

## Privacy Policy

### 1. Overview and Scope

This Carta Capital Markets, LLC (“CCMX”, “we”, “our”, “us”) Privacy Policy (“Privacy Policy”), effective as of December 8, 2020, outlines how we collect, use and share personal information in connection with our services, systems, websites, and apps (the “Services”). By using the Services, you represent that you have read, understood, and agree to the practices described in this Privacy Policy, in other documents and disclosures available to you on the [CCMX Regulatory Disclosures Page](#), and through your CCMX Brokerage Account profile.

For information about the collection, use and sharing of personal information in connection with the websites, applications and services provided by eShares, Inc. DBA Carta, Inc., including the website at [www.carta.com](http://www.carta.com), see the [Carta, Inc. Privacy Policy](#).

**California residents:** Please see the important information in our Notice for California Residents.

**Individuals in the European Economic Area, UK or Switzerland:** Please see our Notice for European Users.

### 2. Types of Information Collected and How We Collect Them

We may collect the following personal information you provide when you connect with our Services, such as signing up for an account, requesting a transaction, enrolling in a promotion or program, or otherwise engaging or communicating with us:

<b>Identity Data</b>	Includes your full name, date of birth, gender, and copies of government-issued identification documents.
<b>Contact Data</b>	Includes your email address, mailing address, and telephone numbers.
<b>Financial, Tax, and Identity Data</b>	Includes your bank account and payment card details, tax identification numbers, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores.
<b>Profile Data</b>	Includes your username and password, purchases or orders made by you, your knowledge assessment results, and your interests, preferences, feedback, and survey responses.
<b>Usage Information</b>	Includes information about how you access and use our Services, such as your actions on the Services, including your interactions with others on the Services, and other content you provide (“Usage Information”). We will only access the photos and camera on your device with your permission. You can disable these permissions in your device’s settings.
<b>Additional Information</b>	Includes information that you submit via focus groups, contests/sweepstakes, job applications, customer support, surveys, or other similar means. We may also collect any communications between you and CCMX and any information you provide to CCMX.
<b>Personal Information Collected Automatically</b>	Like many digital platforms, we collect personal information automatically when you visit our online services, including: <b>Location Data</b> <ul style="list-style-type: none"> <li>We may collect location data such as your device’s GPS location (when you give us permission to do so through your device’s settings), and the approximate location associated with the IP addresses used in conjunction with our Services. We may also collect information about your location where permitted by law through Wi-Fi, wireless network triangulation, or other methods in order to obtain your location.</li> </ul> <b>Usage and Device Data</b> <ul style="list-style-type: none"> <li>We, and our third-party partners, may automatically collect certain types of usage information when you visit or use our Services, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including cookies, web beacons, embedded scripts, location identifying technologies, file information, and similar technology (collectively, “Tracking Technologies”). For example, we may collect information about your device and its software, such as IP address, browser type, Internet service provider, platform type, device type, operating system, date and timestamp, a unique ID, and other similar information. From your device</li> </ul>

	<p>manufacturer, we also may collect the names of other third-party applications that you have downloaded on your device. Some browsers allow you to control whether the browser will accept or reject cookies, or notify you each time a cookie is sent - you may elect to reject cookies by adjusting your settings, but doing so will likely limit the range of features available to you. Read any information provided by your browser developer to understand the limitations of these settings. You may set your email options to prevent the automatic downloading of images or technologies that may allow us to know whether you have accessed our email, used our Services, or performed certain functions.</p> <p>For more information, see our <a href="#">Cookie Policy</a>.</p>
<b>Other Sources &amp; Third Parties</b>	We may also obtain personal information from other third-party sources including affiliates and business partners, which we may combine with other information we collect.
<b>Publicly Available Data</b>	Includes contact information, employment-related information, and other information from public sources, which we may combine with the information we collect.

### 3. How We Use Your Information

We use and process the information we collect for purposes described in this Privacy Policy or as otherwise disclosed to you on our Services or in connection with our Services. For example, we use your information to:

