

Last updated January 1, 2020

We at Encanto Squared (e2) respect your concerns about privacy. This Privacy Policy describes E2's collection and use of personal information of users of our website at www.encantosquared.com and our other services that display this Policy. This Policy describes the measures we take to safeguard the personal information, the parties with whom we may share the information, and the choices available regarding our use of the information. If you are a California consumer, for more information about your privacy rights, please see the section of this Privacy Policy called California Consumer Privacy Statement.

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COLLECTION OF PERSONAL INFORMATION

We collect personal information that our users provide to us in a variety of ways through our website and platform Services collectively referred to in this policy as the “Services”. These include the following:

- Login Credentials. You may be granted login credentials to access our Services.
- Communications. If you contact us by email, using the inquiry contact form on the Services or by postal mail, fax, or other means, we collect the personal information contained within, and associated with, your communication.

We collect personal information uploaded to our platform by E2 customers who are paid subscribers of the Services for processing on their behalf. This is “Customer Data”. This information may include information about a client’s customers, such as name, email address and financial account data, in order to perform wealth management services for those customers via the Services. E2 customers may electronically submit Customer Data to the Services or may instruct third parties (including custodians) to do so. E2 may access Customer Data except as prohibited by the license agreement between E2 and the customer, or as otherwise prohibited by law.

Automated Information Collection

When you visit our Services, some information is collected automatically. For example, when you access our Services, we automatically collect your browser’s Internet Protocol (IP) address, your browser type, the nature of the device from which you are visiting the Services such as a personal computer or a mobile device, the identifier for any handheld or mobile device that you may be using, the website that you visited immediately prior to accessing any web-based Services, the actions you take on our Services, and the content, features, and activities in which you participate on our Services.

We may collect this information automatically using technologies such as standard server logs, cookies, and web beacons. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected devices to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server.

We use automatically-collected information to administer, operate, and improve our Services and to improve the effectiveness of our marketing. You can stop certain types of cookies from being downloaded to your computer by selecting the appropriate settings on your web browser. Most web browsers will tell you how to stop accepting new browser cookies, how to be notified when you receive a new browser cookie and how to disable existing cookies. You can find out how to do this for your particular browser by clicking “help” on your browser’s

menu or by visiting www.allaboutcookies.org. Our Services are not designed to respond to “do not track” signals received from browsers.

Third-Party Web Analytics Services

Through our Services, we may obtain personal information about your online activities over time and across third-party apps, websites, devices, and other online services. On our Services, we use third-party online analytics services, such as those of Google Analytics. The service providers that administer these analytics services use automated technologies to collect data (such as email addresses, IP addresses, cookies, and other device identifiers) to evaluate, for example, the use of our Services and to diagnose technical issues. To learn more about Google Analytics, please visit <https://support.google.com/analytics/answer/6004245>.

Information from Other Sources

We may receive personal information about you from third parties and may combine this information with other personal information we maintain about you.

USE OF PERSONAL INFORMATION

We use personal information about you to:

- provide services and information that you or your organization request;
- enhance, improve, operate, and maintain our Services, programs, website, apps, and other systems and features;
- prevent fraudulent use of our Services and other systems and features;
- prevent or take action against activities that are, or maybe, in violation of our Terms of Use or applicable law;
- tailor content and other aspects of your experience on and in connection with the Services;
- maintain a record of our dealings with you; and
- perform other administrative activities.

We also may use your personal information for other purposes about which we will notify you when we request the information, and with your consent.

DISCLOSURE OF PERSONAL INFORMATION

Except as described in this Policy, we will not disclose your personal information to third parties without your consent. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

Service Providers

We disclose personal information to third-party service providers such as those used for payment processing, data storage, and processing facilities that assist us in our work. We limit the personal information provided to these service providers to that which is reasonably

necessary for them to perform their functions, and we require them to agree to maintain the confidentiality of such personal information.

