

## Otis Wealth, Inc.

### Privacy Policy

**Last Updated on June 26th, 2019**

Your privacy is important to us. This Privacy Policy (“ **Policy** ”) applies to services provided by Otis Wealth, Inc. (“ **we** ”, “ **us** ”, or “ **Otis Wealth** ”) and our website, mobile app, or other platform (collectively, the “ **Services** ”) explains what information we collect from users of our Services (a “ **user** ”, “ **you** ”, or “ **your** ”), including information that may be used to personally identify you (“ **Personal Information** ”) and how we use it. We encourage you to read the details below. This Policy applies to any user or visitor to or user of our Services. We will be the controller of your personal data provided to, or collected by or for, or processed in connection with, our Services.

We reserve the right to change this Policy at any time. We will notify you of any changes to this Policy by sending notice to the primary email address specified in your account or by a prominent notice on our website. Significant changes will go into effect thirty (30) days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check our website, including this privacy page, for updates. You acknowledge that your continued use of our Services after we publish or send a notice about our changes to this Policy means that the collection, use and sharing of your Personal Information is subject to the updated Policy.

#### **What Information Do We Collect?**

##### Information Provided by You to Us

We collect information that you knowingly give us when you create an account, contact us, or otherwise access or use our Services This may include

- Your name, email address, postal address, gender, telephone number, profession, social security numbers, date of birth, employer, employer address, your responses to surveys that we may ask you to complete for research purposes or to help direct Otis Wealth activities, the contact information of your representative, your social media account information
- Details of any financial transactions you participate in on the Services, including the amount, currency, and method of payment.

##### Information Collected Automatically

- Your internet protocol address (i.e., IP address) and, if you access the Services from a mobile application, your unique mobile device ID number and non-email authentication.
- Browser and device information and information collected through technologies such as cookies, pixel tags, and other technologies. This Privacy Policy does not cover the use of cookies by any third parties, and we aren't responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services
- If you use our Services from a mobile device, that device will send us data about your location based on your phone settings.

#### **How Do We Use The Information We Collect?**

We use the information we collect to:

- Deliver and improve the Services and your overall user experience.
- To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.

- To link or combine user information with other Personal Information.
- To compare and verify information for accuracy and update our records.
- To validate information from users for identity verification, including verification for AML and KYC protocols.
- Email, text, message, or otherwise contact you with information and updates about us and the Services, and respond to your comments and questions, if you've provided us with the means to do so.
- On a de-identified, aggregated basis, analyze how you use the Services with tools such as Google Analytics and other tools to help us understand traffic patterns and know if there are problems with the Services.
- Create targeted advertising to promote the Services and engage our users.

### **Do We Share Your Personal Information?**

We do not rent, sell, or share your Personal Information with other people or non-affiliated third parties except with your consent or as necessary to complete any transaction or provide any service you have requested or authorized, as set forth below.

To help us do our work, we may provide limited access to some of your Personal Information to the following third parties:

- **Partners:** Sometimes we collaborate with other organizations, including our broker-dealer, to deliver the Services. In these cases, we may share your name, contact information and other details you provided when making an account with our partners.
- **Affiliates:** We may share your information with our affiliates and/or subsidiaries.
- **Service Providers:** We work with a wide range of third party providers, notably our database administrators, cloud computing services, advertising services, data analysts, application service providers, and other non-governmental organizations.
- **Payment processors:** We work with payment processors such as Stripe and Plaid to help process credit card transactions and other payment methods made through the Services. These payment processors will store certain information about you. Please refer to their privacy policies to learn more about how they use your Personal Information.

We may store your Personal Information and other information, such as suitability information and accreditation, investment experience, user survey responses, in our databases or any information that is necessary to enable us to operate effectively and deliver our services to you. We collect financial account information or card payment information either directly or through our partners or service providers, and we may collect information to verify your income or net-worth. Please note that we do not store your card payment information, but we do store other financial information. We may also transfer your Personal Information to a third party as a result of a merger, acquisition, reorganization or similar transaction; when required by law or to respond to legal process; to protect our customers; to protect lives; to maintain the security of the Services; and to protect the rights or property of Otis Wealth. In such event, and to the extent legally permitted, we will notify you and, if there are material changes in relation to the processing of your Personal Information, give you an opportunity to consent to such changes. Any third party with whom we share your data with will be required to provide the same or equal protection of such data as stated in this privacy policy.

## **Protection of Otis Wealth and Others**

We will also share Personal Information with companies, organizations or individuals outside of Otis Wealth if we have a good-faith belief that access, use, preservation, or disclosure of your Personal Information is reasonably necessary to detect or protect against fraud or security issues, enforce our terms of use, meet any enforceable government request, defend against legal claims, or protect against harm our legal rights or safety.

