



This Privacy Policy was last revised and updated on January 3, 2025.

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:

- Additional Privacy Notices
- What Information We Collect
- How We Collect Information
- How We Protect the Information We Collect
- How We Share the Information We Collect
- How Long We Retain Your Information
- Transfer of Personal Information Outside the US
- What Choices and Rights You Have Regarding Your Information
- Residents of the European Economic Area, Switzerland or the United Kingdom
- California Residents
- Additional Information
- How To Contact Us Regarding This Privacy Policy

Additional Privacy Notices

Certain additional tZERO privacy-related notices that may apply are posted herein. 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</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</p>

<u>Context</u>	<u>Types of Data</u>	<u>Primary Purpose for Collection and Use of Data</u>
	Services, and other payment processing information.	<p>provide are suitable for your circumstances.</p> <p>We also use this information to place your transactions and the actions taken on the Services and for regulatory compliance purposes.</p>
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.

<u>Context</u>	<u>Types of Data</u>	<u>Primary Purpose for Collection and Use of Data</u>
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 other content that you send to us.	We use this information to communicate with you and to improve our Services.
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

<u>Context</u>	<u>Types of Data</u>	<u>Primary Purpose for Collection and Use of Data</u>
		most useful, and to detect and prevent fraud.
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.

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. For instructions on how to opt-out, click see our privacy notices below.

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

FACTS

WHAT DOES TZERO SECURITIES, LLC ("tZERO") 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 and income
- Account balances and transaction history
- Identification data collected from passport or driver's license and contact information

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 tZERO chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does tZERO 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	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

To limit
our
sharing

- Call (855) 334-8608—our menu will prompt you through your choice(s)
- Email us at legal@tzero.com or
- Mail the **form** below

Please note:

If you are a *new* customer, we can begin sharing your information **30** days from the date we sent this notice. 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 (855) 3348608

Mail-in Form

Leave Blank
OR

If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.

☐ Apply my choices only to me

Mark any/all you want to limit:

- ☐ Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- ☐ Do not allow your affiliates to use my personal information to market to me.
- ☐ Do not share my personal information with nonaffiliates to market their products and services to me.

Who we are	
Who is providing this notice?	tZERO Securities, LLC
What we do	
How does tZERO protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does tZERO collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Open an account or provide account information • During transactions, including deposits and withdrawals • When you interact with us <p>We also collect your personal information from others, such as credit bureaus, 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 • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</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—unless you tell us otherwise.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial or nonfinancial companies. Our affiliates include tZERO Group, Inc., and its subsidiaries, including companies and associated trust entities that use the tZERO name. Additional affiliates include VerifyInvestor, Inc.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. Nonaffiliates we share with can include financial services companies such as credit unions, and nonfinancial companies such as providers of data hosting, maintenance, analytics and security services as well as marketing services.
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <p>tZERO Securities does not have any joint marketing partners.</p>

Other important information

For CA residents: We will not share personal information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example, with your consent or to service your account. You may limit our sharing of such information with affiliates by contacting us as set forth above. To exercise these rights, or to see a more comprehensive list of instances where your personal information may be shared without your authorization, please contact us at the email

For VT residents: We will not share personal information we collect about you with nonaffiliated third parties or affiliates, except as permitted by law, including, for example, with your consent or to service your account.

To limit
our
sharing

- Call (855) 334-8608—our menu will prompt you through your choice(s)
- Email us at legal@tzero.com or
- Mail the **form** below

Please note:

If you are a *new* customer, we can begin sharing your information **30** days from the date we sent this notice. 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 (855) 334 - 8608

Mail-in Form

Leave Blank

OR

If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.

☐ Apply my choices only to me

Mark any/all you want to limit:

- ☐ Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- ☐ Do not allow your affiliates to use my personal information to market to me.
- ☐ Do not share my personal information with nonaffiliates to market their products and services to me.

