



PRIVACY POLICY

Privacy Notice

Folionet companies (“Folionet”, “we”, “us”, or “our”) recognize the importance of respecting the privacy of customers. Your personal information is carefully managed within our company, and we want you to know the steps we take when we collect your information, how we use it, and when it is shared while you are using Folionet website and mobile App, including our investment and banking services (the “Services”).

Scopes and Affiliates

This policy covers customer information. Customer information means information personally identifiable with a specific customer, or about a customer’s current, or former relationship with our company. If you are under the age of 18, unfortunately you cannot use our Services. We are providing this policy to you in accordance with federal privacy laws.

Affiliates are companies related by common ownership or control. They can be financial and non-financial companies. “Folionet” for purposes of this document includes Folionet Financial LLC (a securities broker dealer), Folionet Advisers LLC (a state registered investment adviser), Folionet Money LLC (a banking technology services affiliate), and Folionet Technologies LLC. In this Privacy Policy we refer to all as “Folionet.”

1. Information we collect and use

To provide excellent customer service we gather information that helps us identify who you are and assess your needs. We do not sell your personal information for monetary consideration.

However, as described in Section 2.C, we share personal information with advertising and marketing partners, which may be treated as a “sale” or “sharing” of personal information under certain U.S. state privacy laws; you may opt out as described in this Policy.

We value your trust and that is why managing the security of your information is one of our most important responsibilities. All our staff who have access to your information must follow a code of conduct that requires the confidential treatment of all customer information. Our staff is subject to disciplinary actions for not complying with our policies and procedures. These individuals only access your information if it’s to provide you products and customer service. Additionally, we maintain procedural electronic and physical safeguards to protect customer information. The customer information we collect and maintain typically consists of the following personal information/data:

A. Automatically collected through the Services and other sources

We collect usage information such as device identifiers, the identifier for advertisers (“IDFA”), operating system and version, wireless carrier, network type, internet protocol addresses (“IP address”), browser type and language, referring and exit pages and uniform resource locators (date/time, amount of time spent on specific pages), features you use at Folionet or visit, purchases, and similar information regarding your use of our Services.

We also collect your location data from your mobile device, wireless carrier, or third-party service providers. Be mindful that you may control the collection of precise geolocation data through the user settings on your device. In addition, activity data, such as purchases/sales, amount, type of transaction, time and date, and similar activity conducted through our Services is collected.

We use cookies to collect tracking data, web server logs, web beacons, pixels, and similar data collection and tracking technologies, such as IP address, browser, type, internet service provider (“ISP”), platform type, and device type. Also, service providers and partners, such as fraud risk assessments and protection, identity verification, credit records, payment processing information, ad campaign information, and data from other users.

We collect data from social media, such as information from your interactions with our social media platforms, and from services that you connect with Folionet. For example, when you link, connect, or log into Folionet through social media, Google, Apple, Facebook, among others. Also, publicly available data such as contact information, public records, and information you have designated as publicly available on other sites, is collected as well.

Finally, we obtain third-party analytics services, such as demographic data, mobile and internet

usage, analyses of performance metrics, and reports regarding your use of Folionet.

B. From Customers

We collect from customers: full name, date of birth, national identification number (social security number or foreign tax ID), picture of photo ID, nationality or citizenship, email, phone number, mailing/home address and also information of a trusted contact person. In addition, financial/personal data such as your bank account and payment card details, investment profile, personal income, account balance, credit scores and tax information. And, personal profile data such as financial services industry affiliations or public companies' involvement.

We collect also content such as photos and contacts in your mobile device or email (collected with your consent). Profile data such as username/password, trading history, experience and knowledge assessments, interests, preferences feedback, survey responses, and inferences regarding characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes is also collected. Other information obtained via customer support and/or other interactions with us is also included within the information we collect.