## **How Do We Use Tracking Technologies?**

A "cookie" is a small file placed on your hard drive by some of our web pages. We, or third parties we do business with, may use cookies to help us analyze our web page flow, customize our services, content and advertising, measure promotional effectiveness and promote trust and safety. Cookies are commonly used at most major transactional websites in much the same way we use them in our Services.

Even if you are only browsing the Services, certain information (including computer and connection information, browser type and version, operating system and platform details, and the time of accessing the Services) is automatically collected about you. This information will be collected every time you access the Services and it will be used for the purposes outlined in this Privacy Policy.

You can prevent or limit the usage of cookies collected from your device. An easy way of doing this is often to change the settings in your browser. If you do that you should know that (a) your use of the Services may be adversely affected (and possibly entirely prevented), (b) your experience of this and other sites that use cookies to enhance or personalize your experience may be adversely affected, and (c) you may not be presented with advertising that reflects the way that you use our and other sites. You find out how to make these changes to your browser at this site: [www.allaboutcookies.org/manage-cookies/](http://www.allaboutcookies.org/manage-cookies/). Unless you have adjusted your browser settings so that it will refuse cookies, our system will send cookies as soon as access our Services. By using the Services, you consent to this, unless you change your browser settings.

Web beacons may be used to track the traffic patterns of users from one page to another in order to maximize web traffic flow. Our third-party advertising service providers may also use web beacons to recognize you when you visit the Site or access the Services and to help determine how you found the Services. If you would like more information about this and to know your choices about not having this information used by these companies, please visit: the Digital Advertising Alliance's website, <http://www.aboutads.info/>, or the Network Advertising Initiative's website, [http://networkadvertising.org/consumer/opt\\_out.asp](http://networkadvertising.org/consumer/opt_out.asp).

## **How Do We Secure Your Personal Information?**

Your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

## **Your Choices Regarding Information**

You have several choices regarding the use of Personal Information on the Services:

*Changing or Deleting Your Personal Data.* All users may review, update, correct or delete the Personal Information furnished by a user in their user account (including any imported contacts) by contacting us at [help@otiswealth.com](mailto:help@otiswealth.com) or by accessing your user account. For your protection, we may only share and

update the Personal Information associated with the specific email address that you use to send us your request, and we may need to verify your identity before doing so. We will try to comply with such requests in a reasonably timely manner. If you completely and permanently delete all of your Personal Information, then your user account may become deactivated. If you wish to cancel your account, you may do so by emailing [support@otiswealth.com](mailto:support@otiswealth.com), and any personally identifiable information associated with your account will be deleted as soon as is reasonably practical or as required by applicable law. Please note that we may retain information that is otherwise deleted in anonymized and aggregated form, in archived or backup copies as required pursuant to records retention obligations, or otherwise as required by law. We may retain an archived copy of your records as required by law or for legitimate business purposes.

*Download or Access Personal Information.* You can ask us for a copy of your Personal Information and can ask for a copy of Personal Information you provided in machine readable form by emailing us at [help@otiswealth.com](mailto:help@otiswealth.com).

*Opting Out of Email Communications.* We may use some of the information we collect for marketing purposes, including to send you promotional communications about new Otis Wealth features, products, events, or other opportunities. If you wish to stop receiving these communications or to opt out of use of your information for these purposes, please follow the opt-out instructions, such as clicking "Unsubscribe" (or similar opt-out language) in those communications. You can also contact us at [help@otiswealth.com](mailto:help@otiswealth.com) to opt out. Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our terms of service or privacy policy.

### **Links to Third Party Websites**

We may provide links to other websites. We have no control over these websites, and they are subject to their own terms of use and privacy policies. As such, we do not endorse and are not responsible for the availability of, or for any content, advertising, products, or other materials on or available from, these third party websites. By using the Services, you agree that we will not be liable for any damage or loss caused by your use of or reliance on any content, advertising, products, or other materials on or available from these third party websites.

### **How We Respond to Do Not Track Signals**

Your browser settings may allow you to automatically transmit a Do Not Track signal to websites and other online services you visit. We do not alter our practices when we receive a Do Not Track signal from a visitor's browser because we do not track our visitors to provide targeted advertising. To find out more about Do Not Track, please visit <http://www.allaboutdnt.com>.

### **Third Party Direct Marketing**

We do not share personal data with third parties for their directly marketing purposes without your consent.

### **A Note to Users Outside the United States**

Otis Wealth is based in the United States. The Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In

certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.

**Contact Us**

If you have any questions about this Policy, your Personal Information, or the Services, you can contact [help@otiswealth.com](mailto:help@otiswealth.com).