Who we are	
Who is providing this notice?	tZERO Digital Asset Securities, LLC
What we do	
How does tZERO protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does tZERO collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Open an account or provide account information • During transactions, including deposits and withdrawals • When you interact with us <p>We also collect your personal information from others, such as credit bureaus, 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 • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</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—unless you tell us otherwise.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial or nonfinancial companies. Our affiliates include tZERO Group, Inc., and its subsidiaries, including companies and associated trust entities that use the tZERO name. Additional affiliates include VerifyInvestor, Inc.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. Nonaffiliates we share with can include financial services companies such as credit unions, and nonfinancial companies such as providers of data hosting, maintenance, analytics and security services as well as marketing services.
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <p>tZERO Digital Asset Securities, LLC does not have any joint marketing partners.</p>

Other important information

For CA residents: We will not share personal information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example, with your consent or to service your account. You may limit our sharing of such information with affiliates by contacting us as set forth above. To exercise these rights, or to see a more comprehensive list of instances where your personal information may be shared without your authorization, please contact us at the email

For VT residents: We will not share personal information we collect about you with nonaffiliated third parties or affiliates, except as permitted by law, including, for example, with your consent or to service your account.

Supplemental Privacy Notice: California

This California Resident Privacy Notice supplements the information contained in our Privacy Policy and applies to residents of California. This notice covers the requirements of the California Consumer Privacy Act as amended by the California Privacy Rights Act (collectively, “CCPA”).

When we use the term “personal information” in this notice, 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 you or your household such as your real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers. Personal information does not include publicly available information and certain other information that is regulated by certain other applicable laws that are exempted from the requirements of the CCPA.

Please note that the CCPA does not apply to personal information governed by certain other privacy laws, such as the Gramm-Leach-Bliley Act. Depending on your relationship with us, the CCPA, and this section, may not apply to your personal information, even if you a California resident.

Your Rights and Choices under the CCPA

Right to Know

You have the right to request that we provide certain information to you about our collection of your personal information. Such information shall cover the 12-month period preceding our receipt of your request. Upon our receipt of your verified request, we will provide you with the following:

- The categories of personal information we have collected about you
- The categories of sources from which we have collected your personal information
- Our business or commercial purpose(s) for collecting or selling your personal information
- The categories of third parties with whom we have shared your personal information; and
- The specific pieces of personal information we have collected about you

You have the right to request that we provide certain information to you about our disclosures and sales of your personal information. Such information shall cover the 12-month period preceding our receipt of your request. Upon our receipt of your verified request, we will provide you with the following:

- The categories of personal information we have collected from you
- The categories of personal information we have sold about you and the categories of third parties to whom we sold such information, by category or categories of personal information for each category of third parties to whom the personal information was sold; and
- The categories of personal information that we disclosed about you for a business purpose

You may only make a verifiable “Right to Know” request twice within a 12-month period.

Right to Opt-Out

You have the right to opt-out of the sale of your personal information. While we do not currently use targeted behavioral advertising, you also have the right to opt-out of sharing your personal information with third parties for the purposes of targeted behavioral advertising at any time if we ever engage in such activity.

Right to Delete

You have the right at any time to request that we delete your personal information. However, in some cases we cannot delete all or some of your personal information as required or permitted by applicable laws.

Right to Correct

You have the right to request that we correct inaccurate personal information that we maintain about you. However, in some cases, we may deny requests to correct inaccurate personal information, or may alternatively delete such personal information.

Right to Non-Discrimination

We will not discriminate against you for exercising your rights under the CCPA, such as by denying you products and services, charging you different rates or prices, including use of discounts or penalties, or suggesting or providing a different level of service or quality of products to you. However, we may charge a different price or provide a different level or quality of products and services if the price or difference is directly related to the value provided to you by your personal information.

We may from time to time offer you financial incentives, including payments to you as compensation, for collecting, or deleting your personal information. We also may offer a different price, rate, level, or quality of goods or services if that price or difference is directly related to the value provided to you by your personal information.

Information We Collect

In the preceding 12 months, we have collected the following categories of personal information.

