

# ONLINE PRIVACY POLICY

Effective Date: November 1, 2019

## OVERVIEW

At Ethos, we take privacy and security seriously. This Online Privacy Policy outlines how we collect your data to operate our business and provide services to you, while keeping your information safe.

## SCOPE

Ethos, LLC (the “Company,” “Ethos,” “we,” “our,” or “us”) is committed to protecting the privacy and security of your personal information. This Online Privacy Policy (“Policy”) explains how we handle and process personal information to operate, improve, and grow what we provide you. By accessing or using our services, systems, websites, and apps (the “Services”), you signify that you have read, understood, and agree to our collection, storage, use, and disclosure of your personal information as described in this Policy and our Terms of Service.

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## 1. TYPES OF INFORMATION COLLECTED AND HOW WE COLLECT THEM

### Personal Information You Provide:

We collect the following personal information you provide when you connect with our Services, e.g., when you sign up for an account, enroll in a promotion or program, or otherwise engage or communicate with us:

- **Identity Data** includes your full name, date of birth, gender, and other data government-issued identification documents
- **Contact Data** includes your email address, mailing address, and telephone numbers

- **Financial and Identity Data** includes your bank account and payment card details, information about your income, account balances, financial transaction history, credit history, tax information, and credit scores
- **Profile Data** includes your email and password, purchases or orders made by you, and your interests, preferences, feedback, and survey responses
- **Usage Information** includes information about how you access and use our Services, such as your actions on the Services, including your interactions with others on the Services, and other content you provide (“Usage Information”). We only access your device camera roll and camera with your permission. If you need to update your permissions, you can do so in your device’s settings. Please remember that Ethos may, but has no obligation to, monitor, record, and store Usage Information in order to protect your safety or the safety of other users, to assist with regulatory or law enforcement efforts, to protect and defend our rights and property, or for other reasons relating to our provision of the Services. By using the Services, you consent to the recording, storage, and disclosure of such information you send or receive for these purposes
- **Contact List Information.** With your permission, we may access your contact list on your mobile device or in your email accounts so that you can identify your contacts on the Services and direct the invitation of your contacts. We’ll store and use this information to suggest referrals or connections and for other reasons related to our provision of the Services. We make these recommendations based on your contact list information as well as, with their consent, your contacts’ information if they’re also an Ethos customer. We only access your contact list information with your explicit permission. If you provide us with personal data from your third-party contacts, it’s your responsibility to ensure that the communication of such data to, and further processing by, Ethos is lawful. For example, when you provide us with information about your contacts, we may use it to let you know which of your contacts have also signed up for our Services or, at your exclusive direction, send messages to your contacts regarding our Services. We will not send messages to your contacts that are not explicitly directed by you
- **Additional Information** includes information that you submit via focus groups, contests/sweepstakes, job applications, customer support, or other similar means. We may also collect any communications between you and Ethos and any other information you provide to Ethos.

### **Personal Information Collected Automatically:**

As is true of many digital platforms, we collect certain personal information automatically when you visit our online services, including:

- **Location Data.** To help us protect against fraud, provide our services to you, and improve our services, we collect location data, including current and historical information concerning a user’s geographic location, GPS location, transaction location, and IP addresses that they use in conjunction with our Services. We collect and use your location data with your permission, for example, to protect against debit card fraud by detecting and declining transactions that may occur far away from your device’s location. We collect information about your location through GPS, Wi-Fi, wireless network triangulation, or other methods in order to obtain your location. We may also approximate your location by your IP Address. We also use the Google Maps API to gather information about your location. Google uses various technologies to determine your location, including IP address, GPS, and other sensors that may, for example, provide Google with information on nearby devices, Wi-Fi access points, and cell towers (see Google Maps privacy policy to learn more)
- **Usage and Device Data Collected Automatically Through Tracking Technologies.** To provide a personalized and enhanced user experience, we, and our third-party partners, automatically collect certain types of usage information when you visit or use our Services, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including cookies, Flash objects, web beacons, embedded scripts, location identifying technologies, file information, and similar technology (collectively, “Tracking Technologies”). For example, we collect information about your device and its software, such as your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique ID (that allows us to uniquely identify your browser, mobile device, or your account), and other similar information. We use Tracking Technologies to help ensure that you have a high-quality experience on our Services. We also use tracking technologies to aid in the targeted advertising of our services on other platforms. From your device manufacturer, we also may collect the names of other third-party applications that you have downloaded on your device.

If you prefer, you can change your cookie settings. Some browsers have options that allow the user to control whether the browser will accept cookies, reject cookies, or notify the user each time a cookie is sent. You may elect to reject cookies by adjusting your settings, but doing so will limit the range of features available to you on our Services and other websites. Be sure to read any information provided by your browser developer to understand the limitations of these settings, as they may differ from browser to browser and may not apply to all technologies. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email, used our Services, or performed certain functions with it.

