



# Ursa Privacy Policy

*(Version 1.0 - last revised on 6/10/2020)*

## **URSA CONSUMER PRIVACY POLICY**

Financial companies and investment advisers are required by law to inform their clients of their policies regarding privacy of personal information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives the client the right to limit some but not all sharing of personal information. It 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. Any capitalized terms not defined herein shall have the meaning as set forth in the Terms of Use.

### **Types of Nonpublic Personal Information (NPI) We Collect**

We collect nonpublic personal information about you that is either provided to us by you when you register to become an Ursa User, access and use our services or otherwise provide us with your personal information or obtained by us with your authorization. The types of personal information we collect and share depend on the Services or Platforms that you request, interact with and/or use. This information may include, but is not limited to, your Social Security number, date of birth, banking information, financial account numbers and/or balances, employment information, sources of income, and investment experience and history. When you are no longer our client, we may continue to share your information only as required by applicable law or governing/regulatory bodies.

### **Parties to Whom We Disclose Information**

All financial companies may need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

- For 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;
- For our marketing – to offer our products and services to you;
- For our affiliates' everyday business purposes – information about your transactions and experiences and information about your creditworthiness.

We do not share your information for joint marketing with other financial companies or with any affiliates or non-affiliates.

If you are a new customer we may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as required by applicable law or governing/regulatory bodies.

### **Protecting Confidentiality of Current and Former Client's Information**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

### **Federal & State Law Allows You to Limit Sharing – Opting Out**

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for non-affiliates’ everyday business purposes – information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

**DEFINITIONS:** Affiliates – companies related by common ownership or control. They can be financial and non-financial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

***Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.***

### **Specific State Notices**

California residents: Under California law, we will not share information we collect about you with companies outside of Ursa, unless the law allows.

Nevada residents: We are providing this notice to you pursuant to Nevada law.

Vermont residents: Under Vermont law, we will not share information we collect about Vermont residents with companies outside of our corporate family, unless the law allows.

## **URSA ONLINE PRIVACY POLICY**

### **Introduction**

This Ursa Online Privacy Policy, along with the terms of the Ursa Consumer Privacy Policy set forth above, (collectively the “**Privacy Policy**”) applies to all websites and mobile applications linking to or posting to this Privacy Policy (each a “**Platform**”) that are operated by Ursa Technologies, Inc. or Ursa Financial, LLC (collectively “**Ursa**”, the “**Company**”, “**we**”, “**our**” or “**us**”). This Privacy Policy describes how we use, store, disclose, and process information that we obtain about you through our Platforms, including information that we obtain through any of the investment advisory services that we provide, in whole or in part, through any of our Platforms (collectively our “**Service**”), as well as any information related to your use of our Service that you provide to us outside of our Platforms (such as email for example).

Please read this information carefully before accessing any of our Platforms or using the Service. By accessing any of our Platforms, or by setting up an account with us or using our Services, you agree to the terms of this Privacy Policy. Each time you visit or use any of our

Platforms or use any Service, you agree and expressly consent to our collection, use and disclosure of the information that you provide as described in this Privacy Policy. Any capitalized terms not defined herein shall have the meaning as set forth in the Ursa Terms of Use.

Please note that this Privacy Policy does not apply to your use of third-party sites, services, or applications you may access through or in conjunction with the Services. We encourage you to review the privacy policies of those third parties for more information regarding their privacy practices.

### **What types of information do we collect through our Platforms?**

We may collect personally identifiable information as well as non-personally identifiable information associated with you, including:

