

# PRIVACY POLICY

Last Updated: March 10, 2020

LTSE's products are built by entrepreneurs for entrepreneurs. Our products are designed to help you.

The Long Term Stock Exchange, Inc. and its affiliated companies, including LTSE Services, Inc. ("**LTSE**," "**we**," "**us**," and "**our**") process personal information through all LTSE websites, apps, and online services that link to this Privacy Policy, our tools and software products (collectively, our "**Services**"). This Privacy Policy explains how we collect, use, disclose, and otherwise process personal information in connection with our Services.

Please note that this Privacy Policy does not apply to our processing of information about our employees or contractors. We may provide additional privacy policies where the scope of our processing of your personal information falls outside the scope of this Privacy Policy. In such cases, the additional privacy policy will govern how we may process the information you provide at that time.

## 1. Our Collection of Personal Information

When we use the term "personal information" in this Privacy Policy, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you. It does not include aggregated or de-identified information that is maintained in a form that is not reasonably capable of being associated with or linked to you.

We collect personal information when you voluntarily submit information to us or when you use our Services. We collect certain information automatically when you visit our websites or use our Services, and we may collect some information about you from third parties.

### **Personal Information You or Your Representative Provides**

We collect the personal information you provide in connection with our Services in the following ways:

- **Registration and Forms.** If you register for our Services or otherwise provide information to us through any paper or electronic applications or other forms, we will collect your name and email address, username, password, photograph or avatar, payment information, information you provide about your company, including company name, expenses, financing, information you provide about your shareholders, as well as information you provide about your employees, including demographics information and salaries.

- **Communications.** If you correspond with us about our Services, either through the website, or via phone, email or in-person, we collect your name, contact information, information about your company and account, and any other information you choose to provide to us.
- **Transactions.** If you execute transactions through our Services or where your company is listed on our exchange, we collect Information about such transactions, including payment information and the transaction time, date, amount and the other parties involved.
- **Visiting our Facilities.** If you visit our facilities, we may collect your name, contact information and a government issued identification card, such as your driver's license for security purposes.
- **Job Applications.** If you apply for a job with LTSE, we will collect your name, contact information, demographic information, education and work history, work eligibility information and any other information you choose to provide. Eligible candidates may be asked to undergo a background check or other screening measures, which are facilitated by our third-party partners.

### **Information We Collect Online Automatically.**

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

- **Log File Data.** When you visit our online Services, we collect certain information about your device automatically and store it in log files, including information about your device used to access the websites, including your IP address, browser type, internet service provider, referring/exit pages, mobile device ID, device type, operating system and clickstream data. We use this information to monitor aggregate user metrics, analyze traffic patterns, diagnose and fix technology problems, plan for and enhance our Services, for fraud protection and to protect our rights and the rights and safety of individuals.
- **Cookies and Other Data Collection Technologies.** We and our service providers use cookies, pixels, scripts and similar technologies to manage the Services and to collect information about you and your use of the Services. These technologies help us customize or personalize your experience and analyze the use of our Services to make them more useful to you. Most internet browsers allow you to remove or manage cookie functions and adjust your privacy and security preferences. For information on how to do this, access the "help" menu on your internet browser, or access <http://www.aboutcookies.org/how-to-control-cookies>. Please note, however, that disabling our cookies may mean that you will not be able to take full advantage of our Services. For information about our and our third-party partners' use of cookies and related technologies to collect information automatically, and any choices you may have in relation to its collection, please visit our [Cookie Notice](#).
- **Analytics Data.** When you visit our online Services, we collect analytics data using third-party analytics tools such as Google Analytics, to help us measure traffic and usage trends for the Service and to understand more about the demographics of our users. You can learn more about

Google's practices with Google Analytics by visiting Google's privacy policy [here](#). You can also view Google's currently available opt-out options [here](#).

