



Clear Street Privacy Notice

Last updated on February 1, 2025

Introduction

Clear Street LLC and its global affiliates (collectively "**Clear Street**" "**our**" "**us**" or "**we**") are committed to respecting your right to privacy and ensuring the security of your personal information. This Privacy Notice explains to you who we are, how we collect, share and use your personal information and how you can exercise your data protection rights. This Privacy Notice applies to personal information we collect and process when providing our services and operating our business, including when you visit our websites, communicate with us, sign up to create a Clear Street account, and use our Studio platform ("**Platform**") and related services (collectively our "**Services**"). For the purposes of this Privacy Notice, "you" or "your" refers to any individuals interacting with us or whose personal information we need to process in connection with providing our Services.

This Privacy Notice does not apply to:

- Personal information we process as a processor or service provider on behalf of our customers.
- Any personal information we collect or process in our capacity as an employer or employer of record.
- Any product, services, website or content that are offered by third parties through integrations with our Services.

About Us

Clear Street builds modern infrastructure for complex global capital markets and provides a cloud-native brokerage platform to institutions, investors, professional traders, and brokers around the world. For more information about Clear Street, please see the [About](#) section of our website and below for specific information about each Clear Street entity.

- Clear Street LLC is a broker-dealer registered with the U.S. Securities and Exchange Commission ("**SEC**") and a futures commission merchant registered with the Commodities Futures Trading Commission ("**CFTC**"). Clear Street LLC is also a member of the Financial Industry Regulatory Authority ("**FINRA**"), Securities Investor Protection Corporation ("**SIPC**"), the National Futures Association ("**NFA**") as well as various securities and futures exchanges and clearinghouses. You may access additional information about Clear Street LLC and its associated persons on [FINRA BrokerCheck](#).
- Clear Street Canada Inc. is a member of the Canadian Investment Regulatory Organization (CIRO) and a member of the Canadian Investor Protection Fund (CIPF).
- Clear Street Europe B.V.
- Clear Street UK Limited is regulated by the Financial Conduct Authority ("**FCA**"). Please view the FCA Register [here](#) for more information about our financial regulatory authorizations and status, your ability to complain to the Financial Ombudsman Service, and information on any protections and support available to UK customers.

- Clear Street Singapore Pte. Ltd is regulated by the Accounting and Corporate Regulatory Authority ("ACRA").

For more information, please see our [Regulatory Disclosures](#).

If you have any questions or concerns about our use of your personal information, please contact the applicable Clear Street entity using the contact details under "How to contact us" heading below.

Controller

If you are a visitor to any of our websites, the controller of your personal information is typically Clear Street LLC.

If you are a customer or we have collected your information in connection with providing Services to our customer, the controller of your personal information is typically the Clear Street entity that is engaging with and managing the relationship with that customer. Full details of the Clear Street entities are set forth below in the "*How to Contact Us*" section.

What personal information do we collect?

The personal information we collect from you will depend on the context of your interactions with Clear Street and the choices you make, the Services and features you use, your location and applicable laws. If you provide us with information about another individual, you represent and warrant you have the authority to do so and have delivered any required notices and obtained all necessary rights and consents to provide such information to us for processing in accordance with this Privacy Notice.

It is your responsibility to ensure that any personal information you have directly provided to us remains up to date and valid.

Information provided to us

We provide our Services to individual customers and to business customers and their employees and other authorized users ("**Authorized Users**"). If you or someone at your company begins the process of applying for a Clear Street account, we may receive or collect information about you as an Authorized User, your company, and individuals associated with your company.

At the time of account opening, we may collect:

(i) **Identity Data** of individual customers and of company owners, control personnel and other relevant company personnel, such as date of birth, residential address, social security number and driver's license, passport or other government-issued identification, and any other information captured on identification or through our identification verification process; and

(ii) **KYC and AML Data**, such as background screening information, anti-money laundering check reports and information requested from you as part of our account opening process. Some of this information may be obtained from public registries or our third-party data providers.

This information is needed to verify the identity of the customer wishing to use the Services, comply with legal and regulatory obligations applicable to us and our financial institution partners (such as global AML requirements and KYC obligations), determine the availability of Services offering, and maintain your Clear Street account(s).

