



Privacy Policy

Last Updated: July 2023

At Frec Markets Inc., and its wholly owned subsidiaries, Frec Securities LLC and Frec Advisers LLC (“Frec,” “we,” “us,” or “our”) we take privacy and security seriously. We have created this Privacy Policy (“Policy”) to describe what kinds of personal information we may obtain through our website and platform located at www.frec.com (“Website”) (the “Services”).

By visiting our Website or accessing or using our Services, you acknowledge that you have read, understood, and agree to the practices described in this Policy, and our Terms of Service. Capitalized terms not defined in this Policy shall have the meaning set forth in our Terms of Service. Some Services, such as Plaid services, may have additional privacy guidance, and in addition to this Privacy Policy, we will also follow such additional privacy guidance to protect your privacy.

This Policy describes how we may use and disclose the information we obtain through our Services, the steps we take to keep it secure, your choices regarding our use of your information, and how you can contact us if you have any questions about our privacy practices.

California residents may have additional rights regarding their personal information under the California Consumer Privacy Act (“CCPA”). The CCPA, however, does not apply to certain non-public information collected by Frec to provide Services, as that information is regulated by specific federal privacy laws. If you are a California resident, please also see the “Notice to California Residents” section below.

Nevada residents may have additional rights regarding the “sale” of their personal information under the Nevada Revised Statutes. If you are a Nevada resident, please also see the “Notice to Nevada Residents” section below.

IF YOU DO NOT AGREE TO THE TERMS OF THIS POLICY, PLEASE STOP USING THE SERVICES IMMEDIATELY AND WHERE RELEVANT UNINSTALL.

If you have any questions about this Policy or the Services, please contact us at help@frec.com.

This Policy will help you understand the following:

1. The Information We Collect
 - a) Information you provide to us
 - b) Information we collect automatically
 - c) Information collected through third-party analytics services
2. How we use your information
3. How we share your information
4. How we protect your information
5. Do Not Track
6. Notice to California Residents
7. Notice to Nevada Residents
8. Accessing and Modifying Your Personal Information and Communication Preferences
9. Children’s Privacy
10. Legal U.S. Residents Only; Note to International Users
11. Updates to this Policy

12. How to Contact Us

1. The Information We Collect

a) Information you provide to use

When you use our Services, we collect the below information:

- **Identity Data:** your name, date of birth, marital status, social security number, and other data on government-issued identification documents;
- **Contact Data:** your email address, mailing address, and telephone number;
- **Financial Data:** your bank account details, and information about your income, account balances, and tax information;
- **Profile Data:** your username and password, your financial knowledge assessment results, your interests, preferences, and feedback.

If you do not have a Frec account or use our Services without a login, you will not be regarded as a client of Frec. There will be no business relationship between you and Frec when you use Frec without a login.

b) Information we collect automatically

Our Website may use cookies or similar tracking technology to automatically collect and receive certain technical and usage information such as IP address, browser, ISP and device type when you connect with Services. Cookies are small packets of data that a website stores on your hard drive so that your computer will remember information about your visit. The data collected through cookies and similar tracking technology enables us to personalize your experience with our Services, understand how you use them, maintain a persistent session, improve and further develop our services, and measure and optimize advertising and promotional effectiveness.

We may use session cookies, which expire once you close your web browser. We may also use persistent cookies, which stay on your computer until you delete them. Most browsers and mobile devices allow you to manage cookies in your settings. If you refuse a cookie, or if you delete cookies from your device, you may lose functionality and/or experience some inconvenience in your use of our Services. Furthermore, if you use a different device, change browsers, or delete the opt-out cookies that contain your preferences, you may need to perform the opt-out task again.

c) Information collected through third-party analytics services

We may use one or more third-party analytics services to evaluate your use of the Services, compile reports on activity (based on their collection of IP addresses, Internet service provider, browser type, operating system and language, referring and exit pages and URLs, data and time, amount of time spent on particular pages, what sections of the Services you visit, number of links clicked while on the Services, search terms and other similar usage data), and analyze performance metrics. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Policy. For more information on these third parties, including how to opt out from certain data

collection, please visit the sites below. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Services.

For Google Analytics, please visit <https://www.google.com/analytics>

2. How We Use Your Information

We use your information to provide the Services to you and operate our business. This includes:

- **Service-Related Usage:** We use the information we collect from and about you to provide and support the Services, such as communicating with you and other users, processing your account applications(s), authenticating your identity, managing user accounts, handling billing, providing customer service, maintaining our systems, sending you trade confirmation, invoices, technical notices, security alerts, support and administrative messages, and information about your transactions.
- **Analyzing and Improving the Services:** We may run calculations, aggregate, normalize, clean, and make derivative works of your information in order to
 - Understand and analyze usage trends and preferences;
 - Monitor and analyze the effectiveness of the Services;
 - Improve the Services and develop new products, services, features, and functionality; and
 - Test the Services and our infrastructure to make sure the Services are working correctly.
- **Marketing:** As permitted by applicable law, we may use your information for marketing purposes, such as providing you with promotional materials that could be useful, relevant, valuable, or otherwise of interest to you. Where required under applicable law, we will obtain your prior opt-in consent to send you electronic marketing communications or text messages.

3. How We Share Your Information

We share, transfer, or disclose your information if you consent to us doing so, as well as in the following circumstances:

- **Authorized third-party vendors and service providers:** We engage service providers to perform functions and provide services to us such as customer services, website management, payment processing, marketing, and other similar service providers. We may share your information with such service providers subject to obligations consistent with this Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your information only on our behalf and pursuant to our instructions as necessary to perform services for us.
- **Compliance with Legal Requirements:** Notwithstanding anything to the contrary in this Policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; to protect the safety of any person; to address fraud, security or technical issues; or to protect our users' rights or property. However, nothing in this Policy is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your information.
- **Help protect the safety and security of our services, business, and users:** We may use your information to investigate and help prevent fraud or unlawful activity.

