# Privacy Policy

This Policy was last updated on February 2, 2023.

At TradeUP Securities Inc. and its affiliates (collectively, "TradeUP Securities," "Company" "we," "us," or "our"), we appreciate the trust that clients place in us and we recognize the importance of protecting the confidentiality of non-public personal information that we have in our possession. The information is used to ensure accuracy in reporting and record keeping and to carry out requested transactions. It also allows us to create and make available new products and services to meet your financial needs. Keeping this information secure is a top priority for TradeUP Securities and in keeping with recently adopted regulations, we share our U.S. Privacy Policy (the "Policy") for clients.

The Policy outlines what information we collect about you through our websites, mobile apps, services, and when you otherwise interact with us in the United States (the "Services") and how we process the information. Services include, among other things, maintaining or servicing accounts, providing customer service, processing or fulfilling trades and other transactions, verifying customer information, processing payments, providing financing, determining eligibility for Services, recordkeeping, and related activities. And the Policy also explains steps you can take to control and protect your personal information on our Services. You agree to the Policy by accessing or using our Services. If you do not agree, you may not access or use the Services. The websites and mobile apps that you use to interact with us may be owned and operated by our affiliates, and their use may have additional privacy guidelines.

**1. INFORMATION WE COLLECT AND HOW WE COLLECT IT.**

Information You Provide

We collect the information you provide when you use our Services or otherwise engage or communicate with us as described below.

- Identity Data, such as your name, date of birth, marital status, social security number, biometric identifiers, and other data on government-issued identification documents;
- Contact Data, such as your email address, mailing/home address, and telephone number;
- Financial Data, such as your bank account and payment card details, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores;
- Profile Data, such as your username and password, your knowledge assessment results, your interests, preferences, feedback, survey responses, and inferences regarding characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes;
- Stored Content, such as photos from your mobile phone gallery or contacts stored in your mobile device or email accounts. We only collect this information with your permission; and

- Additional Data You Provide, such as via focus groups, survey responses, contests/sweepstakes, customer support, or other means.

Information We Collect Automatically

We also collect certain information about you automatically when you access or use our Services, as described below.

- Usage Information. We collect information about your activity on our Services, which includes device identifiers (like IP address, operating system and version, carrier and network type, browser type and language, or mobile device identifiers), pages or features you use or visit, time and date of access, and other similar usage information.
- Activity Information. When you receive, submit, or complete a transaction via the Services, we collect information about the transaction, such as amount, type, nature of the transaction, time and date of the transaction, and similar activity through the Services.
- Information Collected Through Tracking Technologies. We and our service providers also use technologies, including cookies, pixels, web server logs, and web beacons, to automatically collect certain types of usage and device information when you use our Services or otherwise interact with us online (e.g., via email or other electronic means). The information collected through these technologies includes your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique device or account ID, usage information and other similar information.

Information We Collect from Other Sources

We also obtain information about you from other sources as described below:

- Data from Vendors, Service Providers and Business Partners. We collect information about you from companies that we do business with, such as name, contact data, inferences about your preferences and attributes, payment processing information, as well as inferred fraud risk, from identity verification and fraud prevention partners.
- Publicly Available Data, such as contact information, your interactions with our social media platforms, and other information from publicly available sources, for instance, public websites.
- Advertising Data. We collect information in connection with our ad campaigns that surfaced on other platforms, such as the ads you clicked on and other interactions with our ads.

**2. HOW WE USE YOUR INFORMATION.**

We use the information we collect for purposes described below or as otherwise described to you at the point of collection:

- Conduct ‘Know Your Customer’ activities, including anti-money laundering checks and other due diligence efforts;
- Maintain system and process functionality and provide the Services, including processing account applications, authenticating your identity, communicating with you regarding your account, responding to inquiries from you, repairing our Services, support, and handling billing and account management;

- Send you transactional or relationship information, including confirmations, invoices, technical notices, customer support responses, software updates, security alerts, support and administrative messages, and information about your transactions;
- Communicate with you about offers and other things we think you will be interested in, such as newsletters, product announcements, partner offerings, surveys, contests or sweepstakes, events or announcements;
- Personalize our Services, such as by suggesting content or customizing content or ads we show you;
- Monitor, enhance, and improve our Services, including analyzing usage, research and development;
- Facilitate contests, sweepstakes, and promotions and process and deliver entries and rewards;
- Help protect the safety and security of our Services, business, and users, such as to investigate and help prevent fraud or other unlawful activity;
- Establish, enforce, protect or otherwise exercise our legal rights or defend against legal claims, including to enforce and carry out contracts and agreements;
- Comply with applicable laws and legal obligations, such as compliance obligations associated with being a regulated broker-dealer; and
- As otherwise permitted by applicable law, or with your consent.

