



AINVEST FINANCIAL, INC. PRIVACY POLICY

Ainvest Financial, Inc. strongly believes in the privacy and protection of personal information of our clients and visitors. The purpose of this notice is to describe how Ainvest Financial collects your data and under the firm may share it.

Information Gathering

We gather information about you directly and indirectly when attempting to formulate a relationship with you such as opening a new account with the firm and its clearing firm, Apex. The firm uses this information to verify your identity to meet regulatory requirements as well as to transact business with you. We also continually strive to improve our services, this information helps us improve your experience with the firm by customizing your browsing experience and informing you about additional products, services or promotions that may be of possible interest.

We may collect and store the following information, your name, mailing address, telephone number, e-mail address, gender, education, occupation, employment details, marital status, banking information, number of dependents, risk tolerance, account objectives and trade experience. To properly confirm your identity, we may collect your birth date, social security, a personal self photo, as well as any other state or government issued ID number such as passport number or driver's license number. We may also ask for photos of the above documents as well. Additionally, as required by law, to assess your experience in margin use and trading, we may also collect your approximate annual income, approximate liquid net worth, approximate worth, and credit reports to assess your financial position. You as a customer directly provide us the information above by completing an account application and related documentation, placing a trade, sending us an e-mail or by submitting information in regards to a promotion or special offer.

Parties to Whom We Disclose Information

All Broker Dealers 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 joint marketing with other financial companies;
- For our affiliates' everyday business purposes – information about your transactions and experiences;
- For affiliates to market to you.
- Plaid (third party business vendor) When you use Plaid for your money transfer needs as a client, Plaid will gather and store your name, email address, phone number, billing address, and any other relevant information that you provide directly to us. Plaid will also store the relevant data required to complete your transaction, including but not limited to your financial information, bank account numbers, routing numbers, billing address and company name. Plaid may also rely on a third-party payment processor to complete transactions, and all data shared with them falls under their own privacy policies. Further, Plaid will collect and associate all relevant end-user data with your client account, including but limited to end-user names, email addresses, billing addresses and financial information. Plaid may additionally collect information on the IP addresses, devices, and locations used to access Plaid, which may be linked to your account for fraud detection and prevention purposes. Finally, Plaid may collect additional data for identity verification on an as-needed basis determined at its sole discretion. For reference please review

Plaid's privacy policy at plaid.com/legal

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 described in this notice. However, you can contact us at any time to limit our sharing.

What information does Ainvest Financial, Inc. share with affiliates and or partners?

We may share information with our affiliates if the information is required to be provided by virtue of the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer.

Affiliates are defined as companies related by common ownership or control. They can be financial and non-financial companies. Non-affiliated companies are not related by common ownership or control. They can be financial and non-financial companies. Joint marketing is a formal agreement between non-affiliated financial companies that together market financial products or services to you. We build partnerships which may include joint marketing agreements, with other companies who offer products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with our partners and/or affiliates. This allows Ainvest and the partners and/or affiliates to better understand the offers that are most relevant and useful. We may also compare our client lists with those of our partners and affiliates to ensure they are not sending messages to you if you've elected not to be so notified previously. In our strategic partnerships, we will require that it be identified that an offer is being extended because of the relationship with us. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

Third Party Links

Some information on our website or services we offer may contain links to content maintained by third parties that we have no control over. We are not responsible for the privacy practices of these third parties or the content of third party services or third party service providers. The information practices of these third parties are not covered by this privacy policy. Please review the privacy policies of these third-party services. We urge you to read their privacy policies as well as terms and conditions of use to understand how they collect, use, and share your information.

Child Privacy

It is not our intention to collect or use personal information from anyone under the age of majority. We don't knowingly collect or solicit any information from minors. In the event that we learn that we have collected personal information of minors, we'll take reasonable steps to delete that information as quickly as possible. If we are also made aware that we have collected any personal information from minors and are asked to delete such information from our databases, we will hastily do so. If you believe that we might have any information from a minor, please contact us at support@ainvest.com

California Residents Only- California Consumer Privacy Act

This section provides details applicable to California residents under the California Consumer Privacy Act ("CCPA") regarding the personal information we collect about California residents and the rights afforded to them. Subject to certain limitations and exceptions, the CCPA provides California residents the right to opt-out of the sale of personal information; please note Ainvest does not sell personal information; the ability to request the details of the personal information we collect; allow California residents to exercise their rights under CCPA and the option to control and delete personal information.

In accordance with the CCPA, California residents may exercise their rights under the CCPA by sending an email to support@ainvest.com.

Please note that:

- The CCPA does not apply to what is referred to as nonpublic personal information collected by financial institutions such as Ainvest.
- We may deny your deletion request if retaining the information is necessary for us or our service providers to provide our services to you.
- We may verify the request as well as your identity by asking you to provide information that matches information we have on file and or your authorized agent if you designated one to act on your behalf.