2. How we use and share your information

We do not sell Personal Information to third parties but do allow third parties to collect personal information through our Service and share personal information with third parties for the business purposes described in this Privacy Policy, including without limitation advertising and marketing on our Service and elsewhere based on users' online activities over time and across different sites, services, and devices.

Our primary purpose in collecting customer information is to provide you with a secure, smooth, efficient, and customized experience. We may use information about you to provide, understand, develop our Services, to create and maintain a safe environment (to comply with regulatory and legal obligations) and to personalize, measure, and improve our advertising and marketing.

A. For services related purposes

We may use Personal Information to enable you to access and use our Services. Also, to comply with our account and other related agreements or any requests for customer support.

We also use your information to provide you with personalized suggestions and

recommendations about investing based on information obtained from you. In addition, to maintain or service customer accounts, process or fulfill orders and transactions, verify customer information, or process payments.

Another way we use your information is to engage third party service providers to perform certain functions on our behalf (such as hosting, mailing information, maintaining databases, ID verification, processing applications, processing payments and completing transactions.)

Your information is also used to operate, protect, improve, and optimize Folionet's Services, such as by performing analytics and conducting research (compiling aggregated and anonymized information about our customers' demographics, interests and behaviors, in order to better understand our customer base and to develop new products, features or services.)

In summary, we process your Personal Information for these purposes given our interest in improving our Services.

B. For security purposes

We may use Personal Information to create and maintain a trusted and safe environment, including, for example:

- To comply with our legal obligations, including to detect and prevent fraud, spam, abuse, security incidents, and other harmful or illegal activity, or to conduct security investigations and risk assessments. To conduct debugging to identify and repair errors.
- To verify or authenticate information or identifications provided by you, or to conduct checks against databases and other information sources, including background or police checks, to the extent permitted by applicable laws and with your consent where required.
- To ensure compliance with and enforce our terms of service, privacy policy, or other policies, agreements or terms and conditions.
- To resolve any disputes with any of our customers and enforce our agreements with third parties.
- To share your Personal Information with any of our affiliates, and any of our third-party service providers who perform services for us and help us operate our business.
- To comply with our obligations in the event of a corporate sale, acquisition, merger, reorganization, sale of assets, dissolution, or similar event. If your Personal Information is part of the transferred assets, you will be notified of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

- To comply with a court order or other lawful request or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Folionet, (iii) act in urgent circumstances to protect the financial security of customers or Folionet against fraud or other harm, or (iv) protect against legal liability.

C. For advertising and marketing purposes

We may use Personal Information to provide, personalize, measure, and improve our advertising and marketing, including, for example:

- To send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences and your Personal Information.
- To administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Folionet.
- To communicate with you in response to your inquiries and to provide you with any requested information and updates about our Services.
- To develop one or more automated models, algorithms or similarly designed technologies that conduct profiling based on your Personal Information, characteristics and preferences in order to send you promotional messages, marketing, advertising and other information that we think may be of interest to you.
- To share your Personal Information with third parties, including but not limited to third-party market research firms for analysis purposes and to help such third parties generate anonymized and aggregated market research data for us, or to third party marketing partners for external ad distribution and ad optimization (including targeting or retargeting, analyzing, managing, or optimizing of ads). However, under no circumstances will we ever sell your Personal Information to third parties.

We process your Personal Information for the above-mentioned purposes given our interest in protecting Folionet and its Services, and to measure the adequate performance of our contractual obligations with you, and to comply with applicable laws. Also, we process your Personal Information given our legitimate interest in undertaking marketing activities to offer you products or services that may be of interest to you.

Cookies

A cookie is a piece of information that the computer that hosts Folionet gives to your browser

when you access our Services. Our cookies help provide additional functionality and analyze our Services more accurately.

If you do not want Folionet to place cookies in your browser, you can opt out by setting your browser to reject cookies or to notify you when a website tries to put a cookie in your browser software. If you choose to disable cookies in your browser, you can still use our Services although some features may be affected. The “help” section on your browser’s toolbar will assist when receiving a new cookie and how to turn cookies off.

