

Privacy Policy

Introduction

The Tradier Brokerage, Inc. (“Tradier”, “Company”) Privacy Policy is intended to inform you of Tradier’s policies and practices regarding the collection, use, and disclosure of any information you submit to Tradier through the Company’s website at brokerage.tradier.com. By opening an account with Tradier and accessing the Company’s website, you agree that your use of Tradier’s services, tools, and any dispute over the Company’s policies will be governed by this Privacy Policy.

Tradier is committed to protecting your privacy online. The Company recognizes the need for appropriate protection and management of any information you share with the Company. As such, Tradier respects your privacy, particularly with regard to the storage, access, and use of personally identifiable data collected online. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires Tradier to tell you how the Company collects, shares, and protects your personal information. The Company will maintain your personal information in a secure format and, except, as set forth herein, at no time will the Company permit anyone to access your confidential information. Please read this notice carefully to understand what Tradier does with respect to privacy.

Why does Tradier collect customer information?

There are several important reasons why Tradier collects information when you open an account. The information the Company gathers is necessary to communicate with you about your account, to process transactions for you, and to comply with federal and state laws, including tax and anti-money laundering laws. Additionally, Tradier collects information to help the Company safeguard your assets. Furthermore, Tradier may choose to gather information to help the Company assess your needs and preferences.

What information does Tradier collect?

Information Tradier collects directly from you:

The information Tradier collects directly from you is referred to as “Personally Identifiable Information” (“PII”). PII is defined as information that identifies a specific customer by non-public information that is associated with the customer. Such information that the Company collects directly from you includes, but is not limited to, information required to communicate with you and to uphold expectations as an introducing broker-dealer. Such information may include your name, mailing address, email address, home phone number, mobile phone number, Social Security number, date of birth, and/or your employer’s name and address. Federal law requires Tradier to assess your suitability for trading in a margin account. Therefore, the Company may also collect, but is not limited to, your approximate annual income and net worth in order to reasonably determine whether your financial position is suitable for trading in a margin account. Additional demographic information Tradier may collect includes, but is not limited to, the following: gender, education, occupation, trade experience, and investment objectives.

Information Tradier collects indirectly from you:

Tradier asks you to provide “Non-Personally Identifiable Information” (“NPII”) defined as information that is not associated or linked to PII and does not permit the identification of individual persons by itself. This information aids the Company in anticipating the needs and requests of its customer base to ensure the Company is always making efforts to satisfy requests. The NPII information Tradier collects indirectly from you includes, but is not limited to, your Internet Protocol (“IP”) address, browser type, operating system, Internet Service Provider (“ISP”), time stamps, transactions placed, products or services used, referral site(s), and banner ads you click through. Through the use of cookies, which are small pieces of information that a website sends to your computer’s hard drive while you are viewing that website, Tradier is able to indirectly collect information of this sort. Cookies

provide operational data that enable the Company to better understand your interaction with the Company's website and the services the Company provides, in order for the Company to troubleshoot and improve security and navigation on an as-needed basis. The Company reserves the right to share this NPII with any of its authorized third-party service providers (collectively referred to as "third parties") to measure the overall effectiveness of Tradier's online advertising, content, and distribution.

When does Tradier collect information?

You directly provide the majority of the information Tradier collects when you perform various actions on the Tradier website and use the products and services offered by the Company and/or its affiliate company.

Listed below are some of the specific means in which Tradier collects information directly from you:

- When you start the new account application
- When you agree to customer agreements
- When you read the Company's policies and disclosures
- When you place a trade
- When you access the website, trade platform, and other tools
- When you send us an email with questions or comments
- When you voluntarily submit information in response to a promotion or special offer

Listed below are some of the specific means in which Tradier collects information indirectly from you:

- When we analyze your usage of our website
- When we provide products and services to you
- When we obtain information from other sources such as credit agencies, affiliates, and business partners

How does Tradier use your personal information?

