

# StreetLinx Inc.

## Privacy Policy

Effective Date: September 5, 2019

StreetLinx Inc. (“StreetLinx”, “we”, “us” and/or “our”) provides the services available through [www.streetlinx.com](http://www.streetlinx.com) and each of our mobile applications that include a link to this Privacy Policy (collectively, the “Service”) subject to our **Terms of Service** and this Privacy Policy. This Privacy Policy is meant to help you understand what data we collect via the Service, why we collect it, and what we do with it.

This Privacy Policy (the “Policy”) addresses data subjects (“you”, “your”) whose personal data we may receive through the Service. StreetLinx is the data controller for such personal data. This Policy does not apply to personal data we collect by other means, such as the personal data of our employees.

### Information We Collect:

**Information You Give Us:** When you register the firm that you are authorized to represent (a “Firm”) as a firm administrator (each, a “Firm Administrator”) with us in order for that Firm to participate in the Service, you will be asked to provide contact and profile information about the Firm as well as personal data about investment professionals and additional employees you authorize to participate in the Service (each, a “Member”). The Service relies on Members and Firm Administrators to supply profile data about your Firm and its personnel (collectively, “Profile Data”). Member Profile Data may be provided to StreetLinx by a Firm Administrator or from a Member directly via the StreetLinx portal (located at <https://members.streetlinx.com/login>). Profile Data may include the following types of personal data about Members:

- biographical information including first and last names and narrative Member biographies;
- contact information including Member work email addresses, work and mobile phone numbers;
- employment information including Member job functions, titles, and job histories;
- educational information, including schools attended by Members;
- investment focus areas including asset classes and sectors that each Member trades, researches, or invests in;
- Members’ contact and engagement preferences;
- Photographs of Members; and
- any other information that may be voluntarily provided by Members.

With the exception of email addresses, which are required in order to use the Service, all of the preceding information is optional: you and your Firm can choose which types of personal data are shared on the Service. Members and Firm Administrators have direct control over the personal data they choose to include in the Service.

**Information We Collect from Public Sources:** From time to time, StreetLinx may update or augment your Profile Data with data collected from publicly available sources, such as Firm websites or professional networking platforms.

**Device and Location Information:** When you and your Members use the Service via a mobile device, we may collect and store information about the device that is used, including, without limitation, the applicable device identifier. We may collect and use this information to help us manage and improve the Service and deliver a more customized experience to our users. Web requests made to StreetLinx contain your IP address. We may use such IP address for various purposes, including to: analyze and report upon the usage of our Service and any content, features, and services made available through the Service; diagnose and prevent service or technology problems affecting our Service; determine the geographic location from which you are accessing our Service; and monitor and prevent fraud and abuse.

**Automatically Collected Data:** In addition to Profile Data, when you use the Service, we automatically receive and store certain information about your visit and use of the Service (“Automatically Collected Data”). Automatically Collected Data is collected passively using various technologies such as web beacons that access or set cookies (see Cookies below) and may be used to track usage of the Service. StreetLinx may store such Automatically Collected Data itself or the Automatically Collected Data may be included in databases owned and maintained by StreetLinx or its service providers. We may use and share such Automatically Collected Data and pool it with other information to track, for example, the total number of users of our Service, the number of visitors to particular features of our Service, and the domain names of our visitors’ Internet service providers. We may share Automatically Collected Data with our current or prospective business partners.

#### **Cookies and Other Tracking Technologies:**

A cookie is a small text file stored on your device that contains information about use of your browser and activity on websites and web-based applications. Our Service may use cookies and similar technologies. Similar technologies include, for example, clear GIFs (a.k.a. web beacons), local shared objects (a.k.a. “flash cookies”), and pixels. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Website users. These similar technologies may help us better manage content on our Service by informing us what content is effective, let us know browser type, IP address, and other information about our users, tell us about ad impressions or clicks, or access user cookies. We may use Cookies for the purposes of offering certain Service functionality, enabling certain features, personalization of our Service, serving targeted advertisements, developing Service usage analytics, and generally improving our Service.

