

PRIVACY POLICY

Firma Advisors LLC

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Firma Advisors LLC, an SEC-registered investment adviser, welcomes you. This FIRMA Privacy Policy (“Privacy Policy”) describes how we collect, use, protect, and disclose information and data when you use our online services (“Services”). All references to “FIRMA”, “we”, “us”, or “our” mean Firma Advisors LLC and its affiliates.

Our Services are or will be available to you primarily through our mobile application and through a variety of other platforms, including but not limited to our website located at www.firma.finance (the “Website”) or any other websites, messaging application accessible by any US or Canada-based cellular subscriber via SMS and MMS, or products, (collectively with the Website and our mobile application, the “Platform”).

This Privacy Policy applies to visitors to the Platform, who view only publicly-available content (the “Visitors”) and clients who have signed up to access and use the Services offered by FIRMA through the Platform (the “Clients”). By visiting the Platform or using our Services, you agree to the terms of this Privacy Policy.

Please note that our [Client Privacy Notice](#) applies to information that we collect about individuals who seek, apply for, or obtain financial products or services from us for personal, family, or household purposes. We encourage you to review our Client Privacy Notice, as your rights and our obligations may be different than those described in this Privacy Policy when you seek, apply for, or obtain financial products or services from us for personal, family, or household purposes.

Information We Collect or Receive

In the course of operating the Platform and providing the Services, we collect or receive the following types of information:

1. **Registration Information**

We may collect personal information when you voluntarily provide us with Personal Information as a Visitor, such as your email address when you sign up for our waitlist. When you register to become a Client, you will be asked to provide us with certain information about you, such as, your name, date of birth, social security number, Driver’s License, passport or other government identification with your image on it, citizenship, home address, telephone number, email address, bank account login credentials, bank name, whether you are a “control person” (pursuant to FINRA Rule 3210), annual income range, total net worth range, and other information as appropriate for our legitimate business needs.

2. **Card and Bank Information**

Certain features of the Services will allow you to link your bank account(s), credit card, and debit card to your FIRMA account(s) by providing your account number, billing address and similar information (collectively, the “Card and Bank Information”). Card and Bank Information may be collected and processed by one or more third parties pursuant to the terms and conditions of their respective privacy policies and terms of use.

3. Transaction Information

When Clients wish to make a purchase, sale or any other transaction through the Platform, they must provide us with certain information about the transaction they are seeking to execute. Clients that use certain features on the Services such as adding and/or updating personal assets, may provide us with access to one or more photographs on their mobile device or tablet.

4. Geolocation Information

Certain features and functionalities of the Services may be based on your location. In order to provide these features and functionalities while you are using a mobile device, we may, with your consent, automatically collect geolocation information from your mobile device, wireless carrier, or certain third-party service providers. Such information is collectively called the “Geolocation Information.” You may decline to allow us to collect such Geolocation Information, in which case FIRMA will not be able to provide certain features or functionalities to you.

5. Survey Information

We may, from time to time, ask you to participate in surveys on our Platform. Participation in these surveys is completely voluntary.

6. Other Information.

We may automatically collect or receive additional information about you, your use of our Platform, your interactions with us and our advertising, as well as information regarding your computer or other devices used to access our Platform (collectively, the “Other Information”). Such Other Information may include, but is not limited to, the following:

A. From Your Activity

We collect information about your activity on our site, including

- IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device;
- Browser type and language;
- Referring and exit pages;
- Details regarding your activity on the Platform, such as search queries and other performance and usage data.

B. About Your Device

- Type of device;

- Universally Unique Identifier (“UUID”);
- Advertising Identifier (“IDFA” or “AdID”);
- Operating system and version (e.g., iOS, Android or Windows);
- Wireless carrier; and
- Network type (WiFi, 3G, 4G, or LTE).

C. From Cookies, Web Beacons, and Other Similar Tracking Techniques

In operating the Platform, we may also use data collection and tracking tools such as web beacons, pixel tags, embedded links, cookies, and other similar tracking techniques. A cookie is a piece of information that the computer that hosts our Platform gives to your browser when you access the Platform. Our cookies help provide additional functionality to the Platform and help us analyze the Platform usage more accurately.

D. Third-Party Analytics

We may use third-party analytics services (for example, we may use Google Analytics, and others) to evaluate your use of the Platform, compile reports on activity, analyze performance metrics, and collect and evaluate other information relating to the Platform and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. For more information on these third parties, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Platform.

You may choose to opt-out of certain types of tracking and sharing of information at any time by selecting the specific partners you wish to exclude from these websites:

<http://www.aboutads.info/choices> and <http://optout.networkadvertising.org/>.

We may also collect Personal Information and information about your transactions with us and those you engage in with our affiliates, unaffiliated third parties, banking verification services and information from consumer reporting agencies. We may further collect information about you from third-party data sources, such as brokers, banks and government databases. We may combine data we collect about you from third-party data sources with data we collect from you and may use and share such data as described in this Privacy Policy. All information we collect and/or receive from such third-party sources is collectively referred to as “Third-Party Information.”