In connection with providing our Services, we collect additional information submitted by, on behalf of and relating to a company and its Authorized Users, such as:

- **Contact Data**, such as full name, email address, telephone number, postal address, date of birth, marital status.
- **Employment Data** such as your job title or position, employment status, employer name, employer address, and salary.
- **Account Data** such as your login information (username and password), account trading type, individual or joint account, trusted contact person information, and two factor authentication information.
- **Banking Data** such as routing number and account number or credit or debit card details including primary account number ("**PAN**"), credit limit, date of issuance, billing cycle date, local currency transaction information, and bank address and country.
- **Trading Data**, such as equities trading experience, options trading experience, large trader information, options investment objectives, dividends and corporate action information, authorized traders list, and transaction history.
- **Legal and Tax Data** such as financial disclosure information, W9 Tax form, tax identification number (TIN), customer tax documentation, and any litigation information.

Information that we collect automatically

We collect personal information about you when you interact and use our Services, including through automated means from your device when you use our websites. Some of the information we collect indirectly is captured using cookies and other tracking technologies, as explained further in the *Cookies and similar tracking technology* section below.

The personal information we collect indirectly includes:

- **Online and Device Data** collected using tags and pixels, including your IP address, the browser you use to visit our websites, operating system, webpage views and searches, time spent on webpages, and other user experience information.
- **Analytics and Usage Data** includes analytics and derived data generated by Clear Street, such as common search terms, most-clicked areas of webpage layouts, time spent on website, and average number of logins each day, week, or month.
- **Location Data** collected using Wi-Fi access points from which we can identify your precise geographic location, including state and country.

Information from other sources

We also collect information about you from third parties, such as your affiliate companies, companies that provide identification verification services, credit reference agencies, other financial institutions or service providers with whom you may have authorized to provide such information, consumer-reporting agencies, or public sources, such as public information available on government websites and financial sanction lists. Information received from third parties will be checked to ensure that the third party either has your consent or are otherwise legally permitted or required to disclose your personal information to us.

How do we use your personal information?

We use the personal information that we collect from and about you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your information.

In some jurisdictions, such as in the European Union and the United Kingdom, we need a "legal basis" to process your personal information. Our legal basis will be one of the following:

- **Contract** - we require certain personal information for the performance of our contract with you and to provide and support the Services you request from us;
- **Consent** – in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use, or disclose your personal information, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you;
- **Legitimate interests** – we may use or disclose your personal information for the legitimate business interests of either Clear Street or a third party, but only when we are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, it will be in a way which is reasonable for you to expect as part of the running of our business and which does not materially affect your rights and freedoms. Our legitimate interests will normally be to: operate, provide and improve our business, including our website; communicate with you and respond to your questions; use the insights to improve or develop our marketing activities and promote our Services; detect or prevent illegal activities (for example, fraud); and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, and vendors; or
- **Legal obligation** – there may be instances where we must process and retain your personal information to comply with laws or to fulfil certain legal obligations, such as to defend our legal rights or comply with our financial regulatory obligations relevant to providing brokerage services, conducting background screening checks and complying with global AML and KYC obligations.

We have set out a description of all the ways we will use your personal information and which legal basis we rely on to do so, in the table below. Our legal basis will depend on the personal information concerned and the specific context in which we process it.

Purpose/Activity	Type of data	Legal basis for processing including basis of legitimate interest
Establish, manage and administer your account on our brokerage platform, facilitate investment transactions in equities, futures, derivatives and options at your direction, and provide Clear Street's Services to you.	Contact Data Identity Data Employment Data Account Data Banking Data Trading Data KYC and AML Data Online and Device Data Location Data	<ul style="list-style-type: none"> • Where we have a contract with you, performance of that contract with you. • Where we have not entered into a contract with you, we rely on our legitimate interests to operate and provide our Services to you. • Consent (in the case of processing of Location Data). • Legal obligation.

