



Privacy Notice

Last updated: April 12th, 2025

1. Introduction

Bullish US Operations LLC is part of the Bullish group. For the purposes of applicable data protection law, Bullish Global acts as the data controller in respect of personal information collected through Bullish's websites and services ("**Bullish Global**", "**Bullish**", "**we**", "**us**", or "**our**").

We respect an individual's rights to privacy and are committed to protecting the privacy of your personal information. This notice explains how Bullish demonstrates this commitment, including:

- the types of information we collect through your use of our products and services, when visiting or using our websites or mobile applications (including CoinDesk trading);
- the manner in which we use and share the information, and why;
- the circumstances in which your information may be transferred to another country;
- the rights you may have under relevant privacy or data protection laws;
- cookies that we use or used by our service providers; and
- whom you can reach out to regarding this notice.

The Bullish group includes CoinDesk, a digital media and news company. Where relevant, this Privacy Notice covers the sharing of your personal information with other Bullish group companies.

2. Purpose

Your privacy rights and how to exercise them are explained in this notice.

This notice should be read in conjunction with any other notice or policy that we may provide when collecting or processing Personal Information about you, as it provides additional information regarding specific Personal Information processing. This notice supplements but is not intended to override those other notices or policies. By accessing Bullish Services you acknowledge and fully understand Bullish's privacy practices described in this notice.

By accessing and using our Services, you signify your acceptance to the terms of this notice. If you do not agree with or you are not comfortable with any aspect of this notice, you should immediately discontinue access or use of our Services.

If you do not reside in the United States, kindly refer to our global [Privacy Notice](#).

3. Updates to this notice and the accuracy of your Personal Information

To keep up with changing legislation, best practices and changes in how we process your Personal Information, we reserve the right to revise this notice at any time and without notice by posting an updated

version on this website. To stay up to date on any changes, we would therefore encourage you to review this notice regularly to stay informed of the purposes for which we process your Personal Information and your rights to control how we process it. To the extent permitted by law, by continuing to use our Data Sources after changes have been posted, you are confirming that you have read and understood the latest version of this notice. Please refer to the effective date at the top to determine when the most recent version took effect. Your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check this notice periodically for updates.

4. Children privacy

Protecting children's safety and privacy is very important to us. We do not knowingly collect Personal Information from children under the age of thirteen (13). Bullish Services and Websites are directed to individuals aged 18 years and over. Our verification process prevents Bullish collecting data of minors.

However, if you believe any individual under the age of 18 is using our Services, please contact us at privacy@bullish.com so we can take immediate action to prevent his or her access to our Services and delete the information.

5. Scope

This Privacy Notice applies to your use of, access to, or participation in any of the following sources (collectively, our **"Data Sources"**):

- our website at: www.bullish.com/home-us;
- any mobile application and any products, services, applications or software offered through our website or mobile application, including any communications with you about our services (**"Services"**), unless a separate privacy policy or notice is expressed to apply in respect of such Service;
- any events hosted by us, whether such events are open to the public or by invitation;
- subsections of social media platforms (e.g. LinkedIn) controlled by us; and
- websites from the Bullish group.

You should also familiarise yourself with our global [Privacy Notice](#) which will be applicable if you use services provided by other Bullish group companies. If you use CoinDesk's websites or services, please also refer to the [CoinDesk Privacy Notice](#).

6. Third-party applications and websites

Our Data Sources may contain links to third-party applications not affiliated with us. Your use of an external application or any informational content found on external applications is subject to and governed by the privacy policies, terms, and conditions of that application.

We do not endorse or make any representations or warranties concerning, and will not in any way be liable for, any informational content, products, services, software, or other materials available on external applications or websites.

