

## 1. Information We Collect

ClearingGateway provides record keeping for financial institutions and must obtain certain personal information about you. This information is necessary for us to provide investment services to you; in fact, we are required by law to obtain most of this information. Also, we want you to understand that in order to provide our services to you, we must disclose some of your personal information to certain third parties. This Privacy Notice is intended to inform you of our policies and procedures regarding the collection and disclosure of your personal information. It is also intended to inform you of the policies and precautions we have taken to ensure that your personal information is maintained securely and confidentially.

Information we collect from you: During the registration process we obtain certain nonpublic personal information from you, including your name, your address and telephone number, your social security number, your birth date, your email address, your bank account number and routing information, and information about your income, investing goals, and risk tolerance. You can always update any of your personal information by clicking the "Edit Profile" option under the "Portfolio" tab on this website.

Information we receive from Partner Websites: If you become a ClearingGateway member through a link from one of our partner websites, ClearingGateway may obtain, and share, certain of your personal information (for example, your name, address, telephone number, and email address) with the Partner Website. In addition, our Partners may obtain information directly from you in connection with their own online business. Any information collected by our Partners that is not related to the services ClearingGateway provides will be controlled by the Partner's own Privacy policy. Our Partners do not share any of your personal information that we share with them with anyone else and do not use the information for any improper purposes.

## 2. How We Use and Disclose Information We Collect

We use your personal information to help us service your account, to improve our services to you, to provide you with products you have requested, and to inform you about additional products or services that may be of interest to you. We also may share your personal information with our Partners/Vendors to assist us in servicing your account or providing products and services to you.

In order to meet our legal and regulatory requirements, we may occasionally disclose your personal information to the Internal Revenue Service, Securities and Exchange Commission, and other state and federal regulatory and governmental entities.

We do not and will not disclose any nonpublic personal information about our members or former members to anyone except as outlined above or as otherwise provided by law or with the prior consent of the member.

We will never sell your personal information to any third party.

Corporate Events. If ClearingGateway and/or its assets are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by ClearingGateway on the websites. In this event, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your personal information, and choices you may have regarding your personal information.

**ClearingGateway's Security and Confidentiality Policies** - We know you may be concerned about what we do to protect your personal financial information. You have our assurance that:

- We are committed to safeguarding your privacy online.
- We protect your account information by placing it on the secure portion of our website. That's why we have a login procedure. You must enter your username and password to obtain information about your account, such as investment balances and history, shopping rebates, gifts, fees, secure messages, etc. You also must enter your username and password to request trades. Please remember, you can use the Logout button located throughout the site to securely exit your account without closing your browser. Closing your browser will also log you off the system. Remember, your password should never be shared with anyone.

- We do not collect personally identifying information about you except when you specifically and knowingly provide it. We leverage a technology called "cookies" which can be used to provide tailored information from a website. A cookie is an element of data that a website can send to your browser, which may then store it on your system. We use cookies for authentication and verification purposes. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it. Please understand, however, that if you restrict the use of cookies you will be repeatedly requested to enter your username and ID when accessing your personal ClearingGateway information and you may be unable to access your account.

This website logs IP addresses for systems administration purposes. IP addresses are logged to track a user's session. This gives ClearingGateway.com an idea of which parts of our site users are visiting. We do not link IP addresses to anything personally identifiable. This means that a user's session will be tracked, but the user will be anonymous.

All of your personal information is protected and secured during all transmissions through the use of SSL encryption technology.

We offer some financial planning tools, which you can use to plan for your financial future. These tools may collect some of your personal financial information. We may use the information we collect to assist you in devising a financial plan. We also may maintain the information for you and keep you up to date on where you are in your financial plan. We do not sell or disclose your financial information to any third parties.

For additional information on the security measures we have implemented, please see the ClearingGateway FAQ page.

If ClearingGateway changes its privacy practices at any time in the future, the company will notify you by email of any such change. In addition, we will provide you an annual reminder of our privacy policies as required by law.