- Business Transfers: In the event of a merger, dissolution, reorganization or similar corporate event, or the sale of all or substantially all of our assets, we expect that your information, including personal information, would be transferred to the surviving entity in a merger or the acquiring entity. All such transfers shall be subject to our commitments with respect to the privacy and confidentiality of such personal information as set forth in this Privacy Policy.
- Frec Affiliates: Where appropriate, we may share your information with any of our parent companies, subsidiaries, joint ventures, or other companies owned or under common control with us.
- Companies in which you hold Securities: We may provide your name, address, email address, and securities positions to requesting companies in which you hold securities.
- Aggregated Information. In an ongoing effort to better understand users of our Services, we may analyze your information in aggregate form in order to operate, maintain, manage, and improve the Services. This aggregate information does not identify you personally. We may use this aggregate information for marketing purposes. We may share this aggregate information with our affiliates, agents, business and business partners, and other third parties. We may also disclose aggregated user statistics in order to describe the Services and our products to current and prospective business partners and to other third parties for other lawful purposes.

4. How we protect your Information

We have physical, electronic, and procedural safeguards that comply with federal regulations to protect your personal information. We take all reasonable security measures to protect your information against loss, improper use, unauthorized access or disclosure. We will work within the reasonable security standards and use a variety of security measures to protect the security of information. We have established a specialized management, process and organization system to ensure information security. For example, we strictly restrict the employees who can access information, requiring them to provide unique authentications to access information and comply with their confidentiality obligations and conduct audits. However, no security measures are perfect or impenetrable. We thus cannot guarantee the security of our databases, nor can we guarantee that your information will not be intercepted while being transmitted over the internet to and from us.

We will establish an emergency response plan. If there is a security breach involving the personal information of our users, we will activate the emergency response plan to prevent the expansion of such security incident and take appropriate measures to inform you, including in the form of push notifications, public announcements, etc.

5. Do Not Track

Some web browsers transmit “do-not-track” signals to websites. We currently don’t take action in response to these signals.

6. Notice to California Residents

If you are a California resident, please see below details about the personal information we collect about California residents and the rights afforded to them under the California Consumer Privacy Act (“CCPA”).

Subject to certain limitations and exceptions, the CCPA provides California residents the following right:

- The ability to request a covered business disclose the detailed personal information we collect;
- The opt-out of the sale of personal information, if applicable. We do not sell personal information;
- The option to control and delete personal information. Many web browsers are set to accept cookies and similar tracking technologies by default. If you prefer, you can set your browser to delete or reject these technologies. If you choose to delete or reject these technologies, this could affect certain features of our Services. Furthermore, if you use a different device, change browsers, or delete the opt-out cookies that contain your preferences, you may need to perform the opt-out task again.
- Not be discriminated against for exercising rights they have under CCPA.

In accordance with California law, we will not share information we collect about you with nonaffiliates, 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. We do not sell information about you to third parties. In order to help Frec deliver advertising and marketing on other platforms, we do allow third parties to collect information through our services.

For exercising CCPA specific rights, please contact our customer services at help@frec.com. We may verify the request by asking you to provide information that matches information we have on file about you. You can also designate an authorized agent to exercise these rights on your behalf, but we will require proof that the person is authorized to act on your behalf and may also still ask you to verify your identity with us directly.

7. Notice to Nevada Residents

If you are a Nevada resident, you have the right to opt-out of the sale of your personal information to third parties. You can exercise this right by contacting us at help@frec.com with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A.

8. Accessing and Modifying Your Personal Information and Communication Preferences

If you are a registered user of our Services, we provide you with tools and account settings to access, correct, delete, or modify the personal information you provided to us and associated with your account. You can download certain account information, including your account statements and trade confirmations.

Keep in mind that search engines and other third parties may still retain copies of your public information, such as your posts and comments on Frec’s online social media pages, even after you have deleted the information from the Frec Services or deactivated your account.

In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of any Frec marketing email. We will use commercially reasonable efforts to process such requests in a timely manner. You cannot opt out of receiving transactional e-mails related to the Services and your account.

9. Children's Privacy

The Services are not directed to individuals under the age of 18, we do not knowingly collect personal information from individuals under the age of 18, and we request that individuals under the age of 18 not provide any personal information to us. If you learn that your child has provided us with personal information without your consent, you may alert us at the contact information listed below. We will take steps to delete the information as soon as possible should we learn that we have unintentionally collected personal information from your child without your consent.

10. Frec is only for Legal US Residents; Note to International Users

Our Services are only available to legal U.S. residents. We make no representation that the Services are appropriate or available for use outside of the United States. Access to the Services from countries or territories where such access is illegal is prohibited. Please be aware that your information, including your personal information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use Services, you do so at your own risk.

11. Updates to this Policy

This Policy is effective as of the date stated at the top of this Policy. We may change this Privacy Policy from time to time and will post any changes on the Services as soon as they go into effect. By visiting the Website, and/or accessing and/or using the Services after we make any such changes to this Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the information collected is governed by the Policy in effect at the time we collect the information. Please refer to this Privacy Policy on a regular basis.

All services of Frec are subject to this Policy, however, some services have their own specific privacy guidance/statements. Some specific privacy guidance/statements describe how we process your information in the service more specifically. If this Policy is inconsistent with the privacy guidance/statements of a particular service, the privacy policy of that service shall prevail.

12. How to Contact Us

If you have any questions, comments or suggestions about this Policy or our privacy practices, you can contact us help@frec.com.