While we do review the privacy practices of our service providers prior to engaging them to ensure that they meet our privacy standards, we ultimately do not control the privacy practices of any external applications or websites. The websites may contain links to websites not affiliated with us. Your use of external websites or

any informational content found on external websites is subject to and governed by the privacy policies, terms, and conditions of those websites. We do not endorse or make any representations or warranties concerning, and will not in any way be liable for, any informational content, products, services, software, or other materials available on external websites even if one or more pages of the external websites are framed within a page of our websites.

7. Personal Information We Process

We process the Personal Information we collect about you when you use, gain access to, or participate in our Data Sources.

Please note that in some cases, if you do not agree with the way we process your information, it may not be possible for us to continue to operate your account and/or provide certain products and services to you. How is your personal information collected:

We will collect and process the following personal information provided by you:

Categories of Personal Information	Examples
Personal Identification information	such as: • full name, title, date and place of birth, gender, signature, nationality, photograph, live portrait selfie, marital status; • Our third-party identity verification and KYC service providers can use image recognition software to verify your ID when you are looking to open an account with us. This involves them using optical character technology to extract relevant information from your ID documents. • Government Issued Identification Information, such as passport copy, driving license, national identification card, State ID card, Tax id number, visa information and any other information we may request in order to comply with our legal obligation under financial and anti-money laundering laws.
Social Identity Data	such as your group/company data, information on referrals related to you, political background, close connections, behavioral data, risk assessment, compliance assessment.
Contact Data	email address, residential details, home address, mailing address, telephone number, proof of address documentation.
Financial Information	such as bank account information, payment details, primary account number, transaction history, trading history, trading data and tax identification, virtual currency accounts, cryptocurrency wallet address (including public key or private key); stored value accounts, amounts associated with accounts, external account details, consumer reports, source of wealth and source of funds.

Transaction Information	which includes account and authentication information, details about payments to and from you, and any other details of any transactions you enter into using the Services.
Investment Data	which includes information about your financial objectives, and your knowledge of and experience in investment matters.
Technical Data	online Identifying Information, which means your IP address, browser name, operating system, GUID, and coarse location. When you visit our website or access our mobile application, our web server automatically records details about your visit (for example, your IP address, the web site from which you visit us, the type of browser software used, the pages that you actually visit including the date and the duration of your visit).
Profile Information	such as your password, your identification number as our user, information on whether you have an account with Bullish, emails associated with your accounts, requests by you in connection with our Services, your preferences and feedback, other information generated by you when you interact and communicate with us.
Usage Data	information about how you use our Services and other offerings made available by us.
Marketing and Correspondence Information	which means: - the contents of the communications and correspondence between us, whether by email, social media, or otherwise through one of our Service, through your submission of an online form and survey responses, or when you otherwise provide information to our support team or user research team, as well as your communications preferences, including your preferences in receiving marketing from us. - Details of our interactions with you and the products and services you use with a view to establish relevant facts (including without limitation, any records of the phone calls between you and Bullish, emails, meeting notes, letters).
Employment Data	such as your job title, salary, work experience and office location.

We may also collect Institutional Information, such as Personal Identification Information (as per above) of any agent or attorney acting on behalf of the client. Employer identification number (or comparable number issued by a government agency), proof of legal formation. If relevant to the Services we provide to you, we may also collect information about your additional account holders, business partners (including other shareholders or beneficial owners), dependents or family members, representatives, and agents. Before providing Bullish with this information, you should provide a copy of this Policy to those individuals.

We also collect, use, and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Information, but it is not considered Personal Information in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your Personal Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this privacy notice.

Certain Personal Information may be sensitive and may only be used in accordance with the law.

8. How your Personal Information is collected

We collect Information from and about you using a variety of methods, including:

- Your use of or participation in our Data Sources and Information you provide to us.
- A third party's use of our Data Sources relating to you, for example where a third party may manage a Service or Event on our behalf.
- Direct or unsolicited interactions, such as when you voluntarily provide your information to us by contacting us, submitting requests and comments, subscribing to our newsletters, submitting job applications, or otherwise engaging with us through our Data Sources. For example, we may collect Personal Information from you when you sign up for a marketing newsletter.
- Indirectly, such as through public or media Websites or government Websites when conducting user identity verifications and reviews.

