

### tastytrade, Inc. Privacy Policy

#### Last Updated: March 14, 2023

tastytrade, Inc. provides online brokerage services via desktop downloadable software, web browser, and mobile application to self-directed investors (collectively "**tastytrade**," "**we**," "**us**," or "**our**"). This Privacy Policy is designed to help you understand how we collect, use, process, and share your personal information, and to help you understand and exercise your privacy rights.

- 1. SCOPE AND UPDATES TO THIS PRIVACY POLICY
- 2. PERSONAL INFORMATION WE COLLECT
- 3. HOW WE USE YOUR PERSONAL INFORMATION
- 4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION
- 5. YOUR PRIVACY CHOICES AND RIGHTS
- 6. SECURITY OF YOUR INFORMATION
- 7. INTERNATIONAL DATA TRANSFERS
- 8. RETENTION OF PERSONAL INFORMATION
- 9. ADDITIONAL INFORMATION FOR RESIDENTS OF CALIFORNIA, VIRGINIA, CONNECTICUT, UTAH, AND COLORADO
- 10. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS
- 11. CHILDREN'S INFORMATION
- 12. OTHER PROVISIONS
- 13. CONTACT US

### 1. SCOPE AND UPDATES TO THIS PRIVACY POLICY

This Privacy Policy applies to personal information processed by tastytrade, including on our websites, software, mobile applications, and other online or offline offerings. To make this Privacy Policy easier to read, our websites, software, mobile applications, and other offerings are collectively referred to here as the "**Services**."

**Changes to our Privacy Policy**. We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

#### 2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. Generally speaking, we collect personal information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations. See below for more details regarding each category.

### A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

• Account Creation. We may collect personal information when you create an account, such as full name, email address, username, password and security question, and type of account. In order to

comply with our legal obligations, we may ask additional "Know Your Customer" ("KYC") questions regarding your citizenship, mailing address, date of birth, Social Security Number ("SSN") or other Individual Tax Identification Number ("ITIN"), marital status, dependents, employment status, trusted contact information, mobile or other telephone number(s) (for example for account notices), affiliation information, and images of your photo IDs where necessary. You can also enable two-factor authentication (TFA) using a third-party application.

We may also ask you for additional personal information depending on the type of account you create with us:

- **Individual Account:** type of account (Margin, Cash, or Retirement), and any associated financial information, including your knowledge of financial tools and trading objectives, annual income, and net worth.
- **Entity Account:** that entity's legal name, and your relationship to said entity, identities of beneficial owners, and financial account activity.
- **Joint Account:** the joint owner's name and email address. The joint owner will receive an email request to complete the application by providing the rest of their information.
- **Deposits and Withdrawals**. We may collect personal information and details associated with funding your brokerage account, including external bank routing and account information and / or external brokerage account information. Any transactions, such as deposits into or withdrawals from your brokerage account made via our Services are processed by third-party payment processors. We may collect additional personal information from you in connection with processing Automated Customer Account Transfers ("ACATs") that you may request. See section C below for additional information regarding our use of third-party vendor services provided by Plaid.
- Your Communications with Us. We may collect personal information, such as email address, phone number, or mailing address when you request information about our Services, apply for a brokerage account, request customer or technical support, or otherwise communicate with us.
- **Surveys**. We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features**. We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., our social media pages, messaging and chat features, and commenting functionalities). Any information you provide on publicly-available portions of the Services will be considered "public," unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.
- **Promotions, Sweepstakes or Contests**. We may collect personal information you provide for any promotions, sweepstakes, or contests that we offer. In some jurisdictions, we are required to publicly share information of promotion, sweepstakes, and contest winners.
- **Conferences, Trade Shows, and Other Events**. We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships**. We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.

• **Job Applications**. We may post job openings and opportunities on our Services. If you respond to one of these postings, we may collect your personal information, such as your application, CV, cover letter, and/or any other information you provide to us.

### **B.** Personal Information Collected Automatically

We may collect personal information automatically when you use our Services.

- Automatic Collection of Personal Information. We may collect certain information automatically when you use our Services, such as your Internet Protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
  - **Crash Reports**. If you provide crash reports, we may collect personal information related to such crash reports, including detailed diagnostic information about your device and the activities that led to the crash.
- **Cookies and Other Technologies (Cookie Policy).** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies ("**Technologies**") to automatically collect information through your use of our Services.
  - **Cookies**. Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
  - Pixel Tags/Web Beacons. A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary**. This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality.
- **Performance-Related**. We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics below*).
- **Functionality-Related**. We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed.

