

# Stockpile Privacy Policy & COPPA Compliance

**Effective Date:** October 9<sup>th</sup> 2024

**Version:** 11.2

At Stockpile, we take privacy and security seriously. This Privacy Policy outlines how Stockpile, Inc. and its affiliates (“Stockpile,” “we,” “our,” or “us”) process the information we collect through our website, mobile app, or otherwise through our interactions with you (collectively, the “Services”).

If you have a Stockpile account or have taken steps to create an account with us, please also review the Stockpile Financial Privacy Policy below which sets forth the disclosures to which you are entitled under the Gramm-Leach-Bliley Act (“GLBA”).

For information on our privacy practices regarding children’s data, please see the section below entitled “Children’s Privacy & COPPA Compliance.”

If you are a resident of California, please see the section below entitled “California Residents: Your Rights” for additional information.

## 1. Information Collection

We collect the following types of information in the following contexts.

- **About our customers and prospective customers,** we collect contact information such as name, date of birth, email, phone number, and address. We may also collect information related to account set-up and administration such as financial account numbers, payment card information, social security number, driver’s license number, other data on government issued identification documents, tax information, and employment and income information. We also collect transaction data and any other information you provide to us when using our Services or receiving customer support.
- **About our business partners,** we collect business contact information such as name, email, phone number, address, etc.
- **About job applicants,** we collect contact information such as name, email, phone number, and address, along with additional personal information contained in a resume or other application materials such as employment history, education, work authorization status, protected classification characteristics, race or ethnicity, or any other information we obtain during the hiring process.
- **From any of the above categories of individuals, as well as from others who may browse or use our website and mobile app,** we collect personal information such as username, password, and IP address, as well as usage information such as information about your activity on our Services, which includes mobile device identifiers, pages or features you use, browser type, time and date of access, and other similar usage information. For more information about our use of tracking technologies, see the section below titled “Cookies and Tracking Technologies.”

We collect information from:

- You directly;
- You indirectly by monitoring your activity on our website or mobile app;

Your bank;

- Our service providers and business partners such as identity verification service providers, credit bureaus, and advertising partners; and
- Public sources.

## 2. Cookies and Tracking Technologies

A cookie is a small text file that is stored on your browser or the hard drive of your computer. We—and our third party partners and service providers (such as advertising networks, analytics providers and social media platforms and networks)—use cookies and similar technologies such as tracking pixels and web beacons to collect user activity information including IP address, location, browser and device characteristics, operating system, language preferences, referring URLs, information about how and when you use the website or mobile app, and other technical details. We use the following types of cookies:

- Strictly Necessary cookies:
  - These cookies are necessary for our website to function and cannot be switched off in our systems. They are usually set in response to actions made by visitors, such as setting privacy preferences, logging in, or filling out forms. You can set your browser to block or alert you about these cookies, but this may cause parts of the site to not work properly.
- Analytics cookies:
  - These cookies may be set by us or by third party providers. They allow us to measure and analyze our website audience so we can improve the performance of our website. They help us track traffic sources, know which pages are the most and least popular, and see how visitors move around the site.
- Marketing cookies:
  - These cookies may be set by us or by our advertising partners. They may be used to understand your interests and market to you. These cookies can be based on uniquely identifying your browser or device. If you do not allow these cookies, you will experience less targeted advertising.

Our website uses third parties to assist us in analyzing data regarding visitors to our website and delivering personalized advertising, such as Google. For example, we use Google Analytics to collect information such as the number of visitors to a site, the webpage that referred visitors to a site, and the pages visitors view within a site. You can opt-out of Google Analytics by downloading [Google's Opt-Out Browser Add-on](#). Third parties may use cookies to track you across websites and serve you advertisements for Stockpile while you are visiting other websites (i.e., retargeting).

Most web browsers automatically accept cookies, but you can modify your browser settings to decline cookies if you prefer. If you use your browser settings to block all cookies, you may not be able to access all or parts of our website.

Some internet browsers have “Do Not Track” or “DNT” features which, when turned on, send a signal to the website that the individual visiting the website does not wish to be tracked. Our website does not honor DNT signals, but you can adjust your cookies settings as described above.

Please note that in addition to cookies, we also utilize screen tracking or session replay services that employ software code to record users' interactions with our Services in a manner that allows us to study and analyze visual reconstructions of users' sessions. The replays may include users' clicks, mobile app touches, mouse movements, scrolls, and keystrokes/key touches during their sessions. These replays help us diagnose usability problems and identify areas for improvement.

### **3. Information Use**

We use the information we collect, including personal information, for the following purposes.

