

DINARI SECURITIES, LLC.

PRIVACY POLICY

At Dinari Securities, LLC we are serious about protecting your privacy. You don't have to take our word for it though, you can read below to understand how we treat your Personal Data. When you use our brokerage services pursuant to our [Terms of Service and Customer Agreement](#), we require that you acknowledge and agree to our Privacy Policy, that you understand and consent to our Privacy Policy and that we will collect, use, and share information as we outline below.

Remember that your use of our Website and brokerage services are subject to our [Terms of Service and Customer Agreement](#), which incorporates our Privacy Policy, among other policies. Capitalized terms in this Privacy Policy have the definitions given to them in the [Terms of Service and Customer Agreement](#), unless first defined in this Policy.

Why We Have A Privacy Policy (And What It Covers)

Our Privacy Policy is here to help you understand our collection and use of information, and to outline your rights. Our Privacy Policy covers how we treat Personal Data that we gather when you access or use our brokerage services. "Personal Data" is any information relating to an identified or identifiable individual and is protected similarly as Personal Data or personally identifiable information under applicable data protection laws. If your Personal Data is lawfully given to any company that we don't own or control, or to people we don't directly oversee, then the privacy policy of that company is applicable, and not this Privacy Policy. In our Privacy Policy, we will go over a few important areas: How we obtain your Personal Data; The types of Personal Data we collect; How we Use your Personal Data; Sharing your Personal Data; and Your rights with respect to your Personal Data. If any part of this Privacy Policy is unclear or if you believe that your Personal Data is being misused in violation of this Privacy Policy, please contact us immediately, so we can look into it and try our best to remedy the situation to your satisfaction. Please understand that our brokerage services utilize blockchain smart contract technology for redundant recordkeeping, and as such, information on the blockchain is not often private; however, we take reasonable steps to anonymize this public

information in a way that cannot be personally tied to you or any of your Personal Data.

Here Is How We Gather Personal Data

We collect Personal Data about you from a few different sources. For our brokerage services, the main way we obtain your Personal Data is directly from you. As a user of our brokerage services, you will be required to provide Personal Data directly to us, and while you use our brokerage services, we may also obtain additional Personal Data as necessary to provide the brokerage services (including any future services) and to be compliant with applicable laws and regulations. From time to time, companies that we don't own or control, or people we don't directly oversee ("Third Parties"), may provide us with Personal Data about you. As an example, we may use analytics service providers to help us understand how you use our brokerage services, or third parties may help us provide you with ancillary services that we do not directly provide. We automatically collect certain Personal Data when you use our brokerage services, you will be shown a cookie disclosure that will provide detail on what cookies/pixels/tags we use and for what purposes. Our Website may use cookies or other similar methods such as pixel tags, web beacons, clear GIFs, and JavaScript (collectively, "Cookies") to help our Website recognize you (your web browser, phone, etc). Additionally, these Cookies may give us information on how and when you visit the Website and use our brokerage services. They help us to analyze trends, so we can learn more and improve our brokerage services. This information can be supplemented with other information received from third parties. At this time, when you visit the Website and use the brokerage services, we are unable to offer "Do Not Track" requests – if you ask us to not track, we may not be able to fulfill the brokerage services for you. You can decide whether to accept Cookies through settings on your browser. You can also delete Cookies already on your device. If you do this, some of your preferences may have to be adjusted when you visit the Website and use our brokerage services (it is possible that some of functions may not work until you allow Cookies).

If this kind of stuff interests you, then you are in luck! Take a look at [AllAboutCookies](#) to find – well – All About Cookies!

This is the kind of Personal Data We Collect

Information that Identifies You Personally – Like your full name, mail, billing and email addresses, online identifiers or usernames, Internet Protocol (IP) address, and any number used in your jurisdiction that identifies you for taxation purposes (used only

to help us identify you and make sure that you are properly taxed when it comes to earned compensation). This information may include customer and user records identified by applicable law – Like your full name, signature, taxation number (see above), bank account, digital wallet, and credit card numbers. These may be controlled by local laws in your jurisdiction. Internet Activity Information – Like your internet browsing and search history, or information on your interaction with a website or application.

Overall, we try to collect information that we believe is necessary to make the Website render and work well for you, and to make your use of the brokerage services faster, easier, and more intuitive, and to improve and expand our brokerage services. Without much of this information, the brokerage services simply will not be possible, and for the others, it will make improving the brokerage services difficult or more costly.