- **Service Delivery.**
  - Create and process your account and deliver the Services to you, including to authenticate your identity, allow you to register for the Services, participate in interactive features, billing and account management, to fulfill our legal and regulatory obligations such as obligations that apply to being a regulated broker-dealer, and other administrative matters;
  - Send you transactional information, including confirmations, statements, technical notices, product and services information and announcements, software updates, security alerts, support and administrative messages, and information about your transactions with us; and
  - Monitor, administer, and enhance our Services, including troubleshooting, data analysis, testing, research, statistical, and survey purposes.
- **Communications.** Communicate with you to respond to your comments and questions, provide customer service or feedback, conduct surveys, respond to employment opportunities for which you have applied, notify you about upcoming events, or for other purposes in connection with the Services.
- **Research and Development.** We may use your personal information for research and development purposes, including to analyze and improve the Services and our business. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Services and promote our business.
- **Marketing and Advertising.** Provide you with information via email and other channels about products and services offered by us and selected partners. We and our third party advertising partners may also use your personal information for interest-based advertising as described in the Third-Party Tracking and Online Advertising section below.
- **Compliance and Protection.**
  - Protect the rights, safety, property and security of CCMX, our affiliates, our agents, our Services, our business, our customers, our users and others, including by investigating, preventing and deterring harmful, unauthorized, fraudulent or unlawful activity;
  - Perform audits and protect or exercise our legal rights or defend against legal claims, including by enforcing and carry out contracts and agreements; and
  - Comply with applicable laws and legal obligations.

### 4. Disclosure of Personal Information

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the personal information we collect. We may share your personal information as described in this Privacy Policy,

including in the instances described below, or for other purposes with your consent. For further information on your choices regarding your information, see the “Control Over Your Information” section below.

- **Service Providers.** We share personal information with certain authorized contractors, subcontractors, third-party vendors, and service providers who help us run and protect our business. This may include sending emails, conducting business analytics, marketing, and data processing. For example, we may share personal information with service providers that identify and serve targeted advertisements or provide mailing services, tax and accounting services, web hosting, or analytics services.
- **Third-Party Advertising Partners.** We may share personal information with third party advertising partners or allow them to collect it through the services as described in the Third-Party Tracking and Online Advertising section below.
- **Affiliates.** We share personal information with companies affiliated with CCMX. These companies will use your personal information in the same way that we do under this Privacy Policy.
- **Strategic Transaction Participants.** We may share personal information in connection with a substantial corporate transaction or negotiations for such a transaction, such as a merger, consolidation, reorganization, financing, change or control or acquisition of all or a portion of our business or assets by another company or third party, asset sale, initial public offering, or in the event of bankruptcy or similar proceeding.
- **Authorities and Others.** We disclose personal information to respond to subpoenas, court orders, legal process, law-enforcement requests, legal claims, or government inquiries and for the other purposes described in the Compliance and Protection sub-section above.

## 5. Third-Party Links

Some of the Services may contain links to content maintained by third parties that we do not control. We are not responsible for the privacy practices of these third parties or the content on the third-party services, and the information practices of these third parties are not covered by this Policy. Please note that these third-party services have their own privacy policies, and we recommend that you read their privacy policies as well as terms and conditions of use to understand how they collect, use, and share your information.

## 6. Third-Party Tracking and Online Advertising

We may employ interest-based advertising and use third-party advertising companies to serve you targeted advertisements online that they believe will interest you based on your online browsing history over time on the Services and third party online services. As a self-directed broker-dealer, we do not advertise on behalf of specific securities or investment options on our Services.

Typically, though not always, the information used for interest-based advertising is collected through Tracking Technologies. For advertising, we may share a common account identifier (such as an email address or user ID) or hashed data with our third-party advertising partners to help identify you across devices. We and our third-party partners use this information to make the advertisements you see online on other platforms more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research. We are not responsible for the privacy practices of these third parties, and the information practices of these third parties are not covered by this Privacy Policy. Some of these companies are members of industry organizations that offer a single location to opt out of ad targeting from member companies. To learn more, please visit <http://www.networkadvertising.org/choices>, <https://optout.aboutads.info/?c=2&lang=EN>, or (if you are in Europe) <http://www.edaa.eu>. Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You may also be able to set your browser to delete or notify you of cookies by actively managing the settings on your browser or mobile device. Please note that some advertising opt-outs may not be effective unless your browser is set to accept cookies. If you use a different device, change browsers, or delete the opt-out cookies, you

may need to perform the opt-out task again. You may also be able to limit certain interest-based mobile advertising through the settings on your mobile device.

## **6.1. Google Analytics and Advertising**

We use Google Analytics to recognize you and link your devices and when you use our Services on your browser or mobile device, log in to your account on our Services, or otherwise engage with us. We share a unique identifier, like a user ID or hashed email address, with Google to facilitate the Services. Google Analytics allows us to better understand how our users interact with our Services and to tailor our advertisements and content to you.

For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, see “How Google uses data when you use our partners’ sites or apps” linked here: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can learn about Google Analytics’ currently available opt-outs, including the Google Analytics Browser Add-On, here: <https://tools.google.com/dlpage/gaoptout/>.