- Advertising- or Targeting-Related. We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party digital properties. Some of the advertising Technologies we use include, but are not limited to Meta, Google, AppLovin, LiveRamp, Criteo, Microsoft, and their partners. Click each partner's name for more information regarding their privacy practices. See "Your Privacy Choices and Rights" below to understand your choices regarding these Technologies.
- **Analytics**. We may use Technologies and other third-party tools to process analytics information on our Services. These Technologies allow us to better understand how our digital Services are used and to continually improve and personalize our Services. Some of our analytics partners include:
  - **Google Analytics**. For more information about how Google uses your personal information (including for its own purposes, e.g., for profiling or linking it to other data), please visit <u>Google Analytics' Privacy Policy</u>. To learn more about how to opt-out of Google Analytics' use of your information, please click here.
  - Facebook Connect. For more information about how Meta uses your personal information (including for its own purposes, e.g., for profiling or linking it to other data), please visit <u>Meta's Privacy Policy</u>. To learn more about how to opt-out of Meta's use of your information, please click <u>here</u>.
  - HubSpot. For more information about how HubSpot uses your personal information, please visit <u>HubSpot's Privacy Policy</u>. To learn more about how to opt-out of HubSpot's use of your information, please click <u>here</u>.
- **Social Media Platforms**. Our Services may contain social media buttons, such as Facebook, Twitter, Instagram, and LinkedIn, which might include widgets such as the "share this" button or other interactive mini programs. These features may collect personal information such as your IP address and which page you are visiting on our Services, and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.
- C. Personal Information Collected from Other Sources

**Third-Party Services and Sources.** We may obtain personal information about you from other sources, including through credit reporting agencies, company affiliates, and other qualified third-party services and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect personal information about you from that third-party application that you have made available via your privacy settings.

**Referrals and Sharing Features.** Our Services may offer various tools and functionalities that allow you to provide personal information about your friends through our referral service. Our referral services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Please only share with us contact information of people with whom you have a relationship (e.g., relative, friend, neighbor, or co-worker).

**Use of Plaid:** We use Plaid Technologies, Inc. ("Plaid") to gather your data from financial institutions. By choosing to use Plaid for instant verification and money movement in coordination with our Services, you grant tastytrade and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information, and consent to it being transferred, stored, and processed by Plaid in accordance with the Plaid Privacy Policy, which can be viewed at <a href="https://plaid.com/legal/#privacy-policy">https://plaid.com/legal/#privacy-policy</a>. You may opt not to use instant verification via Plaid for money movement if you wish to opt out of sharing your information with Plaid.

## 3. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

## A. Provide Our Services

We use your information to fulfill our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing your financial information and other payment methods for products or Services purchased;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for promotions and events.

# **B.** Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Short-term, transient use, such as contextual customization of ads;
- Improving, upgrading, or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing personal information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

# C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we market to you may include email campaigns, push notification, custom audiences advertising, and "interest-based" or "personalized advertising," including through cross-device tracking.

If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in "Contact Us" below.

## D. With Your Consent

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

### E. Other Purposes

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

- Automated Decision Making. We may engage in automated decision making, including profiling. For example, we may engage in automated decision making in connection with our marketing efforts. tastytrade's processing of your personal information will not result in a decision based solely on automated processing that significantly affects you unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are permitted by law to engage in such automated decision making. If you have questions about our automated decision making, you may contact us as set forth in "<u>Contact Us</u>" below.
- **De-identified and Aggregated Information**. We may use personal information to create de-identified and/or aggregated information (for example, aggregate reports detailing the total number of users we have in a given jurisdiction).

### 4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

### A. Disclosures to Provide our Services

The categories of third parties with whom we may share your personal information are described below.

- **Service Providers**. We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Services. This includes but is not limited to service providers and vendors that provide us with IT support, hosting, payment processing, clearing and custodial services, tax services, identity verification, customer service, and related services.
- **Business Partners**. We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.