A primary goal of Tradier is to have long-term relationships with its customers, and the Company understands that upholding the trust of its customers is critical to achieving that goal. Therefore, Tradier uses personal information only as appropriate to provide you quality service and security. The Company may use the information collected from you to verify your identity and contact you. Additionally, Tradier may use this information during the process of establishing your trading account, issuing an account number, issuing a username and password, maintaining necessary records of your portfolio and trading activity, and contacting you regarding account-related information, as well as other support services the Company offers to its customers. The Company may also use demographic information on its customers provided by other third parties in order to develop new products, support new lines of business, and establish new services for customers.

Customers should be aware that there are published regulatory requirements that request that customer information be retained and accessible by broker-dealers for a specified period of time after an account is closed.

What does Tradier share with affiliated companies?

The purpose of the Tradier Privacy Policy is to affirm that customer privacy is at the forefront of the Company's commitment to maintain a superior level of trust with its customers. Thus, the Company does not sell, license, lease or otherwise disclose your personal information to any third party for any reason other than the purposes described below:

- The Company may disclose personal information in order to administer or process a transaction, product or service you have authorized or requested, or in the context of facilitating the settlement of a transaction. An applicable example of this could be if Tradier is required to deliver personal information about you to third parties for certain investments, as well as validating customer identities when performing electronic transfers of funds and wires.

- The Company may disclose personal information about you to third parties or to government entities as required by law or regulation, or in response to mandatory legal requests.
- The Company may disclose personal information when necessary to protect your rights and property as a Tradier customer, or that of Tradier.
- The Company may share information with third parties that you have identified as having a commercial relationship with you during or after your account opening.
- The Company may disclose personal information to help the Company improve its services to you. In that regard, Tradier may engage another business, such as its clearing company, to help the Company carry out certain internal functions such as, but not limited to, account processing, fulfillment, retention requirements, or other data collection activities relevant to our business.
- The Company may disclose customer information from its database and admin systems to help the Company analyze and identify the needs of its customer base. In doing so, Tradier is equipping the Company with the means to notify customers of products and service offerings that may be of interest to them. It is important to note that the information shared still adheres to the overall model of Tradier's Privacy Policy, therefore it is limited to only facilitating the execution of the task at hand.
- The Company may disclose customer information to a purchaser of its capital stock, business or assets or to an affiliate-successor.
- The Company may disclose personal information should you decide to participate in certain promotions and special offers due to the fact that the promotion may require the Company to gather and share your personal information, such as supplying personal information to the promotion sponsor, which may be a third party or the Company's affiliate company. For example, it is common practice for a referral program to require that the Company provide your name as a reference to a prospective customer. You should understand that if at any time should you choose to purchase a product or service offered by another company, any personal information you share with that company would no longer be under the jurisdiction of Tradier's Privacy Policy.
- The Company uses Plaid Technologies, Inc. ("Plaid") to gather End User's data from financial institutions. By using the Company's services, you grant Tradier and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid Privacy Policy, which can be viewed at <https://plaid.com/legal/#privacy-policy>.

All third parties with whom Tradier shares personal information have their own privacy policies, and while they are expected to protect personal information in a manner that aligns respectively with the protocols described in Tradier's Privacy Policy, you should visit their website(s) to view their respective privacy policies.

If Tradier proposes to share customer information in a manner not covered in this Privacy Policy, it is the Company's responsibility to notify you of this change by making an updated Privacy Policy available to you on the Tradier website, as well as notifying you via email that an updated Privacy Policy is available for review.

Can you opt-out of sharing personal information with non-affiliated third parties for marketing purposes?

The Company does not share information with non-affiliated third parties for marketing purposes unless the Company has record of your prior consent. Therefore, there is no need to opt-out. You may respectively decline to share your information if and when there is a time that the Company requests your consent before disclosing any information to a non-affiliated third party.

Can you opt-out of receiving marketing information?

Yes. If you opt-out of marketing emails regarding news about new products and services, Tradier will always honor your request. However, from time to time, Tradier needs to send you certain notifications that contain important information about your account, such as changes to your account information, and due to the important, sometimes time-sensitive, nature of these notifications we cannot prevent the delivery of these message via an

opt-out feature. If you want to opt-out of receiving all direct marketing communication from Tradier, you can send an email to service@tradierbrokerage.com with the word “unsubscribe” in the subject line. You will receive an email confirming your desire to opt-out of all direct marketing communication from Tradier.