**3. DISCLOSURES OF INFORMATION.**

We may share information about you in the instances described below:

- Authorized third-party vendors and service providers. We share information about you with third-party vendors and service providers who perform services for us, such as identification verification, fraud prevention, advertising, mailing services, tax and accounting services, contest fulfillment, web hosting, and analytics services.
- Companies in which you hold securities. We may provide your name, address, email address, and securities positions to requesting companies in which you hold securities.
- Company affiliates. Where appropriate, we share information about you with our affiliates. These companies will process any information shared in the same manner as described under this Privacy Policy.
- Substantial corporate transactions. We may share information about you in connection with a substantial corporate transaction, a merger, consolidation, reorganization, financing, change in control or acquisition of all or a portion of our business by a third party, or in the unlikely event of a bankruptcy or similar proceeding.
- Legal purposes. We disclose information about you if we believe that disclosure is in accordance with, or required by, any applicable law or legal process or to protect and defend the rights, interests, safety, and security of TradeUP Securities, our users, or the public.
- With your consent. We share information about you for any other purposes disclosed to you with your consent.

We may share information with others in an aggregated or otherwise de-identified form that does not reasonably identify you.

**4. THIRD-PARTY TRACKING.**

We use third-party tracking and analytics services to better understand your online activity, personalize your experience with the Services, understand how you use them, maintain a persistent session, improve and further develop the Services, and measure and optimize advertising and promotional effectiveness. Information about your use of our Services and other websites and online services over time may be collected through cookies, device identifiers, or other tracking technologies. We and our third-party partners may use this information to, among other things, analyze and track data, determine the popularity of the content, and provide data-related services to us such as reporting, attribution, analytics, and market research.

**5. DO NOT TRACK.**

Some web browsers transmit signals to websites. We currently don't take action in response to web browsers "do-not-track" signals or other mechanisms that provide users the ability to exercise choice regarding the collection of personal information about that user's online activities over time and across third-party web sites or online services.

**6. MANAGING YOUR INFORMATION.**

- Account profile. You may access, review, delete, change or update certain account profile information by logging into your account. You may also request that we rectify any inaccuracies or incomplete information in your personal data, and such requests will be processed by us in a timely manner using commercially reasonable efforts.
- Access to your device data. You may disconnect our mobile app's access to certain stored device information through your device's settings.
- How to control your communications preferences. You can stop receiving promotional emails from us by clicking the "unsubscribe" link in those emails. We may still send you service-related or other non-promotional communications, such as account notifications, receipts, security notices and other transactional or relationship messages.
- Cookie controls. Many web browsers are set to accept cookies and similar tracking technologies by default. If you prefer, you can set your browser to delete or reject these technologies.

**7. STATE NOTICES.**

- Residents of each state may have additional right under your state's regulation.
- California residents may have additional rights regarding their personal information under the California Consumer Privacy Act ("CCPA") as set forth in the Policy. The CCPA, however, does not apply to certain nonpublic personal information collected by financial institutions like us to provide the Services, as that information is subject instead to other financial privacy laws. We will not discriminate against California residents who exercise their privacy rights.

**8. CHILDREN.**

- If you are under the age of 18, you may not use our Services. We do not knowingly collect, maintain, or sell information from minors under 18.
- In the event we learn that we have inadvertently collected personal information from a child under age 18, we will take reasonable steps to delete that information. If you believe that we might have any information from a child under 18, please contact us at support@tradeup.com.

**9. TRANSFER OF INFORMATION.**

Our Services are United States-based and are controlled, operated and administered by TradeUP Securities from its offices within the United States. This Policy is provided in accordance with and subject to applicable U.S. law. If you decide to continue to access our Services from your location outside the United States, you hereby agree that your use of those Services is subject to this Policy and your personal information will be transferred or processed in the United States. Please note that in providing our Services, your personal information may be accessed by our affiliates in jurisdictions other than the United States.

**10. LOCATION OF DATA STORAGE AND PROCESSING.**

The personal information we collect from you will be stored in the United States and may be stored in other countries that may have different privacy laws and standards than those in your country of residence. Your personal information may be transferred to or processed in the United States by us or by a third-party service provider working for us. If you are located outside of the United States, the transfer of personal information is necessary to provide you with the requested information, products, and services and/or to perform any requested transaction. When we transfer or disclose your personal information to other countries, we will protect that information as described in this Policy. By submitting personal information via our mobile app or other means, you agree to such storage, transfers, and processing.

**11. DATA SECURITY.**

We maintain reasonable physical, administrative, and technical safeguards to protect your nonpublic personal information. Our employees and third-party service providers have access to your nonpublic personal information only on a "need to know" basis. We have internal policies governing the proper handling of consumer information by employees and requiring third parties that provide support or marketing services on our behalf to adhere to appropriate security standards with respect to such information.

**12. RETENTION OF PERSONAL INFORMATION.**

We retain personal information in accordance with our information management policies, which establishes general standards and procedures regarding the retention, handling, and disposition of our records, including personal information. Personal information is retained as long as necessary to meet legal and regulatory requirements. Retention may be extended if we are required to preserve personal information in connection with litigation, investigations, and proceedings.

**13. THIRD PARTY SITES.**

This Policy does not apply to the privacy practices of companies that we do not own or control, such as companies with whom we partner for certain services. We are not responsible for the content or the privacy policies of those third-party websites, including third-party website, mobile application, or Internet location. You are recommended to check the applicable third-party privacy policy and terms of use when interacting with any third-party sites.

**14. CHANGES TO THIS POLICY.**

We may update this Notice from time to time. To stay informed of our privacy practices, we recommend you review the Policy on a regular basis as you continue to use our Services.

**15. HOW TO CONTACT US.**

If you have any questions about the Policy or our privacy practice, please contact us at support@tradeup.com.