- **Affiliates**. We may share your personal information with our company affiliates (our "**Affiliates**") for our administrative purposes, IT management, or for them to provide services to you or support and supplement the Services we provide.
- Other Users or Third Parties You Share or Interact With. As described above in "Personal Information We Collect," our Services may allow you to share personal information or interact with other users and third parties (including individuals and third parties who do not use our Services and the general public).
- Advertising Partners. We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as "interest-based advertising" or "personalized advertising."
- **APIs/SDKs**. We may use third-party application program interfaces ("**APIs**") and software development kits ("**SDKs**") as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in "<u>Contact Us</u>" below.

### **B.** Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena, information requests from regulatory agencies and self-regulatory organizations, to protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

### C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in an actual or proposed merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets or all or parts of our business, or transition of service to another provider, your information may be sold or transferred in connection with such a transaction, as permitted by law and/or contract.

#### 5. YOUR PRIVACY CHOICES AND RIGHTS

**Your Privacy Choices**. The privacy choices you may have about your personal information are determined by applicable law and are described below.

• **Email Communications**. If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our agreements, Terms, or this Privacy Policy).

- **Text Messages**. If you receive an unwanted text message from us, you may opt out of receiving future text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us as set forth in "Contact Us" below. Note that even if you opt out of text message updates, you can still receive one-time password hints from us via SMS on request.
- **Push Notifications**. We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device.
- **Cookies and Personalized Advertising**. You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for <u>Android</u>, <u>iOS</u>, and <u>others</u>.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the <u>Network Advertising Initiative</u>, <u>the Digital Advertising Alliance</u>, <u>the European Digital Advertising Alliance</u>, and <u>the Digital Advertising Alliance</u> and <u>the Digital Advertising Alliance</u>.

Please note you must separately opt out in each browser and on each device.

• "Do Not Track" / "Global Privacy Control." Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Additionally, some browsers or plug-ins use a "Global Privacy Control" ("GPC"), which you can learn more about at https:// globalprivacycontrol.org/. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers. However, if our site detects a GPC signal from your device, we will interpret it as a Do Not Sell request where required under applicable law, and we will also interpret it as a request to limit the sale or sharing of personal information for targeted advertising for residents of the European Economic Area, the UK, China, and Brazil.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- Access Personal Information about you, including: (i) confirming whether we are processing your personal information; and (ii) obtaining access to or a copy of your personal information;
- **Request Correction** of your personal information where it is inaccurate, incomplete, or outdated. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion, Anonymization or Blocking** of your personal information when processing is based on your consent or when processing is unnecessary, excessive or noncompliant;
- **Request Restriction of or Object to** our processing of your personal information when processing is noncompliant;

- Withdraw your Consent to our processing of your personal information. Please note that your withdrawal will only take effect for future processing, and will not affect the lawfulness of processing before the withdrawal. If you refrain from providing personal information or withdraw your consent to processing, some features of our Service may not be available;
- Request data portability and receive an electronic copy of personal information that you have provided to us;
- **Be informed** about third parties with which your personal information has been shared; and
- **Request the review of decisions taken exclusively based on automated processing** if these decisions could affect your data subject rights.

If you would like to exercise any of these rights, please contact us as set forth in "<u>Contact Us</u>" below. We will process such requests in accordance with applicable laws.

## 6. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of personal information.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

### 7. INTERNATIONAL DATA TRANSFERS

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

If we transfer personal information which originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the <u>EU Standard Contractual Clauses</u>.

For more information about the safeguards we use for international transfers of your personal information, please <u>contact us</u> as set forth below.

### 8. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws and regulations.

# 9. ADDITIONAL INFORMATION FOR RESIDENTS OF CALIFORNIA, VIRGINIA, CONNECTICUT, UTAH, AND COLORADO

## A. PERSONAL INFORMATION WE COLLECT AND SHARE

The information we have collected within the last twelve (12) months about you, as well as the categories of third parties with whom we have shared this information, are described in the table below.