9. How Your Personal Information is Used

Use of your Personal Information for the following Commercial and Business Purposes:

- **Register you as a customer and provide the Services:** enable you to use our Services and enforce our Service terms and conditions;
- **Provide support for our Services:** answer your queries, resolve matters with accounts, disputes, collecting fees, to troubleshoot problems and otherwise provide general support related to our Services;
- **Marketing/prospecting:** communicating with you by any means you agreed to (including email, telephone, text message, social media, digital, post, or in person), subject to ensuring that such communications are provided to you in accordance with applicable law; and maintaining and updating your contact information as necessary;
- **Operation of our Websites and analytics:** operation and management of our websites; content provision; display of advertising and other information to you; communication and interaction with you via our Sites;
- **Improving our products and services** by identifying existing product and service issues, planning enhancements to existing products and services, and developing new products and services;

- **IT operations:** management of our communication systems, IT security operations, and IT security audits;
- **Financial management:** sales; finance; corporate audit; and vendor management;
- **Research:** conducting market or customer satisfaction research, in addition to interacting with you to obtain your thoughts on our products and services;
- **Security:** the physical and electronic protection of our facilities, including login records and access details, where you access our electronic systems;
- **Investigations:** detecting, investigating, and preventing violations of policy, agreements, and criminal offenses in accordance with the law;
- **Legal compliance:** adherence to our legal and regulatory responsibilities in accordance with applicable law;
- **Legal Proceedings:** recognition, exercise, and protection of legal rights;
- **Risk Management:** audit, controls, and other;
- **Fraud investigation,** detection, and prevention.

10. How We Share Your Personal Information

We may share your Personal Information with service providers, agents, subcontractors, and other associated organizations, our entities that form part of the Bullish group (including Coindesk, a media and data company, acting as data processor) in order to complete tasks, provide the Services, provide marketing communication if you have consented to it and use of the Bullish Services and Website to you on our behalf, and fulfill other obligations.

Where your data is shared with third parties, we will seek to share the minimum amount necessary.

We may share your Personal Information and other data you provide to us for the following purposes:

- to verify your identity;
- to identify and prevent fraud, money laundering, terrorist financing, and other financial crimes and illegal activities;
- to facilitate the provision of services, your transactions, and relevant business operations to support our delivery of the Services to you and related aspects;
- to provide customer service;
- to promote our Services if you submit a product review or post content on public areas of our Services or social media accounts;
- to assign our rights and responsibilities under the applicable terms and conditions governing the use of any Services (to the extent allowed);
- in response to a request for information if we believe disclosure is in accordance with any applicable law, regulation, or legal process, to protect against or prevent actual or potential fraud, unauthorized transactions, claims, or other liability, and to protect the rights, property, and safety of us or others;

- to evaluate, effectuate, or otherwise transfer your personal information as part of a proposed or actual merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, or other change of ownership or control (whether in whole or in part).

We may share your personal information with the following categories of third parties for the purposes outlined above:

- companies and organizations that assist us in processing, verifying, or refunding transactions or orders; identity verification agencies; fraud or crime prevention agencies;
- any third party as a result of a reorganization, sale, or acquisition involving our group or any affiliates;
- regulatory and law enforcement authorities, where the law permits or requires us to do so;
- our corporate affiliates in the Bullish group, when necessary to complete the processing activities described above;
- third-party service providers who require access to Personal Information in order to provide services to us, including advertising and analytics services;
- public entities and institutions;
- with our professional advisors who provide banking, legal, compliance, insurance, accounting, or other consulting services in order to complete third-party financial, technical, compliance, and legal audits of our operations or otherwise comply with our legal obligations;
- with third-party service providers who require access to Personal Information in order to assist us in delivering Services or operating our business.