**Types of Cookies:** We use both session and persistent Cookies. Session Cookies are deleted or removed when you close your browser. Persistent Cookies may be retained after you close your browser but typically have an expiration date. Some of the Cookies placed on your device through our Service are first-party Cookies, since they are placed directly by us. Other parties, such as Google, may also set their own (third-party) Cookies through our Service. Please refer to the privacy policies of these third parties to learn more about the way in which they collect and process information about you.

#### **How We Use Cookies on Our Service:**

**Strictly Necessary Cookies:** These Cookies are necessary for the Service to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in, or filling in forms. You can set your browser to block or alert you about these Cookies, but as a result of blocking such Cookies, some parts of our Service will not work.

**Performance Cookies:** These Cookies allow us to count Service visits and traffic sources so we can measure and improve the performance of our Service. They help us to know which pages are the most and least popular and see how visitors move around the Service. All information these Cookies collect is aggregated and therefore is anonymous. If you do not allow these Cookies, we will not know when you have visited our Service, and will not be able to monitor its performance.

**Functional Cookies:** These Cookies enable the Service to provide enhanced functionality and personalization. They may be set by us or by third-party providers whose services we have added to our pages. If you do not allow these Cookies, then some or all of these services may not function properly.

#### **Opting Out of Cookies:**

You can adjust your browser settings to reject certain types of Cookies. Note, if you reject certain Cookies, such as Strictly Necessary or Functional Cookies, you may not be able to access and use all of the features on our Service. You may also set your browser to send a Do Not Track (DNT) signal. For more information, please visit <https://www.aboutcookies.org/> and <https://allaboutdnt.com/>. Please note that our Service does not have the capability to respond to “Do Not Track” signals received from web browsers.

#### **Basis of Processing**

We may process your personal data on the basis of:

- the need to perform a contract with you;
- the need to pursue our legitimate interests, such as our interest in marketing, selling, and providing the Service;
- sending marketing communications, your consent if required by the applicable law;
- the need to comply with the law; or
- any other ground, as required or permitted by law.

#### **How We Use and Share Information We Collect:**

**Why We Process Your Data:** StreetLinx processes personal data to make it easy for trading counterparties to find and contact you, and to provide you with more targeted resources and trade ideas as well as for other business purposes.

**Member Data:** We consider Members’ Profile Data to be confidential. As such, your Firm and Member Profile Data is only shared with participating Firms and Members or other financial institutions, as approved by your firm. StreetLinx may use email addresses to send Service-specific transactional emails. Sending, receiving, and responding to transactional email communications is inherent in the use of our Service. Receiving marketing messages from StreetLinx, such as by email or post, is optional and subject to your specific preferences. All marketing communications sent by StreetLinx will contain instructions permitting you to determine which, if any, communications you want to receive from StreetLinx, including the ability to unsubscribe from all future marketing emails or some part thereof.

**Analytics:** StreetLinx may also use your Member Profile Data and other information collected through the Service for analytics for the internal purpose of improving our Service including content and functionality, and to better understand our users.

**Sharing Within the Service:** Firm Administrators have the option to determine the visibility of their firm's and members' Profile Data within the Service. StreetLinx will share your personal data with other participating Firms and Members for which your administrator has approved access and visibility.

**Aggregated Data:** In an effort to understand and serve the needs of the users of the Service, StreetLinx analyzes user demographics, interests, and behavior based on Member Data and other information provided to us. This research may be compiled and analyzed on an aggregate basis (the "Aggregated Data"), and StreetLinx may share this Aggregated Data with its agents, business partners and other third parties. StreetLinx may also disclose Aggregate Data in order to describe our Service to current and prospective business partners, and to other third parties for other lawful purposes (see For Legal Reasons below).

**Agents, Consultants and Related Third Parties:** StreetLinx, like many businesses, sometimes hires other companies as service providers to perform certain business-related functions, some of which require access to your personal data. Our service providers may provide:

- application hosting services;
- cloud storage services;
- project management and collaboration software;
- analytics tools;
- business productivity software;
- email software;
- email marketing software and services; and
- authentication services.

**Group Companies:** StreetLinx may also share personal data with corporate affiliates where necessary for the provision of services.

