



## Earlytrade - Privacy Policy (USA)

Earlytrade is committed to protecting the privacy and security of your Personal Information. The information you share, or that that we collect about users or companies is used to improve the experience you have with the Earlytrade service and to improve the accessibility of our service.

Earlytrade has a Privacy Program to ensure the Personal Information we collect is secure and properly handled. Our Privacy Policy sets out how we collect, use, store and disclose your personal information. In this Privacy Policy, 'us' 'we' or 'our' means Earlytrade Inc. and our related bodies corporate and covers our processing activities as a data controller.

### CCPA Principles

While operating across multiple US jurisdictions and not falling under its scope, Earlytrade's intent is to align with the key principles and rights set out in the California Consumer Privacy Act (CCPA). Enacted in 2018 and effective from 2020, this influential law ensures personal data is used with transparency, purpose limitation, and gives priority to the rights of the person providing personal data. The CCPA sets out the privacy rights for consumers, including:

- The right to know about the personal information a business collects about them and how it is used and shared;
- The right to delete personal information collected from them (with some exceptions);
- The right to opt-out of the sale or sharing of their personal information;
- The right to non-discrimination for exercising their CCPA rights;
- The right to correct inaccurate personal information that a business has about them;
- The right to limit the use and disclosure of sensitive personal information collected about them.

### How Earlytrade collects personal data

- **Personal data you provide to Earlytrade.** When you register for our platform and service, use it or correspond with us; when you contact us through our website, or live chat functions; or when applying for employment, we retain appropriate data in line with the earlier described principles.
- **Automatically collected data.** As you use Earlytrade's platform we will collect technical data such as IP address, browser type and usage details. This can be used for security purposes, logged for audit and analysis and to inform us of what we should improve or enhance.

### Why Earlytrade collects and processes personal data

*We are careful about how we use your information. We use it to deliver our services as well as to understand your needs when improving them.*

We may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use our website and services;
- to operate, protect, improve and optimize our website and service and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and the information requested by you;
- to enable us to verify your identity for user account administration purposes;
- to send you marketing and promotional messages and other information that may be of interest to you;
- to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us;



- managing our website, services and other commercial arrangements with you or your organisation;
- understand customer needs and offer products and services to meet those needs;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- to consider or contact you about your employment application.

There is no obligation on you to provide your personal information to us but if you choose not to, it may affect your ability to use our website or services.

Modern technologies let us combine information we have about you and our other users, for example, transaction information, with data from other sources, such as third-party websites or financial information providers. We analyze this data to learn more about you and our other users, and how to improve our services. This may involve use of third-party analytics or infrastructure providers.

### **What Earlytrade collects and processes**

*We collect information about you when you use our products or services, or deal with us. We may also collect information about you from other organizations.*

Information we collect from you:

We collect personal information about you when you use our products or services, or deal with us in some way. This includes collecting information when you:

- Register an account
- Contact us - for example, when you call, chat or email us
- Visit our websites or use our apps
- Apply for employment

We may collect the following types of personal information:

- Name;
- email address;
- telephone number and other contact details;
- job title and corporate address
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app;
- any other information you provide to us through customer surveys; or
- any other personal information that may be required in order to facilitate your dealings with us.

We may collect these types of personal information either directly from you, or from third parties. We may collect this information when you:

- register on our website or app;
- submit any applications or other forms online, by email, in hard copy format or verbally with our staff;
- communicate with us through correspondence, chats, email, surveys or when you share information with us from other social media applications, services or websites;
- interact with our sites, services, content and advertising; or
- invest in our business or enquire as to a potential purchase in our business.



In addition, when you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from applicable privacy legislation.

### **Legal basis for processing personal data**

Public Earlytrade assets such as the website are offered for the purpose of helping you determine whether you would like to enter a contractual relationship with us. Only typical log information exposed in browsing, such as IP address, is relied upon to ensure the security and stability of our assets.

#### *Using our website*

We may collect personal information about you when you use and access our website. While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer. We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other devices. They enable the entity that put the cookie on your device to recognize you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so. We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

#### *Using our secure platform*

The secure Earlytrade platform is provided on the lawful basis of consent, once you or your employing organization have entered a contract with us, or registered for the platform and agreed to the terms and conditions.

### **Data Retention**

Earlytrade will only keep the information for as long as it is required. This includes the duration of your time using the platform, plus any period during which we may need details to support audit or viewing of history. This will not exceed 7 years.

