

# Privacy Statement

## We care about your personal data

ROBINHOOD Trade appreciates your visit to this website ("ROBINHOOD Trade Wealth Management Website") and your interest in our services and products. Your privacy is important to us and we want you to feel comfortable visiting our site. This privacy notice explains how and what type of personal will be collected, processed and used during and following your visits to the Vine FX Trade Website, why it is collected, with whom it is shared and your rights in this regards. Please read this notice carefully.

This privacy notice applies to any information obtained by Robinhood Trade through your use of the Robinhood Trade Website. It does not apply to any websites controlled by third parties not affiliated with Robinhood Trade that the Robinhood Trade Website may link to ("Third Party Sites"). Please review the privacy statemetns of Third Party Sites as Robinhood Trade is not responsible for and has no influence on the content or the privacy practices of Third Party Sites.

The terms of this privacy notice are subjected to any additional terms, disclaimers or other contractual terms you have entered into with Robinhood Trade such as client privacy statements or notices, and any appliable mandatory laws and regulations.

This privacy notice may be updated from time to time, please do check it on a regular basis.

# 1. Who is the data controller?

A data controller is the individual or legal person who controls and is responsible to keep and use personal data in paper or electronic files. Robinhood Trade is the data controller as defined by relevant data protection laws and regulations.

# 2. What personal data will be collected?

When you visit the Robinhood Trade Website, our web server automatically records details about your visit including:

- IP address;
- the website from which you visited us;
- the type of browser software used;
- the Robinhood Trade Website pages that you visit; and
- the date and duration of your visit to the Robinhood Trade Website

We will also collect and process various types of personal data, including:

- Surname, First Name, Title
- Address;
- Gender;
- Contact Details;
- Company Name, Business or Profession;
- Shareholder Number
- SSN
- IDs

### 3. How will we use your personal data?

- Robinhood Trade will use your personal data for the following purposes:  
for technical administration, research and development of the Robinhood Trade Website ;
- for customer and user administration and marketing;
- to maintain business relationships;
- to conduct research and analysis with regard to our business relations;
- to inform you about our events, services, products and news when you visit the Robinhood Trade Website or when you subscribe to our newsletter or mailing lists;
- to facilitate compliance with securities law, public company listing requirements and related laws and regulations;
- for fraud prevention and detection;
- to comply with any legal obligations (e.g. tax, accounting and administrative obligations)

For the purposes indicated above, we will process personal data we receive about you from public and commercial databases.

We will inform you where we require your consent to process your personal data. Otherwise, we will process your personal data to meet our legitimate business interests (including maintaining contact with clients, providing updates and information about Robinhood Trade, organizing and hosting events, and conducting market research and analysis) or where it is needed to comply with a legal obligation. In addition, we may also process your personal data to enter into a contract with you, or to perform our obligations under an existing contract with you.

Robinhood Trade respects applicable laws and regulations in its use of personal data.

## 4. Are cookies used on the Robinhood Trade Website?

Tracking technology helps us manage and improve the usability of the Robinhood Trade Website, for example by detecting whether there has been any contact between your computer and us in the past and to identify the most popular sections of the Robinhood Trade Website.

Based on a more detailed description on the usage of cookies our Cookies Management Tool helps you to manage your cookies preferences including providing consent. The link to the respective Cookies Management Tool you find below. You can withdraw your consent to the usage of certain cookies any time using the before mentioned tool.

When you save your cookie settings, they should also apply to your future visits to the Robinhood Trade Website. However, for technical reasons beyond the control of Robinhood Trade, this cannot be guaranteed. For example, if you reset your browser, delete your cookies or access the Robinhood Trade Website from another browser or device, your cookie settings may be lost. To comply with applicable laws and regulations, in some countries you may be asked to confirm your cookie settings when you first visit the Robinhood Trade Website. If you are in a country where you are automatically required to set your cookie settings, you may be asked to set them again on a future visit.

In many cases you can also control tracking technologies using your browser. Please ensure that your browser setting reflects whether you wish to be warned about and/or accept tracking technologies (such as cookies) where possible. The specific capabilities of your browser and instructions on how to use them can usually be found in the manual or help file of your browser.

Without tracking technologies the availability of the services provided by the Robinhoodr Wealth Management Website may be reduced,

## COOKIE SETTINGS

### 5. How are social media plug-ins used on the Robinhood Trade Website?

The Robinhood Trade Website uses the following social media plug-ins ("plug-ins"):

- Share button on Facebook, powered by Meta Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA;
- Tweet button, powered by Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA;
- Button Xing, operated by XING AG, Gänsemarkt 43, 20354 Hamburg, Germany;
- Share Button on LinkedIn, operated by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, United States.
- YouTube Plugin, powered by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

All social media links and plug-ins (YouTube plugin) are indicated with the brand names of the respective providers Facebook, Twitter, Xing, LinkedIn and Google ("Provider"). To increase the level of data protection and in accordance with applicable laws and regulations for plugins, we have implemented additional programs by means of a so-called consent solution. This procedure ensures that when you visit the Pothier Wealth Management Website, no direct connection of your browser to the servers of the Provider is established.