Communicate with you regarding our Services, notify you about important changes and updates to our Services, and respond to your enquiries, requests or complaints.	<p>Contact Data</p> <p>Account Data</p> <p>Online and Device Data</p> <p>Analytics and Usage Data</p>	<ul style="list-style-type: none"> Where we have a contract with you, performance of that contract with you. Where we have not entered into a contract with you, we rely on our legitimate interests to operate, provide and improve our Services; to make sure we are providing Services that meet customer needs; and to make sure complaints are investigated.
Detect and prevent fraud and money laundering, keep our business, including employees, customers and vendors secure, and to verify your identity. For example, online we may use malware and spyware monitoring tools to detect suspicious activity and algorithms to detect unauthorized access to our platform.	<p>Identity Data</p> <p>Contact Data</p> <p>Account Data</p> <p>Banking Data</p> <p>Online and Device Data</p> <p>Analytics and Usage Data</p> <p>Location Data</p> <p>KYC and AML Data</p> <p>Legal and Tax Data</p>	<ul style="list-style-type: none"> Necessary for our and our third parties' legitimate interests (to operate and provide our Services, including our website; to detect, prevent, and investigate illegal and fraudulent activities, money laundering and other crimes, and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, and vendors). Legal obligation
Comply with our global anti-money laundering requirements and know your customer (KYC) obligations to protect our customers, authorized individuals, service providers, and the Clear Street platform, and support law enforcement in the prevention of financial crime.	<p>Identity Data</p> <p>KYC and AML Data</p> <p>Legal and Tax Data</p>	<ul style="list-style-type: none"> Necessary for our and our third parties' legitimate interests (to prevent and detect financial crimes and money laundering activities) Legal obligation
Administer and improve our website and our IT systems (including monitoring, troubleshooting, data analysis, testing, system maintenance, repair and support), and to create and develop new Services.	<p>Identity and Contact Data</p> <p>Account Data</p> <p>Online and Device Data</p>	<ul style="list-style-type: none"> Legitimate interests (to operate, provide and improve our Services, including our website; to detect or prevent Illegal or fraudulent activities and/or to manage the security of our IT infrastructure).

	Analytics and Usage Data	
Manage our use of tracking technologies such as cookies (including enabling you to manage your cookie preferences) and analyse collected data to learn about our website. This includes website analytics, identifying browsing / purchasing trends and patterns and evaluating this information on an aggregated basis.	Account Data Online and Device Data Analytics and Usage Data Location Data	<ul style="list-style-type: none"> • Consent (where required under applicable law). • Otherwise, (for strictly necessary cookies) legitimate interests to operate, provide and improve our business, including our website, or use the insights to improve or develop our marketing activities and promote our Services.
Contact current and prospective customers about our Services and events we think may be of interest.	Contact Data Identity Data Account Data Analytics and Usage Data	<ul style="list-style-type: none"> • Consent (where required under applicable law). • Otherwise, legitimate interests (to operate, provide and improve our business; drive customer engagement and measure satisfaction, to communicate with you).
Personalise and customise your experience whilst using our platform and Services, including to provide local customization and information for customers, and to tailor the content on our website.	Account Data Analytics and Usage Data Online and Device Data	<ul style="list-style-type: none"> • Consent (where consent is required under applicable law). • Legitimate interests (to operate, provide and improve our business, including our website, to use the insights to improve or develop marketing activities and promote our Services).
Comply with legal, regulatory, and tax obligations under applicable law to which we are subject, including our obligations to respond to your requests under data protection law.	Contact Data Identity Data Account Data Analytics and Usage Data Location Data	<ul style="list-style-type: none"> • Legal obligation.

	Trading Data KYC and AML Data Legal and Tax Data	
Protect our legal rights (including where necessary, to share information with law enforcement and others), for example to defend claims against us and to conduct litigation to defend our interests.	Identity and Contact Data Account Data Banking Data Location Data Analytics and Usage Data Trading Data KYC and AML Data Legal and Tax Data	<ul style="list-style-type: none"> • Legitimate interests to protect our business interests. • Legal obligation.

Who do we share your personal information with?

We share your personal information with the following categories of recipients:

- **our group companies** who provide data processing services necessary to provide you with our Services (for example, to provide functionality on our platforms), or who otherwise process personal information for purposes described in this Privacy Notice. Our group companies, to which we transfer your personal information, also operate in the brokerage and financial instrument trading sectors;
- **third party service providers and partners** who provide data processing services to us as necessary to provide you with our Services. Among other things, these service providers help us to administer your accounts, provide tax reporting and prospectus delivery on your accounts, enhance the security of our platforms and to conduct tax and regulatory auditing as per applicable laws. Clear Street's service providers include, for example, cloud storage providers, trading execution providers, payment processing and tax reporting service providers, technology service providers, and fraud detection software providers;
- **third party services** when you use third party services linked through our website / platforms, for example, third party payment services, your personal information will be collected by the provider of such services. Please note that when you use third party services, their own terms of use and privacy notices will govern your use of their services;
- any **competent law enforcement body, government agency, court, fraud prevention agencies, or other third parties**, such as our attorneys and accountants, where we believe disclosure is necessary (i) as a matter of applicable law or regulation, such as federal and European financial services legislation and other financial services regulations, (ii) to exercise,

establish or defend our legal rights against fraud, unauthorized or violative transactions (such as money laundering violations, anti-terrorist due diligence), (iii) to respond to a subpoena or court order, judicial process or governmental or regulatory inquiry (including but not limited to, anti-money laundering inquiries), or (iv) to protect your vital interests or those of any other person;

- a **buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger, acquisition or transfer of all or a portion of Clear Street's business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- any **other person or authority with your consent** to the disclosure, such as appropriate tax authorities (obtained separately from any contract between us); or
- any **other person or third-party companies** as necessary to provide our ongoing Services to you.

Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, "**Cookies**") to collect and use personal information about you. 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 investment or other financial services options on our Services.

How do we keep your personal information secure?

We use appropriate technical and organizational measures to protect your personal information against unauthorized, accidental, or unlawful access, destruction, loss, alteration, disclosure or use. The measures are designed to provide a level of security appropriate to the risk of processing your personal information. We maintain physical, electronic and procedural safeguards that comply with applicable legal standards and other relevant regulatory requirements.

Where you have created an account with us that uses a unique password to enable you to access our website, it is your responsibility to keep this password secure and confidential.

Data retention

We retain the personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements) or to ensure compliance with applicable regulations which prescribe required retention periods. In certain circumstances, we will need to keep your information for legal reasons after our contractual relationship has ended or your account has been deleted.

The specific retention periods depend on the nature of the information and why it is collected and processed and the nature of the legal requirement. For example, we keep your information when we have a legal obligation to do so (such as, if a court order is received about your account, we would retain your personal information for longer than the usual retention period when an account is deleted), and for litigation or regulatory matters (such as, we would retain your information if there was an ongoing legal claim and the information was relevant to the claim. This information would be retained until the legal claim had been concluded).

When we have no ongoing legitimate business need or legal reason to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

International data transfers

Personal information provided to Clear Street may be transferred to and otherwise processed in the United States, Canada, India, the European Union, the United Kingdom, and any other country in which Clear Street's trusted third-party service providers operate facilities. When we transfer your information internationally, we will take steps to ensure that appropriate safeguards are put in place. These include the Standard Contractual Clauses approved by the European Union (and similar protections authorized by the authorities in the United Kingdom and Switzerland), with the aim of ensuring that your privacy rights continue to be protected as required by applicable law, and as outlined in this Privacy Notice.

What are your privacy rights and choices?

You have rights about the personal information we process about you which may include the right to ask us for a copy of your personal information or to delete or change your personal information. You may also be able to ask us to stop processing your personal information or unsubscribe from our marketing communications.

Depending on where you are located and how you interact with Clear Street you may have one or more of the following rights:

- You may **access, correct, update or request deletion** of your personal information.
- You can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information (i.e. your data to be transferred in a readable and standardized format).
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. If you choose to opt out of marketing communications, we may still send you non-promotional emails, such as emails about your account or our ongoing business relations.

- If we have collected and processed your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in Europe are available [here](#) and for the UK [here](#).) Certain data protection authorities may require that you exhaust our own internal complaints process before looking into your complaint.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Your ability to exercise these rights will depend on a number of factors, such as the country in which you are located, the Clear Street entity providing the Services and the reasons why we process your personal information.

Children's Privacy

Our website and our Services are not intended for or directed to children under the age of 18. We do not knowingly collect personal information directly from children under the age of 18 without parental consent. If we become aware that a child under the age of 18 has provided us with personal information, we will delete the information from our records. Please contact us at privacy@clearstreet.io if you are aware that we may have inadvertently collected personal information from a child under the age of 18.

On rare occasions, we may process children's data indirectly for KYC and AML purposes to comply with our legal obligations. For example, when a child under the age of 18 is a beneficiary of a trust and this information has been provided to us within a background screening report.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, regulatory, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if, and where, required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “*last updated*” date displayed at the top of this Privacy Notice.

How to contact us?

If you have any questions or concerns about our use of your personal information, please contact us using the following details:

Clear Street LLC

Email: privacy@clearstreet.io

Phone: +1 (646) 845-0036

Postal address:

Clear Street
4 World Trade Center
150 Greenwich St Floor 45
New York, NY 10007

Clear Street Canada Inc

Email: privacy@clearstreet.io

Postal address:

30 Adelaide St. East, 12th Floor
Toronto, Ontario
Canada
M5C 2C5

Clear Street Europe B.V.