- **Registration Information:** When you register to use our Service, you will be asked to establish a User ID and Password, and to provide us with certain personal information, including, but not limited to, your first and last name, email address, mailing address, telephone number, date of birth, and social security number (“Personal Information”). You may also be asked to provide similar information to us from time to time as you use our Service and/or access any of our Platforms.
- **Investment Information:** When you register to use our Service, you will be asked to provide information regarding your investment preferences, including your risk tolerance, investment objectives and experience, time horizon, liquidity needs, and the like.
- **Banking Information:** To use our Service, you will be asked to provide information regarding your banking relationship, including the bank name and your account number, bank routing number, and bank account login credentials.
- **Activity and Demographics Information:** When you use our Service or access any of our Platforms, we may record certain details about your computer, mobile phone or tablet, the name of your Internet Service Provider (ISP), your IP Address, the website from which you visit us, the pages on our Platforms that you visit and in what sequence, the date and length of your visit and other statistical information about your visit to our Platforms. We may also collect aggregated demographic information regarding users of our Service (e.g., age, gender, marital status, citizenship, and income information).
- **Information Collected Via Cookies, Web Beacons, and Similar Technologies:** When you use our Service or otherwise access any of our Platforms, we also may send “cookies” to your computer or device or use similar technologies to enhance your experience. These technologies can identify you as a unique customer and store your personal preferences as well as product preferences, to tell us which webpages you have visited and in what order, and identify your computer or device. On their own, cookies or web beacons do not contain or reveal personally identifiable information; however, if you choose to provide us with such information, it can be linked to the anonymous data stored in the cookies and/or web beacons. We may allow select third parties to place cookies on our Platforms to provide us with better insights into the use of the Platforms or user demographics, or to provide relevant advertising to you. These third parties may collect information about a user’s online activities over time and across different websites when using any of our Platforms.
- **Information We Collect From Other Sources:** We may also obtain information from other sources and combine that with information we collect through the Services. For

example, we may collect information about you from third parties who provide Services on our behalf, such as maintaining and monitoring usage of the Services and processing payment transactions. We also may receive information about you from the third parties with whom you interact through the Services.

### **How do we use information about you collected through our Platforms?**

We may use information collected about you for a variety of purposes, including without limitation the following purposes:

- To provide our Service to you, and to conduct our other everyday business purposes (including to deliver the Services you request, process your transactions, send you related information and maintain and manage your Account and preferences);
- To verify your identity and, if applicable, authorization for you to use the Services;
- To process payment for Services;
- To facilitate use of the Services;
- To prevent or address service, security, technical issues at your request in connection with customer support matters
- To send you technical notices and other administrative messages;
- To inform you of changes made to our Service or any of our Platforms;
- To respond to comments, questions and/or requests that you may have about our Service, any of our Platforms, or about Urso;
- To communicate with you about our other or new products and services, and to inform you of certain products or services of third parties which may be of interest to you;
- To organize or carry out promotional activities or other promotional events;
- To personalize and improve the Services and provide content or features that match user profiles or interests;
- To enforce our Terms;
- To develop an online customer profile for you;
- To monitor, analyze and understand general customer trends, activities, usage and patterns so we can develop and support existing and ongoing marketing strategies for our Platforms and Services;
- To conduct other marketing and commercial activities\* (consistent with this Privacy Policy); and
- To carry out any other purpose for which the information was collected.

\* For advertising purposes, we occasionally use information about our customers to generate a "lookalike audience" or similar audience of prospective customers through the Facebook or Google advertising platforms. This allows us to target advertisements on their networks to potential customers who appear to have shared interests or similar demographics to our existing customers, based on the platforms' own data. We typically do this by uploading a list of email addresses. Facebook's policy is to irreversibly hash (encrypt) such lists prior to uploading, match the hashed data against their own customers, generate the lookalike audience, then delete the uploaded list and use it for no other purpose.

We may also use information about you that we collect through any of our Platforms for security, administrative, and legal purposes.

This Privacy Policy is not intended to place any limits on what we do with data that is aggregated and/or de-identified so it is no longer associated with an identifiable User of the Services.

### **How long do we maintain information about you collected through our Platforms?**

We will retain your Personal Information for the period of time that is necessary to fulfil the original purposes for which it has been collected. Please keep in mind that, in certain cases, a longer retention period may be required or permitted by law or to allow us to pursue our business interests, conduct audits, comply with our legal obligations, enforce our agreements or resolve any dispute.