Bullish requires that a request from a law enforcement agency or public or judicial body having jurisdiction over us be accompanied by sufficient legal process. For instance, production orders, search warrants, freezing orders, seizure orders, and subpoenas, as well as requests for voluntary data disclosure, all constitute a legal process. Bullish thoroughly evaluates each order and request for voluntary disclosure to verify that they have a legitimate legal basis and that any response is carefully limited to ensure that law enforcement receives just the data and/or remedy to which they are entitled. Additionally, Bullish requires that requests for asset freezing and/or seizure adhere to the relevant local jurisdiction's legal process and include all appropriate instructions, including, if applicable, the period of the freeze.

We always endeavor to only share the minimum amount of Personal Information that these third parties need to perform their tasks.

11. Advertising and Analytics Services Provided by Third Parties

We may allow others to serve advertisements on our behalf across the Internet and to provide analytics services. These entities may use cookies, web beacons and other technologies to collect information about your use of our Data Sources and other websites, including your IP address, web browser, pages viewed, blocks created, transactions undertaken, information provided to Bullish, time spent on pages, links you clicked, and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our website, and better understand your online preferences. For more information about interest-based ads, please visit the Digital Advertising Alliance at www.aboutads.info/choices.

We will get your consent before we share your personal data with any third party for marketing purposes.

The third-party service providers we use for advertising and analytics include:

- Plausible Analytics, a web analysis service that captures web analytics entirely anonymously, uses no cookies, and collects no personal data. All data is used in the aggregate only, and there is no tracking across devices, or websites. To learn more, please review the [Plausible Analytics Privacy Policy](#) and the [Plausible Analytics Data Policy](#).
- We use Piwik PRO Analytics Suite as our website/app analytics software. We collect data about website visitors based on [cookies](#). The collected information may include a visitor's IP address, operating system, browser ID, browsing activity and other information. See the [scope of data collected by Piwik PRO](#). We calculate metrics like bounce rate, page views, sessions and the like to understand how our website/app is used. We may also create visitors' profiles based on browsing history to analyse visitor behaviour, show personalised content and run online campaigns. The data is hosted on Microsoft Azure in the Netherlands and the data is stored for 14/25 months. The purpose of data processing is the analytics and conversion tracking based on consent. Piwik PRO does not send the data about you to any other sub-processors or third parties and does not use it for its own purposes. For more, read [Piwik PRO's privacy policy](#).
- Google Tag Manager: In order to monitor and provide diagnostics about system stability, performance, and installation quality, Google Tag Manager may collect some aggregated data about tag firing.
- Google Ads & DoubleClick: Google stores a record of the ads it serves in its logs. These [server logs](#) typically include your web request, IP address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser. Google stores this data for a number of reasons, the most important of which are to improve its services and to maintain the security of its systems. Google anonymizes this log data by removing part of the IP address (after 9 months) and cookie information (after 18 months). To help Google's partners manage their advertising and websites, Google offers many products, including Google Ads, and a range of DoubleClick-branded services. When you visit a page or see an ad that uses one of these products, either on Google services or on other sites and apps, various cookies may be sent to your browser. These may be set from a few different domains, including google.com, doubleclick.net, googlesyndication.com, or googleadservices.com, or the domain of Google partners' sites. Some of Google's advertising products enable its partners to use other services in conjunction with Google's (like an ad measurement and reporting service), and these services may send their own cookies to your browser. These cookies will be set from their domains. See more detail about the [types of cookies used by Google](#) and Google's partners and [how they use them](#).
- Twitter: Conversion tracking enables Bullish to measure its return on ad spend by tracking the actions people take after viewing or engaging with Bullish's ads on Twitter. On Twitter, Bullish can use its Twitter Pixel or the Conversions API to set up conversion tracking. These solutions pass data back to Twitter and help enable user attribution. It does this by matching conversion data to a Twitter user, using available identifiers like cookie IDs, [Click ID](#) or email. The Twitter Pixel allows Bullish to put a piece of code on the website to send conversion data to Twitter. The Conversion API allows advertisers to send conversion data directly from a server to Twitter. Learn more about the Twitter Pixel, Conversions API, and other conversion tracking tools [here](#). Attributed data can be used for a variety of purposes, such as building [Website Activity Audiences](#) for campaign retargeting, to improve optimization models to help you drive action with your campaigns, and for reporting of campaign results, to understand the impact of a campaign. Use of any of Twitter's conversion tracking products or services is subject to the Twitter Conversion Tracking Program T&C's, which can be found [here](#).
- LinkedIn: The LinkedIn Insight Tag enables the collection of data regarding members' visits to Bullish's website, including the URL, referrer, IP address, device and browser characteristics (User Agent), and timestamp. LinkedIn doesn't share the personal data of members with Bullish; LinkedIn only provides

