Privacy Policy



Last revised: September 21, 2024

Altruist Corp and our subsidiaries (referred to as "**Altruist**") are committed to protecting your privacy. This Privacy Policy applies to personal information we collect about individuals who visit, access, or use our websites ("**Sites**") and/or the advisers and their clients who use our platform (collectively with the use of our Sites, our "**Services**").

Our <u>Investor Privacy Notice</u> applies to information that Altruist collects about individuals who seek, apply for, or obtain our financial products and services for business, personal, family, or household purposes. As a financial company, we may choose how we 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 click here to view our Privacy Notice for California Residents.

This Privacy Policy explains what information we collect, why we collect it, how we use that information, and the choices we offer relating to the information we collect from or about you. Some of the information we may collect from you constitutes "personal information." Our collection, sharing, and use of personal information is governed by the Privacy Policy that we deliver to you pursuant to applicable state and/ or federal law. When you use our Services and/or register for an Altruist account, you agree to the terms of this Privacy Policy as well as any other agreements you accept when opening an Altruist account. We periodically review and update this Privacy Policy so please review it regularly to be sure you are still comfortable with its terms. **Your continued use of the Services after any change in this Privacy Policy will constitute your acceptance of such change**.

Click on the links below to jump to specific sections.

- 1. What Information We Collect About You
- 2. How We Use Information
- 3. How We Share Information
- 4. Cookies and Tracking Technology
- 5. Your Choices
- 6. How Altruist Protects My Personal Information
- 7. How Long Altruist Keeps My Personal Information
- 8. Children
- 9. Notice for International Users
- 10. How to Contact Altruist
- 11. Privacy Policy Updates

1. What Information We Collect About You

We collect information about you in various ways. Some of this information may be considered "personal information" under applicable law. The personal information that you provide and that we collect or receive from you depends on the context of your interaction with us and our Services, the choices you make when you use our Services, and the services that you receive from us.

Individuals who visit our Sites

Any time you visit our Sites, we collect information about you automatically using various technologies. This information may not identify you personally, but it is linked to your computer or device. When you visit our Sites, we utilize browser storage mechanisms and information-gathering tools such as cookies, internet tags, web beacons, website analytics, and navigational data collection. This includes device-specific information (such as whether you are accessing our Sites from a mobile phone or laptop), the website URL that directed you to our Sites, your location and Internet Protocol (IP) address, the browser and/or operating system of your device, the date and time of access to our Sites, and the pages that you access and how long you accessed them while using our Sites. Our use of that information is not restricted under this Privacy Policy and we may combine it with other information we collect about you on our Sites or through other sources.

Advisers and Clients

When you register to create an account with Altruist, we will collect certain additional personal information, including your name, email address, and potentially other information such as your address, Social Security or taxpayer identification number, date of birth, assets, income, account balances, investment activity, bank account information and accounts at other financial institutions. The exact information we collect depends on whether you are an investment adviser or their end client. When you enter information in an online account application, we may store this information even if you and/or your adviser do not complete or submit the application.

To facilitate identity verification and provide payment services for you, we work with third-party providers, each of which may require the collection and processing of additional data, as set forth below.

Altruist conducts identity verification through Alloy, which may require the collection of personally identifiable information. By creating an account with Altruist, you acknowledge and agree that the terms of <u>Alloy's Privacy Policy</u> will govern Alloy's use of such information.

Altruist offers account linking services through Plaid Inc. ("Plaid"). By using account linking, you acknowledge and agree that the terms of <u>Plaid's Privacy Policy</u> will govern Plaid's use of such information, and you expressly agree to the terms and conditions of Plaid's Privacy Policy. Altruist will collect information about the transactions associated with, and the cash flows into and out of, accounts linked through Plaid.

Altruist uses Stripe, Inc. ("Stripe") to process payments. By using these payment services, you acknowledge and agree to the terms of <u>Stripe's</u> <u>Privacy Policy</u>.

Individuals who register for or attend one of our events

We collect and receive information from you directly when you register for or attend one of our events, including your name and contact details, the marketing channel by which you learned about Altruist and any communication delivery preferences. We use this information to provide future communications relating to the event or our Services unless and until you opt out of such communications. If we conduct our event with a partner, you may also be providing your information to that third party.

Individuals who interact with our social media pages

We collect and receive information from you when you interact with our social media pages, accounts, or via posts you make on social media and other third-party platforms ("Social Media Platforms"). You may choose to engage with us on Social Media Platforms. If you choose to make any of your activities or other content available through a Social Media Platform, including on our pages, or you engage in other activities in connection with a Social Media Platform, your friends and followers on those Social Media Platforms that you have enabled, and potentially the general public, will be able to view those contributions and activities. Please remember that the manner in which Social Media Platforms use, store, and disclose your information is governed by the policies of such third parties. We are not responsible for the privacy practices or other actions of any Social Media Platform through which we may engage with you. This may include demographic information about users who "follow" our pages or information regarding how you engage with us, such as when you "like" our content.

