

PRIVACY POLICY

Last Updated: January 3, 2022

GLBA Privacy Notice

This Privacy Policy describes how Stackwell Capital, Inc. and Stackwell Capital Advisers, LLC (collectively, “Stackwell”) handles the personal information of individuals to whom we may market and provide our platform, as well as the information we collect on our website and application, from third parties, and from other sources.

About Stackwell

Stackwell provides individual consumers with financial advice, investment management, and digital banking services.

Information We Collect

When you interact with our services, we may collect:

- **Account Information**, such as your first and last name, email address, phone number, and primary address.
- **Financial Information**, such as your bank account number and credit or debit card information.
- **Transaction Information**, such as information about the transactions you make on our services, including the type of transaction, transaction amount, and timestamp.
- **Correspondence**, such as your feedback, questionnaire and other survey responses, and information you provide to our support teams, including via our help chat.
- **Device Data**, such as your computer’s or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 5G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, browsing history, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access, and whether you have opened our marketing emails or clicked links within them.
- **Social Media Information**. We may maintain pages on social media platforms, such as Facebook, LinkedIn, Instagram, and other third-party platforms. When you visit or interact with our pages on those platforms, the platform provider’s privacy policy will apply to your interactions and their collection, use and processing of your personal information.

You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.

- **Information We Get From Others.** We may get information about you from other sources as required or permitted by applicable law, including public databases. We may combine the information collected from these sources with the information we get from this application in order to comply with our legal obligations and limit the use of our services in connection with fraudulent or other illicit activities.
- **Other Data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

We use the following tools for automatic data collection:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating online advertising.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

How We Use Information

We use your personal information for the following purposes:

Service delivery, to:

- Establish and maintain your account on the platform;
- Conduct research and analysis relating to the platform, our application, and our business;
- Process payments and complete transactions with you;
- Communicate with you about the platform and our application, including by sending you push notifications with announcements, updates, security alerts, surveys, offers, and support and administrative messages; and
- Provide support for the platform, and respond to your requests, questions and feedback.

Research and development. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We may use this anonymous data and share it with third parties for our lawful business purposes.

Marketing. We may use the information we collect to market our services to you. This may include sending you communications about our services, features, promotions, surveys, news, updates, and events, and managing your participation in these promotions and events.

Compliance and protection. We may use your personal information to:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- Audit our internal processes for compliance with legal and contractual requirements and internal policies;
- Enforce the terms and conditions that govern our platform; and
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

How We Share Personal Information

We may share your information with:

Service providers. Companies and individuals that provide services on our behalf or help us operate our platform or our business (such as hosting, information technology, customer support, email delivery, and platform analytics services).

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [compliance and protection purposes](#) described above.

Business transferees. Acquirers and other relevant participants in business transactions (or negotiations for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Stackwell (including, in connection with a bankruptcy or similar proceedings).

Your Choices

Access to information. To keep your information accurate, current, and complete, please contact us as specified below. We will take reasonable steps to update or correct information in our possession that you have previously submitted via the platform.

Opt out of marketing communications. You may opt out of marketing-related email communications by following the opt out or unsubscribe instructions contained in the marketing communications we send you.

Opt out of push notifications. If you opt-in to receive push notifications within the application, we may send push notifications or alerts to your mobile device from time to time. You can deactivate push notifications and alerts at any time by changing your device settings, changing the push notification settings within the application, or deleting the application.

Blocking cookies in your browser. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit allaboutcookies.org. Use the following links to learn more about how to control cookies through your browser:

- [Firefox](#); [Chrome](#); [Microsoft Edge](#); [Safari](#)

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Other Sites and Services

Our platform may contain links to websites and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites or online services operated by third parties, and we are not responsible for their actions.

Information Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, no security measures are failsafe and we cannot guarantee the security of your personal information.

Children

Our platform is not intended for use by children under 18 years of age. If we learn that we have collected personal information through our platform from a child under 18 without the consent of the child’s parent or guardian as required by law, we will delete it.

Changes to This Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by email or updating the date of this Privacy Policy and posting it on the application.

How to Contact Us

You can reach us by email at support@stackwellcapital.com or at the following address:

Stackwell Capital, Inc.
800 Boylston St., 16th Floor
Boston, MA 02199

FACTS	WHAT DOES STACKWELL DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Your contact details • Transaction or loss history • Account balances • Investment experience <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>	
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Stackwell chooses to share and whether you can limit this sharing.	
Reasons we can share your personal information	Does Stackwell share?	Can you limit this sharing?
For our 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	Yes	No
For our marketing purposes - to offer our products and services to you	No	We don’t share
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes - information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes - information about your creditworthiness	No	We don’t share
For our affiliates to market to you	No	We don’t share
For nonaffiliates to market to you	No	We don’t share
Questions?	Go to our Support Page at www.stackwellcapital.com .	

Who we are	
Who is providing this notice?	Stackwell Capital, Inc. and Stackwell Capital Advisers, LLC (collectively, "Stackwell")
What we do	
How does Stackwell protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Stackwell collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Initiate an application for a financial product or service • Open an account • Make trades, deposits or withdrawals from your account <p>We also collect your personal information from others, such as banks, credit agencies and other third-party data aggregators.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes - information about your credit worthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Our affiliates include Stackwell Capital Advisers, LLC.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.
Other important information	
<p>Nevada: If you are consumer with a Nevada mailing address, and you prefer not to receive marketing calls from us, you may be placed on our internal Do Not Call List by contacting us at (888) 499-2448 or at support@stackwellcapital.com. You may also contact the Nevada Attorney General's office: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number: 1-702-486-3132; email BCPINFO@ag.state.nv.us or AgInfo@ag.nv.gov</p> <p>Vermont: If you are consumer with a Vermont mailing address, we will not share information we collect about you with companies outside of Stackwell, unless the law allows. For example, we may share information with your consent, to service your accounts or under joint marketing agreements with other financial institutions with which we have joint marketing agreements. We will not share information about your creditworthiness within our corporate family except with</p>	

your consent, but we may share information about our transactions or experiences with you within our corporate family without your consent.

California: If you are a consumer with a California mailing address, we will not share information we collect about you with companies outside of Stackwell unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits to which you are entitled.