



PRIVACY POLICY

Apex Fintech Brokerage Services LLC

Last updated: March 2025

Thank you for choosing to be part of our community at Apex Fintech Brokerage Services LLC. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice (the "Notice"), or our practices with regards to your personal information, please contact us at apexdirect@apexfintechsolutions.com

The Notice describes how Apex Fintech Brokerage Services LLC ("AFBS," "we," "us," or "our") processes the information we collect about you through our websites (the "Website"), mobile app (the "App"), as well as any related services, sales, marketing, or events, and when you otherwise interact with us (the "Services"). This Notice applies to all information collected through our Services (which, as described above, includes our Website and App). We have great respect for your data privacy, so this Notice also describes steps you can take to control and protect your personal information on our Services.

By accessing or using our Services, you agree to this Notice. If you do not agree, you may not access or use the Services and you should discontinue use of our Services immediately. The websites and mobile app that you may use to interact with us are owned and operated by AFBS. From time to time, we may develop new or offer additional Services. If the introduction of these new or additional Services results in any material change to the way we collect or process your personal data we will provide you with more information or additional terms or policies. Unless stated otherwise when we introduce these new or additional Services, they will be subject to this Notice. If you have any questions about this Notice, please contact us (see [How to Contact Us](#) below).

If you are under the age of 18, you may not use our Services. We do not knowingly collect, maintain, or sell information from minors under 18.

You may also review our Regulation SP Privacy Notice for a description of our processing and disclosure activities regarding the non-public personal information that we collect from you in connection with opening and servicing your Account within our disclosures page [here](#).

The purpose of this Notice is to:

1. Ensure that you understand what personal data we collect about you, the reasons why we collect and use it, and who we share it with;
2. Explain the way we use the personal data that you share with us in order to give you a better experience when you are using the Services; and
3. Explain your rights and choices in relation to the personal data we collect and process about you and how we will protect your privacy.

This Notice will help you understand the following:

1. [Information We Collect](#)
2. [How We Use and Share Your Information](#)
3. [Cookies](#)
4. [Analytics, Tracking, and Advertising](#)
5. [How We Protect Your Information](#)
6. [We Do Not Collect Information of Minors](#)
7. [Managing Your Information](#)
8. [Transfers of Your Information](#)
9. [Third Party and Affiliate Sites](#)
10. [State-Specific Considerations](#)
11. [Changes to this Notice](#)
12. [How to Contact Us](#)

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1. Information We Collect

In the course of providing the Services, AFBS collects or receives the following types of information, which includes personal information and user data.

Data Source	Types of Data Collected
You	<ul style="list-style-type: none">● Identity data such as full name, date of birth, nationality identification number (e.g., social security number, passport number), nationality/citizenship, and marital status● Government-Issued Identification Information such as passport, driver's license, or similar government issued identification document(s)● Contact data such as email, phone number, mailing/home address

	<p>information</p> <ul style="list-style-type: none"> ● Employment information such as employment status, employer name, and employed position ● Financial data such as bank account details, balance information, suitability information, personal income, net worth, investment experience, investment objectives, investment time horizon, liquidity needs, and tax information ● Content such as photos and contacts in your mobile device or email ● Profile data such as username and password, purchases or orders, knowledge assessments, interests, preferences feedback, and survey responses ● For businesses, including, but not limited to: principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement or a trust agreement and other such required documents based on the companies registration ● Other information such as information submitted via focus groups, contests, sweepstakes, job applications, customer support and/or other interactions with us
Through Use of the Services	<ul style="list-style-type: none"> ● Usage information such as device identifiers, operating system and version, carrier and network type, internet protocol addresses ("IP address"), browser type and language, smartphone software and settings, referring and exit pages and uniform resource locators (date and time, amount of time spent on pages), what features of the Services you use or visit, purchases, and similar information regarding your use of the Services ● Geolocation data from your mobile device, wireless carrier, or third-party service providers; you may control the collection of precise geolocation data through the user settings on your device ● Activity data, such as purchases/sales, amount, type of transaction, time and data, and similar activity through the Services ● Tracking data collected using first and third-party cookies, pixels, web server logs, web beacons, and similar data collection and tracking technologies, such as IP address, browser, type, internet service provider ("ISP"), platform type, device type ● Trade data, including account statements and confirmations, which are provided by the clearing firm ● Communications data, such as push notifications and emails. We may request to send you push notifications regarding your account or certain features of the App. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings. You may request to unsubscribe from email communications, unless mandated by regulation

This information is primarily needed to maintain the security and operation of our App and Website for troubleshooting, for our internal analytics and reporting purposes, and for

compliance with applicable laws, rules, and regulations.

