

TOKEA Privacy Policy

This Privacy Policy (“Privacy Policy” or “Policy”) describes information about the categories of personal information collected by TOKEA and its affiliates (“we,” “us,” “our,” or “TOKEA”) through this website or our mobile application (“Site” or “Platform”) or obtained in connection with any services provided by us, why we collect it, and the types of entities to whom we may disclose your personal information. We also describe rights you may have with respect to such information. By accessing the Site and/or utilizing any of our Services, as defined below, you agree to our collection and use of personal information as described in this Policy and our Terms of Service, and any other agreements, disclosures, operating rules, policies and procedures that may be, from time-to-time, required by us, delivered to you, or published on the Platform by us, each of which is incorporated by reference and each of which we may update from time to time without notice to you. These Terms of Service are in addition to any agreements between us or any other affiliated or unaffiliated issuer of securities, unless otherwise specified.

Personal Information We Collect and Purposes For Collection

Website Visitors and Platform Registrants

When you visit or interact with the Site, register to join our Platform, or utilize any of our services (together, our “Services”), we may collect your name, email address, home address, phone number, trust account information, date of birth, IP address, information you report regarding your net worth, account number and password, social security number, and bank account information. We collect this information to provide our Services to you, respond to your inquiries, and for analytics, marketing, and advertising purposes.

We may also collect internet and other electronic activity information associated with your interaction with our Site, including your browser type, and internet service provider (“ISP”); your operating system; which of our web pages you access and how frequently you access them; referral or exit pages; click stream data; and the dates and times that you visit the Site. We collect this information to operate our Site, analyze and improve your experience on our Site, and for advertising purposes.

User Registration and Utilization of our Services

Using our Services will require you to provide personal data. Such information typically includes, without limitation, your name, email address, home address and phone number, date of birth, social security number and/or tax identification number, employer, and job title. We use this data to enable you to log in to and interact on the Site, provide you with our Services, guard against potential fraud, and maintain regular communications with you about our Services.

Financial Data (for Investors)

When you subscribe to make an investment using our Services, we may also collect additional bank information and related information to, among other things, enable issuers of securities products, including issuers unaffiliated with us, and affiliated issuers (“Issuer(s)”), and you to originate funds transfers and make subsequent investment

disbursements to you.

Cookies and Tracking Technologies

We may send one or more “cookies” to your computer. Cookies are small text files placed on your web browser when you visit our Site that store information on your computer, such as your Site preferences. We use cookies when you sign in to keep track of your personal session, including some account identifiers to ensure that you are the only person making changes to your account. We also use cookies to track your activity on the Site as a unique person.

You can set your web browser to inform you when cookies are set, or to prevent cookies from being set altogether. Please note, however, that if you decline to use cookies, you may experience reduced functionality and slower site response times. In some instances, declining to use our authentication-related cookies may prevent you from using the website entirely.

We also allow third parties (including Google and Meta) to use third-party cookies, web beacons, and other storage technologies to collect or receive information about how you interact with our Site and elsewhere on the Internet and use that information to provide analytics and other measurements services, and to deliver and target advertisements tailored to you. Third parties may also use some of these technologies to assist us in determining if you require assistance or are having problems navigating on our Sites or Apps, and this may include technologies that record your interactions with the Services, including without limitation, your keystrokes, mouse clicks, screen touches, and information about when, how, and from where you accessed our Services.

We use Google Analytics to evaluate the use of our website. Google Analytics uses cookies and other identifiers to collect information, such as how often users visit the website, what pages they visit when they do so, and what other websites they visited prior to visiting our website. To learn more about how Google Analytics collects personal information, review [Google's Privacy Policy](#).

How and When Your Information Is Shared With Other Parties

If you indicate an interest in making an investment through our Services, we will notify the Issuer of your interest and share your personal information with such Issuer. We may notify other persons with whom you have directed us to share your personal information. By indicating an interest in an investment, you consent to this disclosure of your information to the relevant Issuer. Since we do not have direct control over the policies and practices of unaffiliated Issuers, including, without limitation, their privacy policies and practices that apply to their collection and processing of your personal information disclosed to them, we are not responsible for their privacy practices.

We may share or provide access to your personal information with vendors we use to assist us in or facilitate the provision of our Services and operation of the Site. We may also transfer or disclose your personal information to a third-party in the event of an actual or proposed sale, merger, reorganization, or restructuring of TOKEA.

We may share your information with law enforcement or other government agencies as required or permitted by law or for the purposes of limiting fraud or complying with applicable laws. We reserve the right to disclose your personally identifiable information when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order, or legal process. We further reserve the right to disclose any of your personal information that we believe, in good faith, appropriate or necessary to take precautions against liability,

to investigate and defend against any third-party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of the Site or our Services, or to protect our rights, property or personal safety of our users, issuers, or others.

We retain personal information for a period of time as required by laws and regulations and the necessary business purpose. We securely delete personal information as soon as legally permitted. California residents covered by the California Consumer Privacy Act may have additional rights. To learn more, view the section covering the California Consumer Privacy Act for additional information.