**Business Transfers:** If we are involved in a merger, acquisition, reorganization, bankruptcy, receivership, sale of company assets or transition of service to another provider, your information, including all Member Profile Data, may be sold or transferred as part of such a transaction as permitted by law and/or contract.

**Direct Marketing:** StreetLinx may use your personal data to send you direct marketing messages about our Service or other offerings. We do not and will never sell your personal data to a third party.

**For Legal Reasons:** StreetLinx may disclose your Profile Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation or a government request, (ii) verify compliance with or enforce our legal terms or protect and defend the rights or property of StreetLinx, users of the Service, or others, (iii) act in urgent circumstances to protect the personal safety of users of the Service or the public, or (iv) protect against legal liability.

If we have to disclose your personal data to governmental/law enforcement officials, we may not be able to ensure that those officials will maintain the privacy and security of your personal data.

Some of the third parties with whom we share your personal data may be located outside of the United States. However, before transferring your personal data to these third parties, we will either ask for your explicit consent or require the third party to maintain at least the same level of privacy and

security for your personal data that we do. We remain liable for the protection of your personal data that we transfer to third parties, except to the extent that we are not responsible for the event that leads to any unauthorized or improper processing.

Also, some of the third parties with whom we share your personal data may be located outside of the European Union or the European Economic Area. In some cases, the European Commission may not have determined that the countries' data protection laws provide a level of protection equivalent to European Union law. We will only transfer your personal data to third parties in these countries when there are appropriate safeguards in place. These may include the European-Commission-approved standard contractual data protection clauses. You can request a copy of the StreetLinx Data Processing Addendum, which includes standard contractual clauses, by contacting us by the methods described below.

**Data Retention:**

StreetLinx will retain your personal data for as long as necessary to fulfil the purposes for which it was collected. To determine the appropriate retention period for personal data, StreetLinx considers the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you are a Member and you leave your current Firm, StreetLinx may keep your personal data on file in the event you want to sign up for the Service at a new employer.

**Information Security:**

StreetLinx takes the security of your data seriously. StreetLinx takes commercially reasonable steps (including physical, technical, and organizational measures) to protect the Firm and Member Profile Data from loss, misuse, and unauthorized access, disclosure, alteration or destruction.

StreetLinx has commercially reasonable policies and procedures in place to ensure your personal data is kept safe and secure, including:

- Data encryption;
- Firewalls;
- Intrusion detection;
- 24/7 physical protection of the facilities where your data is stored;
- Background checks for personnel that access our systems; and
- Security policies and procedures across all service operations.

Please note, however, that we cannot guarantee that such information may not be accessed, disclosed, altered or destroyed by breach of our firewalls and secure server software. No Internet or email transmission or electronic storage of information is ever fully secure or error-free. In particular, information sent to or from this Service via email may not be secure.

**Children:**

The Service is not intended for use by children and StreetLinx does not knowingly collect any personally identifiable information from children under the age of 18.

### **Links to other Websites:**

This Privacy Policy applies only to the Service. Our Service may contain links to other web sites not operated or controlled by StreetLinx (the “Third-Party Sites”). The policies and procedures we described here do not apply to the Third-Party Sites. The links from this Service do not imply that StreetLinx endorses or has reviewed the Third-Party Sites. We suggest contacting those Third-Party Sites directly for information concerning their privacy policies.

### **Access to Your Member Profile Data:**

As a Firm Administrator, you will have the direct ability to correct, modify, delete or otherwise amend any Member Data concerning the Members in your Firm by accessing the settings for the particular Member’s profile. If we process your personal data, you may have the right to request access to (or to update, correct, or delete) such personal data. You may also have the right to ask that we limit our processing of such personal data, as well as the right to object to our processing of such personal data. You may also have the right to data portability.

If we have received your Personal Data in reliance on the Privacy Shield, you may also have the right to opt out of having your Personal Data shared with third parties and to revoke your consent to our sharing your Personal Data with third parties. You may also have the right to opt out if your Personal Data is used for any purpose that is materially different from the purpose(s) for which it was originally collected or which you originally authorized. To submit these requests or raise any other questions, please contact us by using the information in the “Contacting Us” section below.

