



PRIVACY POLICY

This Privacy Policy was last revised and updated on January 19th, 2023.

Thank you for your interest in tZERO. tZERO is committed to protecting the privacy of our users, and we strive to provide a safe and secure user experience.

This tZERO Privacy Policy (“Privacy Policy”) describes how we collect, share, and use personal information we collect in connection with your use of the websites, services, applications, platforms, mobile applications, and social media pages owned or operated by tZERO Technologies, LLC (“tZERO Tech”) and certain of its affiliates (collectively, “tZERO,” “we,” “us,” or “our”), and offline when you contact us electronically, by mail or through our customer service center (together, our “Services”). This Privacy Policy also explains your privacy rights.

This Privacy Policy includes the following Sections. You can jump to particular topics by clicking the headings below:

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Additional Privacy Notices

Certain additional tZERO privacy-related notices that may apply are posted [here](#). If and where required by law, you may also receive an additional privacy notice in connection with your use of a particular product or relationship with a specific business.

What Information We Collect and Why

When we use the term “personal Information” in this Privacy Policy, we are referring to information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. We collect the following types of information when you use our Services or interact with us. When

you use certain tZERO products and services, we collect additional specific information related to your use of those products and services. We have noted below when that happens.

<u>Context</u>	<u>Types of Data</u>	<u>Primary Purpose for Collection and Use of Data</u>
Account, Customer, and Contact Information	<p>We collect your (and in some cases our customers' employees') name and contact information, such as email address, mailing and physical address, phone or mobile number, zip code, date of birth, information about your spouse, location data, photographs, videos, comments, passport or driver's license numbers, national/tax identification numbers, number and country of issuance of other government-issued documents, and other identification verification when you create an account. We also collect information relating to the actions that you perform while logged into your account.</p> <p>We also collect your crypto virtual currency digital wallet addresses, and photographs or images of you.</p>	<p>We use this information to provide account related functionalities to our users, including creating, maintaining, and securing your account, verifying your identity, communicating with you, for billing purposes, and to provide Services to you. In some circumstances, we also collect this information to comply with applicable law, including "know your customer" laws.</p> <p>We also use this information for easy checkout and to save your preferences and transaction history.</p>
Commercial Information	<p>We collect details of queries, complaints, feedback or issues related to our Services; and credit card information, banking information and other payment processing information.</p> <p>We also collect information about your trading experience, transaction history, details of investing, and your access to the Services, such as your log in activity.</p> <p>We also collect your payment history, transaction or loss history, purchase history, banking information, transactions through the Services, and other payment processing information.</p>	<p>We collect this information in order to provide you Services, to respond to your queries, complaints, or feedback. In some circumstances, we also collect this information to comply with laws, including "know your customer" laws.</p> <p>We also use this information to confirm your status as an accredited investor, qualified purchaser, qualified client, and to understand other suitability requirements. We also use this information to improve our risk mitigation systems to make sure that we meet your needs by ensuring the Services we provide are suitable for your circumstances.</p> <p>We also use this information to place your transactions and the</p>

<u>Context</u>	<u>Types of Data</u>	<u>Primary Purpose for Collection and Use of Data</u>
		actions taken on the Services and for regulatory compliance purposes.
Cookies and first party tracking	We use cookies and clear GIFs. "Cookies" are small pieces of information that a website sends to a computer's hard drive while a web site is viewed. See our "How We Collect Information" section for more information.	We use this information to make sure our websites operate efficiently and to improve your experience. Where required by applicable law, we rely on your consent for non-essential cookies, as applicable.
Demographic Information	We collect your age or location.	We use this information for internal analytics purposes to better understand our customers and users.
Geolocation	If you use our Services, we collect your location from the GPS, Wi-Fi, and/or cellular technology in your device to determine your location.	We use this information to offer and provide tailored Services to you. Where required by law, we will obtain your consent before collecting this information. We also use this information to determine your eligibility to use certain Services or enter into certain transactions.
Email Interconnectivity	If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases.	We use this information to understand how you interact with our communications to you.
Employment	If you apply for a job posting, or become an employee, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required for employment.	We use information about applicants to evaluate you for possible employment. We use information about current employees to facilitate the employee relationship. In some contexts, we are also required by law to collect information about our employees and applicants.
Feedback/Support	If you provide us feedback or contact us for support we will collect your contact information such as name and e-mail address, as well as any	We use this information to communicate with you and to improve our Services.