reports and alerts (which do not identify members) about Bullish's website audience and ad performance. LinkedIn also provides retargeting for website visitors, enabling Bullish to show personalised ads off Bullish's website by using this data, but without identifying the member. LinkedIn also uses data that doesn't identify members to improve ad relevance and reach members across devices. LinkedIn members can control the use of their personal data for advertising purposes through their account settings.

- The Trade Desk offers what is known in the industry as a Demand Side Platform. The Trade Desk provides technology that helps advertisers and their advertising agencies manage digital advertising campaigns across many channels, such as websites, apps, audio, smart TVs, and other video. The Trade Desk technology uses data to target and serve or to help Bullish to target and serve relevant advertising to consumers and to perform attribution analysis or other analytics regarding advertising audiences, as well as to compile, match and link audiences on behalf of Bullish. For instance, The Trade Desk may, or help Bullish to, use this data to: – Determine what ad to show a consumer, and customise ads to particular types of audiences; – Customise ads to the type of web page users are viewing; – Limit the number of times a consumer sees an ad or a type of ad; – Perform analysis of how effective the ads are; – Help Bullish learn more about their own consumers; – Troubleshooting; and – Fraud detection. Learn more about The Trade Desk's privacy policy here.
- PubMatic, Inc., who develops and implements online advertising software and strategies for the digital publishing and advertising industry. Learn more about PubMatic's privacy policy here.
- Casale Media uses cookies for the purpose of tracking when an Internet user has seen an advertisement. Learn more about Casale Media's privacy policy here.

12. Cookies

We use Cookies, web beacons, and other data collecting technologies, such as when you navigate the website or click on links in the emails we send you. A cookie is a small data file that is transferred to a web browser, allowing our Sites to remember and customize your subsequent visits. A web beacon (also called a "pixel tag" or "clear GIF") is a piece of computer code that enables us to monitor user activity and website traffic. To learn more about how we use cookies then please visit our Cookie Notice. For more information on cookies and web beacons more generally, please visit AllAboutCookies.org. Some web browsers offer settings that allow you to reject cookies or alert you when a cookie is placed on your computer or device. Please note that if you reject cookies, the functionality of some areas of the website may be limited.

You have the option to manage cookies placed by our website on an ongoing basis by opting out of any Cookies category except Strictly Necessary Cookies by changing your Cookies Settings using our cookie preference manager found in the Cookie Notice that you may access by clicking on "Customize Settings" in our Cookie Notice. Please note that if you reject cookies, the functionality of some areas of the website may be limited.

13. Personal Information Security

We have implemented safeguards that are intended to protect the personal data we collect. Please be aware that despite our efforts, no data security measures can guarantee absolute security.

You can find more information about our security practices on Bullish on security.

14. How long we keep your Personal Information

We consider the amount, nature, and sensitivity of the Personal Information; the potential risk of harm from unauthorized use or disclosure of your Personal Information; the purposes for which we process your Personal Information and whether we can achieve those purposes through alternative means; and the applicable legal,

regulatory, tax, or other requirements when determining the appropriate retention period for Personal Information.