### **Your Rights Over Your Personal Data**

StreetLinx takes your privacy seriously, and is happy to work with you to ensure that your personal data is processed in a secure, responsible manner. You may have certain rights which apply in respect of your personal data, depending on your relationship with StreetLinx, our legal and regulatory obligations, and the country in which you are located.

- You have the right to request a copy of the personal data that we hold about you. If you would like a copy of some, or all, of your personal data, please contact us according to the instructions below.
- You may have the right to request that the personal data we hold about you is erased under certain circumstances including where there is no additional legal and/or regulatory requirement for StreetLinx to retain this information.
- You may have the right to request that any personal data you have provided to us that you consented to give us or that was provided to us as necessary in connection with our contract with you, and that is processed by automated means, be transmitted to another controller in a commonly used and machine-readable format, otherwise known as ‘data portability’.
- You have the right to ensure that your personal data is accurate and up to date, or, where necessary, corrected. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please contact us or your Firm administrator.
- You may have the right to object to your personal data being processed, for example when we process your data based on a legitimate interest, or for direct marketing purposes.
- You may have the right to restrict the processing of your personal data.

### **EU-U.S. and Swiss-U.S. Privacy Shield Frameworks**

For Personal Data processed in the scope of this Policy, StreetLinx complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework (the “Privacy Shield”), as adopted and set forth by the U.S. Department of Commerce regarding the processing of Personal Data transferred from the European Union, the European Economic Area, the United Kingdom, or Switzerland to the United States, or otherwise received in reliance on the Privacy Shield. We commit to adhere to the Privacy Shield Principles and have certified our adherence to the Department of Commerce.

To learn more about the Privacy Shield, and to view our certification, please visit <https://www.privacyshield.gov> and <https://www.privacyshield.gov/list>, respectively.

### **Dispute Resolution**

Where a privacy complaint or dispute cannot be resolved through our internal processes, we have agreed to participate in the [VeraSafe Privacy Shield Dispute Resolution Procedure](#). Subject to the terms of the VeraSafe Privacy Shield Dispute Resolution Procedure, VeraSafe will provide appropriate recourse free of charge to you. To file a complaint with VeraSafe and participate in the VeraSafe Privacy Shield Dispute Resolution Procedure, please submit the required information here: <https://www.verasafe.com/privacy-services/dispute-resolution/submit-dispute/>

### **Binding Arbitration**

If your dispute or complaint can't be resolved by us, nor through the dispute resolution program established by VeraSafe, you may have the right to require that we enter into binding arbitration with you under the Privacy Shield's “Recourse, Enforcement and Liability Principle” and Annex I of the Privacy Shield.

### **U.S. Regulatory Oversight**

StreetLinx is subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

### **European Union Representative**

We have appointed VeraSafe as our representative in the EU for data protection matters. While you may also contact us, VeraSafe can be contacted on matters related to the processing of Personal Data. To contact VeraSafe, please use this contact form: <https://www.verasafe.com/privacy-services/contact-article-27-representative/> or via telephone at: +420 228 881 031.

Alternatively, VeraSafe can be contacted at:

**VeraSafe Ireland Ltd**  
Unit 3D North Point House  
North Point Business Park  
New Mallow Road  
Cork T23AT2P  
Ireland

### **European Union Supervisory Authority Oversight**

If you are a data subject whose personal data we process, you may also have the right to lodge a complaint with a data protection regulator in one or more of the European Union member states.

**Changes to this Policy:**

If we make any material change to this Policy, we will post the revised Policy to <https://streetlinx.com/privacy>. We will also update the “Effective” date. By continuing to use our Service after we post any of these changes, you accept the modified Policy.

**Contacting Us:**

If you have any questions, concerns or complaints about this Privacy Policy or how StreetLinx has handled your personal data in the Service, please email us at [info@streetlinx.com](mailto:info@streetlinx.com).

Alternatively, you may write to:

StreetLinx Inc.  
575 5<sup>th</sup> Avenue, 14<sup>th</sup> Floor  
New York, NY 10017