activities, and protect against, identify and prevent fraud and other prohibited or illegal activity, claims and liabilities; and
- Any other measures reasonably necessary to comply with our internal policies and procedures.

## **4. SHARING OF PERSONAL INFORMATION**



*We may share your information with affiliates, service providers that perform functions on our behalf, or other third parties on the basis and for the purposes indicated below. We will not sell, rent, or trade your personal information outside of that which is indicated in his Policy.*

#### 4.1 Sharing with Affiliates and Advisors

We may share personal data with affiliates in order to provide support or customer service, help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services and communications.

For example, even if you do not reside in the U.S, your information may be shared with LGO Markets LLC, which provides global support for all LGO Services including technical and operations infrastructure, product development, security, compliance, fraud prevention, and customer support. LGO Markets and LGO Europe may need to share information related to a client accounts, transactions, or a compliance issue.

We may also share your information with our professional advisors who provide legal, accounting, or other consulting services in order to complete third party financial, technical, compliance and legal audits of our operations or otherwise comply with our legal obligations. These advisors are held to the same privacy and confidentiality standards as employees.

#### 4.2 Sharing with Service Providers

We may share personal data with service providers who help with our business operations and to deliver you the LGO Services, such as cloud service providers providing cloud infrastructure, providers of I.D. verification solutions or other due diligence or compliance solutions, providers of customer service solutions, website analytics, or marketing automation.

LGO's third-party service providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. Such third parties are bound to comply with applicable data privacy and protection laws. Please note, however, that these third parties may be in other countries where the laws on processing information may be less stringent than in your country.

#### 4.3 Sharing with Unaffiliated Third Parties

We may share information with unaffiliated third parties, including banks, business partners, or custodians where such information is needed to complete a transaction authorized by you or to improve your experience, where you expressly consent or for legal and compliance purposes.

We may share your personal data to prospective purchasers or purchasers under suitable confidentiality terms if we are discussing selling or transferring a part or all of our business or if we are reorganised or sold in order to continue to provide Services to you.

*The content of this presentation is proprietary and confidential information of LGO SAS and its subsidiaries (collectively "LGO"). It is not intended to be distributed to any third party without the written consent of LGO.*



We may share certain personal information with other financial institutions to help them comply with anti-money laundering and counter-terrorist financing requirements to the extent permitted by applicable law, including Section 314(b) of the U.S.A. Patriot Act.

#### 4.4 Sharing with Law Enforcement or Government Authority

*We may share your information for our protection and the protection of others. Your personal data may be shared if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of legal claims.*

We reserve the right to disclose your personal information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, subpoena, court order, or legal process; enforce or apply this Privacy Policy, our Terms of Use and Service or other agreements; or protect the rights, property or safety of the Website, its Users, or others.

With respect to U.S. residents, we also may share your information with tax authorities, including the Internal Revenue Service, pursuant to the Foreign Account Tax Compliance Act (“*FATCA*”), to the extent that this statute may be determined to apply to LGO.

## **5. SECURITY OF PERSONAL INFORMATION**

*We take security seriously and take numerous precautions to protect the security and confidentiality of personal information we collect and store, such as computer safeguards like firewalls and data encryptions. LGO maintains personal data on secure servers in the U.S. and elsewhere in the world where our offices and service providers are located with the appropriate technical and organizational safeguards in place to protect your data.*

Although, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. While we employ commercially reasonable security measures to protect data and seek to partner with companies which do the same, we cannot guarantee the security of any information transmitted to or from the Website, our service providers, or third parties, and are not responsible for the actions of any third parties that may receive any such information.

We regularly train and raise awareness for all our employees to the importance of maintaining, safeguarding and respecting your personal information and privacy. We regard breaches of individuals’ privacy very seriously and will impose appropriate disciplinary measures, including dismissal from employment. We have also appointed a LGO Data Protection Officer, to ensure that LGO manages and processes your personal information in compliance with the applicable privacy and data protection laws and regulations, and in accordance with this Policy.