## Information From Third Party Sources

We also obtain personal information from other sources, which we often combine with personal information we collect either automatically or directly from you. We receive the same categories of personal information as described above from the following sources and third parties:

- **Single Sign-On.** We use single sign-on to allow a user to enter login information from a third-party platform to access the Services. If you create or log into your account through a third-party social media site, such as LinkedIn, we may receive access to certain data and information from that site, such as your name, email address, profile picture and other information the social media site may provide to us. To learn more about the use of data collection technologies by social media sites, please visit each site's privacy policy.
- **Third Party Services.** When you interact with us through third party services or platforms, such as interacting with our posts on Medium or through social networks, we collect the information you have authorized the third party to share with us.
- **Individuals Within Your Company.** When your company registers a business account with us, we may collect information about you from your account administrator, including your name, email, job title or role, username, password, photographs or avatars, ownership of assets or stock, and any other information the administrator chooses to provide.

## 2. Our Use of Personal Information

We use the personal information we collect to:

- **Provide Services.** To create, maintain, improve, and provide the products and Services you request.
- **Manage the Business.** Manage the day-to-day operation of the Services and the creation and maintenance of accounts.
- **Communications.** To contact you, such as in response to your inquiries, comments or orders, to provide technical or administrative support or to let you know about new products, Services or offers.
- **Personalization.** To remember you and provide personalized content, information and user experiences.
- **Analyze and Improve Services.** To monitor, enhance, and improve our Services, track our website usage, and monitor the effectiveness of our service.
- **Fraud Prevention and Security.** To prevent, investigate, and provide fraud notifications, unlawful or criminal activity, unauthorized access to or use of personal information, our data system services, and to meet governmental and institutional policy obligations.

- **Dispute Resolution.** To investigate and resolve disputes and security issues and to enforce our [Terms of Service](#).
- For any other lawful, legitimate business purpose.

### 3. Our Disclosure of Personal Information

We disclose personal information in the following ways:

- **LTSE.** We disclose personal information within the LTSE family of companies for purposes and uses that are consistent with this Privacy Policy. For example, we may disclose your contact information to process and fulfill your order for a particular Service that is owned or operated by a different LTSE entity.
- **Business Partners.** We disclose personal information with our third-party partners, when such sharing is necessary to provide a Service you request. For example, we will share your information with our partner financial institution when you use our service to submit valuation information to the financial institution.
- **Service Providers.** We disclose personal information with our third-party vendors, consultants and other service providers that perform services on our behalf, which may include hosting services, administrative or business management services, analytics services, technology services (including web and mobile platforms, email communications providers and data storage providers) and payment processing services for any orders you may make.
- **Business Transaction or Reorganization.** If LTSE or some or all of our assets are acquired or otherwise transferred, or in the unlikely event that we go out of business or enter bankruptcy, the personal information of our users may be transferred to or acquired by a third party.
- **Legal Obligations and Rights.** We may disclose personal information to third-parties, such as legal advisors and law enforcement to:
  - satisfy any applicable law, regulation, subpoena/court order, legal process or other government request;
  - enforce our Terms of Service, including the investigation of potential violations thereof;
  - investigate and defend ourselves against any third-party claims or allegations;
  - protect against harm to the rights, property or safety of LTSE, our users or the public as required or permitted by law; and
  - detect, prevent or otherwise address criminal (including fraud), security or technical issues.
- **Consent.** We may disclose personal information about you to certain other third-parties, including publicly, with your consent. For example, if you post comments on our public blog, we share the information you provide, such as your name and the content you post, with the general public.

### 4. Children's Personal Information

Our Services are not directed to, and we do not intend to, or knowingly, collect or solicit personal information from children under the age of 13. If you are under the age of 13, please do not use our Services or otherwise provide us with any personal information either directly or by other means. If a child under the age of 13 has provided personal information to us, we encourage the child's parent or guardian to contact us to request that we remove the personal information from our systems. If we learn that any personal information we collect has been provided by a child under the age of 13, we will promptly delete that personal information.

## 5. **Control Over Your Personal Information**

You have some choices regarding how we use your personal information, including the following:

- ***Profile and Data Sharing Settings.*** If you have an account with us, you may update your profile information, such as your user name and email address by logging into your account and modifying the information on your profile page or by contacting the account administrator at your company.
- ***Communications Preferences.*** You can stop receiving promotional email communications from us by clicking on the "unsubscribe link" provided in such communications. You may not opt out of Service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Service, technical and security notices).