We may also use certain forms of display advertising and other advanced features through Google Analytics, such as Remarketing with Google Analytics, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics Demographics and Interest Reporting. These features let us use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your use of our Services. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>, or by visiting NAI’s online resources at <http://www.networkadvertising.org/choices>.

## **6.2 Do Not Track Signals**

Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

## **7. Control Over Your Information**

You may update or correct your profile information, such as your name, and may change some of your data-sharing preferences by emailing us at [support@cartacapitalmarkets.com](mailto:support@cartacapitalmarkets.com). You may control the mobile app’s access to your device information in your device’s settings. You can stop receiving promotional emails from us by clicking on the “unsubscribe” link within the emails. You may not opt out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Services, and technical and security notices).

If you have any questions about reviewing, modifying, or deleting your information, you can contact us directly at [support@cartacapitalmarkets.com](mailto:support@cartacapitalmarkets.com). We may not be able to modify or delete your information in all circumstances as we are subject to legal and regulatory recordkeeping obligations which may survive account closure.

## **8. Transfer of Personal Information**

Your information collected through our Services may be stored and processed in the United States or any other country in which CCMX or its parent, subsidiaries, affiliates, or service providers maintain facilities or conduct business activities. Please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data-protection laws as your jurisdiction.

## 9. Data Security and Retention

We maintain a number of physical, administrative, and technological safeguards designed to preserve the integrity and security of information collected through our Services. However, no security system is impenetrable, and we cannot guarantee that these safeguards are failsafe.

## 10. Changes to this Policy

We may change this Privacy Policy. If we make any material changes related to how we collect or use data, we will revise the "Effective Date" above and post the new Privacy Policy. To stay informed of our privacy practices, we recommend you review the Privacy Policy on a regular basis as you continue to use our Services.

## 11. How to Contact Us

If you have any questions about this Privacy Policy, please contact us at [support@cartacapitalmarkets.com](mailto:support@cartacapitalmarkets.com).

## 12. Information for California residents

**Scope.** This section applies only to California residents. It describes how we collect, use, and share Personal Information of California residents in our capacity as a "business" under the California Consumer Privacy Act ("CCPA") and their rights with respect to that Personal Information. For purposes of this section, "**Personal Information**" has the meaning given in the CCPA. However, this section does not apply to:

- Information exempted from the scope of the CCPA, including nonpublic personal information;
- Personal Information we collect from individuals acting in their capacities as representatives of organizations solely in the context of conducting due diligence regarding, or providing or receiving a product or service to or from, such organizations; and
- Personal Information we collect, use, and share on behalf of our customers as a "service provider" under the CCPA for purposes of providing our services to them.

CCMX does not sell (as such term is defined in the CCPA) the Personal Information we collect (and will not sell it without providing a right to opt out).

**Your California privacy rights.** As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
  - The categories of Personal Information that we have collected.
  - The categories of sources from which we collected the Personal Information.
  - The business or commercial purpose for collecting Personal Information.
  - The categories of third parties with whom we share the Personal Information.
  - The categories of Personal Information that we disclosed for a business purpose.
  - The categories of third parties to whom the Personal Information was disclosed for a business purpose.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

**Right to information, access and deletion.** You may submit requests to exercise your right to information, access or deletion by submitting your request [here](#) or via email to [privacy@carta.com](mailto:privacy@carta.com) or toll-free at +1-855-921-2859. We will need to verify your identity to process your information, access and deletion requests and we reserve the right to confirm your California residency. You may be required to provide government

identification, give a declaration as to your identity under penalty of perjury and/or provide additional information. If you wish to designate an authorized agent to make a request on your behalf, we will need to verify both your and your agent's identities and your agent must provide a valid power of attorney pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity, and provide us with written confirmation that you have given the authorized agent permission to submit the request. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. In certain cases, we may be required or permitted by law to deny your request.

**Personal information that we collect, use and disclose.** For each category of data described above in the "2. Types of Information Collected and How We Collect Them" section of the Privacy Policy, the list below summarizes the Personal Information we may collect by reference to the categories of Personal Information specified in the CCPA, and describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Examples of Personal Information Collected	Purpose	CCPA Categories	Source
<b>Identity Data</b>	Service delivery; communications; research and development; marketing and advertising; compliance and protection	Identifiers; California Customer Records (as defined in California Civil Code section 1798.80); sensory information	You
<b>Contact Data</b>	Service delivery; communications; research and development; marketing and advertising; compliance and protection	Identifiers; California Customer Records (as defined in California Civil Code section 1798.80); online identifiers	You
<b>Usage Information</b>	Service delivery; communications; research and development; marketing and advertising; compliance and protection	California Customer Records (as defined in California Civil Code section 1798.80); commercial information; financial information; internet of network information; online identifiers; sensory information; inferences	You; automatic collection
<b>Additional Information</b>	Service delivery; communications; research and development; marketing and advertising; compliance and protection	Commercial information; inferences	You
<b>Personal Information Collected Automatically</b>	Service delivery; communications; research and development; marketing and advertising; compliance and protection	Commercial information; internet or network information; geolocation data; inferences	Automatic collection
<b>Publicly Available Data</b>	Service delivery; communications; research and development; marketing and advertising; compliance and protection	Identifiers; California Customer Records (as defined in California Civil Code section 1798.80)	Third party sources