Our Services also occasionally use “local shared objects” (also known as “Flash cookies”). Like browser cookies, Flash cookies may be used for coordinating content delivery, website functionality, maintaining preferences, advertising, or analytics. Unlike browser cookies, “Flash cookies” are not stored in the browser. You may be able to manage these Flash cookies by visiting the Adobe website.

Several types of cookies and tracking technologies are used for our Services:

- Essential Cookies – these cookies enable you to use our Services. These cookies are essential to enable you to browse our Services and use certain features. Disabling them may prevent you from using certain parts of the Services. These cookies can also help with the safety and security of our Services.
- Preference Cookies – these cookies store information such as your preferred country and language selection, login data, and website preferences. Without these cookies, our Services may not be able to remember certain choices you’ve previously made or personalize your browsing experience by providing you with relevant information. These cookies can also be used to recognize your device so that you do not have to provide the same information more than once.
- Performance Cookies – these cookies collect information about how you use our Services, such as which pages you visit regularly. These cookies are used to provide you with a high-quality experience by doing things such as tracking page load, response times, and error messages.
- Content / Advertising Cookies – these cookies gather information about your use of our Services so we may improve your experience and provide you with more relevant content and advertising. They’re also used to gather feedback through surveys. For more information, see “Third-Party Tracking and Online Advertising” below.

Do-Not-Track Signals and Similar Mechanisms. Some web browsers transmit “do-not-track” signals to websites. Because of differences in how web browsers incorporate and activate this feature, it’s not always clear whether users intend for these signals to be transmitted, or whether they’re even aware of them. We currently don’t take action in response to these signals.

**Personal Information from Other Sources and Third Parties:** We also obtain personal information from other sources, which we often combine with personal information we collect either automatically or directly from you.

- **Third-party data** includes data that we collect from business partners, marketing, and vendor partners. For example, we collect suitability data to determine your suitability for investments, such as employer, dependents, investment objective, investment time horizon, marital status, liquidity needs, income, assets, risk tolerance, years of options trading experience, and net worth
- **Publicly available data** includes contact information, employment-related information, and other information from publicly available sources. We may combine this information with the information we collect from you directly. We use this information to contact

you, to send you advertising or promotional materials, or to personalize our Services and to better understand the demographics of our users.

## **2. HOW WE USE YOUR INFORMATION**

We use and process the information we collect for purposes described in this Online Privacy Policy or as otherwise disclosed to you on our Services or in connection with our Services. For example, we use your information to:

- Create and process your account and deliver the Services to you, including to allow you to register for the Services, authenticating your identity, participate in interactive features, account management, to fulfill our legal and regulatory obligations, and other administrative matters;
- Send you transactional information, including confirmations, technical notices, product and services information and announcements, software updates, security alerts, support and administrative messages, and information about your transaction with us;
- Communicate with you such as to respond to your comments and questions, provide customer service or feedback, conduct surveys, respond to employment opportunities for which you've applied, notify you about upcoming events, or for any other purposes in connection with the Services;
- Conduct research and analytics to understand our visitors and customers and tailor our product offerings;
- Provide you with updates about products and services offered by us and selected partners, as well as facilitate new contests, sweepstakes, promotions and rewards;
- Make suggestions and recommendations to you about things that are similar to those about which you have inquired or that may otherwise be of interest to you, such as providing you with advertisements based on your interests and activity on the Services;
- Monitor, administer, and enhance our Services, including troubleshooting, data analysis, testing, research, statistical, and survey purposes;
- Enhance the safety and security of our Services, business, and users, and investigate or provide notice of fraud or unlawful or criminal activity;
- Perform audits and protect or exercise our legal rights or defend against legal claims, including to enforce and carry out contracts and agreements; and
- Comply with applicable laws and legal obligations

## **3. DISCLOSURES OF PERSONAL INFORMATION**

We're committed to maintaining your trust, and we want you to understand when and with whom we may share the personal information we collect. We may share your personal information in the instances described below. For further information on your choices regarding your information, see the "Control Over Your Information" section below. We do not sell or rent your personal information to third parties for their use in marketing their products and services.

- **Authorized third-party vendors and service providers.** We share personal data with certain authorized and vetted contractors, subcontractors, third-party vendors, and service providers who help us run and protect our business. This includes sending emails, conducting business analytics, marketing, and data processing. For example, we may share personal data with service providers that identify and serve targeted advertisements or provide mailing services, tax and accounting services, contest fulfillment, web hosting, or analytics services
- **Ethos affiliates.** We share personal data with other companies and brands owned or controlled by Ethos, as well as other companies owned by or under common ownership as Ethos. This includes subsidiaries (i.e., any organization we own or control) or our parent holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. These companies will use your personal information in the same way that we do under this Online Privacy Policy.
- **Business transfers.** We may share personal data in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, reorganization, financing, change or control or acquisition of all or a portion of our business by another company or third party, asset sale, initial public offering, or in the unlikely event of bankruptcy or similar proceeding.
- **Legal purposes.** We disclose personal data to respond to subpoenas, court orders, legal process, law-enforcement requests, legal claims, or government inquiries and to protect and defend the rights, interests, safety, and security of Ethos, our affiliates, users, or the public.
- **With your consent.** We share personal data for any other purposes disclosed to you with your consent.