## 6. **Region-Specific Disclosures**

We may choose or be required by law to provide different or additional disclosures relating to the processing of personal information about residents of certain countries, regions or states. Please refer below for disclosures that may be applicable to you:

### **Nevada Residents**

If you are a resident of the State of Nevada in the United States, Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. We do not currently sell personal information, but to submit a request to opt-out of potential future sales, please contact us at [privacy@ltse.com](mailto:privacy@ltse.com) with sufficient information to identify you in our systems.

### **California Residents**

If you are a resident of the State of California in the United States, this section describes how we collect, use, disclose and otherwise process your personal information, either online or offline, within the scope of the California Consumer Privacy Act of 2018 ("CCPA") and the rights that may be afforded to you under the CCPA. Please note, this Privacy Policy does not apply to the extent that LTSE is delivering Services as a "service provider," as that term is defined

under the CCPA, in which case the contractual terms and conditions between LTSE and the "business," as that term is defined under the GDPR, shall govern its processing of personal information. In such cases, please contact the applicable business to learn more about its privacy practices.

- **Collection of Personal Information.** In the last 12 months, we have collected the following categories of personal information:
  - Identifiers;
  - California Customer Records Categories;
  - Protected Classification Characteristics;
  - Commercial Information;
  - Internet/Network Information;
  - Professional/Employment Information;
  - Other Personal Information; and
- For further details, see the ["Our Collection of Personal Information"](#) section above. **California Consumer Rights.** As a California resident, you may be able to exercise the following rights in relation to the personal information about you that we have collected under the CCPA (subject to certain exemptions and limitations at law). The provisions below only apply to the extent your personal data is covered by the CCPA. Please note that to the extent the exercise of these rights limits our ability to process personal information, we may not be able to provide our Services to individuals who exercise these rights, or to otherwise engage with such individuals going forward. In addition, your rights and choices may be limited in certain cases. For example, in some cases we may be required or allowed by law to keep certain personal information and may be unable to fulfill a deletion request.

The Right to Know	<p>You may have the right to request any or all of the following information relating to your personal information we have collected and disclosed in the last 12 months, upon verification of your identity:</p> <ul style="list-style-type: none"><li>● The specific pieces of personal information we have collected about you;</li><li>● The categories of personal information we have collected about you;</li><li>● The categories of sources of the personal information;</li><li>● The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;</li><li>● The categories of personal information we have sold about you (if any) and the categories of third parties to whom the information was sold; and</li><li>● The business or commercial purposes for collecting or, if applicable, selling personal information about you.</li></ul>
The Right to Request Deletion	<p>You have the right to request the deletion of personal information we have collected from you, subject to certain exceptions.</p>

The Right to Opt-Out of Personal Information "Sales"	You may have the right to direct us not to "sell" personal information we have collected about you to third parties now or in the future.
The Right to Non-Discrimination	You may have the right not to receive discriminatory treatment for exercising these rights.

- **Exercising California Consumer Rights.** To exercise your Right to Know or your Right to Deletion, please submit a request by emailing [privacy@LTSE.com](mailto:privacy@LTSE.com) with the subject line "California Rights Request."  
When submitting a request, please describe your relationship with us and your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We will need to verify your identity before processing your request, which may require us to request additional personal information from you or require you to log into your account (if applicable).  
In certain circumstances, we may decline a request to exercise the rights described above, particularly where we are unable to verify your identity. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with the request.  
Minor Children: If you wish to submit a verifiable consumer request on behalf of your minor child, you must:
  - Provide sufficient information to allow us to reasonably verify your child is the person about whom we collected personal information and you are authorized to submit the request on your child's behalf (i.e., that you are the child's legal guardian or authorized representative).
  - Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- **Opting-Out of Personal Information "Sales":** We do not currently sell personal information to third-parties.
- **California's "Shine the Light" Law.** At the time of this writing, we do not provide your personal information to third parties for their direct marketing purposes, as described in California's "Shine the Light" law (Civil Code Section §1798.83).

#### Individuals Located in the EEA

If you are located in the European Economic Area ("EEA"), this section describes how we collect, use, disclose and otherwise process your personal information, either online or offline, within the scope of the European General Data Protection Regulation ("GDPR") and the rights that may be afforded to you under the GDPR. Please note, this Privacy Policy does not apply to the extent that LTSE is delivering Services as a "processor," as that term is defined under the GDPR, in which the contractual terms and conditions between LTSE and the "controller," as that term is defined under the GDPR, shall govern its processing of personal information. In such cases, please contact the applicable controller to learn more about its privacy practices. Where this Privacy Policy applies, the LTSE entity that will be the "controller" of your Personal Data will be the entity that delivers the Services you (or the company for whom you are working or have a business relationship) are receiving. Without limitation, this may include the entities delivering LTSE's exchange operations (namely, Long Term Stock Exchange, Inc.) or its online software solutions (namely, LTSE Services, Inc.).