<u>Context</u>	<u>Types of Data</u>	<u>Primary Purpose for Collection and Use of Data</u>
	other content that you send to us.	
Investment Information	We collect information about investment trusts and/or entities for which you are the contact, including information about your spouse if your spouse is the accountholder.	We collect this information to maintain contact information related to your investment trusts or entities. In some circumstances, we also require this information in order to provide you our Services.
Investor Information	We collect investor information, which may include income, net worth, entity name, pay slips, bank statements, tax forms, letters from a registered broker-dealer, SEC registered investment attorney, certified public accountant, incumbency certificate, officer's certificate, and any other information you provide or documents you upload to your account for verification.	We collect information about the investors that utilize for certain Services. In some circumstances, we also use this information to provide certain Services for you and in order to comply with law.
Mailing List	When you sign up for one of our mailing lists we collect your email address or postal address.	We share information about our Services with individuals who agree to receive such information.
Order Placement	We collect your name, billing address, shipping address, e-mail address, phone number, bank account information and credit card number when you place an order for certain Services.	We use your information to perform our contract to provide you with certain Services.
Website Interactions	We use technology to monitor how you interact with our Services. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.	We use this information to understand how you interact with our Services, to better improve our Services, to understand your preferences and interests in order to select offerings that you might find most useful, and to detect and prevent fraud.

<u>Context</u>	<u>Types of Data</u>	<u>Primary Purpose for Collection and Use of Data</u>
Web Logs	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.	We use this information to monitor our networks and the visitors to our websites.
Website Interactions	We use technology to monitor how you interact with our websites. This may include which links you click on, or information about your device or browser.	We use this information to understand how you interact with our websites to better improve them, to understand your preferences and interests in order to select offerings that you might find most useful, and to detect and prevent fraud.
Mobile Device	We collect information from your mobile device such as unique identifying information broadcast from your device when visiting our Services.	We use this information to better understand how visitors interact with our Services on mobile devices.
Sweepstakes or Contests	When you participate in a sweepstakes or contest we collect information about you which includes contact information and any other information required by applicable law.	We use this information to enter you into and facilitate the sweepstakes or contest, and to comply with applicable law

In addition to the uses described in the table above, in many situations our purposes for collecting personal information may overlap. For example, if you use our Services, we may collect your personal information to perform our Services, and may also collect and maintain your personal information for record keeping and regulatory reporting purposes.

How We Collect Information

We Collect Information Using Cookies and Other Technologies

In addition to collecting data directly from you, we use cookies, tracking pixels/web beacons and or other technologies to receive and store certain types of information, including your Direct Identifiers and Internet Activity Information. **Cookies** are pieces of information that can

be placed on your computer, tablet, or device for the purpose of facilitating and enhancing your communication and interaction with our Service.

We use cookies and these other technologies to collect information as follows:

- **Category 1: Strictly necessary.** These cookies and other technologies are strictly necessary to enable you to use our Service, for example providing you the Services you have requested.
- **Category 2: User choices.** These cookies and other technologies allow us to remember the choices you have made, for example your user name, language used, or country. They may be used for user preferences purposes.
- **Category 3: Third-Party Analytics.** These cookies and other technologies are placed by our third-party partners for web analytics purposes. Examples of these cookies and other technologies include Google Analytics and Adobe Analytics. You can opt out of Google Analytics by following the instructions provided at <https://tools.google.com/dlpage/gaoptout>.

Generally, you may stop or restrict the placement of our cookies on your computer by adjusting your web browser preferences, but please note that this may impact your ability to use our Service, for example, some Cookies we place are to verify your identity and are therefore an important aspect of maintaining security.

We Collect Information from Other Sources

We may obtain your personal information from third parties, including business partners, in connection with Know Your Client checks, consumer reporting agencies, affiliates, associated trust entities, and publicly available sources, that can enhance and add to our information about you (e.g., adding address information). This may improve our ability to contact you and improve the relevancy of our marketing by providing better recommendations or special offers that we think may interest you.

Location Information

Although you are not required to provide your location information to us to use our Services, certain portions of our Services require your address to function. If you request that we confirm your location or IP address, we may use your geolocation information, which may include your precise geolocation, to do so. Our Services may also tell us the region of the world in which you are located when you use the Services, even if you do not provide us with your precise geolocation. If you have questions about location and notification privacy, please contact your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

How We Protect the Information We Collect

No method of transmission over the Internet, or method of electronic processing or storage, is fully secure. While we maintain reasonable security measures to protect the confidentiality and security of information we hold, we cannot guarantee the security of your information. In

the event that we are required by law to inform you of a breach of your information, we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

How We Share the Information We Collect

Our Affiliates and Associates

We may share your information with our corporate affiliates and associates (e.g., parent company, sister companies, associated trust entities, subsidiaries, joint ventures, or other companies under common control). We have a legitimate business interest to share data with our group as it allows us to better understand the performance of our Services and how to offer and improve our product offerings across the group (for example, to provide you with Services, for marketing purposes, for internal reporting and where those companies provide services to us). It also assists us with finding operational efficiencies (such as financial efficiencies through sharing IT infrastructure), making use of group level software solutions and improving our technological offerings which form an integral part of our Service.