Analytics tracking and advertising

Folionet regularly uses third-party advertising and analytics services to better understand your online activity and to provide you with relevant content. These services collect information about your use of our Services and other websites and online services over time through cookies and other tracking technologies. The data collected may include your IP address, web browser, mobile carrier or network, pages viewed, time spent, links clicked, and conversion information.

We and our third-party partners use this information to analyze and track data, determine the popularity of content, and deliver targeted advertisements, among others. Analytics companies may also provide advertising-related services to us such as reporting, attribution, analytics, and market research. By accessing and using the Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Notice.

For more information on third party providers such as Google Analytics, including how to opt out from certain data collection, you can visit <https://support.google.com/analytics/>. 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, you can visit www.aboutads.info. 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. Be mindful that if you opt out of any of these services, your Folionet experience may be limited.

3. How we protect your information

Folionet uses reasonable, industry standard security measures to protect information under our control from loss, misuse, unauthorized access, disclosures, alterations, or destruction. We maintain appropriate physical, electronic and procedural safeguards, including restricting

access to personal information on a need-to-know basis, and limiting the amount and type of information available for downloading or transmittal. We also regularly conduct audits to ensure the effectiveness of our system.

Please understand that no security system is impenetrable and thus we cannot guarantee that our security measures will prevent hackers from illegally obtaining this information, or that our database and/or systems will not be subject to a cyber-attack. Folionet retains your personal information for as long as necessary to accomplish (i) the purpose for which it was collected, (ii) meeting our legitimate interest, and (iii) meeting our legal and regulatory obligations including compliance with our records retention practices.

If you know or have reason to believe that your Personal Information has been stolen, misappropriated, or compromised, or if you receive an unsolicited email or other electronic communication that appears to be from Folionet, but you suspect it may be from some other source or fraudulent, please contact us immediately at the phone number or email below.

Edit your information. If you have an account at Folionet, you may access, review, delete and make changes to your information by using our Services. You may also request that we rectify any inaccuracies or incomplete information in your personal data. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription database. In such case, we will provide you with the reason why the modification or removal was not possible.

4. Managing your information

There are several ways for you to manage the information collected and processed by Folionet, including the following:

- **Authorization withdrawal.** If you have an account at Folionet, you may withdraw your consent to our processing of your personal information at any time by contacting us at support@folionet.com. If you withdraw your consent to any or all use, collection, disclosure, transfer and/or processing of your personal information or do not consent to the collection of your personal information by us, we may not be able to provide or continue providing you with all features or aspects of our existing Services. Please note that withdrawing consent does not affect our right to collect, use, transfer, process and disclose personal data where such collection, usage and disclosure without consent is permitted or required under applicable laws in any jurisdiction.
- **Delete Account and/or Personal Information.** You may request to have all your personal

information deleted by contacting us. We will comply with deletion requests within a reasonable time to the extent permissible by law; however, we will not delete data that we are legally required to maintain, such as information regulators require for audit or substantiation purposes.

- **Limit data access.** You may disconnect our mobile app's access to certain stored device information through your device's settings. For instance, you can withdraw permission for the app to access your contact list or photo gallery.
- **Communications preferences.** You can stop receiving promotional emails from us by clicking the "unsubscribe" link in those emails. We may still send you service-related or other non-promotional communications, such as account statements, trade confirmations, disclosure notices and other transactional or Service-related messages.
- **Limit mobile ad tracking.** You may set your mobile device to limit ad tracking, in which case we will not be able to see your advertising ID or IDFA. However, we will still share other personal information with our advertising partners as described in this Notice.
- **Data sharing limitations.** You can limit how we share your data with our marketing partners to more effectively market our Services to you across sites and apps by contacting us. When disabled, we will no longer share personal information with these partners for these purposes.
- **Information posting.** Do not post personal information on Folionet's social media (such as Instagram) or other public areas because it will become publicly available. The personal information you post or share with others may in turn be shared by them with other users and it may also show up when someone uses a public search engine (even if that person is not a user of our Service).