Email: privacy@clearstreet.io

Postal address:

Gustav Mahlerlaan 1,
1081 LA Amsterdam,
Netherlands

Clear Street UK Limited

Email: privacy@clearstreet.io

Postal address:

1 Poultry
London,
EC2R 8EJ
United Kingdom

Clear Street Singapore Pte. Ltd

Email: privacy@clearstreet.io

Postal address:

9 Raffles Place Republic Plaza
048619
Singapore

United States Residents

The purpose of this section is to inform our users who are US residents, including California residents, of the categories of personal information that we collect from them and disclose to third parties, and the purposes for which such personal information will be used. This section also explains certain privacy rights that are granted by certain state privacy laws, such as the California Consumer Privacy Act of 2018 (“CCPA”) and how they can exercise these rights.

Categories of Personal Information Collected and Disclosed

You can find a list of the categories of personal information that we collect in the section “*What personal information do we collect?*” above. For purposes of the CCPA, Clear Street has collected during the preceding 12 months the following categories of personal information:

- personal unique identifiers, such as your name, postal address, email address and account name;
- personal information such as telephone number, bank accounts, investment or brokerage accounts, and other financial information;
- characteristics of protected classes or groups under state or federal law, such as sex or marital status;
- commercial information such as products and Services obtained and transaction histories;
- internet and electronic network activity information, such as information about your interactions with our websites, or advertisements;
- geolocation data collected using Wi-Fi access points from which we can identify your precise geographic location; and
- inferences based on information about an individual to create a summary about, for example, an individual’s preferences and characteristics.

Some of the information collected, such as social security number, government ID number, and credit or debit card details, may be considered sensitive personal information under certain state privacy laws. We do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

We receive the categories of personal information listed above from the following categories of sources:

- Directly from you;
- Parties to whom you have directed or authorized our disclosure; and
- From other service providers.

Categories of Personal Information Disclosed and Categories of Recipients

We disclose personal information to third parties for the business purposes as set out in the section “*How do we use your personal information?*” above.

You can find a list of the categories of recipients of personal information in the section “*Who do we share your personal information with?*” above. In addition, your personal information may be accessible to third parties with whom you interact or direct us to share your information through our Services.

Clear Street may share personal and confidential information collected from you with its affiliates and service providers as needed to service your account, unless you have notified Clear Street in writing via the opt out” procedure described below. To opt out of the Clear Street information sharing as set forth above send an email to privacy@clearstreet.io stating that you wish to opt out of information sharing. Please be advised that in such case, Clear Street will be unable to establish an account for you as the sharing that occurs is necessary to establish and maintain your account. Further, all other information sharing in which we participate is required by our regulators and/or the federal/state law enforcement agencies. Additionally, we reserve the right to share appropriate personal information about you with our attorneys, accountants, auditors and service providers in order to effectively discharge its obligations with federal financial services legislation and other related regulations.

Your Consumer Rights

- Right to Access, Correct, and Delete Personal Information

Depending on your state of residence in the U.S., you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law.

You can submit a request to access or delete your personal information, or withdraw consent, by contacting us at privacy@clearstreet.io. Once we receive your request, we will verify it by requesting information sufficient to reasonably verify your identity and have the proper authority to make the request.

California Civil Code Section 1798.83 permits California residents to request and obtain from us a list of what Personal Data (if any) we disclosed to third parties for that third party's direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge. Under Section 1798.83, if we were to share your Personal Data with third parties for their marketing purposes, you may opt-out of this disclosure at any time by submitting a request to us in writing.

Please note that the CCPA does not apply to what is referred to as non-public personal information collected by financial institutions (like Clear Street), as that information is subject instead to other financial privacy laws. As a result, the CCPA does not apply to most of the information that Clear Street collects and retains.

Depending on your state of residence in the U.S., you may designate an authorized agent to submit a request on your behalf to access or delete your personal information. To do so, you must: (1) provide that authorized agent written and signed permission to submit such request; and (2) verify your own identity directly with us. Please note, we may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf.

- Right to Opt-Out of Cookies and Sale/Sharing Using Online Tracking Technologies

As explained in the section "Cookies and similar tracking technology" above, we use third-party advertising and analytics services to better understand your online activity and serve you targeted advertisements. Our use of online tracking technologies may be considered a "sale" / "sharing" under applicable law.

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, analyse 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.

Categories of third parties to whom personal information was disclosed that may be considered a "sale"/ "sharing" under certain state privacy laws include advertisers and marketing partners, data analytics providers, and social media networks. We do not knowingly sell or share the personal information of individuals under the age of 18.

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 investment or other financial services options on our Services.

- Right to Non-Discrimination

You have the right not to be discriminated by us, and we will not discriminate against you, for exercising the privacy rights conferred by state privacy laws such as the CCPA, although some of the functionality and features available to you may change or no longer be available to you.