| Category of Personal Information Collected by<br>tastytrade                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Category of Third Parties<br>Personal Information is<br>Disclosed to for a<br>Business Purpose | Category of Third<br>Parties to Whom<br>Personal<br>Information is Sold<br>And/or Shared |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| Identifiers.<br>A real name, alias, postal address, unique personal<br>identifier, online identifier, Internet Protocol address,<br>email address, account name, Social Security number,<br>Individual Tax Identification Number, or other similar<br>identifiers.                                                                                                                                                                                                                                                                                                                                                                                                                                               | <ul> <li>Service providers</li> <li>Affiliates</li> <li>Data analytics providers</li> </ul>    | <ul> <li>Advertising<br/>partners</li> <li>Data analytics<br/>providers</li> </ul>       |
| Personal information categories listed in the<br>California Customer Records statute (Cal. Civ. Code<br>§ 1798.80(e))<br>A name, signature, Social Security number, physical<br>characteristics or description, address, telephone<br>number, state identification card number employment,<br>employment history, bank account number, credit card<br>number, debit card number, or any other financial<br>information. Personal Information does not include<br>publicly available information that is lawfully made<br>available to the general public from federal, state, or<br>local government records. Note: Some personal<br>information included in this category may overlap with<br>other categories. | <ul> <li>Service providers</li> <li>Data analytics providers</li> </ul>                        | • Data analytics providers                                                               |
| <b>Commercial information</b><br>Records of personal property, products or services<br>purchased, obtained, or considered, or other purchasing<br>or consuming histories or tendencies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <ul><li>Service providers</li><li>Affiliates</li><li>Data analytics providers</li></ul>        | <ul> <li>Advertising<br/>partners</li> <li>Data analytics<br/>providers</li> </ul>       |
| <b>Internet or other electronic network activity</b><br>Browsing history, search history, information on a<br>consumer's interaction with an internet website,<br>application, or advertisement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <ul> <li>Service providers</li> <li>Affiliates</li> <li>Data analytics providers</li> </ul>    | <ul> <li>Advertising<br/>partners</li> <li>Data analytics<br/>providers</li> </ul>       |
| Sensory data<br>Audio, electronic, visual, or similar information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <ul> <li>Service providers</li> <li>Affiliates</li> <li>Data analytics providers</li> </ul>    | <ul> <li>Advertising<br/>partners</li> <li>Data analytics<br/>providers</li> </ul>       |
| Inferences drawn from other personal information to<br>create a profile about a consumer<br>Profile reflecting a consumer's preferences,<br>characteristics, psychological trends, predispositions,<br>behavior, attitudes, intelligence, abilities, and aptitudes.                                                                                                                                                                                                                                                                                                                                                                                                                                              | <ul> <li>Service providers</li> <li>Affiliates</li> <li>Data analytics providers</li> </ul>    | <ul> <li>Advertising<br/>partners</li> <li>Data analytics<br/>providers</li> </ul>       |

## **B. USE OF PERSONAL INFORMATION**

We may use or disclose the Personal Information we collect for the purposes outlined in <u>Use of</u> <u>Information</u> above. Where required under applicable law, we will not collect additional categories of Personal Information or use the Personal Information we have collected for materially different, unrelated, or incompatible purposes without first providing you notice.

## C. SALES/SHARING OF PERSONAL INFORMATION

tastytrade does not "sell" personal information, nor do we have actual knowledge of any "sale" of personal information of minors under 16 years of age, as the term "sell" is commonly understood. That said, we may share information with third-party advertising partners for the purpose of promoting our Services as described above. You may limit such sharing by following the instructions found above in the section titled, Your Privacy Choices and Rights > Your Privacy Choices > Cookies and Personalized Advertising, or by contacting us as set forth in "<u>Contact Us</u>" below.

## D. YOUR RIGHTS AND CHOICES

Subject to applicable law, if you are a resident of California, Virginia, Connecticut, Utah, or Colorado, you may have the following rights:

- **To Know and Access**: to obtain a copy of the specific pieces of Personal Information we have collected about you. (Note that this right only applies to Personal Information relating to you, and not to any other user.)
- **Deletion**: to request that we delete your Personal Information. This right may be limited to the extent that we are permitted or required by applicable law to retain certain information. (Note that if you request deletion of your Personal Information, you may no longer be able to use or access the Services. If you decide to use or access the Services again, we may consider this a new account, and may collect Personal Information associated with that account in accordance with this Privacy Policy.)
- **Opt-Out of "Sale" and Certain Sharing Practices**: you have the right to opt-out of certain information sharing practices with third parties who do not act as our service providers. In some states, like California, this information sharing may qualify as a "share" or a "sale," while in other states, like Virginia, this information sharing may qualify as "targeted advertising" (collectively, "personalized advertising"). If you wish to opt-out of personalized advertising, you can opt out of said sharing by following the instructions above, or by contacting us as set forth below.
- **Correction**: to request the correction of inaccurate Personal Information that we may have on file about you.
- **Obtain additional details regarding our information practices**: You may have the right to request disclosures regarding our information practices. (Note that this information is generally available in this Privacy Policy).