### **Children**

We offer our services only to those over the age of 18 and of capacity to enter a contractual relationship. If you are below this age you should seek consent from a parent or cease using the Earlytrade site, as publicly exposed information may be captured and logged.

### **Special categories of personal data**

"Special Category Data" refers to personal data about a person relating to race, politics, religion, genetics or biometrics, health, sex or sexual orientation. If we need this type of information from you, we'll ask for your permission and explain why we want it — except where otherwise allowed by law.

### **Direct Marketing**

We may send you direct marketing communications and information about our service. This may take the form of email, SMS, mail or other forms of communication, in accordance with the CAN-SPAM Act and the CCPA. You may opt-out of receiving marketing materials from us



by contacting us using the details set out below or by using the opt-out facilities provided (e.g. an unsubscribe link).

**Disclosure**

We may disclose personal information for the purposes described in this privacy policy to:

- our employees and related bodies corporate;
- our customers, in circumstances where that personal information was originally provided to us by that customer;
- our third-party infrastructure hosting and technology providers;
- professional advisers, dealers and agents;
- our existing or potential agents, business partners or partners;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website or notifying you by email. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy. Your continued use of our services constitutes acceptance of any changes to this Privacy Policy.

**Disclosure of personal information outside the United States**

Sometimes, we may need to send your personal information outside the United States to our service providers located overseas, including in the Australia for some of the purposes listed above. You consent to our disclosure of your personal information outside of the United States as set out in this Privacy Policy. If we do this, we ensure that only the necessary personal information required to facilitate the services is provided, and we take reasonable steps to ensure that any overseas recipient will deal with this personal information in a way that is consistent with the CCPA principles.

**Security**

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. Here are some of the things we do to protect your information:

Employee training	We train our employees on how to keep your information safe and secure.
Secure handling and storage	Where we send information overseas or use third parties that handle or store data, we put arrangements in place to protect your information.
System security	When you log into our website or apps, we encrypt data sent from your computer to our systems so no one else can access it. When storing your data in our system we encrypt it.  When we send your electronic data to other organizations we use secure networks and/or encryption.

**Links**

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated



otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

### **Your rights as a data subject**

“Data Subject” means the person whose personal data is being processed, and we use the term ‘you’ in this document to refer to the data subject. In particular, you may:

- Request access to your personal data. This lets you have a copy of your personally identifiable data and check we are processing it within the bounds of what we’ve said in this policy.
- Request correction of your personal data. We will then correct any incomplete or incorrect information relating to you.
- Request erasure of your personal data.
- Object to processing of your data, ask for processing to be restricted, or request erasure of your personal data. See ‘Withdrawing or modifying consent’ below.

We will facilitate your rights over your personal data when you contact us on the Contact Details provided at the end of this policy. We will need to confirm your identity before actioning these requests.

### **Withdrawing or modifying consent**

Consent to utilize your own personal data may be withdrawn at any time by contacting Earlytrade. In the event of a current contract or transaction being in place, it may be necessary to provide alternative contact details (which do not need to be personally identifiable) in order to ensure contractual obligations can be met, including obligations on us to inform a registered user of particular events.

### **Complaints**

If you have a concern or wish to make a complaint about the privacy or handling of your personal information, contact one of our customer service teams or our privacy contact below. We’ll look into the issue and try to fix it promptly. We’ll provide a reference number for the complaint, and contact details for whom you can contact for updates.

If you’re not satisfied with how we handled your complaint, we will provide you with information on other steps you can take or you can contact the Federal Trade Commission (ftc.gov).

### **Contact details**

For further information about our Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

Privacy Officer, Earlytrade Inc.  
16192 Coastal Highway, Lewes, DE 19958  
[privacy.us@earlytrade.com](mailto:privacy.us@earlytrade.com)

### **Changes to the Privacy Policy**

From time to time we may change this policy. This policy will always be available at <https://www.earlytrade.com/privacy/us> and the latest effective date will be displayed at the top of the policy.

### **Definitions**

“Data Subject” means the person whose personal data is being processed.



**“Personal Data”** means information relating to a living, identifiable person. It can include details such as name, address, phone number, email etc., or other particulars that can be combined to identify a specific person.

**“Special Category Data”** means personal data about a person relating to race, politics, religion, genetics or biometrics, health, sex or sexual orientation.

**“Processing”** refers to Earlytrade engaging in activities using the data, including collection and storage.

*Effective Date: September 21, 2023*