Should you unsubscribe from all direct marketing communications, you acknowledge that you are no longer going to be notified of additional product and service offerings or inquiries. An opt-out election must be made for each separate account you hold at Tradier.

Does this Privacy Policy apply to links out to other websites?

Tradier is not responsible for the privacy policies or the content of websites the Company links out to. The Company has no governance over the use or protection of information provided by you when visiting those websites, nor any control over the information collected by those websites. If you elect to link to a co-branded website or to a linked website, you may be asked to provide registration or other information. The information you provide to that website is not under the jurisdiction of the Tradier Privacy Policy, and therefore you should read their privacy policy.

How does Tradier protect personal information?

Tradier takes the safety of its customer data very seriously and employs industry standard measures to ensure data is protected from being accessed by any unauthorized persons. Any access to customer data by Company employees is strictly controlled and audited. The Company utilizes multiple layers of firewalls, network segregation, intrusion prevention, and password policies to prevent a security breach or violation by unauthorized parties. The Tradier website requires a secure layer of authentication. A customer must log in with their brokerage credentials in order to access their account information or place a trade. The brokerage credentials are transmitted directly to the brokerage without any intermediate storage in the web application. Any communication between employees of the Company and a customer regarding sensitive, private information requires authentication of the customer’s identity, such as the customer’s account number.

All communication with the Tradier website is encrypted with Transport Layer Security and sent over a secure channel.

How does Tradier use information collected from Cookies and/or other tracking techniques?

PII or otherwise sensitive, private customer information (such as account number, username, or password) are not contained in the cookies used by Tradier. The Company and the customer may use both session cookies, which expire once you close your web browser, and persistent cookies, which stay on your computer until you delete them, to provide you with a more personal and interactive experience with Tradier.

The Company uses cookies for marketing purposes, to collect information about customers’ identities as they interact with the website and trading platform, and to manage personalized settings on the website. Cookies provide a convenience factor for customers by creating a more streamlined login process, keeping track of transactions, and preserving order information between sessions. The information collected from cookies is used to improve the functionality of Tradier by avoiding duplicate data entry when appropriate, facilitating navigation, increasing the relevance of content and enhancing security.

You can set your browser to alert you when a cookie is being used, the duration of the cookie, and to inform you of where your information is being returned. You then have the opportunity to accept or reject the cookie. Additionally, you may set your browser to refuse all cookies or accept only cookies returned to the originating servers. Persistent cookies can be removed by following your Internet browser’s help directions. Customers may generally disable the cookie feature on their browser without affecting their ability to use Tradier’s website, however there are exceptions where cookies are used as an essential feature to allow the successful completion of a customer action. Disabling cookies may limit your use of many convenience features offered by Tradier.

The Company uses cookies to assist Tradier in securing your trading activities, to enhance the performance of Tradier's website, and to offer any special services that may pertain to you. The Company may share website usage information about visitors to approved and reputable advertising companies for improved advertisement targeting on Tradier's website and on other sites. For this purpose, pixel tags may be used to note the pages you've visited. It should be noted that information collected by the advertising companies through the use of these pixel tags is not PII, and that the advertising companies have their own privacy policies. To improve the Tradier website and services offered to you, the Company may use a third party to track and analyze usage, traffic volume, and other statistical information, such as page requests, customer initiated actions, and click-through paths. Customer data that is collected for the purpose of tracking and analyzing customer behavior on the Tradier website and through the use of Tradier's products is property of Tradier. Furthermore, Tradier, Inc, the Company's Parent Company and affiliate, may collect customer data for the purpose of tracking and analyzing customer behavior on their platforms, mobile applications, and websites that Tradier may use to further improve the Company's website and services offered to you.

Can customers update their information?

You can review, change, or correct any of your PII at any time. You are responsible for maintaining the accuracy and completeness of your personal and investment information. The Company encourages you to review your information regularly to ensure it is up to date. If you have any questions regarding your customer information or believe there to be incorrect information, please directly contact Tradier's Customer Support Team at service@tradierbrokerage.com.

What if there are changes to this Privacy Policy?