Business Transfers

Personal information about our users may be disclosed and otherwise transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of E2 assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

To Protect Our Interests

We also disclose personal information if we believe that doing so is legally required, or is in our interest to protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights or property of others, or otherwise to help protect the safety or security of our Services, users of the Services or others.

YOUR CHOICES

We offer you certain choices in connection with the personal information we obtain about you. If we offer the ability to create user accounts or profiles on our Services, you may have the ability to access and update many categories of personal information that you provide to us by logging in to your account and accessing your account settings. If you wish to access or amend any other personal information we hold about you, you may contact us at privacy@encanto2.com.

To the extent such personal information is Customer Data, we will use reasonable efforts to communicate your choices to your wealth management services provider.

If you request that we delete your account on any of our Services (via a user settings page, by email, or otherwise), we will do so within a reasonable period of time (or if otherwise required by law), but we may need to retain some of your personal information in order to satisfy our legal obligations in accordance with records retention obligations, or where we reasonably believe that we have a legitimate reason to do so.

You also can unsubscribe from our marketing mailing lists by following the “Unsubscribe” link in our emails (current E2 customers will continue to receive product alerts).

DATA TRANSFERS

We may transfer the personal information we collect about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to recipients in other countries, we will protect that information as described in this Privacy Policy and will comply with applicable legal requirements providing adequate protection for the transfer of personal information to

recipients in countries other than the one in which you provided the information.

SECURITY

E2 uses reasonable security measures that are designed to protect personal information from accidental loss, disclosure, misuse, and destruction.

LINKS AND THIRD-PARTY FUNCTIONALITY

The Services may contain links to other websites, products, or services that we do not own or operate. For example, the Services may contain links to third-party sites, such as social networking services or custodial services. If you choose to visit or use any third-party sites or products or services available on or through such third-party sites, please be aware that this Policy will not apply to your activities or any information you share while using those third-party sites or any products or services available on or through such third-party sites. We are not responsible for the privacy practices of these third-party sites or any products or services on or through them. Additionally, please be aware that the Services may contain links to websites and services that we operate but that are governed by different privacy policies.

In addition, by using third-party services to log in to your E2 account or access our Services, including through our application programming interface (API), you permit such third-party service to access and use all information related to your E2 account that may be accessible to such third party service.

We encourage you to carefully review the privacy policies applicable to any website or service you visit other than the Services, or which you integrate into the Services using the API, before providing any personal information to them.

CHILDREN'S PERSONAL INFORMATION

The Services are designed for a general audience and are not directed to children under the age of 13. The Services do not knowingly collect or solicit personal information from children under the age of 13. If we learn that we have collected personal information from a child under the age of 13, we will promptly delete that information. If you believe that a child under the age of 13 may have provided us with personal information, please contact us as specified in the Contacting Us section of this Privacy Policy below.

CALIFORNIA CONSUMER PRIVACY STATEMENT

Effective: January 1, 2020

This California Consumer Privacy Statement supplements E2's Privacy Policy. It applies solely to California consumers and addresses personal information we collect online and offline. This Statement does not apply to E2 personnel, information collected about B2B personnel, or information collected, processed or disclosed pursuant to the Gramm-Leach-Bliley Act, its implementing regulations or the California Financial Information Privacy Act. Sections 2 and 3 of this Statement do not apply to job applicants.

This California Consumer Privacy Statement uses certain terms that have the meanings given to them in the California Consumer Privacy Act of 2018 and its implementing regulations (the “CCPA”).

