

Privacy Policy

Effective date: May 3rd, 2022

Gatsby Digital Inc., along with its subsidiaries and affiliates, including Gatsby Securities, LLC, ("us", "we", or "our") operates the website and the Gatsby mobile application (the "Service").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. Our Privacy Policy for Gatsby Digital Inc. is managed through [Free Privacy Policy](#).

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number

- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data
- Social Security Number
- Date of Birth

Usage Data

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

Use of Data

Gatsby Digital Inc. uses the collected data for various purposes, including but not limited to:

- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues
- To conduct regulatory customer identification checks
- For the purpose of fraud detection and prevention
- We may also share information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual

Transfer Of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Your information will also be shared with third party service providers for the purposes of fraud detection and prevention, platform analytics, to comply with regulatory requirements and as needed to maintain your account.

Gatsby Digital Inc. will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure Of Data

Legal Requirements

NOTICE TO CALIFORNIA RESIDENTS.

If you are a California resident, the California Consumer Privacy Act (“CCPA”) may provide you specific privacy rights including the right to receive a privacy notice, the right to know what personal information we have collected about you during the past 12 months, the right to know what categories of personal information we have shared with unaffiliated third parties, the right to opt out of having your personal information sold, and the right (with certain exceptions) to request deletion of your personal information that is covered by the CCPA. More information about how to exercise your rights is provided below.

Please note that the CCPA does not apply to what is referred to as nonpublic personal information collected by financial institutions (like Gatsby), as that information is subject instead to other financial privacy laws. As a result, the CCPA does not apply to most of the information that we collect.

In the last 12 months, we collected the following categories of personal information: personal identifiers (such as name, email address and social security number), and Internet or other

electronic network activity information (IP address, cookies and usage data). For more details about the information we collect and the categories of sources of this information, please see the “Information Collection and Use” section above. We share this information with the categories of third parties described in the “Disclosure of Data” section above.

California residents may make a consumer rights request to access or delete certain personal information not otherwise exempt from such requests under applicable law. A request may be made by logging into your Gatsby mobile account, navigating to the Help menu, and selecting the option Start a Conversation. You may also request assistance by sending an email to cco@trygatsby.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.

We will not discriminate against you for exercising any of your CCPA rights.

Gatsby Digital Inc. may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Gatsby Digital Inc.
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security Of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Changes To This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: support@trygatsby.com