

## Clear Street LLC Privacy Policy

Clear Street has a policy of protecting the confidentiality and security of information that it collects about its customers. We restrict access to nonpublic personal information about you to those employees and agents who need to know that information in order to provide products and services to you.

We maintain physical, electronic and procedural safeguards to protect your nonpublic, personal information. If you decide to close your account(s) or you become an inactive customer, we will still adhere to the privacy policies and practices as set forth in this notice 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 and processing securities transactions or funds movements at your direction. Clear Street obtains most of the information it requires directly from you at the time of account opening - 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.

Disclosure of Non-public Personal Information: Clear Street may not disclose information about you to nonaffiliated third parties except as permitted by law, rule, or regulation, as specifically consented by you, and to the following:

- 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; and
- to protect or defend against fraud, unauthorized or violative transactions (such as money laundering violations, anti-terrorist due diligence), lawsuits, claims or other liabilities.

To Whom This Policy Applies: This Privacy Policy applies to Clear Street's customers.

Categories of Information that Clear Street Discloses: 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.

Access to your information: You may access your account information through a variety of media offered by Clear Street. Please contact [privacy@clearstreet.io](mailto:privacy@clearstreet.io) if you require additional information.

Opt Out Provision: Please be advised that you have a right to "opt out" of the information sharing as set forth above however, 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 the Firm's regulators and/or the federal/state law enforcement agencies. Additionally, the Firm reserves its 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 securities laws and other securities regulations.

Opt Out Instructions: To opt out of the Clear Street information sharing as set forth above send an email to [privacy@clearstreet.io](mailto: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 the personal and account information of customers to those employees, affiliates, and service providers who are required to possess that information to fulfill their job responsibilities.

Access to and Correction of Information: If you desire to review any file Clear Street may maintain regarding your information, please contact [privacy@clearstreet.io](mailto:privacy@clearstreet.io). If you notify Clear Street that any information is incorrect, Clear Street will review it. If Clear Street agrees, Clear Street will correct its 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.

Notice to California Residents: On June 28, 2018, California enacted the California Consumer Privacy Act of 2018 (“CCPA”), which went into effect on January 1, 2020. The CCPA provides California residents with specific rights regarding their Personal Data (as such term is used in the CCPA). If you reside in California, you can exercise these rights by contacting us at [privacy@clearstreet.io](mailto:privacy@clearstreet.io).

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 *nonpublic 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.

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](http://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.

Opt-Out for California Residents: California residents may make a consumer rights request to access or delete certain personal information not otherwise exempt from such requests under applicable law. A request may be made by sending an email to [privacy@clearstreet.io](mailto:privacy@clearstreet.io). We may verify the request by asking you to provide information that matches information we have on file about you. You can also designate an authorized agent to exercise these rights on your behalf, but we will require proof that the person is authorized to act on your behalf and may also still ask you to verify your identity with us directly.

Further Information: 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. This notice 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.

