

Clear Street's Privacy Policy

Clear Street (the “Firm”) has instituted a policy of protecting the confidentiality and security of information collected from and about prospects, job applicants, employees, and customers. The Firm restricts access to nonpublic personal information about you to those employees and agents who need to know that information to provide products and services to you or in accordance with this privacy policy. By opening an account with Clear Street or utilizing the products, services, and applications available through Clear Street or in connection with a job application, you have consented to the collection, use, and disclosure of your personal information in accordance with this privacy policy (“Privacy Policy”). Clear Street encourages you to read this Privacy Policy carefully.

Clear Street maintains physical, electronic, and procedural safeguards to protect your nonpublic personal information. If you decide to close your account(s) or become an inactive customer, the Firm will still adhere to the policies and practices as set forth in this Privacy Policy and as otherwise required by applicable law.

Collection of Information

Clear Street collects and uses the information it receives to provide services to you. Such services include maintaining your accounts with the Firm, processing securities transactions or funds movements at your direction, and any other services provided under the Firm’s customer agreement. Clear Street obtains most of the information it requires directly from you at the time of account opening or job application - whether in person, by telephone, or electronically. Clear Street may verify this information or receive additional information, including creditworthiness or credit history, from other financial institutions or service providers with whom you may have authorized to provide such information and/or consumer reporting agencies, verification services, or public sources. This information may relate to your finances, employment, avocations, or other personal characteristics, as well as interactions with or through Clear Street or others. In accordance with federal law, Clear Street may use any information it receives to satisfy its regulatory obligation to verify your identity.

Categories of Information Collected

Clear Street collects, uses, and stores the following categories of information in connection with providing services to you as described above:

- 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 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, preferences, feedback, and survey responses;
- Additional Data you provide, such as via focus groups, survey responses, customer support, or other means;
- Data provided by identity verification and screening vendors; and,
- Data collected from Internet Cookies.

Use of Personal Information

Clear Street may use your personal information for the following purposes (“Permitted Purposes”):

- To provide services to you in accordance with any agreement(s) you or your organization may have with Clear Street for administrative, record-keeping, and compliance procedures;
- To provide you or your organization with brokerage and other related services available on Clear Street’s platforms and/or to deal with any requests or inquiries you may have;
- To enforce any agreement and/or protect the Firm’s (or other’s) property or rights or to defend any potential claim;
- To pursue legitimate interests, including to carry out, monitor, and analyze the Firm’s business or operations, including the activities set forth in this Privacy Policy;
- To conduct the Firm’s recruiting process (applies only to personal information provided by job applicants);
- To respond to requests from you or parties that you authorize and follow up with you;
- To contact you, unless you notify Clear Street not to contact you, regarding features and functionality that may be of interest to you;
- To perform product analysis to develop and improve Clear Street’s products and services;
- To comply with any legal or regulatory requirements or good practices and to fulfill the Firm’s obligations to any tax or revenue authority;
- To comply with applicable laws of any country.

Sharing Your Personal Information:

Clear Street may not disclose information about your Personal Information to unaffiliated third parties except as permitted by law, rule, or regulation, as specifically consented by you, and as follows:

- To its attorneys, accountants, auditors, administrators, or other service providers;

- To respond to a subpoena or court order, judicial process, or governmental or regulatory inquiry (including but not limited to anti-money laundering inquiries);
- In connection with a proposed or actual sale, merger, or transfer of all or a portion of Clear Street's business;
- With Clear Street's affiliates on a confidential basis and where allowed by applicable law or where required for providing products or services and for administrative, billing, or other purposes; and,
- With vendors who provide services to Clear Street, including those vendors that provide tools designed to protect or defend against fraud, unauthorized access, or violative transactions (such as money laundering violations, anti-terrorist due diligence), lawsuits, claims, or other liabilities.

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 "Access and Opting Out" procedure described below.