5. Transfer your information

Our Services are hosted and stored in the United States. If you are located outside the United States, by using our Services, you agree to have your data transferred to and processed in the United States and other countries where Folionet conducts business. We will not transfer any personal data without appropriate safeguards as required by applicable law and regulations.

6. California law

Effective January 1, 2020, the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act ("CPRA"), allows California residents (consumers), upon a verifiable request and subject to applicable exemptions, to request that we give you access, in a portable and (if technically feasible) readily usable form, to the specific pieces and categories of

personal information that we have collected about you, the categories of sources for that information, the business or commercial purposes for collecting the information, and the categories of third parties with which the information was shared. California residents also have the right to submit a request for deletion of information under certain circumstances. In accordance with California law, Folionet will not discriminate against those who exercise their rights, and if you exercise your rights, we will not modify our prices, deny you services or provide lesser quality. To submit such a request, please contact us using the contact details below.

Under the CPRA, California residents also have the right to correct inaccurate personal information and the right to limit our use and disclosure of “sensitive personal information” (which includes Social Security, driver’s license, state identification, passport, and financial account numbers, and precise geolocation) to those uses permitted under the CPRA. In addition, to the extent our sharing of personal information with advertising or marketing partners constitutes a “sale” or “sharing” under the CPRA, California residents have the right to opt out of that sale or sharing. To exercise any of these rights, or to submit a “Do Not Sell or Share My Personal Information” or “Limit the Use of My Sensitive Personal Information” request, please contact us using the contact details below.

California law permits its residents to request for free and obtain from us once a year, a list of the third parties to whom we have disclosed their Personal Information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of Personal Information disclosed to those third parties. Please note that Folionet does not share Personal Information with third parties for their own direct marketing purposes.

We may allow third parties, such as companies that provide us with analytics tools, to collect personal information about your online activities over time and across different apps or websites when you use our Services.

7. Nevada residents

We do not sell consumers covered information for monetary consideration (as defined in Chapter 603A of the Nevada Revised Statutes). However, if you are a Nevada resident, you have the right to submit a request directing us not to sell your personal information. To submit such a request, please contact us using the contact details below.

Information we disclose

We may share information we obtain about you with other affiliates such as your name,

address, social security or tax ID number, investment profile, and financial information. Sharing this information can make it easier for you to do business with us. For example, if you have an account with one of our affiliates and want to open an account with another, your information may be shared. This could save you time in opening the new account by not having the need to provide the same information twice.

You may limit our affiliates from using certain information about you (such as your creditworthiness and other eligibility information) to market their products and services to you. To opt out of this affiliate marketing, please contact us at support@folionet.com or the telephone number below. Your choice will remain in effect until you tell us otherwise.

Accuracy of information

We strive to keep your account information accurate and up to date. You can access your account information in several ways, through the Folionet App, account statements, by telephone with one of our Registered Representatives, or at our offices. If your account information is ever inaccurate, incomplete, or in need of updating, please contact us immediately at support@folionet.com, the telephone number at the bottom of this notice, or stop in at our office and we will update it. If you have any questions or feel that we have not handled your information properly, please contact us and we will investigate your inquiry.

Notifications (Changes to this Policy)

We reserve the right to make changes to this policy periodically and the latest version will be on our website. Our privacy policy will continue to apply to you, even if you are no longer a customer.

We will provide you with a notice of our privacy policy at least annually, as long as you maintain an account with us. Your continued use of our Services is deemed your consent of any updated version. If you do not agree to the Policy as last revised, please do not use (or continue to use) our services.

Contact Folionet regarding this Policy

For your convenience, this information is available on our website. For additional information regarding any of the items of this privacy policy, please contact Folionet at:

Folionet

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