1. Notice of Collection and Use of Personal Information

We may collect the following categories of personal information about you:

- **Identifiers:** These are identifiers such as a real name, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers, and similar technology; customer number, unique pseudonym, or user alias; telephone number and similar), online identifier, internet protocol address, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, social security number, education, and medical information. Applicable only for the purpose of managing career opportunities at E2
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, national origin, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, disability, citizenship status, and military and veteran status. Applicable only for the purpose of managing career opportunities at E2
- **Online Activity:** Internet information, including, but not limited to, information regarding your interaction with E2’s websites and applications
- **Employment Information:** professional or employment-related information. Applicable only for the purpose of managing career opportunities at E2
- **Education Information:** education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99). Applicable only for the purpose of managing career opportunities at E2
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, behavior, abilities, and aptitudes. Applicable only for the purpose of managing career opportunities at E2

We may use the categories of personal information listed above for the purposes described elsewhere in E2’s Privacy Policy. In addition, we may use these categories of personal information for certain business purposes specified in the CCPA. The following categories of Personal Information:

- Identifiers

- Online Activity

are used for

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing analytics services, or providing similar services.
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, auditing compliance
- Short-term, transient use
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

In addition, we may also use the following categories of personal information for purposes of managing career opportunities with E2: Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Online Activity; Employment Information; Education Information, and Inferences.

Our Prior Collection, Use, and Disclosure of Personal Information

We may have collected and used your personal information, as described in Section 1 above, during the 12-month period prior to the effective date of this California Consumer Privacy Statement. For the personal information collected during that timeframe, we describe below:

- (a) the categories of sources from which we may have obtained the personal information,
- (b) the categories of third parties with whom we may have shared the information, and
- (c) the categories of personal information we may have disclosed for a business purpose.

Sources of Personal Information

We may have obtained personal information about you from various sources. The following categories of Personal Information:

- Identifiers
- Online Activity

may have been obtained

- Directly from you
- From your devices, such as when you use our Services
- Our affiliates and subsidiaries
- Vendors who provide services on our behalf

Sharing of Personal Information

We may have shared your personal information with certain categories of third parties. The following categories of Personal Information:

- Identifiers
- Online Activity

may have been shared with

- Our affiliates and subsidiaries
- Vendors who provide services on our behalf
- Data analytics providers

Sale of Personal Information

E2 does not sell personal information and has not sold personal information during the 12-month period prior to the effective date of this Statement.

Disclosure of Personal Information for a Business Purpose

We may have disclosed to third parties for a business purpose the following categories of personal information:

- Identifiers
- Online Activity

California Consumer Privacy Rights

You have certain choices regarding your personal information, as described below.

- **Access:** You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed and sold about you during the past 12 months.
- **Deletion:** You have the right to request that we delete certain personal information we have collected from you.
- **How to Submit a Request.** To submit an access or deletion request, email us at privacy@encanto2.com.

Verifying Requests. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you have an account with us, we may verify your identity by requiring you to sign in to your account. If you do not have an account with us and you request access to or deletion of your personal information, we may require you to provide any of the following information: name, email address, date of contact, etc. In addition, if you do not have an account and you ask us to provide you with specific pieces of personal information, we will require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. If you designate an authorized agent to make an access, deletion or opt-out of sale request on your behalf (a) we may require you to provide the authorized agent written permission to do so, and (b) for access and deletion requests, we may require you to verify your own identity directly with us (as described above).

Additional Information. If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request. This Statement is available in alternative formats upon request. Please contact privacy@encanto2.com to request this Statement in an alternative format.

UPDATES TO THIS POLICY

We may occasionally update this Policy. When we do, we will also revise the “last updated” date at the beginning of the Policy. If we change this Policy in a manner that is materially less restrictive of our use or disclosure of your personal information, we will use reasonable efforts to notify you of the change and to obtain your consent prior to applying the change to any personal information that we collected from you prior to the date the change becomes effective. We encourage you to periodically review this Policy to stay informed about how we collect, use, and disclose personal information.

CONTACTING US

To update your preferences, update or correct your information, or submit a request, or if you have any questions or comments about this Policy, please contact us using the following contact information:

Encanto Squared

101 2nd Street, Suite 300, San Francisco CA 94105
privacy@encanto2.com