2. How We Use Information

We may use the information we collect from you for a number of business and commercial purposes, including to operate, improve, and protect the services we provide, and to develop new services. We may collect this information in an aggregated, de-identified, or anonymized manner (that does not identify you personally) for any purpose permitted under applicable law. More specifically, we may use the information we collect:

- To provide our Services to you and to operate our Services.
- To deliver the information, products, or services that you requested from us.
- To register your account, authenticate your identity and deliver access to your accounts to you.
- If you are a financial adviser, to reach out to you about and share new information, products, or services that we believe you may be interested in.
- To develop new Services, to improve, enhance, modify, add to, and further develop our existing Services, including analyzing usage, performing end-user risk modeling, and for research and development.
- To communicate with you, including notifying you about changes to our Services.
- To help us monitor and improve our Services and deliver a more personalized experience. This includes enabling us to store information about your preferences and recognize you when you return to our Services.
- To carry out our obligations and enforce our rights arising from any contracts entered into with you. This may include billing and collection
 and as we believe is necessary or appropriate to protect, enforce, or defend the legal rights, privacy, safety, or property of the Sites, our
 Services, our employees, agents, or other users, or to comply with applicable law.
- To help us investigate and prevent fraud, security breaches or other malicious or unlawful activity.
- In any other way that we may set forth when you provide the information, or otherwise at your direction or with your consent.
- As permitted by law or as we may notify you.

3. How We Share Information

We may share the information that we collect pursuant to this policy as follows:

- With our affiliates.
- With our service providers, business partners, and vendors, such as consumer identification verification services, fraud prevention
 providers, public accounting firms, and at your request, investment companies. We also may disclose some of the personal information
 we collect to companies that host our Services, provide web analytics, perform data processing, distribute emails to you, or help us
 communicate with you. We generally require that each Service Provider implement and maintain privacy practices consistent with our
 own.
- When you request any of our products or services. We will share your information to the extent necessary or appropriate to fulfill your request.
- When required to do so by law, for example, in response to a court order, regulatory exam or request, or a subpoena. We may also disclose
 such information in response to a law enforcement agency's request.
- For marketing and advertising purposes. Altruist advertises our services on websites not affiliated with Altruist, and we contract with third-party advertising companies to display these ads. These third-party advertising companies, along with data exchanges and similar providers, may use cookies and similar technologies to collect technical and web navigational information, such as device type, browser type, IP address, and pages visited.

Altruist may also share aggregated, anonymized, or de-identified information with third parties, such as about the demographics of users of our services. As part of this process, we may from time to time include, compile, or aggregate some of your personal information in certain data analyses, reports, or other interpretations of investment trends for both internal and external purposes. When including, compiling, or

aggregating personal information for such purposes, we use methods that are designed to ensure that the information is anonymized such that it is not identifiable to any particular customer.

In addition, if Altruist or any of our subsidiaries or lines of business is merged, acquired, divested, financed, sold, disposed of, or dissolved, including through merger, consolidation, sale, or divestiture of assets, the relevant customer database, including personal information we may possess about you, and information collected pursuant to this policy, may, in whole or in part, be sold, transferred, or otherwise disclosed as part of that transaction or proceeding.

4. Cookies and Tracking Technologies

We and the third-party partners we engage may use cookies (small text files that are stored on your browser, computer, or mobile device), web beacons, pixel tags, browser analysis tools, server logs, and other tracking technologies to automatically collect information, including personal information such as your IP address, from your browser. Our Sites use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be accessed every time you use our Sites.

Our Sites use cookies and other tracking technologies for a variety of purposes, including functional, analytics, and advertising purposes. For example, we, our service providers, and other partners we engage use cookies and other tracking technologies:

- For functional purposes, such as to provide the Sites and their content to you.
- For analytics purposes, such as to provide us with information about what web pages a user visits and how much time a user spends on each page.
- To personalize your experience on our Sites (e.g., to recognize you by name when you return to our Site, to save your password in password-protected areas, or to tailor content, product, or service offerings to you).

Some browsers allow you to modify browser settings to decline cookies and/or "opt-out" of tracking technologies. As each browser is different, it is solely your responsibility to determine whether to activate or deactivate those tracking technologies. Disabling those features may impair some of the functionalities of the Sites and/or our Services.

Our Sites may use Google Analytics, a web analytics service, and Google Tag Manager, a tag management system, offered by Google. You may learn more about Google's practices with Google Analytics by visiting <u>Google's Privacy Policy</u>.

We also utilize Facebook pixels to gather information about visitors to the Sites. <u>Meta's Privacy Policy</u> explains how to change your device settings to opt out of Facebook tracking technologies.

