

tastyworks Privacy Policy

Introduction

The tastyworks, Inc. (“tastyworks”, “Firm”) Privacy Policy is intended to inform you of tastyworks’ policies and practices regarding the collection, use, and disclosure of any information you submit to tastyworks through the Firm’s website at www.tastyworks.com. By opening an account with tastyworks and accessing the Firm’s website, you agree that your use of tastyworks’ services, tools, and any dispute over the Firm’s policies will be governed by this Privacy Policy.

tastyworks is committed to protecting your privacy online. The Firm recognizes the need for appropriate protection and management of any information you share with the Firm. As such, tastyworks respects your privacy, particularly with regard to the storage, access, and use of personally identifiable data collected online. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires tastyworks to tell you how the Firm collects, shares, and protects your personal information. The Firm will maintain your personal information in a secure format and, except, as set forth herein, at no time will the Firm permit anyone to access your confidential information. Please read this notice carefully to understand what tastyworks does with respect to privacy.

Why does tastyworks collect customer information?

There are several important reasons why tastyworks collects information when you open an account. The information the Firm gathers is necessary to communicate with you about your account, to process transactions for you, and to comply with federal and state laws, including tax and anti-money laundering laws. Additionally, tastyworks collects information to help the Firm safeguard your assets. Furthermore, tastyworks may choose to gather information to help the Firm assess your needs and preferences.

What information does tastyworks collect?

Information tastyworks collects directly from you:

The information tastyworks collects directly from you is referred to as “Personally Identifiable Information” (“PII”). PII is defined as information that identifies a specific customer by non-public information that is associated with the customer. Such information that the Firm collects directly from you includes, but is not limited to, information required to communicate with you and to uphold expectations as an introducing broker-dealer. Such information may include your name, mailing address, email address, home phone number, mobile phone number, Social Security number, date of birth, and/or your employer’s name and address.

Federal law requires tastyworks to assess your suitability for trading in a margin account. Therefore, the Firm may also collect, but is not limited to, your approximate annual income and net worth in order to reasonably determine whether your financial position is suitable for trading in a margin account. Additional demographic information tastyworks may collect includes, but is not limited to, the following: gender, education, occupation, trade experience, and investment objectives.

Information tastyworks collects indirectly from you:

tastyworks asks you to provide “Non-Personally Identifiable Information” (“NPII”) defined as information that is not associated or linked to PII and does not permit the identification of individual persons by itself. This information aids the Firm in anticipating the needs and requests of its customer base to ensure the Firm is always making efforts to satisfy requests.

The NPII information tastyworks collects indirectly from you includes, but is not limited to, your Internet Protocol (“IP”) address, browser type, operating system, Internet Service Provider (“ISP”), time stamps, transactions placed, products or services used, referral site(s), and banner ads you click through. Through the use of cookies, which are small pieces of information that a website sends to your computer’s hard drive while you are viewing that website, tastyworks is able to indirectly collect information of this sort. Cookies provide operational data that enable the Firm to better understand your interaction with the Firm’s website and the services the Firm provides, in order for the Firm to troubleshoot and improve security and navigation on an as-needed basis. The Firm reserves the right to share this NPII with any of its authorized Third-Party Service Providers (collectively referred to as “third parties”) to measure the overall effectiveness of tastyworks’ online advertising, content, and distribution.

When does tastyworks collect information?

You directly provide the majority of the information tastyworks collects when you perform various actions on the tastyworks website and use the products and services offered by the Firm and/or its affiliate company.

Listed below are some of the specific means in which tastyworks collects information directly from you:

- When you start the new account application
- When you agree to customer agreements
- When you read the Firm's policies and disclosures
- When you place a trade
- When you access the website, trade platform, and other tools
- When you send us an email with questions or comments
- When you voluntarily submit information in response to a promotion or special offer

Listed below are some of the specific means in which tastyworks collects information indirectly from you:

- When we analyze your usage of our website
- When we provide products and services to you
- When we obtain information from other sources such as credit agencies, affiliates, and business partners

How does tastyworks use your personal information?

A primary goal of tastyworks is to have long-term relationships with its customers, and the Firm understands that upholding the trust of its customers is critical to achieving that goal. Therefore, tastyworks uses personal information only as appropriate to provide you quality service and security.

The Firm may use the information collected from you to verify your identity and contact you. Additionally, tastyworks may use this information during the process of establishing your trading account, issuing an account number, issuing a username and password, maintaining necessary records of your portfolio and trading activity, and contacting you regarding account-related information, as well as other support services the Firm offers to its customers.