We want you to get the most out of your relationship with our group, our affiliates, associated third parties and us. One of the ways we might help you do this is by using the contact details you've supplied us to send you marketing information about products or services we think you'll find interesting. For example, we may send an e-newsletter to keep you updated on what new products and services are available to you. We will only send this to you where we have a lawful basis to do so and you will be able to amend your preferences, details of which will be explained to you in relevant communication.

Service Providers

We share your information with service providers that provide services to us. Among other things, these service providers help us with the administration, operation, and marketing of the Services and our product offerings across our group. This includes hosting, communications, printing, marketing, data enhancement, technical support, payment or transaction processing, and fulfillment of services. Our service providers may only process your personal information for the purposes of providing services to us.

Other Third Parties

Subject to any limitations or restrictions under applicable law, described herein, or in any other tZERO privacy notice, we share your information with nonaffiliated third parties, for example, for them to develop their own products or market to you, where we and they have established requisite legal permission(s) to do so if required by law. Such use is not governed by this Privacy Policy. We may also share your information with other third parties with your permission or as permitted or required by law.

Additionally, if you choose to utilize service of third-parties integrated in the Services, we will share information you provide in order to allow them to provide such services to you. For example, for the Crypto Platform, you may use virtual currency custodial services provided by third-parties that are integrated into the Service.

Legal Requirements

We may disclose information when we believe disclosure is appropriate to comply with the law, to enforce or apply applicable terms and conditions and other agreements, or to protect our rights, property or safety or the rights, property or safety of our affiliates or associated trust entities, users, or third parties. For example, we may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws, or for the purposes of “Know Your Customer” and other regulatory requirements, information may be screened against third-party identification services and government-provided databases, which return information regarding potential matches to publicly available information. . We may also share information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.

When You Direct Us

We may share your information at your direction or request, through our Services, or otherwise.

With Your Consent

We may ask if you consent to share your information with other unaffiliated third parties who are not described elsewhere in this Privacy Policy, and may share your information with your consent.

Business Transfers

If another entity acquires, or plans to acquire, our company, business, or our assets, we will also share information with that company, including during the negotiation and diligence stages of the contemplated transaction. We also may retain a copy of that information.

How Long We Retain Your Information

We will retain your information for as long as necessary for the purposes described in this Privacy Policy and in accordance with the following principles:

- For the duration required pursuant to a legal obligation (for example, to comply with applicable anti-money laundering laws);
- For the period required by applicable law and regulations, for the activities relating to the service; or
- For the duration of legal proceedings and the related limitation periods, for processing activities necessary to protect against legal liability and enforce our rights.

Transfer of Personal Information Outside of the United States

Our Services are hosted and operated from the United States. If you are using our Services from outside of the United States, your personal information may be transferred from your

country of residence to the United States and in any country in which we engage service providers. Where such transfers of your personal information are made, they will be made in accordance with applicable law.

What Choices and Rights You Have Regarding Your Information

We offer you the rights and choices described in this section. Note that if your information was collected by another party under their privacy policy, and we are simply a data processor or service provider to that party with respect to our collection and use that information, we may refer you to that party in order to exercise the choices regarding your personal information.

Rectify Your Information

In many cases, you may update and correct your information directly in the Services. Note that we may keep historical information in our backup files as permitted by law. If our Services do not permit you to update or correct certain information, contact us at the address described below to ask us to rectify information that is inaccurate or incomplete.

Revocation of Consent

If you revoke your consent for the processing of your information, then we may no longer be able to provide you with access to certain functionality and features of the Services that require that information to operate. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing of your personal information (where such processing is based upon consent) by contacting us using the contact information provided at the end of this Policy.

Opting Out of E-mail, Telephone and Text Message Marketing

You may unsubscribe from marketing and promotional e-mails by following the unsubscribe instructions in e-mails. Note that even if you decide not to receive marketing or promotional emails, we may still send you transactional communications related to your use of our Services.

If you opt-in, or when you use certain Services, we may send you SMS text messages, and other communication about our Services. To stop receiving SMS text marketing communications from us, you may text "STOP", "END", "CANCEL", "UNSUBSCRIBE", or "QUIT" to a text message from us. After texting STOP, END, CANCEL, UNSUBSCRIBE or QUIT to our shortcode you will receive one additional message confirming that your request has been processed. If you unsubscribe from one of our text message programs, you may continue to receive text messages from us through any other programs you have joined until you separately unsubscribe from those programs.

If you do not wish to receive promotional telephone communication from us, call us at (855) 334-8608 to opt out. This opt out does not apply to operational communication, for example, confirmation of delivery address.

International Visitors – General Information

Our website is hosted in the United States. If you use this website from the United Kingdom, European Union or other regions of the world with laws governing data collection and use that may differ from United States law, then please note that by sending an email or other communication containing personal information or by providing personal information through our website, you are voluntarily transferring your personal information outside of those regions to the United States.