The criteria used to determine our retention periods include:

- Time needed to provide you with our Services or to operate our business.
- Whether your account with us is active. You may contact us to make your account inactive at any time.
- Legal, contractual, or similar obligations to retain your data, such as mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of contract or litigation.

Please note that we are not responsible for storing any information that you provide to us or for any content or information that we provide to you. You are solely responsible for retaining backup files of any information and content that you provide or receive in connection with the Site or Services.

### **To whom do we disclose information about you collected through our Platforms?**

We will not disclose to any third party information collected about you through any of our Platforms, except as described in this Privacy Policy. Specifically, we may disclose to third parties information collected about you either (1) when we have your permission, or (2) in any of the following situations without your permission:

- We may disclose information collected about you to third-party service providers or other partners who perform services on our behalf in connection with our Service or any of our Platforms, including without limitation in connection with our service provider or partner completing or confirming a transaction that you have requested or conduct with us. When we transfer personally identifiable information about you to such a service provider or partner, that entity will be contractually required to use such information only to carry out those services that we have requested and to provide adequate protection for such information.
- We may also share information collected about you with our auditors, attorneys, and similar advisors in connection with our receiving their professional services, subject to standard confidentiality obligations.
- We may disclose the results of aggregate information or blind data about users of our Service or any of our Platforms to any third party. In such circumstances, we do not disclose to these entities any personally identifiable information about you or other users of our Service or any of our Platforms.
- As noted above, any aggregate information or blind data collected by third-party services integrated with any of our Platforms will be disclosed to such third parties.

- We may transfer and disclose information obtained about you through the Platforms to a third party as part of a merger, acquisition, or other sale or transfer of all or substantially all of our assets or business.
- We may disclose information about you to the government or to third parties under certain circumstances when legally obligated to do so, such as in connection with suspected illegal activity in connection with our Service or any of our Platforms, or to respond to a subpoena, court order or other legal process. We reserve the right to release such information to law enforcement or other government officials, as we, in our sole discretion, deem necessary or appropriate.
- We may also disclose information about you to third parties if needed to enforce any of our Terms of Use; to conduct any investigation of potential violations thereof; to detect, prevent, or otherwise address fraud, security or technical issues; to protect the rights, property or safety of Ursa or others; or to protect against harm to any element of the Platforms.

### **Do our Platforms support “Do Not Track” signals?**

Some web browsers incorporate a “Do Not Track” (DNT) or similar feature that signals to websites that a visitor does not want to have his/her online activity and behavior tracked. If a website operator elects to respond to a particular DNT signal, the website operator may refrain from collecting certain Personal Information about the browser’s user. Not all browsers offer a DNT option and there is currently no industry consensus for how companies should respond to “do not track” signals, although one may develop in the future. At this time, our websites do not support or respond to “Do Not Track” preferences that may be available in your browser; if we do so in the future, we will describe how in this Privacy Policy..

For more information about Do Not Track, please visit [www.donottrack.us](http://www.donottrack.us).

### **For purposes of understanding your California Privacy Rights, do we share information about you with third parties for their own direct marketing purposes?**

No. We do not share information collected about you with our affiliates, or with any unaffiliated third parties, for their direct marketing purposes.

Ursa shall comply with the California Consumer Privacy Act of 2018, Cal. Civil Code § 1798.100 et seq., (“CCPA”), which may be amended from time to time. Per the terms of the CCPA, Ursa is a Service Provider and not a Third Party as described in the CCPA. Therefore, Ursa shall not:

- a) Sell the Personal Information.
- b) Retain, use, or disclose the Personal Information for any purpose other than providing the Services or for a Business Purpose. Specifically, Ursa shall not retain, use, or disclose the Personal Information for a Commercial Purpose.
- c) Retain, use, or disclose the Personal Information outside of the direct business relationship between Users and its Users.

Notwithstanding anything in the Terms of Use, Advisory Agreement or any related agreement or other document, the parties acknowledge and agree that a User’s provision of Personal Information is not part of and explicitly excluded from the exchange of consideration, or any other thing of value, between the parties.

