

Fundment

Customer Identification Program Notice



IMPORTANT INFORMATION ABOUT PROCEDURES FOR OPENING OR MAINTAINING AN ACCOUNT

To help the U.S. government fight the funding of terrorism and money laundering activities, federal law requires financial institutions, including broker-dealers, to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open an account, Fundment LLC ("we," "us," or the "Firm") will ask for identifying information, which may include your name, residential address, date of birth, taxpayer identification number or Social Security number, and other information that will allow us to identify you. We may also request a copy of your driver's license, passport, government-issued identification, or other identifying documents.

U.S. Department of the Treasury, Securities and Exchange Commission, and FINRA rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives and risk tolerance.

Digital Identity Verification and Fraud Prevention. When you access our website, mobile application, account-opening platform, or other digital services, we may also automatically collect and use certain information about your device and digital interactions to assist us in verifying your identity, authenticating access to your account, detecting and preventing fraud, protecting customer accounts, complying with applicable legal and regulatory requirements, and maintaining the security of our systems.

This information may include:

- Cookies and similar technologies, including session identifiers and other technologies used to recognize your browser or device;
- Device information, including device type, operating system, browser type and version, device identifiers, and related technical information;
- Internet and network information, including Internet Protocol (IP) address, network information, and information that may indicate the approximate location from which our services are accessed;
- Geolocation information, including approximate geographic location derived from an IP address and, where permitted and enabled, more precise location information provided by a device;
- Digital interaction information, including dates and times of access, pages or screens viewed, links or features selected, account-opening progress, session activity, login activity, and other interactions with our digital services; and

- Security and fraud-prevention information, including information used to identify potentially suspicious devices, access patterns, account-opening activity, or other indicators of identity theft, fraud, unauthorized account access, or other potentially unlawful activity.

We may compare this information with information you provide to us and with information obtained from our service providers, clearing firm, identity-verification providers, fraud-prevention providers, public records, consumer reporting sources where permitted by law, and other lawful sources to verify your identity and protect your account.

How We Use This Information. Digital information may be used as part of our Customer Identification Program ("CIP"), customer due diligence, authentication, cybersecurity, sanctions screening, anti-money laundering, identity-theft prevention, fraud detection, account security, regulatory compliance, recordkeeping, and investigation processes. For example, information indicating that an account application originated from a location, device, or network inconsistent with other information provided to us may result in additional verification being required.

Collection of digital information does not necessarily mean that an account will be approved or rejected. Where we cannot reasonably verify your identity or where information raises identity, fraud, sanctions, money laundering, cybersecurity, or other concerns, we may request additional documentation, restrict access to certain services, decline to open an account, place appropriate restrictions on an existing account, or take other action permitted or required by law and our policies.

Cookies and Tracking Technologies. Certain cookies and similar technologies are necessary to operate and secure our digital services and may be used for authentication, security, fraud prevention, session management, and regulatory compliance. Other cookies or tracking technologies may be subject to choices described in our Cookie Notice or Privacy Policy. Disabling certain technologies may affect our ability to authenticate you or provide particular digital services.

Privacy and Protection of Your Information. Information collected for customer identification, authentication, fraud prevention and account security will be handled in accordance with applicable law and the Firm's privacy and information-security policies. Please review our Privacy Notice and Cookie Notice for additional information concerning the categories of information we collect, how information is used and disclosed, retention practices, service providers, and privacy rights that may be available to you.

By using our digital account-opening or account-access services, you acknowledge that the Firm may collect and use the information described above for identity verification, authentication, fraud prevention, cybersecurity, regulatory compliance, and account-security purposes, subject to applicable law.

What happens if I don't provide the information requested or my identity can't be verified?

Fundment may not be able to open an account or carry out transactions for you. If we have already opened an account for you, we may have to close it.