Depending on the needs of the business or legal and regulatory authorities, retention periods may be modified periodically.

We may, on occasion, retain your information for longer periods, especially if we are required to do so by a court order, an investigation by law enforcement or our regulators, or to comply with a subpoena. This ensures that Bullish will be able to produce records as evidence, if necessary.

Retention requirements vary by jurisdiction; when determining how long we must keep your Personal Information and data, we typically take the following into account:

- if we're investigating a complaint;
- for audit purposes;
- If we believe there is a possibility of litigation regarding our relationship with you, or if we believe we need to keep information to defend possible future legal claims, the respective personal information (e.g., email addresses and content, chats, letters) will be kept in accordance with the statutory limitation period applicable after the end of our relationship;
- In order to comply with any applicable legal and/or regulatory requirements regarding certain types of personal information (e.g., retention of biometric data until the identity verification purposes for the collection have been satisfied; or three years from the time at which you delete or deactivate your Bullish account, whichever occurs first);
- In accordance with applicable industry standards or guidelines;
- In accordance with our legitimate business interest.

Please note that under certain conditions, you can ask us to delete your Personal Information subject to certain exceptions.

15. Your legal rights

Under certain circumstances and depending on your state residency, applicable privacy legislation may entitle you to some or all of the following rights with respect to your Personal Information:

- Right to be informed about how we collect, use and disclose your Personal Information;
- Right to request correction of certain Personal Information;
- Right to request the deletion of certain Personal Information;
- Right to opt-in or opt-out of the sharing or sale of certain Personal Information or profiling, which means the automated processing of your Personal Information by us for decisions that produce legal or similarly significant effects concerning you;
- The right to access the personal information we hold about you;
- The right to obtain a copy of the Personal Information you provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit your Personal Information to another controller, where the processing is carried out by automated means;

- The right to appeal our decision on your rights request. If we decline to take action regarding your request, we will notify you providing our reasons and instructions for how you can appeal the decision. If the appeal is denied, we will provide a way for you to contact the relevant regulatory authority to submit a complaint.

To exercise the above rights, please contact us at privacy@bullish.com. We will consider and process your request within the required period of time. Please be aware that under certain circumstances, or in relation to certain types of data, the applicable legislation may limit your exercise of these rights.

When permitted by applicable law and required to do so, we will disclose and deliver your Personal Information to you free of charge. In order to expedite our response, we may also contact you to request additional information regarding your inquiry and to confirm your identity.

You can submit a request on behalf of another person if you are an authorized agent, guardian or have a Power of Attorney. We will reach out to you and to the person for whom you are making a request with additional instructions.

You have the right to be informed about the sale of your personal information to third parties and to opt out of such a sale.

We may share identifiers with third party analytics providers, advertising partners, and ad networks for analytics and advertising purposes. Please note that sharing Personal Information with service providers, which are parties we hire to perform a function on our behalf and who are contractually bound to use the Personal Information only for that function, and disclosing that information to other Bullish entities, or to other entities when required by law or to protect Bullish or other individuals, does not constitute the sale of Personal Information.

Some of your Personal Information is also subject to the Gramm–Leach–Bliley Act. Certain state privacy laws do not apply to information subject to GLBA and its accompanying regulations (and therefore may not be subject to deletion or other privacy rights requests).

Non-Discriminatory Treatment

Bullish will not discriminate against those individuals who exercise their rights. Specifically, we will not deny you services, charge you different prices for services, or provide you with a different level or quality of services if you exercise your rights. You will not receive discriminatory treatment if you choose to exercise any of the rights conferred to you above.

16. Notice to California Residents

This section shall be read in conjunction with the information provided above and it only applies to California residents who use our Services.