- **Legal Basis of Processing.** The reasons and legal justifications for processing your personal information may differ depending on the purpose of the collection. Regularly we use your information for the following purposes and on the following legal grounds:
  - **Contractual Services:** We use your personal information in order to perform our contractual services or in preparation for a contract with you. If you order Services from LTSE or if you



contact us to request our Services, we use your personal information to provide to you the features and functionality of the Services.

- Legitimate Interests: We use your personal information if justified by our legitimate interests. The usage of your information may also be necessary for our own business interests. For example, we may use some of your information to evaluate and review our business performance, create financial statements, improve our Services or to identify potential cyber security threats. If necessary, we may also use your information to pursue or defend ourselves against legal claims.
- Consent: We use your personal information after obtaining your consent. In some cases, we may ask you to grant us separate consent to use your information. You are free to deny your consent and the denial will have no negative consequences for you. You are free to withdraw your consent at any time with effect for the future. If you have granted us consent to use your information, we will use it only for the purposes specified in the consent form.
- Legal Obligations: We use your personal information to comply with legal obligations. We are obligated to retain certain information because of legal requirements, for example, tax or commercial laws.
- We do not use your personal information for automated individual decision-making.
- Data Subject Rights. If you are located in the EEA, you may be able to exercise the following rights in relation to the personal information about you that we have collected, subject to certain exemptions and limitations at law. The provisions below only apply to the extent your personal data is covered by the GDPR. Please note that to the extent the exercise of these rights limits our ability to process personal information, we may not be able to provide our Services to individuals who exercise these rights, or to otherwise engage with such individuals going forward. In addition, your rights and choices may be limited in certain cases. For example, in some cases we may be required or allowed by law to keep certain personal information and may be unable to fulfill an erasure request.

The Right of Access	You have the right to obtain access to your personal information.
The Right to Rectification	You have the right to obtain rectification of your personal information without undue delay where that personal information is inaccurate or incomplete.
The Right to Erasure	You may have the right to obtain the erasure of your personal information without undue delay in certain circumstances, such as where the personal information is no longer necessary in relation to the purposes for which it was collected or processed.
The Right to Restriction	You may have the right to obtain restriction of the processing undertaken by us on your personal information in certain circumstances, such as, where the accuracy of the personal information is contested by you, for a period of time enabling us to verify the accuracy of that personal information
The Right to Portability	You have the right to portability allows you to move, copy or transfer personal information easily from one organization to another.



The Right to Object	YOU HAVE THE RIGHT TO OBJECT TO ANY PROCESSING BASED ON OUR LEGITIMATE INTERESTS WHERE THERE ARE GROUNDS RELATING TO YOUR PARTICULAR SITUATION. YOU CAN OBJECT TO MARKETING ACTIVITIES FOR WHATEVER REASON WHATSOEVER.
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- If you wish to exercise one of these rights, please contact us using the contact details below. You also have the right to lodge a complaint with a data protection authority. Further information about how to contact your local data protection authority is available at [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm). Data Retention. We will store personal information for as long as necessary to fulfill the purposes for which we collect the personal information, in accordance with our legal obligations and legitimate business interests. Information on performed business transactions will be blocked from general access within a reasonable timeframe after completion of the transaction and deleted once statutory retention requirements expire. For example, national commercial or financial codes may require to retain certain information for up to 10 years.
- International Data Transfers. All transactions relating to our Services shall be deemed to have occurred in the United States, where we currently have all of our personnel and operations. Your information collected through the Services may be stored and processed in the United States or any other country in which LTSE or our subsidiaries, affiliates or service providers maintain facilities. If you are located in the European Union or 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. If we conduct such transfer of information from the European Union to third parties outside the European Union and to countries not subject to schemes which are considered as providing an adequate data protection standard, we will enter into contracts which are based on the EU Standard Contractual Clauses with these parties.