How We Use Your Personal Data

Nearly all of the Personal Data that we collect is used to manage, improve, understand and personalize our brokerage services. We use the Personal Data to:

- Accomplish a purpose (when you when Personal Data to us for a particular purpose), such as when we provide our brokerage services to you and respond to your requests;
- Communicate with you about the brokerage services based on your preferences and send you confirmation emails and promotional offers or email you about your use of the brokerage services;
- Offer and provide support for the brokerage services;
- Personalize the content on our Website;
- Fulfill requests and respond to questions about the Website and brokerage services;
- Better test, research, analyze and develop the brokerage services and to offer new brokerage services and to make the Website better;
- Deter and stop illegal, fraudulent, and other damaging actions and better maintain the safety, security and integrity of the Website and our brokerage services;
- Ensure compliance with our obligations, and enforce our Terms of Use, Terms of Service and other company policies;

- Interact with governmental and law enforcement requests and as required by applicable law, court order, or governmental regulations; and
- Perform other business functions that we noted when we collected your Personal Data, and as is set forth in applicable data privacy laws that govern the use of such Personal Data.
- We may need to use your previously-collected Personal Data for a new purpose that is consistent with our brokerage services and their evolution. When this happens, we will do our best to inform you of such use before we start.

If you do not want to receive communications from us, please use the opt-out that is provided in the email or otherwise indicate your preference by emailing us at: DSPrivacy@dinari.com. But please note that as long as you use our Brokerage services, there may be some communications that you cannot opt out of. For instance, if you invest in the digital shares of a particular company and the company takes a shareholder vote, that company may use the brokerage services to provide you with the legally required notice of that shareholder vote. Or if you earn compensation from the sale of any digital shares, we will have to use your Personal Data to report any taxable compensation you received from that sale.

How We Share Your Personal Data

We are not in the business of sharing your Personal Data for monetary gain. We do need to perform and improve our brokerage services and that does require us to share your Personal Data to make that possible. We may share your Personal Data with companies and services like:

- Our clearing broker, Alpaca Securities, LLC and its Affiliates.
- Payment processors, Security providers, Technology/Hosting services, Analytics providers, Auditors, and others that help us maintain compliance and security (detecting security issues and fraud, and protecting against illegal or other improper activity);
- Those undertaking internal research for technological development and demonstration;
- Those that debug and help us identify and repair errors on the Website or the brokerage services;
- Those that need the Personal Data for a short period of time to build a consumer profile. Where additional consent is required, you will be asked to provide it through a separate consent;

- Those providing customer care, order processing or fulfillment services, or advertising and marketing services; and
- Government, law enforcement, or administrative bodies that require us to provide them with certain information as required by law or regulations.

Others may access your Personal Data if you post that information publicly or as needed to complete a transaction initiated or authorized by you when you use our brokerage services, or to any of our third-party business partners who you access through our brokerage services. If this happens, their privacy and other policies will control the use of that information and not us. While we hope this never happens, your Personal Data may be acquired through a corporate acquisition like a merger, bankruptcy or asset sale.

Data Security and Retention

We employ a number of technical, organizational, and physical safeguards designed to protect the Personal Data we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

Personal Data Use/Storage

Your Personal Data may be used, hosted, or otherwise processed outside of your home jurisdiction in a jurisdiction(s) that may not provide equivalent levels of protection for personal information, including the United States. You must consent to this use and storage in order to use our brokerage services.

Personal Data of Children

We do not offer our brokerage services to children, so we do not knowingly collect or solicit Personal Data from children under 18; if you are under 18 years of age, please do not attempt to register for or otherwise use the Brokerage services or send us any Personal Data. If we discover that we have any Personal Data from a child under 18, we will delete it as quickly as possible. If you believe that a child under 18 may have given us any Personal Data, please contact us at DSPrivacy@dinari.com.

Privacy Rights In Certain Jurisdictions

Certain jurisdictions have enacted laws to protect and empower consumers with respect to their data and Personal Data. You may have additional rights regarding the Personal Data we collect and use based on your residency. This area of law is evolving – if you would like to know what laws your state has enacted (or is considering), there are many resources available, such as those found on the [United Nations Conference on Trade and Development](#).

Changes to this Privacy Policy

From time to time, we may need to change the way we use your Personal Data due to applicable laws or to better perform our brokerage services. If that happens, we will update this Privacy Policy and alert you and other visitors to our Website by placing a notice on the Website, or sending an email, or by another expedient way. If you previously opted out of receiving legal notices by email, or if we do not have a current email, our legal notices will still apply, and you are still responsible for reading and understanding them. If you visit the Website or use our brokerage services after any changes to our Privacy Policy have been posted, you agree to the changes. We use Personal Data (or other information) we collect according to the Privacy Policy effective at the time that information is collected.

Contact Information

If you have any questions or comments about your Personal Data, your privacy, our Privacy Policy, or your rights, please do not hesitate to contact us at: DSPrivacy@dinari.com.