Personal Information Bullish Collects and Discloses

The following table describes the collection, use, and disclosure of personally identifiable information collected by us or our service providers over the past twelve (12) months. See Section 7 – Categories of Personal Information for a detailed explanation of the data included in each category.

Categories of personal information collected	Sources of information; purposes of processing	Parties to whom data has been disclosed or shared

Personal Identity Data	Section 8; Section 9	Regulatory and law enforcement; Identity Verification and Fraud prevention services; other Third Party Service Providers; entities of Bullish group
Social Identity Data	Section 8; Section 9	Regulatory and law enforcement; Identity Verification and Fraud prevention services; Other Third Party Service Providers; entities of Bullish group
Contact Data	Section 8; Section 9	Regulatory and law enforcement; Identity Verification services; other Third Party Service Providers; entities of Bullish group
Financial Data	Section 8; Section 9	Regulatory and law enforcement; Identity Verification and Fraud prevention services; Financial services; other Third Party Service Providers; entities of Bullish group
Transactional Data	Section 8; Section 9	Regulatory and law enforcement; Identity Verification and Fraud prevention services; Financial services; Other Third Party Service Providers; entities of Bullish group
Investment Data	Section 8; Section 9	Regulatory and law enforcement; other Third Party Service Providers; entities of Bullish group
Technical Data	Section 8; Section 9	Regulatory and law enforcement; Advertising and Analytics Service Providers; Identity Verification services; Financial services; and Other Third Party Service Providers
Profile Data	Section 8; Section 9	Regulatory and law enforcement; and Other Third Party Service Providers
Usage Data	Section 8; Section 9	Regulatory and law enforcement; Advertising and Analytics Service Providers; and Other Third Party Service Providers
Marketing and Communications Data	Section 8; Section 9	Regulatory and law enforcement; and Other Third Party Service Providers
Employment Data	Section 8; Section 9	Regulatory and law enforcement; and Other Third Party Service Providers

Opting Out of the Sale or Sharing of Your Personal Information

California residents have the right to opt out of the “sale” of their information by businesses that sell Personal Information. The CCPA defines a “sale” as the disclosure of Personal Information for monetary or other valuable consideration, and “sharing” broadly includes disclosing or making available Personal Information to a third party for purposes of cross-context behavioral advertising. As such, while we do not disclose personal information to third parties in exchange for monetary compensation, we may sell or share: Usage Data and Technical Data with Advertising and Analytics Service Providers for our digital advertising and website analytics purposes.

Exercising Your Rights as a California Consumer

In general, California residents have the following rights with respect to their personal information:

- You may request that we provide you with the following information pertaining to the previous 12 months:
 - The categories of Personal Information collected about you and the categories of sources from which the Personal Information was collected;
 - The business or commercial purpose for collecting Personal Information about you;
 - The categories of third parties to whom we have disclosed your Personal Information and the categories of Personal Information disclosed;
 - The specific Personal Information we have collected about you.
- You have the right to have your personal information deleted and not be discriminated against by a business for exercising your CCPA rights.
- You have the right to opt-out of sales or sharing of your Personal Information.
- You have the right to limit the use or disclosure of sensitive personal information to those uses authorized by the CCPA.
- You may request correction of certain Personal Information.
- You may request the deletion of certain Personal Information.

If you wish to make a request pursuant to the CCPA through a natural person or business entity authorized to act on your behalf, please contact us in advance and we will provide information on how to designate such a person.

To exercise any of the above rights, please contact our Data Protection Officer at privacy@bullish.com. You may also submit the request via our [online form](#).

To exercise the right to opt-out of sales or sharing, you may access our cookie preference manager and opting out of "targeting cookies," "social media cookies," and "performance cookies." You also may turn on "Global Privacy Control" signals through your browser, which our website shall process as a request to opt out of sales and sharing for the relevant browser and device.