Do Not Track

We do not respond to Do Not Track (“DNT”) header signals at this time.

Personal Information of Minors

Our Services are not directed to minors under the age of 16 and we do not knowingly collect the personal information of minors under 16.

How We Keep Your Personal Information Secure

We implement and maintain reasonable security measures appropriate to the nature of the personal information that we collect, use, retain, transfer or otherwise process. Those measures include administrative, physical, and technical safeguards to protect the security, confidentiality, and integrity of personal information. However, data security incidents and breaches can occur due to a variety of factors that cannot reasonably be prevented; therefore, our safeguards may not always be adequate to prevent all breaches of security.

Other Websites and Social Media Buttons

Our Site may contain links to other websites or social media buttons. We are not responsible for the privacy practices or the content of those websites or social media platforms. This Privacy Policy applies only to our business and the personal information we collect.

International Users

The Site may be accessed by users located outside the United States. If you choose to use the Service from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States, and that by providing your personal information on or through the Site then you consent to that transfer.

Federal Gramm-Leach Bliley Act

The above Policy does not include personal information we may collect that is subject to the federal Gramm-Leach Bliley Act (“GLBA”). Such information is governed by the privacy notice included in this section only.

Financial companies choose how they share your personal information. Federal law gives consumers the right

to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. The types of personal information we collect and share depend on the product or service you have with us. TOKEA collects your personal information, for example when you register on our Platform, provide us with necessary information required to purchase securities we offer, and when you purchase securities we offer. This information can include: Social Security Number, bank account information, income and net worth, tax information and contact information. When you are no longer our customer, we may continue to share your information as described in this notice. All financial companies need to share personal information to run their everyday business. In the following section, we list the reasons financial companies can share their customers' personal information; the reasons we choose to share; and whether you can limit this sharing.

Reasons we share personal information: for our everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus; for our marketing purposes, such as to offer our products and services to you, for joint marketing with other financial companies; for our Affiliates and non-affiliates to market to you; and for our Affiliates' everyday business purposes, such as information about your transactions and experiences and information about your creditworthiness. Federal law gives you the right to limit only the sharing for Affiliates' everyday business purposes regarding your creditworthiness, Affiliates from using your information to market to you, and sharing for non-Affiliates to market to you. State law may give you additional rights to limit sharing.

TOKEA protects your personal information from unauthorized access and use by security measures compliant with federal law. Keeping your information secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or by others on our behalf.

California Consumer Privacy Act

Under the California Consumer Privacy Act ("CCPA"), "Personal Information" is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident and includes certain categories of Personal Information discussed below that constitute "Sensitive Personal Information." The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act ("GLBA"). The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this notice does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes.

In the past 12 months, we may have collected and disclosed for our business purposes each of the following categories of Personal Information relating to California residents covered by this notice:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers;
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, Social Security Number, physical characteristics or description, address, telephone number, passport number,

- driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information;
- Characteristics of protected classifications under California or federal law, such as sex and marital status;
 - Commercial information, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
 - Biometric information;
 - Internet or other electronic network activity information, such as browsing history, search history, and information regarding a California resident's interaction with an internet website application or advertisement;
 - Geolocation data, such as device location and Internet Protocol (IP) location;
 - Audio, electronic, visual, thermal, or similar information such as call and video recordings;
 - Professional or employment-related information, such as work history and prior employer;
 - Education information, directly related to a student; and maintained by an educational agency or institution or by a party acting for the agency or institution;
 - Inferences drawn from any of the Personal Information listed above to create a profile about a California resident reflecting their preferences, characteristics, psychological trends, predispositions, behavior, and attitudes, intelligence, abilities, and aptitudes; and
 - The following categories of Sensitive Personal Information:
 - Personal Information that reveals:
 - A California resident's Social Security, driver's license, state identification card, or passport number;
 - A California resident's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;
 - A California resident's precise geolocation;
 - A California resident's racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership;
 - The contents of a California resident's mail, email, and text messages unless the business is the intended recipient of the communication;
 - The processing of biometric information for the purpose of uniquely identifying a California resident; and
 - Personal information collected and analyzed concerning a California resident's health.

In addition to collecting Personal Information ourselves, we additionally coordinate with third parties to collect Personal Information on our behalf, which third parties are engaged in one or more of the business practices described as such: delivering advertising and marketing, including on non-affiliated persons' or entities' sites and mobile apps; facilitating events and event management, including virtual and/or in-person events (e.g., hotels, restaurants, virtual platforms, audio/visual capabilities, food/beverage, transportation services, etc.); and referral sources, whether for purposes of identifying candidates for employment, identifying new client opportunities, or recommending vendors or contractors.

The categories of sources from which we collected Personal Information are: directly from a California resident or the individual's representatives; Service Providers, Consumer Data Resellers, Credit Reporting Agencies

and other similar persons or entities; Public Record Sources (Federal, State or Local Government Sources); Information from our Affiliates; Website/Mobile App Activity/Social Media; Information from Client Directed persons or entities or Institutions representing a Client/Prospect; and Information from Corporate Clients about individuals associated with the Clients (e.g., an employee or board member).