In accordance with California law, Ainvest will not share information we collect about you with non affiliates, except as allowed by law. Please refer to this privacy policy document about who we share your information with and how it is used.

California Residents Only- “Shine the Light Act”

Pursuant to California’s “Shine the Light Act”, California residents are permitted to request information about how we share certain information with third parties for their marketing use. Ainvest Financial Inc. may disclose your personal information to our affiliates or other related third parties for their use in marketing to you. Please send an email to our support team at support@ainvest.com to request a copy of our disclosure pursuant to California law. We will provide the required information to your email address in response. Please be advised that not all possible information sharing is covered by the “Shine the Light Act” requirements of California and only information on covered sharing will be included in our response.

Indirect Information Gathering

The information we collect indirectly from you includes your Internet protocol (IP) address, browser type, operating system, Internet service provider (ISP), time stamps, transaction history and location data. We may collect location data about you through your Internet Protocol (IP) address GPS, Wi-Fi or other methods. Should you close your account with us, we will retain your information, but only use it to comply with regulatory requirements and to periodically contact you to offer you the opportunity to fund your account, reopen your account or participate in other offers.

Cookies

We use cookies and other technologies collectively known as cookies to provide us with data we can use to improve your experience and to get to know you better as a consumer. Cookies are small text files sent from web servers that may be stored on your computer. Cookies enable us to capture how you arrive at our site, when you return, which pages on our site you visit, and to recognize that you are already logged on when we receive a page request from your browser. We collect cookies using our website and our mobile application. We may link the information we store in cookies to personally identifiable information you submit while on our site. We will never share this information with any non-affiliated companies. Cookies do not contain any personal information nor do they contain account or password information. We cannot and will not gather information about other sites you may have visited. We may share website usage information about visitors with reputable advertising companies for the purpose of targeted internet advertisements. The information shared is not personally identifiable. We may also use third party software to track and analyze usage and volume statistical information including page requests, form requests and click paths. All web browsers have settings that allow you to block cookies. By visiting our website with your browser set to allow cookies, you consent to our use of cookies as described above. If you choose to block cookies you may use our services but some functions may not properly work as intended.

How do we use your personal information?

The trust of our clients is very important to us as a firm. Therefore, we use personal information only as needed to provide you with quality service and ensure there is proper security measures in place to safeguard

the data. We may use the information collected from you to verify your identity and contact information. We may also use this information to establish and set up your trading account, issue an account number, a password, maintain your portfolio and trading activity, and contact you with account information. This information helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you. We may also use demographic information provided by others on our clients so that we can develop products and services for our clients. If you've specifically elected not to be notified, we will not contact you with any offers. In our partnerships with other firms, we will require that it be identified that an offer is being extended because of the relationship with us. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate. We may share with our affiliates information about our transactions and experiences with you such as name, e-mail address, mailing address, date of birth, employment status, general account and demographic information. This information may be used for internal reporting, anticipating margin calls, development strategies, to improve customer service and or to provide products and services that may be of interest to you.

Privacy Choices Form

If you prefer that we limit disclosures of personal information about you, you may notify us via email at support@ainvest.com that you elect to opt out of our privacy policy procedures. Please send correspondence along with your account number(s) to: support@ainvest.com

Please indicate the following preferences:

- Limit disclosure of personal information about me to non-affiliated third parties
- Limit the personal information about me that you share with Ainvest affiliates
- Remove my name from your marketing lists shared with affiliates in related lines of business.

Please allow approximately 30 days from our receipt of your request for your instructions to become effective. You do not need to notify us, if you have previously instructed the firm not to share information about you.

Security of Your Personal Information

We employ physical, electronic as well as procedural safeguards to guard your nonpublic personal information. When you open an account with us, you are issued a unique account number, User ID and a password. Remember that you are ultimately responsible for maintaining the secrecy of your account number, User ID and password. We strongly recommend that you do not disclose this information to anyone. We also strongly recommend that you periodically change your password.

Reviewing or Changing Personal Information

Personal identifying information may be reviewed, changed or corrected at any time. You are responsible for maintaining the accuracy and completeness of your personal information stored at the firm. At least once every 36 months we will send you a letter asking you to confirm the information we have on file. If you would like to review your personal information or if you believe that any of your information is incorrect, or if you have any questions regarding your personal information, or if you have any other questions or concerns regarding this privacy policy, simply contact our office at the same contact information listed in the "privacy choices form" section.

In the event the firm materially changes this Privacy Statement, the revised Privacy Statement will promptly be posted to our website. By opening an account with us, you are deemed to agree to accept posting of a revised Privacy Statement electronically on our website as actual notice to you.

Should you have any additional questions concerning our privacy policy, you may submit a written request for additional information to our Customer Service team at the same contact information listed in the "privacy choices form" section.

Effective: August 2021