Residents of the European Economic Area, Switzerland or the United Kingdom

Residents of the EEA, Switzerland, and the United Kingdom have additional privacy rights. Information on these rights is provided in our supplemental European Economic Area, Switzerland and United Kingdom Resident Privacy Notice.

California Residents

Residents of California have additional privacy rights. Information on these rights is provided in our supplemental California Resident Privacy Notice.

Product-specific Details

Please find additional information and disclosures about our collection and use of your personal information when you use the tZERO Services referenced below. The information and disclosures below apply to use and users of the Services identified below, but not to public general use of the website(s) associated with such Services. In the event of any conflict between the information and disclosures noted below and the rest of this Policy, the information and disclosures below will supersede.

Financial Services

We take financial crime seriously. If we, or a fraud prevention agency, believe that someone poses a financial crime risk then we may refuse to provide the Services that the person has asked for. We can also stop providing Services the person already has with us. A record of any fraud risk will be kept by the fraud prevention agencies and this could mean that other providers refuse to offer services, finances or employment. Fraud prevention agencies can hold onto someone's personal data for different periods, depending on the situation. If someone is considered a fraud risk, his or her data will be held for at least six years.

Certain tZERO affiliates are ("tZERO Broker-Dealers") are broker/dealers registered with the Securities and Exchange Commission ("SEC") and are members of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC").

tZERO Broker-Dealers collect personal information about you that is either required or necessary to provide you with financial products or services. tZERO Broker-Dealers may obtain nonpublic personal or business information about you from the following sources.

- Information voluntarily provided by you on applications and other forms, including your tax ID number, and specific information about your business;
- Information about the transactions you execute through tZERO Broker-Dealers;
- Information we receive from reporting agencies or affiliates; and
- Information related to your browsing or use of this website, including through the use of cookies.

tZERO Broker-Dealers may disclose the beneficial ownership of securities information to the issuers of the securities. tZERO Broker-Dealers do not disclose any nonpublic personal or business information about its clients, except as permitted by law.

tZERO Broker-Dealers must obtain your consent before it can share nonpublic customer information with, or obtain certain information from its affiliates. Unless and until you notify a tZERO Broker-Dealer in writing to the contrary, you shall be deemed to have consented to the disclosure of nonpublic information between the tZERO Broker-Dealer and its affiliates, to the extent permitted by law.

Any information you submit in a public forum on the Services (e.g., a blog, chat room, or social network) can be read, collected, or used by us under this Policy (e.g., to personalize your experience).⁴ It may also be read and used by other users of the Services. You are responsible for the information you choose to submit in these instances.

In the event you choose to utilize services of third-parties integrated in the Services, for instance, virtual currency custodial services provided by third-parties, we will share information you provide in order to allow them to provide such services to you.

Additional Information

Important Notices and Transactional E-mail

From time to time, we may send non-commercial electronic email messages with important information about us or our Services to your email address. Please note that any opt-out of marketing or promotional communications will not apply to other communications that will be provided to you or any entity or trust that you are the contact point for in relation to your transactions with us, in agreement with us, or where required by law.

Third Party Websites and Services

Our Services contain links to other websites and services not maintained by us or our affiliates or associates. In addition, other websites and services may also reference or link to our Services. Use of such third-party websites is subject to the terms of use and privacy policies of those third parties. We do not control the privacy policies or practices of these third-party websites. We encourage you to be aware when you enter or leave our Services, or surf the Internet, and to read the privacy statements of each website and service that you visit. We do not endorse, screen, or approve, and are not responsible for the privacy practices or the content of, other websites or services.

Compliance with State and Federal Laws

Certain regulations issued by state and/or federal government agencies may require us to maintain and report demographic information on the collective activities of our membership, users, or customers. We may also be required to maintain certain of your information to comply with applicable federal and state laws regarding recordkeeping, reporting and audits.

Do Not Track

We do not currently recognize automated browser signals regarding tracking mechanisms, which may include Do Not Track instructions.

Children

Our Services are not directed at children under 18, and we do not knowingly collect personal information or other information from children under 18. If you are the parent of a child under the age of 13 and you believe he or she has shared information with us, please contact us at legal@tzero.com so we can remove the information from our systems.

Privacy Policy Revisions

We may change our Privacy Policy and practices over time. To the extent that our Privacy Policy changes in a material way, the Privacy Policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new Privacy Policy. We will note the effective date of the latest version at the beginning of the Privacy Policy.

How To Contact Us

If, at any time, you have questions or concerns about this Privacy Policy, please contact us through our contact page or at:

tZERO Group, Inc.
299 Main Street, Suite 2270,

Salt Lake City, UT 84111
legal@tzero.com
(855) 334-8608