The Company reserves the right to modify this Privacy Policy at any time. Therefore, Tradier encourages you to review it frequently. If Tradier makes material changes to this Privacy Policy, the Company will post the updated Privacy Policy to the Tradier website (www.Tradier.com) and send you an email notification. The Company will note the date of the most recent Privacy Policy in the document footer.

How can I contact Tradier with questions regarding this Privacy Policy?

If you have any questions, complaints, or comments, please email Tradier directly at service@tradierbrokerage.com or address the Tradier Compliance Department at 11016 Rushmore Dr., Suite 350, Charlotte, NC 28277.

Privacy Policy

Apex Clearing Corporation (“Apex”) carries your account as a clearing broker by arrangement with your broker-dealer or registered investment advisor as Apex’s introducing client. At Apex, we understand that privacy is an important issue for customers of our introducing firms. It is our policy to respect the privacy of all accounts that we maintain as clearing broker and to protect the security and confidentiality of non-public personal information relating to those accounts. Please note that this policy generally applies to former customers of Apex as well as current customers.

Personal Information Collected

In order to service your account as a clearing broker, information is provided to Apex by your introducing firm who collects information from you in order to provide the financial services that you have requested. The information collected by your introducing firm and provided to Apex or otherwise obtained by Apex may come from the following sources and is not limited to:

- Information included in your applications or forms, such as your name, address, telephone number, social security number, occupation, and income;
- Information relating to your transactions, including account balances, positions, and activity;
- Information which may be received from consumer reporting agencies, such as credit bureau reports;
- information relating to your creditworthiness;
- Information which may be received from other sources with your consent or with the consent of your introducing firm.

In addition to servicing your account, Apex may make use of your personal information for analysis purposes, for example, to draw conclusions, detect patterns or determine preferences.

Sharing of Non-public Personal Information

Apex does not disclose non-public personal information relating to current or former customers of introducing firms to any third parties, except as required or permitted by law, including but not limited to any obligations of Apex under the USA PATRIOT Act, and in order to facilitate the clearing of customer transactions in the ordinary course of business.

Apex has multiple affiliates and relationships with third party companies. Examples of these companies include financial and non-financial companies that perform services such as data processing and companies that perform securities executions on your behalf. We may share information among our affiliates and third parties, as permitted by law, in order to better service your financial needs and to pursue legitimate business interests, including to carry out, monitor and analyze our business, systems and operations.

Security

Apex strives to ensure that our systems are secure and that they meet industry standards. We seek to protect non-public personal information that is provided to Apex by your introducing firm or otherwise obtained by Apex by implementing physical and electronic safeguards. Where we believe appropriate, we employ firewalls, encryption technology, user authentication systems (i.e. passwords and personal identification numbers) and access control mechanisms to control access to systems and data. Apex endeavors to ensure that third party service providers who may have access to non-public personal information are following appropriate standards of security and confidentiality. Further, we instruct our employees to use strict standards of care in handling the personal financial information of customers. As a general policy, our staff will not discuss or disclose information regarding an account except; 1) with authorized personnel of your introducing firm, 2) as required by law or pursuant to regulatory request, or 3) as authorized by Apex to a third party or affiliate providing services to your account or pursuing Apex’s legitimate business interests. *Member FINRA, NYSE and SIPC 05/2019*

Access to Your Information

You may access your account information through a variety of media offered by your introducing firm and Apex (i.e. statements or online services). Please contact your introducing firm if you require any additional information. Apex may use “cookies” in order to provide better service, to facilitate its customers’ use of the website, to track usage of the website, and to address security hazards. A cookie is a small piece of information that a website stores on a personal computer, and which it can later retrieve.

Changes to Apex's Privacy Policy

Apex reserves the right to make changes to this policy.

How to Get in Touch with Apex about this Privacy Policy

For reference, this Privacy Policy is available on our website at www.apexclearing.com. For more information relating to Apex’s Privacy Policy or to limit our sharing of your personal information, please contact:

Apex Clearing Corporation

Attn: Compliance Department 350 N. St. Paul St., Suite 1300

Dallas, Texas 75201

214-765-1055