# **Privacy Policy**

Thank you for visiting https://tradesense.me, one of the Tradesense websites, or using one of the apps or services, (together the "Site") operated by Tradesense. We provide this privacy policy ("**Privacy Policy**") explaining our online information practices and the choices you can make about the way your information is collected and used at the Site.

### 1. Introduction

Tradesense is a content service about the securities market. Our services empower investors to make the best investing decisions by leveraging reliable news and actionable market data.

#### 2. Personal Information Tradesense collects

When you visit our Site or register for our products and services (including as a subscriber or a contributor), Tradesense collects personal information about you. We use this personal information for the business purpose of providing our products and services, as well as marketing our products and services to new and potential customers. This includes providing you with personalized recommendations and customized content on our Site. The categories of personal information we collect from users of and visitors to our Site are:

<u>Identifiers</u>: This includes, for example, your name, nickname, username, email address,, phone number, postal address (including ZIP code), Internet Protocol address, and cookies or other identifiers which we assigned to uniquely identify you or which others assigned to uniquely identify you. We obtain this information when you provide it to us or otherwise automatically in the course of your interactions with our products and services.

<u>Internet activity information</u>: This includes, for example, device screen size, device type (unique device identifiers), browser information, your interactions with our Site and preferred language used to display our Site. We obtain this information automatically in the course of your interactions with our products and services.

<u>Geo-location data:</u> This includes your country location (based on your IP address). We obtain this information when you provide it to us or otherwise automatically in the course of your interactions with our products and services.

<u>Electronic Data</u>: This includes any interaction that you may have with us (such as for customer service purposes) as well as your profile photo. It also includes any information you submit in message boards, and feedback or testimonials you provide about our products and services. We obtain this information when you provide it to us or otherwise automatically in the course of your interactions with our products and services.

The sources from which we collect personal information are:

Directly from you: For example, when you create an account, make a purchase, apply for or accept an employment position with us, etc.

#### 3. How Tradesense Uses Personal Information

We use personal information collected through our products and services, both individually and combined together, for purposes described in this Privacy Policy or disclosed to you in connection with our products and services. For example, we may use your information to:

- Create your account
- Provide and deliver products and services you request
- Send you service-related information updates, alerts, and support and administrative messages
- Send you marketing communications and personalized content such us showing you articles and news about your preferred stocks, or articles by authors you follow
- Respond to your enquiries
- Carry out analytics and to improve the quality and relevance of our Site
- Survey your opinions through surveys or questionnaires
- Protect the integrity of our products and services and enforce our Terms of Use and other applicable terms, including to detect and prevent fraud and unauthorized activities, to secure our systems and the services, and prevent activities that may violate our policies or be illegal
- Detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and prosecute those responsible for that activity

We may use personal information we collect from or about you to create aggregated or de-identified data that does not specifically identify you.

#### 4. Personal Information Tradesense discloses

We do not share personal information with any third parties.

## 5. Cookies and other tracking technologies

We use cookies and similar tracking technology (collectively, "Cookies") to collect and use personal information about you, including to serve interest-based advertising.

#### 6. Children's Privacy

In accordance with our Terms of Use, the Site is not designed for use by individuals under the age of 18. Accordingly, we do not intend to or knowingly collect personal information from anyone we know to be under 18 years of age. If you believe we have collected personal data from anyone under 18, please contact us at the email address listed below.

#### 7. Security

We have implemented various security policies, rules and technical and organizational measures to protect and safeguard the personal information that we collect and process about you. These measures are designed to provide a level of security appropriate to the risk of processing your personal information.

## 8. California Privacy Information

If you are a California resident, the following information also applies to you and supplements the information contained in this Privacy Policy.

#### Information We Collect and Sources of Information

We have collected the information described in the section "Personal Information Tradesense Collects" above, which also includes categories of sources from which we have collected that personal information.

#### How we use and share information

We collect and use personal information for the business purposes as described in the section "How Tradesense Uses Personal Information?" above. Tradesense does not share your personal information.

# **California Privacy Rights**

If you are a California resident, you have the following consumer privacy rights:

<u>Right to Know</u>: You have the right to request that we disclose to you the personal information we have collected, used, disclosed and sold over the past 12 months, and information about our data practices.

Right to request deletion: You can request that we delete personal information about you. Although you may request deletion, we are allowed, under California law, to keep certain personal information. You can submit a request to delete by law@tradesense.me.

Right to Opt-Out of "Sale" of personal information: You can opt out of the "sale" of your personal information to "third parties" by contacting us at law@tradesense.me.

Right to Non-Discrimination: We will not discriminate against you for exercising any of these rights.

California law also permits you to request certain information regarding the disclosure of your personal information by us and our related companies to third parties for the third parties' direct marketing purposes. We do not disclose your personal information to third parties for their own direct marketing purposes.

You can exercise any of these rights by contacting us at law@tradesense.me and providing us with your name, email address and address (including zip code) or by submitting a request to us through your Tradesense account.

You can also authorize an agent to submit a request on your behalf . An authorized agent must have your signed permission to submit a request on your behalf or provide proof that they have power of attorney in accordance with California probate law. Authorized agents that are business entities must be registered with the California Secretary of State to conduct business in California. Where you use an agent, we will ask for verification of your authorization, namely a copy of your written authorization for the agent to submit the request on your behalf.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We do not discriminate against any consumer for exercising their consumer rights.

## 9. European Privacy Information

If you are a visitor to our Site from the European Economic Area, United Kingdom and certain other territories in Europe, the following information also applies to you and supplements the information contained in this Privacy Policy.

## **Data Controller**

The data controller of your personal information is TREIDSENS GLOBAL, TOO, located at Nur-Sultan, Dom 2v, N. P. 1a, prospekt Bauyrzhan Momyshuly. Please contact our at law@tradesense.me.

# **Data Subject Rights**

You have the following data protection rights:

Right to access, correct, or request deletion: You may be able to do some of this in your Tradesense account or by contacting us.

Right to object, or ask us to restrict processing: In certain circumstances, you can request that we stop processing your personal information.

Right to request portability: In certain circumstances, you can request that we transfer personal information that you have provided to us in a structured, commonly used, machine-readable format.

Right to opt-out of marketing communications: You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you or by contacting us.

Right to withdraw your consent: You can withdraw your consent at any time if you previously gave us consent for processing of your personal information. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Right to complain: You have the right to complain to your local data protection authority. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. If you would like to exercise any of these rights or would like further information please contact us using the contact details provided under the "How to contact us" heading below.

#### Legal Basis

Our legal basis for collecting and using the personal information is usually as follows:

<u>Performance of a contract:</u> where we need the personal information to perform a contract with you, for example setting up and administering your account and providing our products and services

<u>Legal obligation:</u> where we have a legal obligation to collect personal information from you, for example to comply with financial, accounting and other legal obligations

<u>Legitimate interests:</u> where the processing is in our legitimate interests and not overridden by your rights, for example to analyse and improve how our products and services are used, and to provide you with customer service

<u>Consent:</u> where we have your consent to do so, for example in relation to certain types of marketing

#### **International Data Transfers**

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. Specifically, our Site servers are located in the Republic of Kazakhstan.

Tradesense has taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy.

## **Data retention**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

# 10. Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Policy was last updated by checking the "Updated" date displayed at the top of this Privacy Policy.

#### 11. How to contact us

If you have any comments or questions regarding our Privacy Policy, or if you want to exercise your rights, please contact us at law@tradesense.me. We will address any issue to the best of our abilities as soon as possible, and respond to requests within the time required under applicable law.

Updated: October 10, 2022