Categories of Personal Information	Collected
Identifiers (such as your name, postal address, and email address)	Yes
Information covered by California's records-destruction law (California Civil Code §1798.80) (such as your signature, telephone number, and financial-account information)	Yes
Characteristics of legally protected classifications (such as race or religion)	Yes
Commercial Information (such as records of the products and services we have provided to you, and transactions in your account)	Yes
Biometric information	No
Internet/ Electronic Activity (such as information regarding your interactions with our websites and platforms)	Yes
Geolocation data (such as latitude or longitude)	Yes
Audio, electronic, visual, thermal, olfactory, or similar information (such as voice recordings when you call customer service)	No
Professional/employment information	Yes

Categories of Personal Information	Collected
Education information	Yes
Inferences drawn from any of the above information (such as preferences or characteristics)	Yes
Sensitive Personal Information (such as your Social Security number)	Yes

For more details about the specific data points we collect, please see the section of the main Privacy Policy entitled **What Information We Collect and Why**.

Our Sources for Personal Information

We collect personal information from you when you provide it to us, when you use our Services, and when you interact with us, including through social media. We also automatically collect some information when you visit our Site. For additional details, please see the section of the main Privacy Policy entitled **How We Collect Information**.

Our Business Purposes for Collecting Personal Information

Please see the section of the main Privacy Policy entitled **What Information We Collect and Why**.

Sharing Personal Information

We may disclose your personal information for the business or commercial purposes set forth in this Privacy Policy. For more details about our disclosures of personal information, please see the section of the main Privacy Policy entitled **How We Share the Information We Collect**.

We have not sold personal information in the preceding 12 months.

We do not use or disclose sensitive personal information except as set forth in our main privacy policy and as necessary to perform the Services as reasonably expected.

Retention of Personal Information

We retain personal information only for as long as is necessary for the purposes set out in our main Privacy Policy, for as long as your account is active, or as needed to provide the Services. We will also retain and use your information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your information to comply with applicable law), resolve disputes, enforce our agreements, and as otherwise described in our main Privacy Policy.

Making Requests

To submit a request to exercise your “Right to Know,” “Right to Delete,” or “Right to Correct” rights, contact us at (855) 334-8608 or complete our California Consumer Request form available upon request by contacting legal@tzero.com. We will evaluate the request and take action where required to do so.

We will take steps to verify your identity before processing your request. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify you are the individual about whom we collected

personal information. If you have an Account with us, we will use our existing Account authentication practices to verify your identity. If you do not have an Account with us, we may request additional information about you to verify your identity. We will only use the personal information provided in the verification process to verify your identity or authority to make a request and to track and document request responses, unless you initially provided the information for another purpose.

You may also use an authorized agent to exercise your rights on your behalf. If you wish to use an authorized agent, we require that your authorized agent provide written proof to us that he or she is authorized to act on your behalf, and we may also require your authorized agent to verify his or her own identity. To appoint an authorized agent, please contact us at.

We endeavor to respond to your request as soon as we can. If we are not able to respond to your request within 45 days, we will let you know that we may require additional time (up to 90 total days).

Supplemental Privacy Notice: European Economic Area (EEA), United Kingdom (UK) and Switzerland

This European Economic Area (EEA), United Kingdom (UK) and Switzerland Resident Privacy Notice supplements the information contained in our Privacy Policy and applies to residents of the European Economic Area (EEA), the United Kingdom (UK) and Switzerland. It contains additional information required by the EU General Data Protection Regulation and the UK and Swiss equivalents. These provisions, which should be read together with the statements in the tZERO Privacy Policy, explain our practices with regard to data privacy in the EEA, UK and Switzerland.