From time to time, ClearingGateway may request your consent for limited disclosures of personal information in order to make certain offers or promotions available to you. ClearingGateway will never disclose any personally identifiable information to anyone without your prior written consent, except as outlined in this Privacy Statement.

The ClearingGateway.com site contains links to other websites. ClearingGateway.com is not responsible for the privacy practices or the content of such websites.

### [California Consumer Privacy Act Privacy Policy](#)

#### **Information for California Residents - California Consumers' Rights and Choices**

The [California Consumer Privacy Act of 2018](#) (CCPA) gives consumers more control over the personal information that businesses collect about them and the [CCPA regulations](#) provide guidance on how to implement the law. This landmark law secures new privacy rights for California 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; and
- The [right to non-discrimination](#) for exercising their CCPA rights.

In November of 2020, California voters approved [Proposition 24, the CPRA](#), which amended the CCPA and added new additional privacy protections that began on January 1, 2023. As of January 1, 2023, consumers have new rights in addition to those above, such as:

- The [right to correct](#) inaccurate personal information that a business has about them; and
- The [right to limit](#) the use and disclosure of sensitive personal information collected about them.

[Businesses](#) that are subject to the CCPA have several responsibilities, including responding to consumer requests to exercise these rights and giving consumers certain [notices explaining their privacy practices](#). The CCPA applies to many businesses, including [data brokers](#).

You will not be discriminated against for exercising your rights under the California Consumer Privacy Act. Our privacy policy can be found at: <https://ClearingGateway.com>

### **Collection of Personal Information from California Residents.**

Categories of personal information we may have collected from California residents in the past 12 months: Identifiers, Commercial Information, Internet/Electronic Activity, Inferences

Categories of sources from which we may obtain your “Identifiers, Commercial Information, Internet/Electronic Activity, Inferences”: Described in Section 1.

The purposes for collecting your “Identifiers, Commercial Information, Internet/Electronic Activity, Inferences” include: to register you as a new investor, process and deliver your order, manage payments, fees and charges, manage our relationship with you, notify you about changes to our terms or privacy policy, ask you to leave a review or take a survey, enable you to partake in a prize draw or competition, administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), deliver relevant website content and advertisements to you, measure or understand the effectiveness of the advertising we serve to you, use data analytics to improve our website, products/services, marketing, customer relationships and experiences, and make suggestions and recommendations to you about goods or services that may be of interest to you

Categories of third parties we may sell your personal information to: We do not sell personal information to third parties.

Categories of third parties we may otherwise share your personal information with: We do not share personal information to third parties.

**Requests.** You can make requests related to your California privacy rights as follows:

By Calling ClearingGateway Customer Support: [1.877.728.3359](tel:1.877.728.3359)

By Emailing ClearingGateway Customer Support: [support@ClearingGateway.com](mailto:support@ClearingGateway.com)

Please be aware that we do not accept or process requests through other means (e.g., via fax, social media, email addresses, etc.).

When you make a request, we may ask you to provide verifying information, such as your name, email, or phone number. We will review the information provided and may request additional information via email or other means to ensure we are interacting with the correct individual. Please also be aware that making any such request does not ensure complete or comprehensive removal or deletion of Personal Information or content you may have posted, and there may be circumstances in which the law does not require or allow us to fulfill your request.

**Children.** Our Services are not directed to children, and we do not knowingly collect Personal Information from children under the age of 16. If you learn that a child has provided us with Personal Information, then you may contact us as indicated above.

**Do Not Track.** ClearingGateway does not currently take steps to respond to browsers' "Do Not Track" signals as no uniform standard to respond to such signals has been developed at this time.

You may direct any inquiries or complaints related to our Privacy Policy to [diannkozlowski@savedaily.com](mailto:diannkozlowski@savedaily.com). If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, you may contact our U.S. based third party dispute resolution provider (free of charge) at <https://www.jamsadr.com/eu-us-privacy-shield>.