The Firm may also use demographic information on its customers provided by other third parties in order to develop new products, support new lines of business, and establish new services for customers.

Customers should be aware that there are published regulatory requirements that request that customer information be retained and accessible by broker-dealers for a specified period of time after an account is closed.

What does tastyworks share with affiliated companies?

The purpose of the tastyworks Privacy Policy is to affirm that customer privacy is at the forefront of the Firm's commitment to maintain a superior level of trust with its customers. Thus, the Firm does not sell, license, lease or otherwise disclose your personal information to any third party for any reason other than the purposes described below:

- The Firm may disclose personal information in order to administer or process a transaction, product or service you have authorized or requested, or in the context of facilitating the settlement of a transaction. An applicable example of this could be if tastyworks is required to deliver personal information about you to third parties for certain investments, as well as validating customer identities when performing electronic transfers of funds and wires.
- The Firm may disclose personal information about you to third parties or to government entities as required by law or regulation, or in response to mandatory legal requests.
- The Firm may disclose personal information when necessary to protect your rights and property as a tastyworks customer, or that of tastyworks.
- The Firm may disclose personal information to help the Firm improve its services to you. In that regard, tastyworks may engage another business, such as its Clearing Firm, to help the Firm carry out certain internal functions such as, but not limited to, account processing, fulfillment, retention requirements, or other data collection activities relevant to our business.
- The Firm may disclose customer information from its database and admin systems to help the Firm analyze and identify the needs of its customer base. In doing so, tastyworks is equipping the Firm with the means to notify customers of products and service offerings that may be of interest to them. It is important to note that the information shared still adheres to the overall model of tastyworks' Privacy Policy, therefore it is limited to only facilitating the execution of the task at hand.
- The Firm may disclose customer information to a purchaser of its capital stock, business or assets or to an affiliate-successor.

- The Firm may disclose personal information should you decide to participate in certain promotions and special offers due to the fact that the promotion may require the Firm to gather and share your personal information, such as supplying personal information to the promotion sponsor, which may be a third party or the Firm's affiliate company. For example, it is common practice for a referral program to require that the Firm provide your name as a reference to a prospective customer. You should understand that if at any time should you choose to purchase a product or service offered by another company, any personal information you share with that company would no longer be under the jurisdiction of tastyworks' Privacy Policy.
- The Firm uses Plaid Technologies, Inc. ("Plaid") to gather End User's data from financial institutions. By using the Firm's services, you grant tastyworks and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid Privacy Policy, which can be viewed at <https://plaid.com/legal/#privacy-policy>.

All third parties with whom tastyworks shares personal information have their own privacy policies, and while they are expected to protect personal information in a manner that aligns respectively with the protocols described in tastyworks' Privacy Policy, you should visit their website(s) to view their respective privacy policies.

If tastyworks proposes to share customer information in a manner not covered in this Privacy Policy, it is the Firm's responsibility to notify you of this change by making an updated Privacy Policy available to you on the tastyworks website, as well as notifying you via email that an updated Privacy Policy is available for review.

Can you opt-out of sharing personal information with non-affiliated third parties for marketing purposes?

The Firm does not share information with non-affiliated third parties for marketing purposes unless the Firm has record of your prior consent. Therefore, there is no need to opt-out. You may respectively decline to share your information if and when there is a time that the Firm requests your consent before disclosing any information to a non-affiliated third party.

Can you opt-out of receiving marketing information?

Yes. If you opt-out of marketing emails regarding news about new products and services, tastyworks will always honor your request. However, from time to time, tastyworks needs to send you certain notifications that contain important information about your account, such as changes to your account information, and due to the important, sometimes time-sensitive, nature of these notifications we cannot prevent the delivery of these message via an opt-out feature.

If you want to opt-out of receiving all direct marketing communication from tastyworks, you can send an email to support@tastyworks.com with the word "unsubscribe" in the subject line. You will receive an email confirming your desire to opt-out of all direct marketing communication from tastyworks.

Should you unsubscribe from all direct marketing communications, you acknowledge that you are no longer going to be notified of additional product and service offerings or inquiries. An opt-out election must be made for each separate account you hold at tastyworks.

Does this Privacy Policy apply to links out to other websites?

tastyworks is not responsible for the privacy policies or the content of websites the Firm links out to. The Firm has no governance over the use or protection of information provided by you when visiting those websites, nor any control over the information collected by those websites.