#### 7. Links to Third-Party Websites and Services

The Services may contain links to and from third-party websites of our business partners, advertisers, and social media sites and our users may post links to third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. We strongly recommend that you read their privacy policies and terms and conditions of use to understand how they collect, use, and share information. We are not responsible for the privacy practices or the content on the websites of third-party sites.

#### 8. Updates to this Policy

We may update this Policy from time to time. If we make any changes to this Policy, we will change the "Last Updated" date at the top of the Policy and will post the updated Policy on this page. If we make material changes to this Policy, we will notify you by email to your registered email address, by prominent posting on this website or our online services, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided.

#### 9. Contact Us

If you have any questions about this Policy, please contact us at [privacy@ltse.com](mailto:privacy@ltse.com) or by writing to us at:  
Long Term Stock Exchange, Inc.  
250 Montgomery St., Suite 800  
San Francisco, CA 94104

# COOKIE NOTICE

Last Updated: March 10, 2020

Unless otherwise expressly stated, capitalized terms in this Notice have the same meaning as defined in the Privacy Policy.

## 1. Scope of Notice

This Cookie Notice supplements the information contained in the [Privacy Policy](#) by explaining how we and our business partners and services providers use cookies and related technologies in the course of managing and providing our online services and our communications to you. It explains what these technologies are and why we use them, as well as your rights to control our use of them.

In some cases, we may use cookies and related technologies described in this Cookie Notice to collect personal information, or to collect information that becomes personal information if we combine it with other information. For more details about how we process your personal information, please review the [Privacy Policy](#).

## 2. What Are Cookies and Related Technologies

Cookies are small data files that are stored on your computer that allow us and our third-party partners and providers to collect certain information about your interactions with our email communications, websites and other online services. We and our third-party partners and providers may also use other, related technologies to collect this information, such as web beacons, pixels, embedded scripts, location-identifying technologies and logging technologies (collectively, "cookies").

## 3. What We Collect When Using Cookies

We and our third-party partners and providers may use cookies to automatically collect certain types of usage information when you visit or interact with our email communications, websites and other online services. For example, we may collect log data about your device and its software, such as your IP address, operating system, browser type, date/time of your visit, and other similar information. We may collect analytics data or use third-party analytics tools such as Google Analytics to help us measure usage and activity trends for our online services and better understand our customer base. These third-party partners and providers may also collect personal information about your online activities over time and across different websites when you use our websites and online services.

## 4. How We Use That Information

We use or may use the data collected through cookies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit our websites and online services; (b) provide and monitor the effectiveness of our websites and online services; (c) monitor online usage and activities of our websites and online services; (d) diagnose errors and problems with our websites and online services; (e) otherwise plan for and enhance our online services; and (f) facilitate the purposes identified in the [Our Use of Personal Information](#) section of our [Privacy Policy](#). We and our advertising partners also use the information we collect through cookies to understand your browsing activities, including across unaffiliated third-party sites, so that we can deliver ads and information about products and services that may be of interest to you.

Please note that we link some of the personal information we collect through cookies with the other personal information that we collect about you and for the purposes described in our [Privacy Policy](#).

## 5. Your Choices About Cookies

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using our online services, as some features and services on our online services may not work properly. Depending on your device and operating system, you may not be able to delete or block all cookies. In addition, if you want to reject cookies across all your browsers and devices, you will need to do so on each browser on each device you actively use. 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 and performed certain functions with it.

You can learn more about Google's practices with Google Analytics by visiting Google's privacy policy [here](#).

You can also view Google's currently available opt-out options [here](#).

#### 6. Updates to This Cookie Notice

We will update this Cookie Notice from time to time. When we make changes to this Cookie Notice, we will change the "Last Updated" date at the beginning of this Notice. If we make material changes to this Notice, we will notify you by email to your registered email address, by prominent posting on this website or our online services, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided in the notification.

#### 7. Contact Us

If you have any questions or requests in connection with this Cookie Notice or other privacy-related matters, please send an email to [privacy@LTSE.com](mailto:privacy@LTSE.com). Alternatively, inquiries may be addressed to:

Long Term Stock Exchange, Inc.

250 Montgomery St., Suite 800

San Francisco, CA 94104