Only if you grant your consent to the data transfer in the cookie consent preferences for the YouTube plugin or by clicking the direct links for social media, your browser establishes a direct connection to the server of the respective Provider. The Provider receives the information that your browser has accessed the Pothier Wealth Management Website. The content of the plug-in or social media providers is then transmitted by the Providers directly to your browser.

If you interact with the plug-in, e.g. by playing an imbedded YouTube video, the data will be transferred directly from your browser to the Provider and saved by the Provider.

For more information on the purpose and scope of data collection, processing and use, please refer to the privacy statements below:

Facebook: <https://de-de.facebook.com/about/privacy/>

Twitter: <https://twitter.com/privacy>

XING AG: [https://www.xing.com/app/share?op=data\\_protection](https://www.xing.com/app/share?op=data_protection)

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

Google: <https://policies.google.com/privacy?hl=en-US>

## 6. Who will have access to personal data collected through the Robinhood Wealth Management Website?

We will ensure that your personal data is processed in a manner that is compatible with the purposes specified above. For the specified purposes, your personal data may be disclosed to the following parties who operate as third party data controllers:

- Other Robinhood Trade Group companies;
- Authorized agents and third party service providers.

For the stated purposes, we may also share your personal data with the following parties who operate as data processors under our instruction:

- Other Robinhood Trade Group companies;
- Authorized agents, service providers, and research analysis agencies; and
- Facilitators, consultants or experts managing communications and Robinhood Wealth Management sponsored events.

Finally, we may share your personal data in the following instances:

- With law enforcement agencies, government and regulatory bodies to meet applicable legal or regulatory obligations.

## 7. Where will collected personal data be processed?

Your personal data may be processed both inside and outside of the European Economic Area (EEA) by the parties specified above, subject always to contractual restrictions regarding confidentiality and security in line with applicable data protection laws and regulations. We will not disclose your personal data to parties who are not authorized to process them.

Whenever we transfer your personal data for processing outside of the EEA by another Robinhood Trade Group company, we will do so on the basis of the binding corporate rules (BCRs) of Robinhood Trade known as the Pothier Wealth Management Privacy Standard (PWMPS) which establish adequate protection for personal data and are legally binding on Robinhood Trade Group companies.

Where Robinhood Trade Privacy Standard does not apply, we will instead take steps to ensure that the transfer of your personal data outside of the EEA receives an adequate level of protection as it does in the EEA. You can find out what safeguards we rely upon for such transfers (for example, Standard Contractual Clauses) by contacting us as detailed below.

## 8. What are your rights in respect of your personal data?

Where permitted by applicable law or regulation, you have the right to:

- Access your personal data held about you and to learn the origin of the data, the purposes and means of the processing, the details of the data controller(s), the data processor(s) and the parties to whom the data may be disclosed;
- Withdraw your consent at any time where your personal data is processed with your consent;
- Update and correct your personal data so that it is accurate;
- Delete your personal data from our records if it is no longer needed for the purposes indicated above;
- Restrict the processing of your personal data in certain circumstances, e.g. where you have contested the accuracy of your personal data, for the period enabling us to verify its accuracy;
- Obtain your personal data in an electronic format;
- File a complaint with us and/or the relevant data protection authority; and
- object to us processing your personal data, or tell us to stop processing it (including for purposes of direct marketing).



## 9. What security measures have we implemented to protect your information collected through the Pothier Wealth Management Website?

Robinhood Trade has implemented reasonable technical and organizational security measures to protect your personal data collected by Pothier Wealth Management via the Robinhood Trade Website against unauthorized access, misuse, loss or destruction.

## 10. How do we treat electronic messages sent to and from Robinhood Trade?

All electronic messages sent to and from Robinhood Trade are protected by reasonable technical and organizational measures and may only be accessed in justified cases in line with applicable laws and regulations (e.g. court order, suspicion of criminal conduct, violation of regulatory obligations) to specific persons in defined functions (e.g. Legal, Compliance, Risk). Every step of the process, as well as the search criteria used, are logged in an audit trail. All emails are disposed of after the applicable retention period has expired.

## 11. What should you consider when sending data over the Internet?

The Internet is generally not regarded as a secure environment, and information sent via the Internet (such as to or from the Robinhood Trade Website or via electronic message) may be accessed by unauthorized third parties, potentially leading to disclosures, changes in content or technical failures. Even if both sender and receiver are located in the same country, information sent via the Internet may be transmitted across international borders and be forwarded to a country with a lower data protection level than in your country of residence.

Robinhood Trade does not accept responsibility or liability for the security of your information whilst in transit over the Internet to Robinhood Trade. In order to protect your privacy you may choose another means of communication with Robinhood Trade, where you deem it appropriate.

## 12. How long is personal data retained for?

We will not retain your personal data for longer than is necessary and we will hold it only for the purposes for which it was obtained.

## 13. How can you contact us?

If you have any queries about how we use your personal data, you can contact us by post or email via the details specified below:

Robinhood Trade  
Group Data Protection Officer  
Bowling Green  
NY 10004  
[privacy@pothierwealthmanagement.com](mailto:privacy@pothierwealthmanagement.com)

## 14. How often is this notice updated?

We regularly review this privacy notice. We will ensure the most up to date version is published here. This privacy notice was last updated on May 18, 2019.