2. **How We Use and Share Your Information**

We will use and process your information for the following purposes:

- onboarding you as a customer, including identity verification, credit or anti-money laundering checks, or other due diligence efforts;
- providing the Services for you;
- communicating with you regarding your Account;
- monitoring, supporting, analyzing and improving the Services;
- conduct marketing and advertising programs, provided that, where required under applicable law, we will obtain your prior opt-in consent to send electronic marketing communications;
- servicing, maintaining, and protecting your Account;
- processing transactions in your Account;
- responding to inquiries from you;
- newsletters, product announcements, surveys, testimonials;
- product announcements for offerings at AFBS and its affiliates;
- developing, offering, and delivering new products and Services;
- facilitating contests, sweepstakes, and promotions;
- protecting the safety and security of our Services, business, and customers;
- fulfilling legal and regulatory requirements;
- protecting or exercising our legal rights; and
- as otherwise permitted by applicable law, or with your consent.

We make reasonable efforts to ensure that your personal information is sufficiently accurate, complete and up to date. If the personal information that you have provided to us changes, please update by logging into your Account (see [Managing Your Information](#) below) or by contacting us.

We may share your information with third parties as described below:

- vendors and service providers, such as securities clearinghouses, identification verification providers, and cloud storage providers, that provide services at our direction, and are instructed to keep your personal information confidential and use it only to provide the services that we have specified;
- business partners to administer our promotions, sweepstakes, surveys, and other programs, and deliver targeted advertising;
- as part of the sale or other transfer of our business;
- any person or institution with which you have or propose to have dealings, such as companies whose securities you purchase using the Services;
- our affiliates, including those in jurisdiction other than the United States, when doing so will allow us to more effectively provide the Services to you;
- as required by applicable law or legal process;
- report suspicious transactions or assist law enforcement with an investigation;
- protect the rights interest, safety, and security of AFBS, our customers, or the public;
- other third parties, provided that you request or authorize the disclosure, such as implementing, administering, or enforcing a transaction; and

- as otherwise permitted by applicable law, or with your consent.

We may aggregate or otherwise de-identify your personal information so that it does not reasonably identify you and share such information with third parties.

3. Cookies

Our website may use cookies and 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 our Services. Cookies are small packets of data that a website stores on your hard drive so that your device will remember information about your visit. The data collected through cookies and similar tracking technology enables us to personalize your experience with the Services, understand how you use them, maintain a persistent session, improve and further develop the Services, and measure and optimize advertising and promotional effectiveness.

We may use session cookies (which expire once you close your web browser), and persistent cookies (which stay on your computer until you delete them). Most browsers and mobile devices allow you to manage cookies in their 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. For example, you may not be able to sign in and access your Account as quickly, or we may not be able to recognize you, your device, or your online preferences. 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. For more information, see [Managing Your Information](#) below.

4. Analytics, Tracking, and Advertising

AFBS may use Google Maps APIs which is subject to Google's Terms of Service. You may find the Google Maps APIs Terms of Service [here](#). You may find out more about Google's Privacy Policy [here](#). We may use the Google Maps API to retrieve certain information when you make location-specific requests. This includes: The Maps APIs that we use store and access cookies and other information on your devices.

AFBS may use third-party advertising and analytics services (e.g., Google Analytics) to better understand your online activity and to provide you with content that is relevant to your interests and preferences. These services collect information about your use of our Services and other websites and online services over time through cookies and other tracking technologies. The data collected may include your IP address, web browser, mobile network, pages viewed, time spent, links clicked, and conversion information. We and our third-party partners use this information to, among other things, analyze and track data, determine the popularity of content, and deliver targeted advertisements on our Services and other platforms. Analytics companies may also provide advertising-related services to us such as reporting, attribution, analytics, and market research. 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 Notice. For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://support.google.com/analytics/answer/6004245>. For more information about interest-based ads, including to learn about options for opting out of having your web browsing information used for targeted advertising purposes, please visit <https://www.aboutads.info/choices>. You should also review your settings and controls for features that allow you to opt out or opt in to having certain information collected for behavioral advertising purposes. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Services. AFBS does not advertise on behalf of specific securities or investment options on our Services.

5. How We Protect Your Information

AFBS uses reasonable, industry standard security measures to protect information under our control from loss,

misuse, and unauthorized access, disclosure, alteration, or destruction. We maintain appropriate physical, electronic and procedural safeguards, including restricting access to personal information on a need-to-know basis, and limiting the amount and type of information available for downloading or transmittal. We also regularly conduct audits to ensure the effectiveness of our system. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

6. We Do Not Collect Information of Minors

AFBS does not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at apexdirect@apexfintechsolutions.com.

7. Managing Your Information

There are several ways for you to manage the information collected and processed by AFBS, including the following:

Access and change your information. If you have an Account, you may access, review, delete and make changes to your information by using our Services. You may also request that we rectify any inaccuracies or incomplete information in your personal data. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases. In such case, we will provide you the reason why the modification or removal was not possible.

Withdraw the consent. You may withdraw your consent to our processing of your personal information at any time by contacting us (see [How to Contact Us](#) below). If you withdraw your consent to any or all use, collection, disclosure, transfer and/or processing of your personal information or do not consent to the collection of your personal information by us, we may not be able to provide or continue providing you with all features or aspects of our existing Services. Please note that withdrawing consent does not affect our right to collect, use, transfer, process and disclose personal data where such collection, usage and disclosure without consent is permitted or required under applicable laws in any jurisdiction.