Name of data controller and contact details	tZERO Technologies, LLC and its affiliates 299 Main Street, Suite 2270, Salt Lake City, UT 84111 legal@tzero.com Phone: (855) 334-8608
Purposes of the processing	The purposes of the processing are described in the section of the main Privacy Policy entitled What Information We Collect and Why .
Lawful basis for the processing	<p>Generally, we process personal data on the basis that the processing is necessary for purposes of our legitimate interest in conducting our business in a manner typical in the US financial services, brokerage services, crypto currency trading, and investor verification industries (as applicable), having taken into account any risks to your fundamental rights and freedoms (including your right to privacy).</p> <p>We also may process personal data on other bases permitted by the EU General Data Protection Regulation ("GDPR"), the UK Data Protection Act 2018 and other applicable laws, such as to fulfill a contract with you, or when the processing is necessary for us to comply with our legal obligations.</p>
The legitimate interests of the controller or third party, where applicable	Our specific legitimate interests, such as responding to your requests, comments and questions, providing you with support and improving the website, providing you

	<p>with the Services, completing your transactions, are described in the section of the main Privacy Policy entitled What Information We Collect and Why.</p>
The categories of personal data concerned	<p>The categories of personal data that we process are described in the section of the main Privacy Policy entitled What Information We Collect and Why.</p>
The recipients or categories of recipients of the personal data	<p>The potential recipients of the personal data that we collect via the Services are described in the section of the main Privacy Policy entitled How We Share the Information We Collect.</p>
Information regarding the transfers of personal data outside of the European Economic Area (EEA), Switzerland and the United Kingdom (UK)	<p>tZERO Technologies, LLC and its affiliates are headquartered in the USA and the Services are hosted in the USA. The laws of the USA have not been deemed by the European Commission, the United Kingdom or Switzerland to provide an adequate level of protection to personal data.</p> <p>When you provide your personal data to us via the Services or contact us by email, you are providing your personal data directly to the USA.</p> <p>Before you provide your personal data to us via the Services, we request your explicit consent to the transfer of your personal data to the USA.</p> <p>When you email us, the fact that you have chosen to email us knowing that we are located in the USA will be understood to constitute your explicit consent to the transfer of the personal data in your email (including your email address) to the USA.</p> <p>Regardless of the differences in US and European privacy laws, we safeguard your personal data as described in our main Privacy Policy and this section. If we transfer your personal data to a third party, we require the third party to commit</p>

	contractually to process your personal data only in ways that are consistent with our main Privacy Policy and this section.
The period for which the personal data will be stored, or the criteria for determining the retention period	How long we retain personal data varies according to the type of data in question, the purpose for which it is used, and applicable data retention and record-keeping requirements. We delete personal data within a reasonable period after we no longer need to use it for the purpose for which it was collected or for any subsequent purpose that is compatible with the original purpose. This does not affect your right to request that we delete your personal data before the end of its retention period. We may archive personal data (which means storing it in inactive files) for a certain period prior to its final deletion, as part of our ordinary business continuity procedures.
Your rights to access, correct, restrict or delete your personal data and object to processing	You have the right to request access to your personal data, to have your personal data corrected, restricted or deleted, the right to data portability, and to object to our processing of your personal data. Your rights may be subject to various limitations under the GDPR. If you wish to exercise any of these rights, or if you have any concerns about our processing of your personal data, please contact us in any of the ways listed in the section entitled How to Contact Us .
The right to lodge a complaint with a supervisory authority	You have the right to file a complaint concerning our processing of your personal data with your national (or in some countries, regional) data protection authority. The EU Commission has a list here: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

	<p>See www.ico.org.uk for information about contacting the UK Information Commissioner's Office.</p> <p>See www.edoeb.admin.ch/edoeb/en/home.html for information about contacting the Swiss Federal Data Protection and Information Commissioner.</p>
Statutory or contractual requirement or other obligation to provide any personal data	General users of the Services are under no statutory or contractual requirement or other obligation to provide personal data to us via the Services, however, depending on the specific Services that you use, applicable law may require us to collect certain personal data from you in order to use the Services.

Controlling Cookies

If you are visiting our website from the EEA, UK, or Switzerland, then we do not set non-essential cookies unless you accept all cookies on the "cookie banner" via our cookie management tool that launches when you land on our website.

You can learn about how you can adjust your browser's settings to limit or disable non-essential cookies and other tracking technologies by visiting the section above. Strictly necessary cookies cannot be disabled.