

Privacy Policy for Axehedge

This Privacy Policy (“Policy”) describes the “Personal Data” that Axehedge Inc and its affiliates (collectively in this Agreement, “Axehedge”) collect about you, how we use it, how we share it, your rights and choices, and how you can contact us about our privacy practices.

“Personal Data” means any information that relates to an identified or identifiable individual, and can include information that you provide to us and that we collect about you (e.g. device information, IP address), such as when you engage with us through our websites, mobile apps, and other online services (collectively, the “Services”) and when you otherwise interact with us, such as through our customer service channels.

1. Information that we collect

We collect 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 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, and survey responses;
- **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.

2. Information We Collect Automatically

As is true of many digital platforms, we also collect certain information about you automatically when you use our Services, as described below.

- **Usage Information.** We collect information about your activity on our Services, which includes device identifiers (like IP address or mobile device identifiers), pages or features you use, time and date of access, and other similar usage information.
- **Transactional Information.** When you receive, submit, or complete a transaction via the Services, we collect information about the transaction, such as transaction amount, type and nature of the transaction, and time and date of the transaction.
- **Location Data.** We may collect the GPS location of your mobile device in accordance with your device permissions. You can stop the collection of this precise location information at any time (see the Your Control section below for details). Google uses technologies to approximate your location, including IP address (see Google’s Privacy Policy located at <https://policies.google.com/privacy> to learn more about how they process this information). We also approximate your location by your IP address.
- **Information Collected Through Tracking Technologies.** We and our service providers also use technologies, including cookies and web beacons, to automatically collect certain types of usage and device information when you use our Services or interact with our emails. 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. For information about how to disable cookies, please see the Your Controls section below.

3. Information We Collect from Other Sources

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

- **Vendors 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, as well as inferred fraud risk, from identity verification and fraud prevention partners.
- **Connected Services.** If you link, connect, or log in to your AxeHedge account with a third-party service (e.g., Google, Apple), the third-party service may send us information such as your profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- **Publicly Available Data.** Includes contact information, your interactions with our social media platforms, and other information from publicly available sources, such as 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.
- **Data from other users.** If you are in another user's contact list and they choose to share that list with us, then we will collect the contact information and your association with that user.

4. 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:

- **Maintain and provide the Services,** including to process account applications, authenticate your identity, repair our Services, support, and handle 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 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;
- **Protect or exercise our legal rights or defend against legal claims,** including to enforce and carry out contracts and agreements; and
- **Comply with applicable laws and legal obligations,** such as compliance obligations associated with being a regulated broker-dealer.

5. Disclosures of Information.

We are committed to maintaining your trust, and we want you to understand when and with whom we share information about you. We 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. We use an identification verification service provider to determine whether a selfie you take matches the photo in your government-issued identification. With your consent, we may record your voice and send this data to our third-party partner to authenticate you and to help prevent fraud. The information collected from your photo and your voice by our third-party vendors may include biometric data.
- **Companies in which you hold securities.** AxeHedge may provide your name, address, email address, and securities positions to requesting companies in which you hold securities.
- **AxeHedge affiliates.** Where appropriate, we share information about you with other companies owned or controlled by AxeHedge. 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 AxeHedge, our users, or the public.
- **With your consent.** We share information about you for any other purposes disclosed to you with your consent.

6. Third-party Tracking and Online Advertising

We use third-party advertising and analytics services to better understand your online activity and serve you targeted advertisements. For example, we use Google Analytics and you can review the “How Google uses information from sites or apps that use our services” linked here: <http://www.google.com/policies/privacy/partners/> for information about how Google processes the information it collects.

These companies collect information about your use of our Services and other websites and online services over time through cookies, device identifiers, or other tracking technologies. The information collected includes your IP address, web browser, mobile network information, pages viewed, time spent, links clicked, and conversion information. We and our third-party partners use this information to, among other things, analyze and track data, determine the popularity of content, and deliver advertisements targeted to your interests on our Services and other platforms, as well as to provide advertising-related services to us such as reporting, attribution, analytics, and market research.

For more information about interest-based ads, including to learn about options for opting out of having your web browsing information used for targeted advertising purposes, please visit www.aboutads.info/choices. You should also review your mobile device settings and controls for features that allow you to opt out or opt in to having certain information collected for behavioral advertising purposes. Please note, as a self-directed broker-dealer, we do not advertise on behalf of specific securities or investment options on our Services.

7. Children's Information

We do not knowingly collect any Personal Identifiable Information from children under the age of 13. If you think that your child provided this kind of information on our website, we strongly encourage you

to contact us immediately and we will do our best efforts to promptly remove such information from our records.

BY USING OUR WEBSITE, YOU HEREBY CONSENT TO OUR PRIVACY POLICY AND AGREE TO ITS TERMS AND CONDITIONS.

If you have questions or require more information about our Privacy Policy, do not hesitate to contact us at support@AxeHedge.com.