Delete your account and/or your personal information. You may delete your Account at any time, and your personal information will be deleted in the normal course of business pursuant to our current data retention practices. You may also request to have all your personal information deleted by contacting us. We will comply with deletion requests within a reasonable time to the extent permissible by law; however, we will not delete data that we are legally required to maintain, such as information regulators require for audit or substantiation purposes.

Limit access to your device data. You may disconnect our access to certain stored device information through your device's or web's settings. For instance, you can withdraw permission for the App to access your contact list or photo gallery.

Manage communications preferences. You can stop receiving promotional emails from us by clicking the "unsubscribe" link in those emails. We may still send you service-related or other non-promotional communications, such as Account notifications, receipts, security notices and other transactional or relationship

messages.

Limit mobile ad tracking. Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

Posting information. Posting personal information on AFBS social media websites or other public areas will make it publicly available. The personal information you post or share with others may in turn be shared by them with still other users and it may also show up when someone uses a public search engine (even if that person is not a user of our Service). Do not post personal information in public areas of our Service that you want to keep private.

Based on the applicable laws of your state, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please contact us by mail at apexdirect@apexfintechsolutions.com.

8. Transfer of Your Information

Our Services are hosted in the United States, and your information is stored in the United States in the cloud and locally on our servers. If you are located outside the United States, by using our Services you agree to have your data transferred to and processed in the United States and other countries where AFBS conducts business. In providing our Services, your personal information may be accessed by our affiliates in jurisdictions other than the United States. AFBS will not transfer any personal data relating to a natural person located in the European Economic Area, the United Kingdom, or any other jurisdiction that restricts outbound data transfer, from the country of origin without appropriate safeguards as required by applicable law and regulations. You may receive a copy of those safeguards by contacting us (see [How to Contact Us](#) below).

9. Third Party and Affiliate Sites

This Privacy Notice does not apply to the privacy practices of companies that we do not own or control, such as our companies that advertise on our Services, with whom we partner for certain services, or affiliate companies. We are not responsible for the content or the privacy policies of those third-party or affiliate websites. You should check the applicable third-party or affiliate privacy policy and terms of use when visiting any other websites.

We may use Plaid Inc. (“Plaid”) for account linking services and to gather your data from financial institutions. This data may include historical and ongoing information, including transaction information, from time to time from all your sub-accounts (e.g., checking, savings, and credit card) accessible through a single set of account credentials, even if only a single sub-account is designated by you. By using our Services, you grant us, Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid Privacy Policy (<https://plaid.com/legal/#end-user-privacy-policy>).

10. State-Specific Considerations

California Residents.

Under the CCPA, California residents have certain rights (set forth below) regarding their Personal Information.

Right to know. California residents (and their households) have the right to request certain information about whether we collect, use, disclose and sell personal information about them, and to request to know the personal information that we have. To make such a request, please contact us at apexdirect@apexfintechsolutions.com. Please be advised that we will verify all such requests prior to providing any personal information including by requiring you to respond to an email sent to the email you used when making your request and/or the email that pertains to your Account. Please be advised that we are only required to respond to two requests per consumer each year. These reports will be provided free of charge.

Right to request deletion. If you are a California resident, you may request the deletion of personal information we have collected from you. To make such a request, please contact us by mail at apexdirect@apexfintechsolutions.com. Please be advised that we will verify all such requests prior to providing any personal information including by requiring you to respond to an email sent to the email you used when making your request and/or the email that pertains to your Account.

Right to opt out of the "sale" of personal information. California residents have the right to request that we not sell their personal information to third parties, as those terms are defined by California Civil Code Section 1798.140. We do not sell information about you to third parties. In order to help us deliver advertising and marketing on other platforms, we do allow third parties to collect information through our Services. Please see [Analytics, Tracking and Advertising](#) above for more details, including choices available to you.

In the past twelve months, we collected personal information as described in [Information We Collect](#) above. We share this information as described in [How We Use and Share Your Information](#) above.

Nondiscrimination. We will not discriminate against California residents who exercise their privacy rights.

Authorized agent. California residents may use an authorized agent to make requests on their behalf. We require the authorized agent to provide us with proof of the California resident's written permission (for example, a power of attorney) that shows the authorized agent has the authority to submit a request for the California resident. In addition to providing this proof, the authorized agent must follow the appropriate process described above to make a request.

California shine the light law. We do not share your personal information with other businesses or third parties for their own direct marketing purposes.

Do not track notice. We do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide users the ability to exercise choice regarding the collection of personal information about that user's online activities over time and across third-party web sites or online services. We may allow third parties, such as companies that provide us with analytics tools, to collect personal information about your online activities over time and across different apps or web sites when you use our Services.

11. Changes to this Notice

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

12. How to Contact Us

If you have any questions, comments, or suggestions about this Notice or your personal information, please contact us at apexdirect@apexfintechsolutions.com or by post:

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ATTN:LegalDepartment
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