The categories of third parties to which we disclose these categories of Personal Information for business purposes are described in the section above entitled "4. Disclosure of Personal Information".

## 13. Notice to European Users

The information provided in this section applies only to individuals in the European Economic Area, United Kingdom and Switzerland (collectively, “Europe”) and explains our practices regarding personal information that we collect from you or which we have obtained about you from a third party and the legal basis for processing for your personal information. It also sets out your rights in respect of our processing of your personal information.

- **Personal information.** References to “personal information” in this Notice to European Users are equivalent to “personal data” governed by the General Data Protection Regulation (GDPR).
- **Controller or Processor.** Carta Capital Markets, LLC may be either the controller or processor of your personal information covered by this Privacy Policy, as stated under the heading “Types of Information Collected and How We Collect Them”.
- **EU representative.** Our EU representative’s details can be obtained by emailing [privacy@carta.com](mailto:privacy@carta.com).
- **Data protection officer.** Our data protection officer can be contacted at: Data Protection Officer, [privacy@carta.com](mailto:privacy@carta.com), eShares, Inc. DBA Carta, Inc. 333 Bush St., Floor 23, Suite 2300 San Francisco, CA 941014.
- **Legal basis for processing.** The legal bases of our processing of your personal information as described in this Privacy Policy will depend on the type of personal information and the specific context in which we process it. However, the legal bases we typically rely on are set out in the table below. We use your Personal Information only as permitted by law. Our legal basis for processing the personal information described in this Privacy Policy are described in the table below:

Processing purpose	Legal basis
Service Delivery	Processing is necessary to perform the contract governing our provision of our Services or to take steps that you request prior to signing up for the Services. If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the Services you access and request.
<ul style="list-style-type: none"> <li>● Communications</li> <li>● Research and Development</li> <li>● Marketing and Advertising</li> <li>● Compliance and Protection</li> <li>● As otherwise described in this Policy</li> </ul>	These activities constitute our legitimate interests. We do not use your personal information for these activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
Compliance and Protection	Processing is necessary to comply with our legal obligations.
With your consent	Processing is based on your consent. Where we rely on your consent, you have the right to withdraw it any time in the manner indicated when you consent or in the Services.

*Details regarding each processing purpose listed below are provided in the sections above titled “How We Use Your Information”.*

**Use for new purposes.** We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

**Sensitive personal information.** We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services, or otherwise to us.

If you provide us with any sensitive personal information to us when you use the Services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not

consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Service.

**Your rights.** You have the following rights in relation to the personal information we hold about you:

- **Right of access:** You can ask us if we are processing your personal information and to provide you with a copy of it (along with certain details). If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified.
- **Right to erasure:** You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent to our processing of your personal information (where applicable).
- **Right to restrict processing:** You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information.
- **Right to data portability:** You have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- **Right to object:** You can ask us to stop processing your personal information, and we will do so, if we are:
  - relying on our own or someone else's legitimate interests to process your personal information, unless we can demonstrate compelling legal grounds for the processing; or
  - processing your personal information for direct marketing purposes.
- **Right to withdraw consent:** If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.
- **Right to lodge a complaint with the supervisory authority:** If you have a concern about any aspect of our privacy practices, including the way we have handled your personal information, you can report it to the relevant supervisory authority. You can find your data protection regulator [here](#).

You may submit these requests [here](#) or by email ([support@cartacapitalmarkets.com](mailto:support@cartacapitalmarkets.com)) or to our postal address provided above. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions.

**Cross-border data transfer.** If we transfer your personal information out of Europe to a country not deemed to provide an adequate level of personal information protection for purposes of applicable data protection laws such that additional safeguards are required, the transfer will be performed:

- pursuant to the recipient's compliance with Standard Contractual Clauses;
- pursuant to the consent of the individual to whom the personal information pertains; or
- as otherwise permitted by applicable laws.

You may [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.