With respect to each category of Personal Information that we disclosed for a business purpose in the past 12 months, the categories of persons or entities to whom we disclosed that Personal Information are: Affiliates; Service Providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing, marketing, supporting research activities, credit financing, event management, and real estate management; Other Service Providers who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, real estate expertise, appraisal expertise, notaries and auditors, who promote TOKEA and its financial services and products to customers and other prospective buyers; other Service Providers and contractors who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services; other persons or entities to whom we transfer Personal Information as an asset that is part of a merger, acquisition or other transaction in which such other person or entity assumes control of all or part of the business; government agencies as required by laws and regulations; and other persons or entities with which you may use or direct us to intentionally interact or to which you may use or direct us to intentionally disclose your Personal Information.

We do not disclose Personal Information to any other categories of third parties.

We collect, use and disclose for our business purposes Personal Information, including Sensitive Personal Information, relating to California residents to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business or commercial purposes, including the following: performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services (except for cross-context behavioral advertising, a type of targeted advertising), providing analytic services, providing research services, facilitating event management and execution, managing the asset portfolio, or providing similar services; helping to ensure security and integrity to the extent the use of Personal Information is reasonably necessary and proportionate for these purposes; short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a current interaction with us, where the information is not disclosed to a third party and is not used to build a profile or otherwise alter the California resident's experience outside the current interaction with us; auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards; undertaking activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance that service; debugging to identify and repair errors that impair existing intended functionality; undertaking internal research for technological development and demonstration; and complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions).

How Long We Retain Personal Information. The length of time that we intend to retain each category of Personal Information will depend on several criteria, including (i) the length of time we are required to retain Personal Information in order to comply with applicable legal and regulatory requirements, (ii) the length of time we may need to retain Personal Information in order to accomplish the business or commercial purpose(s) for which such Personal Information is collected, used or disclosed (as indicated in this notice), and

(iii) whether you choose to exercise your right, subject to certain exceptions, to request deletion of your Personal Information.

Sale or Sharing of Personal Information. In the 12 months preceding the date of this notice, we have not “sold” or “shared” Personal Information or Sensitive Personal Information subject to the CCPA nor have we “sold” or “shared” Personal Information or Sensitive Personal Information of minors under the age of 16. For purposes of this notice: “sold” means the disclosure of Personal Information or Sensitive Personal Information to a third party for monetary or other valuable consideration; and “shared” means the disclosure of Personal Information or Sensitive Personal Information to a third party for cross-context behavioral advertising.

We only use or disclose Sensitive Personal Information for the following purposes consistent with CCPA Regulations: to perform the services or provide the goods reasonably expected by an average California resident who requests those goods or services. For example, a California resident's precise geolocation may be used by a mobile application that is providing them with directions on how to get to a specific location; to detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted Personal Information, provided that the use of a California resident's Personal Information is reasonably necessary and proportionate for this purpose. For example, we may disclose a California resident's log-in information to a data security company that it has hired to investigate and remediate a data breach that involved that individual's account; to resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of a California resident's Personal Information is reasonably necessary and proportionate for this purpose. For example, we may use information about a California resident's ethnicity and/or the contents of email and text messages to investigate claims of racial discrimination or hate speech; to ensure the physical safety of natural persons, provided that the use of a California resident's Personal Information is reasonably necessary and proportionate for this purpose. For example, we may disclose a California resident's geolocation information to law enforcement to investigate an alleged kidnapping; for short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a California resident's current interaction with us; to perform services such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying a California resident's information, processing payments, providing financing, providing analytic services, providing storage; to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by us.

If you are a California resident covered by the CCPA, you have the right to: receive this notice at or before the point of collection of your Personal Information and request we disclose to you free of charge the following information covering the 12 months preceding your request, including: the categories of Personal Information about you that we collected; the categories of sources from which the Personal Information was collected; the purpose for collecting Personal Information about you; the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that were disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and the specific pieces of Personal Information we collected about you; to request we correct inaccurate Personal Information that we maintain about you; to request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and to be free from unlawful discrimination for exercising your rights under the CCPA.

Requests for specific pieces of Personal Information will require additional information to verify your identity. For individuals submitting a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom the request is made. For a company or organization

submitting a request on behalf of another person, we may require proof of authorization from the individual such as a Power of Attorney and verification of identity directly from the person for whom the request is made. In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another California resident or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights. We will advise you in our response if we are not able to honor your request. We will not provide Social Security numbers, driver's license numbers or government-issued identification numbers, financial account numbers, unique biometric data, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security. We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay. If you are a California resident, you may submit a request by contacting support@tokea.co

Changes to This Policy

We will review and update this Policy as required to keep current with rules and regulations, new technologies and security standards. We will post those changes on the website or update the "last updated" date of the Privacy Policy. If the changes are material, you will be notified via a notice on our website.

Accessibility

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at support@tokea.co

Contact Us

If there are any questions regarding this Policy or to request a copy of this Policy in another format you may contact us using the information below.

TOKEA

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