Access and Opting Out

Access to your information: You may access your account information through various media solutions Clear Street offers. If you require additional information, email privacy@clearstreet.io.

Opting Out Provision: Please be advised that you have a right to "opt-out" of the information sharing as set forth above; however, Clear Street cannot establish an account for you as the sharing that occurs is necessary to establish and maintain your account. All other information sharing is required by the Firm's regulators and/or the federal/state law enforcement agencies. Clear Street also reserves its right to share appropriate personal information about you with attorneys, accountants, auditors, and service providers to effectively discharge its obligations with federal securities laws and other securities regulations.

Opting Out Instructions: To "opt-out" of the Clear Street information sharing as set forth above, email privacy@clearstreet.io stating that you wish to "opt-out" of information sharing.

Protection of Information

Clear Street strives to maintain systems that are secure and that meet industry standards. The Firm maintains physical, electronic, and procedural safeguards that comply with federal standards to protect customer information. Clear Street restricts access to customers' personal and account information to employees, affiliates, and service providers who must possess that information to fulfill their job responsibilities or contractual obligations.

Access to and Correction of Information

If you desire to review any file Clear Street maintains regarding your information, please contact privacy@clearstreet.io. If you notify Clear Street that any information is incorrect, Clear Street will review it and if Clear Street agrees, will correct the records. If Clear Street does not agree, you may submit a statement of dispute, which Clear Street will include in future disclosures of the disputed information. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available.

Use of Cookies and Other Tracking Technologies

Clear Street may send text files (e.g., “cookies” or other cached files) or images to your web browser to collect and/or store information on your computer. Such text files and images are used to support the operation of Clear Street’s digital offerings and for the technical convenience of storing information on your computer. The Firm may use information stored in such text files and images primarily for administrative purposes, including to improve or customize your experience on the Clear Street website or to monitor the use of the Clear Street website. The Firm may also use cookies to conduct research and analytics, including compiling statistics such as frequency of use, pages visited, and length of each visit, in order to improve the Clear Street website, as well as the Firm’s products and services.

By using the Clear Street website with your browser set to accept cookies, you consent to the Firm’s use of cookies as described and other tools to provide the products and services available on the website. You may set your browser to notify you when you receive a cookie. Many web browsers also allow you to block cookies. If you block cookies, you may not be able to access certain parts or use all features of the Clear Street website. You can disable cookies from your computer system by following the instructions on your browser or at <http://www.allaboutcookies.org/>.

California Residents

As a federally regulated provider of financial services, Clear Street is broadly exempt from the California Consumer Privacy Act (“CCPA”). Personal information collected from clients and prospective clients is protected under separate federal legislation. Over the past twelve months, the only type of information that the Firm has collected that is potentially subject to CCPA is web-browsing information from passive visitors to the Clear Street website who are California residents.

Clear Street uses third-party advertising and analytics services to better understand your online activity and serve you with targeted advertisements. For example, the Firm uses Google Analytics and you can review the “How Google uses information from sites or apps that use Clear Street’s 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 Clear

Street’s 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. Clear Street and the Firm’s 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 Clear Street’s services and other platforms, as well as to provide advertising-related services to the Firm such as reporting, attribution, analytics, and market research.

For more information about interest-based advertisements, 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 have certain information collected for behavioral advertising purposes.

Under the CCPA, California residents connected to this type of web-browsing data have a right to request access to it or request that it be deleted. Clear Street is unable (and not required) to process such requests because the Firm cannot connect such passive web-browsing information collected with an email address to other personal information that can be used to verify if a requesting party is, in fact, connected to a specific web browser or IP address.

Updates to Clear Street’s Privacy Policy

Clear Street reserves the right to change its Privacy Policy. The examples contained within the Firm’s Privacy Policy are illustrations and are not intended to be exhaustive. The Privacy Policy complies with federal law and SEC regulations regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.

Contacting Clear Street

If you have any questions about Clear Street’s Privacy Policy, please email privacy@clearstreet.io.