Our Sites may reference or provide links to third-party websites, including social media bookmarking buttons that enable or require you to share certain content on or communicate with our Sites. Some of these sites may be co-branded with an Altruist logo even though they are not operated or maintained by Altruist. You may be directed through links to those sites while visiting our Sites. This Policy only applies to Altruist's privacy practices. Altruist is not responsible for any activities of third-party websites. We do not control, nor are we responsible for, the privacy policies, operation, data collection, information practices, or use of third parties or their websites. When you use third-party links, these third parties may collect personal information about you or your online activities.

5. Your Choices

Opting out of marketing communications

Except where "opt-in" consent is required by law, we will provide you an "opt-out" or unsubscribe option that clearly and conspicuously describes your right to opt out of future marketing communications from us. If you would like us to remove your name and information from marketing communications, please email us at privacy@altruist.com. It may take up to 30 days to complete your request.

Tracking technologies

Altruist and third-party advertising companies may use the data they collect to provide you with ads relevant to you and personalized content while you are on Altruist or other sites. You can choose not to permit tracking technologies, such as cookies and web beacons when you use our Services, but blocking some types of these tracking technologies may interfere with your experience.

Browser-Based Opt-Outs. You may be able to disable tracking technologies using your web browser settings. Please review your browser's instructions or visit <u>All About Cookies</u> for general information. Note that your web browser may have settings that allow you to transmit a "Do Not Track" signal when you use online services. Like many websites, our Sites are not currently designed to respond to "Do Not Track" signals received from browsers.

Self-Regulatory Program Opt-Outs. Two self-regulatory programs are available to help you control the use of tracking technologies on your browsers — the Digital Advertising Alliance and the Network Advertising Initiative. Both programs help to regulate vendors in the digital advertising space. One function of their self-regulatory programs is to give you the ability to opt out of targeted (or interest-based) advertising, including the use of tracking technologies, from their member companies. You can visit the Digital Advertising Alliance's <u>Your Ad Choices</u> website to opt out of targeted advertising for participating vendors. The Network Advertising Initiative similarly assists with opt outs through its <u>Opt Out of Interest-Based Advertising</u> webpage.

Google Analytics Opt-Out. With respect to Google Analytics, you can view <u>Google's currently available opt-out options</u> to opt-out of being tracked by Google Analytics.

6. How Altruist Protects My Personal Information

Your privacy matters to Altruist and we work hard to protect it. We protect your personal information by physical, electronic, and procedural safeguards. However, as with all online service providers, the security of your information depends in part on the security of your computer, device, internet service provider, and your activities, all of which are beyond Altruist's control. Your use of our Services is also governed by the relevant agreements found at <u>altruist.com/legal</u>, the terms of which are incorporated herein by reference, to the extent relevant. Altruist does not send unsolicited communications asking for account information, such as your password.

7. How Long Altruist Keeps My Personal Information

Altruist retains personal information for as long as necessary to provide our services, carry out the purposes described in this Privacy Policy, or as required to comply with applicable law.

8. Children

Our services are not directed to individuals under the age of 18. However, Altruist does offer Uniform Gifts to Minors Act (UGMA) and Uniform Transfers to Minors Act (UTMA) accounts, and in order to open and maintain those accounts, collects personal information about individuals under the age of 18 from the custodians opening and managing the accounts on their behalf. Children themselves should never provide Altruist with personal information for any reason. If a parent or guardian becomes aware that his or her child under the age of 18 has provided us with personal information, please contact us at privacy@altruist.com.

9. Notice for International Users

Altruist is based in the United States and our Services are provided and targeted only to residents of the United States. Personal information provided to us may be transferred to or controlled and processed in the United States, but in certain circumstances, service providers or business partners may process data in or outside of the United States. By providing Altruist with personal information and by using the Services, you consent to this transfer and acknowledge that personal information stored or processed in the United States will be subject to the laws of the United States, including the ability of governments, courts, law enforcement, and/or regulatory agencies of the United States that have valid jurisdiction over Altruist to obtain disclosure of your personal information. You also understand and agree that your personal information may be transferred to and processed in the United States and other countries that may not provide the same level of data protection and privacy as the United States or the country of your residence, and may have been deemed to have inadequate data protection and privacy laws. If you access the Services from a location outside of the United States, you agree that your use of our Services is subject to the terms of this Privacy Policy.

10. How to Contact Altruist

Privacy matters to Altruist. If you have reason to believe that we have not adhered to this Privacy Policy, or any other questions or complaints relating to our privacy practices, please contact Altruist by email at <u>privacy@altruist.com</u> or by mail at 3030 S La Cienega Blvd Culver City, California 90232.

11. Privacy Policy Updates

This Privacy Policy will evolve with time. When we update it, we will revise the "Last Revised" date above and post the new Policy. In some cases, we provide additional notice (such as adding a statement to our services or sending you a notification). To stay informed of our privacy practices, we recommend you review the Privacy Policy on a regular basis as you continue to use our Services.