In order to comply with your request to exercise any of the aforementioned rights, Bullish may need to verify your identity in order to prevent your personal information from being disclosed to unauthorized third parties. We will only use the personal information we collect for the exclusive purpose of verifying your identity or as otherwise required by law.

Please be aware that the Gramm–Leach–Bliley Act applies to some of your personally identifiable information. The information we collect subject to GLBA and its implementing regulations is not covered by California law and is therefore exempt from deletion requests.

You will not be subject to discrimination if you exercise any of the rights outlined in this notice.

17. GLBA Consumer Privacy Notice

Please see our GLBA Consumer Privacy Notice below for disclosures under the Gramm–Leach–Bliley Act.

FACTS	WHAT DOES BULLISH DO WITH YOUR PERSONAL INFORMATION?		
Why?	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.		
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: • Transaction history • Account Transactions • Employment information • Wire transfer instructions • Investment experience		
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Bullish chooses to share; and whether you can limit this sharing.		
Reasons we can share your personal information		Does Bullish share?	Can you limit this sharing?
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		Yes	No
For our marketing purposes — to offer our products and services to you		Yes	No
For joint marketing with other financial companies		No	We don't share
For our affiliates' everyday business purposes — information about your transactions and experiences		Yes	No
For our affiliates' everyday business purposes — information about your creditworthiness		Yes	Yes
For our affiliates* to market to you *Affiliates include CoinDesk		Yes	Yes
For nonaffiliates to market to you		We don't share	We don't share
To limit our sharing		• Use our online form or • Send us an email at privacy@bullish.com Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice, where an exception does not apply. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.	

	However, you can contact us at any time to limit our sharing.
Questions?	Contact privacy@bullish.com or go to Help Center
Who we are	
Who is providing this notice?	Bullish US Operations, LLC
What we do	
How does Bullish protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Bullish collect my personal information?	We collect your personal information, for example, when you: • Open an account • Visit our websites or apply for, access or attempt to access our Services • Make deposits or withdrawals from your account • Provide employment information • Provide account information • Give us your contact information We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account I hold jointly with someone else?	Currently, joint accounts are not supported by Bullish.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • Our affiliates include Bullish US LLC, Bullish HK Limited, Bullish (GI) Limited, Bullish SG Pte Ltd, Bullish Global and CoinDesk.

Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • Bullish does not share with nonaffiliates so they can market to you
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Currently, Bullish does not engage in joint marketing activities.
Other important information	
California residents: If you are a California resident and we share information with affiliates, or if we have entered into joint marketing agreements with nonaffiliated financial companies, we have separately provided you with a California Privacy Notice. In accordance with California law, we will not share information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example, with your consent. We will limit sharing among our companies to the extent required by California law. If you are a new consumer, we can begin sharing your information 45 days from the date we sent this notice. Vermont residents: We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures. North Dakota residents: We will not share information we collect about you with non-affiliated third parties, except as permitted by law, such as to process your transactions or to maintain your account. Nevada residents: We are providing you this notice pursuant to Nevada law. If you prefer not to receive marketing calls from us, you may be placed on our Internal Do Not Call List by emailing us at privacy@bullish.com. Nevada law requires we provide the following contact information: Office of the Nevada Attorney General, Bureau of Consumer Protection, 100 N. Carson Street, Carson City, NV 89703; Phone number: 702.486.3132; email: aginfo@ag.nv.gov. Bullish US Operations LLC Suite 302 4001 Kennett Pike, County of New Castle, Wilmington, DE 19807; Phone number: 855.857.2855; email: privacy@bullish.com.	

18. USA Patriot Act

The USA PATRIOT Act is a federal law in the United States that requires all financial institutions to obtain, verify, and record the identity information of each individual and legal entity that opens an account. In order to assist the government in the fight against money laundering and the financing of terrorism, when you open an account for yourself or your business, Bullish will request some basic identifying information. In addition, prior to the approval of a business account, we may request evidence of the entity's formation, existence, and authority.