- To provide you with the Services
- To validate, underwrite, create, and manage your account
- To provide customer support
- To provide service announcements
- To communicate with you and respond to your inquiries
- To provide information you have requested
- To provide information, newsletters, or advertisements that may be of interest to you
- To solicit feedback and survey responses
- To administer, personalize, and improve the Services
- To develop new features and services
- To generate statistics and de-identified data
- To prevent, detect or fight fraud or illegal activities
- To comply with legal requirements
- For any other purpose with your consent

### **4. Information Disclosure**

In the following circumstances, we share personal information with third parties.

**Disclosures to Service Providers or Business Partners:** To assist us in providing our Services, we may share personal information with service providers or business partners, such as providers of hosting services, cloud services, email solutions, data analytics services, advertising partners, support and maintenance services, rewards or incentive partners, or financial institutions.

**Business Transfers:** If we are involved in a merger, acquisition, or other corporate transaction, we may share your personal information during the diligence process with counterparties and others assisting with the transaction, as well as to a successor as part of such a transaction.

**Legal Requirements:** We may also share personal information if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, including to cooperate with law enforcement, (ii) protect and defend our rights or property, (iii) prevent fraud, (iv) act in urgent circumstances to protect the personal safety of users, or the public, or (v) protect against legal liability.

**Consent:** We may also share your personal information to other third parties if we receive your consent to do so.

## **5. Data Security**

We use reasonable administrative, technical, and physical safeguards designed to ensure that the personal information we collect is protected from accidental or intentional manipulation, loss, destruction, or access by unauthorized persons. For example, we require two-factor authentication to log into your account. The transmission of information via the Internet, however, is not completely secure. When you access our account holder areas, you are required to provide your username and your password. Users should not share their password, should change it frequently, and should not replicate passwords across accounts or websites.

## **6. Data Retention**

Stockpile will retain your personal information only for as long as is necessary for our business and operational purposes, conducting audits and reporting, complying with our legal and regulatory compliance obligations such as books and records requirements and legal holds, and enforcing our legal agreements and policies.

## **7. Third Party Links**

For practical reasons or for your information, our website contains links to other websites, such as links to our profile pages on social media sites. We exercise no control over such other websites and are not responsible for the content thereon. This privacy policy does not apply to third party websites, and we recommend that you review the online privacy policy of any website you visit to determine how the operator handles personal information collected through its site.

## **8. Your Rights**

You can access and edit the personal information associated with your Stockpile account at any time by logging into your account. Please note that certain information cannot be changed, such as your Social Security Number. If you have inquiries regarding information which is not editable within your account, please contact customer service. If you wish to permanently delete your Stockpile account, follow the steps as outlined in the app or visit the webpage [here](#).

]Similarly, parents can take these actions with respect to their children's custodial accounts (see the Children's Privacy section below). Please note that we may retain certain information as necessary to satisfy our legal compliance obligations.

## **9. Children's Privacy & COPPA Compliance**

As a supplement to the disclosures made elsewhere in this policy, this section describes how we comply with the Children's Online Privacy Protection Act ("COPPA") with respect to personal information we collect from children under 13 years of age.

### Information Collection from Children

Most of the personal information we collect about children under 13 is provided to us by you, the parent (or guardian), when you set up a custodial account for your child. During enrollment you will provide your child's name, date of birth, and Social Security Number. Once you establish a custodial account for your child, your child will then provide their

email address as their username and create a password so that they can access their custodial account and request trades (which must be approved by you). **By establishing a custodial account for your child, you consent to our collection of personal information from your child as described.**

Please note that our Services do not enable children to make their personal information publicly available. In addition, our Services do not require children to provide more information than is reasonably necessary to facilitate their use of the Services.

In addition to the personal information described above, we may also collect certain information about your child's use of our mobile application. This information may include IP address, device ID, browser or operating system information, geolocation information, cookies and other tracking technologies, and other usage or analytical data. We may combine non-personal information we collect through these technologies with personal information about you or your child that we collect online.

### Information Use

We use the information discussed above in a number of ways, such as:

- Receiving instructions and processing transactions;
- Verifying your child's identity;
- Preventing fraud and enhancing the security of their account or our online services;
- Responding to their requests and communicating with them (which will include sending any text or email account alerts that are activated for the account);
- Managing their preferences;
- Compiling analytics concerning their use of our online services;
- Operating, evaluating and improving our business (including developing new products and services; improving existing products and services; performing data analytics; and performing accounting, auditing and other internal functions);
- Complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies; and
- For any other purposes that we may specifically disclose to you during enrollment or in connection with your or your child's use of Stockpile.

We may also use data that we collect on an aggregate or anonymous basis (such that it doesn't identify you or your child) for various business purposes, where permissible under applicable laws and regulations.