## **What security measures do we employ for information about you collected through our Platforms?**

To help protect the privacy of information collected through our Platforms, we employ commercially reasonable and industry standard technical, physical, and organizational measures intended to protect such information against accidental or intentional manipulation, loss, misuse, or destruction, and against unauthorized disclosure or access, as well as to protect such information, both during transmission and once it is received, including encrypting the transmission of any sensitive information (such as bank account information or payment card information).

***Notwithstanding the foregoing, please note that despite our best intentions no technology is completely secure. Please be aware that our Platforms are operated on software, hardware and networks, any component of which may, from time to time, experience breaches of security or other problems beyond our control.*** Accordingly, we cannot guarantee that any information obtained about you through our Platforms, whether during transmission or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others who do not have your authorization. Any such transmission or sharing of that information is done at your own risk.

You also play a role in protecting your personal information. Please do not share your user name or password with others. If we receive an order or instructions using your information we will consider that you have authorized the transaction.

## **What are the policies of linked websites and other third parties?**

Our Platforms may contain links to other websites that are not covered by this Privacy Policy and where information practices may be different from ours. You should consult any linked site's privacy policies before submitting any of your personal information to such third parties, as we are not responsible for and have no control over information that is submitted to, or collected by, these third-party sites. We encourage you to ask questions before you disclose your information to others.

In addition, as noted above, when you are using our Platforms you may be interfacing with third-party integrated services, such as third parties presenting or serving advertisements, third parties providing us with data collection, reporting and ad response measurement, and third parties assisting us with the delivery of relevant marketing messages and advertisements. We prohibit those third parties from collecting any information through our Platforms other than aggregate information and blind data about our Users. In any event, please note that Ursa is not responsible for the privacy practices of third parties.

## **How can you correct, update or make choices about the personally identifiable information collected through our Platforms and that we are storing?**

You can update, change or delete any personally identifiable information we have collected about you through our Platforms at any time by emailing us at [help@ursavest.com](mailto:help@ursavest.com). Please note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period. Please note that we are not responsible for storing any information that you provide to us or a third party or for any content or information that we or a third party provide

to you. You are solely responsible for retaining backup files of any information and content that you provide or receive in connection with the Services.

You can choose not to receive promotional communications from us by following the instructions in any communications you receive from us. Please note that this will not stop us from sending emails to you about your account or your transactions with us.

### **What is our policy on the use of our Platforms by children?**

You must be 18 years or older to register to use our Service. Our Platforms are not designed or intended to be attractive to use by children under 13 years old, and we do not knowingly collect personally identifiable information from anyone under 13 years old. ***If you are under 13 years old, please do not use any of our Platforms at any time or in any manner.*** If you learn that your child under 13 years old has provided us with personal information without your consent, please contact us at [help@ursavest.com](mailto:help@ursavest.com). We will delete that data from our systems.

### **What are the terms regarding any future changes to this Privacy Policy?**

We reserve the right to update, change or modify this Privacy Policy from time to time, with any such changes to be effective immediately upon being posted unless we advise you otherwise. However, we will not use your Personal Information in a way that is materially different than the uses described in this Privacy Policy without giving you an opportunity to opt out of such differing uses. Please visit this webpage periodically so that you will be apprised of any such changes. Your continued use of any of our Platforms or Services after any modification to this Privacy Policy will constitute your acceptance of such modification.

### **What law governs this Privacy Policy?**

You agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the law of the State of Delaware, without reference to the choice of law or conflicts of law principles thereof, and will be subject to the dispute resolution clause contained in our Terms of Use ([www.ursavest.com/terms](http://www.ursavest.com/terms)).

If any provision of this Privacy Policy is judged to be illegal, void or unenforceable due to applicable law or by order of a court of competent jurisdiction it shall be deemed deleted and the continuation in full force and effect of the remainder of the provisions will not be prejudiced.

### **How can you contact us?**

If you have any questions or comments about this Privacy Policy, please feel free to contact us at [help@ursavest.com](mailto:help@ursavest.com).