We may also share information with others in an aggregated or otherwise anonymized form that doesn't reasonably identify you directly as an individual.

#### 4. THIRD-PARTY LINKS

Some of the Services may contain links to content maintained by third parties that we don't control. We're not responsible for the privacy practices of these third parties or the content on the third-party services, and the information practices of these third parties are not covered by this Policy. Please note that these third-party services have their own privacy policies, and we strongly recommend that you read their privacy policies as well as terms and conditions of use to understand how they collect, use, and share your information.

## 5. THIRD-PARTY TRACKING AND ONLINE ADVERTISING

We participate in interest-based advertising and use third-party advertising companies to serve you targeted advertisements based on your online browsing history and your interests. We do not advertise on behalf of specific securities or investment options on our Services. We permit third-party online advertising networks, social media companies, and other third-party services to collect information about your use of our Services over time so that they may play or display ads on other websites, apps, or services you may use, and on other devices you may use. Typically, though not always, the information used for interest-based advertising is collected through cookies or similar tracking technologies. For advertising, we may share a common account identifier (such as an email address) or hashed data with our third-party advertising partners to help identify you across devices. We and our third-party partners use this information to make the advertisements you see online on other platforms more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

We're not responsible for the privacy practices of these third parties, and the information practices of these third parties are not covered by this Policy. Some of these companies are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies. To learn more, please visit <http://www.networkadvertising.org/choices> or the DAA's resources, available at [www.aboutads.info/choices](http://www.aboutads.info/choices). You may also be able to set your browser to delete or notify you of cookies by actively managing the settings on your browser or mobile device. Please note that some advertising opt-outs may not be effective unless your browser is set to accept cookies. Furthermore, if you use a different device, change browsers, or delete the opt-out cookies, you may need to perform the opt-out task again. You may also be able to limit certain interest-based mobile advertising through the settings on your mobile device by selecting "limit ad tracking" (iOS) or "opt out of interest based ads" (Android).

**Google Analytics and Advertising.** We use Google Analytics to recognize you and link your devices and when you use our Services on your browser or mobile device, log in to your account on our Services, or otherwise engage with us. We share a unique identifier, like a user ID or hashed email address, with Google to facilitate the Services. Google Analytics allows us to better understand how our users interact with our Services and to tailor our advertisements and content to you. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, see "How Google uses data when you use our partners' sites or apps" linked here: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Ad-On, here: <https://tools.google.com/dlpage/gaoptout/>. We may also use certain forms of display advertising and other advanced features through Google Analytics, such as Remarketing with Google Analytics, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics Demographics and Interest Reporting. These features let us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your use of our Services. You may control your advertising

preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>, or by visiting NAI's online resources at <http://www.networkadvertising.org/choices>

## **6. CONTROL OVER YOUR INFORMATION**

**Profile and data-sharing settings.** You may update your profile information, such as your name, and may change some of your data-sharing preferences by emailing us at [support@Ethos.so](mailto:support@Ethos.so).

**Access to your Device Data.** You may control the mobile app's access to your device information in your device's settings. For instance, you can withdraw permission for the app to access your contact list.

**How to control your communications preferences.** You can stop receiving promotional emails from us by clicking on the provided "unsubscribe" link. All unsubscribe requests are processed within 10 business days. You may not opt out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Services, and technical and security notices).

**Modifying or deleting your information.** If you have any questions about reviewing, modifying, or deleting your information, or if you want to remove your name or comments from our Services or publicly displayed content, you can contact us directly at [support@Ethos.so](mailto:support@Ethos.so). We may not be able to modify or delete your information in all circumstances

## **7. TRANSFER OF PERSONAL INFORMATION**

Your information collected through our Services may be stored and processed in the United States or any other country in which Ethos or its parent, subsidiaries, affiliates, or service providers maintain facilities or conduct business activities. If you're located in other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data-protection laws as your jurisdiction

## **8. DATA SECURITY AND DATA INTEGRITY**

We maintain reasonable physical, administrative, and technological safeguards designed to preserve the integrity and security of all information collected through our Services. We also maintain reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete, and current. However, no security system is impenetrable, and we cannot guarantee the security of our systems 100%

## **9. CHILDREN'S PRIVACY**

We don't knowingly collect or solicit any information from anyone under the age of 13 on this Services. In the event that we learn that we have inadvertently collected personal information



from a child under age 13, we'll take reasonable steps to delete that information as quickly as possible. If you believe that we might have any information from a child under 13, please contact us at [support@Ethos.so](mailto:support@Ethos.so)

## **10. CHANGES TO THIS POLICY**

This Policy will evolve with time, and when we update it, we'll revise the "Effective Date" above and post the new Policy. To stay informed of our privacy practices, we recommend you review the Policy on a regular basis as you continue to use our Services

## **11. HOW TO CONTACT US**

If you have any questions about this Policy or the Services, please contact us at [support@Ethos.so](mailto:support@Ethos.so)