Remember that you play an important role in protecting your data. Please review LGO's Terms of Use and Service regarding your obligations. Please notify us immediately if you become aware of any unauthorized access to or use of your Account.

## **6. RETENTION OF PERSONAL INFORMATION**

*LGO retains personal data as required or permitted by law and to fulfill the purposes of this Policy. We may retain personal data, such as the information collected when opening an LGO Account, for 5 years or more (in accordance with applicable law) after an account has been closed or inactive.*

The criteria we may use to determine the retention period for certain categories of data includes:

- How long your LGO Account has been open;
- Whether there are contractual, legal or regulatory obligations that exist that require us to retain the data for a certain period of time;
- Whether there is any ongoing dispute or claim that relates to your relationship with us;
- What the expectation for retention was at the time the data was provided to us; and
- Our internal policies and procedures and current record keeping obligations.

We will not delete personal data if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

## **7. TRANSFER OF PERSONAL INFORMATION**

We may transfer and process your information with LGO affiliates, partners, and service providers based throughout the world, including in the United States, Europe, and possibly other countries other than your country of residence whose data protection laws may be different from, and less stringent than, those in your country of residence:

- We may use standard contractual clauses for the international transfer of personal information. You can obtain a copy of such clauses by contacting us using the contact details below;
- We may require that the other party agree to at least the same level of privacy safeguards as required under applicable data protection laws;
- We may transfer your information to countries where the EU Commission has decided that they have an adequate level of data protection or we take measures to ensure that all recipients provide an adequate level of data protection ("third countries"); or
- We may transfer your personal data where you have consented to such transfer. Where transfers to a third country are based on your consent, you may withdraw your consent at



any time. Please understand, however, that our services may not be available if we are unable to transfer personal data to third countries.

By using the LGO Services, you expressly consent to your personal information being processed and transferred in this way for the purposes described in this Policy. In all such transfers, we will protect your personal information as described in this Privacy Policy and ensure that appropriate information sharing contractual agreements are in place.

## **8. RIGHTS REGARDING PERSONAL INFORMATION**

*You may be able to assert certain rights concerning your personal information under applicable data privacy and protection laws and can exercise them by contacting us directly via email at [compliance@lgo.group](mailto:compliance@lgo.group).*

*These rights are not absolute and access may be denied in instances such as where denial is required or authorized by law, the request is frivolous or vexatious, or for other reasons. If any of the rights listed below are not provided under law for your operating entity or jurisdiction, LGO has absolute discretion in providing you with those rights.*

*We will make reasonable efforts to answer such requests, though we may ask for additional information to confirm your identity before disclosing the personal data requested. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.*

**Access:** You may be entitled to ask us if we are processing your information and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it to check that we are lawfully processing it. We process a large quantity of information and may request that before the information is delivered, you specify the information or processing activities to which your request relates. You may also have the right to request us to transmit that data to another controller.

**Correction:** You are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected. Further, LGO's Terms of Use and Service require you to promptly update your information if it changes in a material manner. Please indicate what information you would like to update when you contact us.

**Erasure:** You are entitled to ask us to delete or remove personal data in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims. However, because we keep track of past transactions, you cannot delete information associated with past transactions on the Website. Further, it may be impossible for us to completely delete all of your information because we periodically backup information.

*The content of this presentation is proprietary and confidential information of LGO SAS and its subsidiaries (collectively "LGO"). It is not intended to be distributed to any third party without the written consent of LGO.*



**Restriction:** You are entitled to ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

**Objection:** Where we are processing your personal data based on a legitimate interest (or those of a third party), you may challenge this. However we may be entitled to continue processing your information based on our legitimate interests or where this is relevant to legal claims. You also have the right to object where we are processing your personal data for direct marketing purposes.

**Automated Decisions:** You may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.

**Withdraw Consent:** You may have the right to withdraw your consent. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations.