### Information Disclosure

We may share the information we collect from and about your child with our affiliates and service providers. We may also share it with a successor in the event of a merger, acquisition, or other corporate transaction. In addition, we may share the information (i) to comply with a legal obligation, including to cooperate with law enforcement, (ii) to protect and defend our rights or property, (iii) to prevent fraud, (iv) to act in urgent circumstances to protect the personal safety of users, or the public, (v) to protect against legal liability, or (vi) otherwise with your consent.

### Parental Rights

As a parent or legal guardian, you have the following rights:

- The right to review the personal information we collect online from your child.

- The right to refuse to allow further use or collection of personal information from your child by closing your child's custodial account. Please note that if you close an account, we may need to retain certain personal information even after the account is deactivated as required or permitted by law or regulation.
- The right to delete the personal information collected online from your child. Again, we will delete as much information as we are legally permitted, but due to regulatory recordkeeping obligations, we may be required to retain some information associated with a closed account.

You may exercise these rights by contacting us at the contact information listed below.

## **10. Changes to this Policy**

We may revise this privacy policy from time to time. When we make changes to this policy, we will post the updated version on our website and mobile app and indicate the date the policy was last updated. We encourage you to review this policy periodically to check for any updates. Your continued use of our Services indicates your consent to the then-current terms of this policy.

## **11. Contact Information**

If you have questions about this privacy policy or wish to exercise your rights described above, please contact us at:

Stockpile, Inc.  
Attn: Legal Department  
679 Toland Place  
San Francisco, CA 94124  
[support@stockpile.com](mailto:support@stockpile.com)  
(877) 374-2584

## Stockpile Privacy Policy

FACTS	WHAT DOES STOCKPILE 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: <ul style="list-style-type: none"> <li>• Social Security number</li> <li>• Checking account and/or credit/debit card information</li> <li>• Account balances and transaction history</li> </ul>
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 Stockpile chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Stockpile share?	Can you limit this sharing?
<b>For our everyday business purposes</b> — such as processing your transactions, maintaining your account(s), responding to court orders and legal investigations, or reporting to credit bureaus	Yes.	No.
<b>For our marketing purposes</b> — to offer our products and services to you	Yes.	No.
<b>For joint marketing with other financial companies</b>	No.	We don't share.
<b>For our affiliates' everyday business purposes</b> — information about your transactions and experiences	Yes.	No.
<b>For our affiliates' everyday business purposes</b> — information about your creditworthiness	Yes.	Yes.
<b>For our affiliates to market to you</b>	Yes.	Yes.
<b>For non-affiliates to market to you</b>	No.	We don't share.
<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>• To opt out, email us at: <a href="mailto:support@stockpile.com">support@stockpile.com</a></li> </ul> <p><b>Please note:</b>            If you are a <i>new</i> customer, we can begin sharing your information <del>we</del>30 days from the date sent this notice. When you are <i>no longer</i> our customer, we continue <del>to</del> to share your information as described in this notice. However, you can contact us at any time to limit our sharing.         </p>	
<b>Questions?</b>	E-mail: <a href="mailto:support@stockpile.com">support@stockpile.com</a>	

<b>Who we are</b>	
<b>Who is providing this notice?</b>	This form is being provided by Stockpile Investments, Inc., Stockpile Cash, Inc., Stockpile Rewards, LLC, Stockpile Gifts, Inc., Investables, and Stockpile Crypto, LLC.
<b>What we do</b>	
<b>How does Stockpile protect my personal information?</b>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards, secured files, and buildings.</p> <p>When you access our Account Holder areas, you are required to provide your username and your password. Do not share your password and change it frequently.</p>
<b>How does Stockpile collect my personal information?</b>	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> <li>● Open an account</li> <li>● Provide account information</li> <li>● Direct us to sell securities</li> <li>● Direct us to buy securities</li> <li>● Make deposits or withdrawals from your account</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>● Sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>● Affiliates from using your information to market to you</li> <li>● Sharing for non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	<ul style="list-style-type: none"> <li>● Your choices will apply to everyone on your account</li> </ul>
<b>Definitions</b>	

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> <li>• <i>Our affiliates include Stockpile Investing, Inc., Stockpile Cash, Inc., Stockpile Rewards, LLC, Stockpile Gifts, Inc., Investables, and Stockpile Crypto, LLC.</i></li> </ul>
<b>Non-affiliates</b>	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> <li>• <i>Stockpile does not share with non-affiliates for them to market to you.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>• <i>Stockpile does not jointly market.</i></li> </ul>
<b>Other Important Information</b>	
<p><b>Stockpile Privacy Policy:</b> Please review our general privacy policy for additional information regarding our privacy practices such as policies related to online tracking technologies.</p> <p><b>California Residents:</b> In accordance with California law, we will not share information we collect about you with non-affiliates, except as allowed by law. For example, we may share information with your consent or to service your accounts. Among our affiliates, we will limit information sharing to the extent required by California law.</p> <p><b>Vermont Residents:</b> 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.</p>	