We will not discriminate against you, in terms of price or services that we offer, if you exercise any of the rights listed above.

*Verification and Appeal Process*: We are required by law to take reasonable steps to verify your identity prior to responding to your request. Please note that your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege). If we are unable to process your request via you authenticating yourself on the Services, we may verify your request by asking for information sufficient to confirm your

identity, such as your name, email address, and phone number. Requests to exercise these rights may be granted in whole, in part, or not at all, depending on the scope and nature of the request and as permitted by applicable law. Where required by applicable law, we will notify you if we reject your request, and notify you of the reasons we are unable to honor your request.

If you are a resident of Colorado, Virginia, or Connecticut, you have the right to appeal a request we deny when we have verified your identity and still decline to honor your request. The process for that appeal will be sent to you separately if your request is denied.

Authorized Agent: Depending on where you live, you may have the right to use an authorized agent on your behalf to exercise a privacy right discussed above. If you are an authorized agent acting on behalf of a user to communicate with us or to exercise a privacy right discussed above, you must be able to demonstrate that you have the requisite authorization to act on behalf of the user, and have sufficient access to that user's laptop, desktop, or mobile device to exercise that user's right digitally. If you are an authorized agent trying to exercise rights on behalf of one of our users, then you can make a request on the user's behalf by contacting us as set forth below in the "<u>Contact Us</u>" section: Such requests must include the following information: (1) a written authorization from the consumer that includes the consumer's full name, address, telephone number and valid email address used by the consumer to interact with us, that is signed by the consumer and clearly bestows upon the agent the proper authority; and (2) a certificate of good standing with your state of organization. Alternatively, an acting agent can provide a valid power of attorney signed by the consumer on the agent's behalf and a valid email address used by the consumer to interact with us. The email address of the consumer will be used to separately verify the agent's authority with the consumer.

*Refer-a-Friend, Promotions, and Similar Incentive Programs*: We may offer referral programs, promotions such as sweepstakes, giveaways, or other incentivized information collection programs. We may offer incentives to you such as discounts or promotional items or credit in connection with these programs, wherein you provide Personal Information regarding your friends or colleagues (such as their email address) and receive rewards when they sign up to use our Services. (The referred party may also receive rewards for signing up via your referral.) Alternatively, we may ask you to provide your Personal Information in exchange for a reward or participation in a promotion. These programs are entirely voluntary and allow us to grow our business and provide additional benefits to you. The value of your information to us depends on how you ultimately use our Services, whereas the value of the referred party's information to us depends on whether the referred party ultimately uses our Services. Said value will be reflected in the incentive offered in connection with each program. You may withdraw from the incentives at any time. In order to withdraw from the financial incentive, please <u>contact us</u> as described below.

Shine the Light Disclosure: California residents are entitled to ask us for a notice that identifies the categories of Personal Information that we share with our affiliates and/or third parties for marketing purposes, and provides contact information for such affiliates and/or third parties. If you are a California resident and would like this information, please submit a written request to us using the contact information below.

**De-Identified Information.** If we create or receive de-identified information, we will not attempt to reidentify such information, except to comply with applicable law.

### **10. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. You can exercise this right by contacting

us at privacy@tastytrade.com with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth in "<u>Contact Us</u>" below.

### **11. CHILDREN'S INFORMATION**

The Services are not directed to children under 18 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in "<u>Contact Us</u>" below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child's account if applicable.

### **12. OTHER PROVISIONS**

**Third-Party Websites/Applications.** The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

**Supervisory Authority**. If your personal information is subject to the applicable data protection laws of Australia, Brazil, the European Economic Area, Switzerland, or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority or attorney general if you believe our processing of your personal information violates applicable law.

- Office of the Australian Information Commissioner
- Autoridade Nacionalde Proteçãode Dados (ANPD)
- EEA Data Protection Authorities (DPAs)
- Swiss Federal Data Protection and Information Commissioner (FDPIC)
- <u>UK Information Commissioner's Office (ICO)</u>

### 13. CONTACT US

tastytrade is the controller of the personal information we process under this Privacy Policy.

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at:

tastytrade, Inc. Attn: tastytrade *Compliance Department* 1330 West Fulton St. Suite 600 Chicago, IL 60607 (888) 247-1963 privacy@tastytrade.com