**Opt out of Emails:** As a condition of using the LGO Services, we will send you Administrative and Promotional emails:

- “Administrative Emails” relate to a User’s activity on the Website and LGO Platform, and include emails regarding a particular User’s account, requests or inquiries, and purchases of products and services. You cannot opt-out of Administrative Emails.
- “Promotional Emails” advertise our products and services, including exclusive sales and other offers, and/or the products and services of our Advertisers and Affiliates. In contrast to Administrative Emails, however, you do have a choice with respect to Promotional Emails.

If you do not want to receive Promotional Emails from us, you may elect to opt-out of receiving Promotional Emails at any time after registering by emailing us, mailing us at the addresses contained herein, or by hitting the “unsubscribe” button at the bottom of any of our emails. When contacting us, please indicate your name, address, email address, and what Promotional Emails you do not want to receive.

**Lodge a Complaint:** If you believe that we have infringed your rights, we encourage you to first submit via email to [support@lgo.group](mailto:support@lgo.group) so that we can try to resolve the issue or dispute informally. If that does not resolve your issue, you may contact the LGO Data Protection Officer at [compliance@lgo.group](mailto:compliance@lgo.group).

You may also have a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where you are habitually resident, where we are based, or where an alleged infringement of data protection law has taken place.



If you reside in the EU, you can file a complaint with the International Centre for Dispute Resolution by phone at +1.212.484.4181, or by visiting the website <http://info.adr.org/safeharbor>, or your relevant data protection authority. In the U.K. you can make a complaint to the Information Commissioner's Office (Tel: 0044 1625 545 700 or at [www.ico.org.uk](http://www.ico.org.uk)).

## **9. PRIVACY POLICIES OF THIRD PARTIES**

This Policy only addresses the collection, use, and disclosure of information we collect from you through your use of the LGO Services. We are not responsible for the policies or privacy practices of third parties.

Other websites that may be accessible through the LGO Website and social media pages have their own privacy policies. If you establish an LGO Account indirectly through a third party, any information that such third party collects will be subject to their own data collection, use, and disclosure practices.

In addition to agreeing and accepting this Privacy Policy, you may also be subject to the privacy policy of a third party depending on the service or product being provided. We urge you to review the privacy practices of such third parties.

## **10. MISCELLANEOUS**

### 10.1 Privacy of Minors

We do not knowingly collect personal information from anyone under the age of 18, and no part of the Website is designed to attract anyone under the age of 18.

### 10.2 Notice of Privacy Rights to California Residents

California law requires that we provide you with a summary of your privacy rights and the categories of personal information that we collect about you for direct marketing purposes. California law requires us to inform you, at your request: (1) the categories of information we collect and what third parties we share that information with for direct marketing purposes; (2) the names and addresses of those third parties; and (3) examples of the products marketed by those companies.

Effective January 1, 2020, pursuant to the California Consumer Privacy Act of 2018 (“**CCPA**”), California residents have certain rights in relation to their personal information, subject to certain



exceptions. Any terms defined in the CCPA have the same meaning when used in this California Privacy Rights section.

For personal information collected by us during the preceding 12 months that is not otherwise subject to an exception, California residents have the right to access and delete their personal information. We must also allow you to control who you do not want us to share that information with. We will not discriminate against those who exercise their rights. Specifically, if you exercise your rights, we will not deny you services, charge you different prices for services or provide you a different level or quality of services.

To obtain this information, please send a request by email. Please allow thirty (30) days for a response. Also, please note that there is no charge for controlling the sharing of your personal data or requesting this notice.

If you are a California resident, you may designate an authorized agent to make a request to access or a request to delete on your behalf. We will respond to your authorized agent's request if they submit proof that they are registered with the California Secretary of State to be able to act on your behalf, or submit evidence you have provided them with power of attorney pursuant to California Probate Code section 4000 to 4465. We may deny requests from authorized agents who do not submit proof that they have been authorized by you to act on their behalf, or are unable to verify their identity.

## **11. CONTACT**

If you have any questions about our privacy policy, please email [compliance@lgo.group](mailto:compliance@lgo.group).