If you elect to link to a co-branded website or to a linked website, you may be asked to provide registration or other information. The information you provide to that website is not under the jurisdiction of the tastyworks Privacy Policy, and therefore you should read their privacy policy.

How does tastyworks protect personal information?

tastyworks takes the safety of its customer data very seriously and employs industry standard measures to ensure data is protected from being accessed by any unauthorized persons. Any access to customer data by Firm employees is strictly controlled and audited. The Firm utilizes multiple layers of firewalls, network segregation, intrusion prevention, and password policies to prevent a security breach or violation by unauthorized parties.

The tastyworks website requires a secure layer of authentication. A customer must log in with their brokerage credentials in order to access their account information or place a trade. The brokerage credentials are transmitted directly to the brokerage without any intermediate storage in the web application.

Any communication between employees of the Firm and a customer regarding sensitive, private information requires authentication of the customer's identity, such as the customer's account number.

All communication with the tastyworks website is encrypted with Transport Layer Security v1.2 (TLS 1.2) and sent over a secure channel.

How does tastyworks use information collected from Cookies and/or other tracking techniques?

PII or otherwise sensitive, private customer information (such as account number, username, or password) are not contained in the cookies used by tastyworks.

The Firm and the customer may use both session cookies, which expire once you close your web browser, and persistent cookies, which stay on your computer until you delete them, to provide you with a more personal and interactive experience with tastyworks.

The Firm uses cookies for marketing purposes, to collect information about customers' identities as they interact with the website and trading platform, and to manage personalized settings on the website. Cookies provide a convenience factor for customers by creating a more streamlined login process, keeping track of transactions, and preserving order information between sessions. The information collected from cookies is used to improve the functionality of tastyworks by avoiding duplicate data entry when appropriate, facilitating navigation, increasing the relevance of content and enhancing security.

You can set your browser to alert you when a cookie is being used, the duration of the cookie, and to inform you of where your information is being returned. You then have the opportunity to accept or reject the cookie. Additionally, you may set your browser to refuse all cookies or accept only cookies returned to the originating servers. Persistent cookies can be removed by following your Internet browser's help directions. Customers may generally disable the cookie feature on their browser without affecting their ability to use tastyworks' website, however there are exceptions where cookies are used as an essential feature to allow the successful completion of a customer action. Disabling cookies may limit your use of many convenience features offered by tastyworks.

The Firm uses cookies to assist tastyworks in securing your trading activities, to enhance the performance of tastyworks' website, and to offer any special services that may pertain to you.

The Firm may share website usage information about visitors to approved and reputable advertising companies for improved advertisement targeting on tastyworks' website and on other sites. For this purpose, pixel tags may be used to note the pages you've visited. It should be noted that information collected by the advertising companies through the use of these pixel tags is not PII, and that the advertising companies have their own privacy policies.

To improve the tastyworks website and services offered to you, the Firm may use a third party to track and analyze usage, traffic volume, and other statistical information, such as page requests, customer initiated actions, and click-through paths. Customer data that is collected for the purpose of tracking and analyzing customer behavior on the tastyworks website and through the use of tastyworks' products is property of tastyworks. Furthermore, dough, Inc. ("dough"), the Firm's Parent Company and affiliate, may collect customer data for the purpose of tracking and analyzing customer behavior on their platforms, mobile applications, and websites that tastyworks may use to further improve the Firm's website and services offered to you.

Can customers update their information?

You can review, change, or correct any of your PII at any time. You are responsible for maintaining the accuracy and completeness of your personal and investment information. The Firm encourages you to review your information regularly to ensure it is up to date. If you have any questions regarding your customer information or believe there to be incorrect information, please directly contact tastyworks' Customer Support Team at support@tastyworks.com.

What if there are changes to this Privacy Policy?

The Firm reserves the right to modify this Privacy Policy at any time. Therefore, tastyworks encourages you to review it frequently. If tastyworks makes material changes to this Privacy Policy, the Firm will post the updated Privacy Policy to the tastyworks website (www.tastyworks.com) and send you an email notification. The Firm will note the date of the most recent Privacy Policy in the document footer.

How can I contact tastyworks with questions regarding this Privacy Policy?

If you have any questions, complaints, or comments, please email tastyworks directly at support@tastyworks.com or address the tastyworks Compliance Department at 1000 W. Fulton Market, Suite 220, Chicago, IL 60607.