How We Use this Information

We and our service providers use the information that we collect for a variety of purposes, including:

- **Providing Our Services to You**, including to track your investments, provide trade recommendations; advise you about your portfolio and ways to save money; process trades and transactions; and to generally fulfill our contractual obligations to you.
- **Advertising and Marketing**, including to inform you about our Services and those of third parties that may be of interest to you.
- **Verifying Your Identity**, including conducting identity verification; authenticating your login credentials; verifying your location to allow access to your accounts; and storing security questions for subsequent verification.
- **Improving Our Products and Services**, including personalizing and optimizing your experience on the Platform; count and recognizes Visitors and Clients on our Platform; and perform analytics.
- **Complying with Legal or Other Requirements**, including as described below in the section titled “How We Share this Information.”
- **Using Aggregated and De-Identified Information**, including using data such as using or modifying the information described in this Privacy Policy in a manner that does not allow us to reasonably identify you. Information that has been aggregated and de-identified is no longer subject to this Privacy Policy.

How We Share this Information

We may share your information with the following third parties:

- **Affiliates:** We may share some or all of your information with any other companies that we control, are controlled by, or are under common control with us.
- **Service Providers:** We, like many businesses, sometimes hire other companies to perform certain business-related functions on our behalf. Examples of such functions include website hosting, mailing information, maintaining databases, ID verification, processing applications, processing payments and completing transactions.
- **Legal Purposes:** We may disclose your Information to government entities and others for legal purposes such as if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of FIRMA, (iii) act in urgent circumstances to protect the financial security of users of the Platform or the public against fraud or other harm, or (iv) protect against legal liability.
- **Organizational Transfers:** As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, launch of a new subsidiary, dissolution, or similar event, the Information may be part of the transferred assets and you will be notified via email and/or a prominent notice on our Platform of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.
- **Recipients of Aggregated and De-Identified Information:** We may share aggregated and de-identified information with third parties for any purpose.

Communication Preferences

When you sign up for our Services or newsletter(s), if any, we will send periodic emails to you regarding the Services or to tell you about services we believe will be of interest to you.

If at any time you wish not to receive any future newsletters or marketing communications or you wish to have your name deleted from our mailing lists, please follow the unsubscribe instructions included in these emails or contact us at info@firma.finance. We will use commercially reasonable efforts to process such requests in a timely manner. Note however that as a user of the Services we and/or our custodian(s) will send you administrative and transactional communications that are reasonably necessary to provide the Services, such as billing, brokerage or service notifications and you cannot opt out of receiving such communications.

Accessing and Modifying Information Communication Preferences

If you have provided us any Personal Information, you may access, remove, review, and/or make changes, by making the change(s) in your registered account settings page. If you experience difficulties, please contact customer support at info@firma.finance. We will respond to your request as soon as possible. Please note that customer service is notable to make changes on your account.

How We Protect Your Information

The security of your information is important to us. When you enter sensitive information (such as your social security number) in our Platform, we encrypt the transmission of that information using secure socket layer technology (SSL). All PII data is fully encrypted and tokenized by our Data Security Provider (<https://www.verygoodsecurity.com>) before reaching our system. We and our custodian also use third-party ID verification to ensure our users' true identities are validated.

We take commercially reasonable technical, administrative, and physical safeguards to protect information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such information, nor can we guarantee that the information you supply will not be intercepted while being transmitted over the Internet. In particular, email sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via email. If you have any questions about security on our website, you can contact us at info@firma.finance.

Retention of Your Information

We will retain your Information for as long as it serves the purpose(s) for which it was initially collected as stated in this Privacy Policy, or subsequently authorized. We will also retain and use your Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

If your Client relationship with FIRMA ends, we will not destroy your Information unless required or permitted by law. We will continue to treat your Personal Information in accordance with this Privacy Policy and applicable laws.

Suspicious Email

We do not email you or send you other electronic communications to request nonpublic information or account information (such as username and password). If you receive an unsolicited email or other electronic communication that appears to be from FIRMA but you suspect it may be from some other source or fraudulent, please email us at info@firma.finance.

Children

INDIVIDUALS UNDER THE AGE OF 18 ARE NOT PERMITTED TO SUBSCRIBE TO ANY OF OUR SERVICES.

We do not knowingly collect Personal Information from children under the age of 18 through the Platform. If you are under 18, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Policy by instructing their children never to provide Personal Information through the Platform without their permission. If you have reason to believe that a child under the age of 18 has provided Personal Information to us, please contact us, and we will endeavor to delete that information from our databases.

Links to Other Websites and Integration of Third-Party Content

This Privacy Policy applies only to the Platform. The Platform may contain links to other websites or services not operated or controlled by FIRMA (the "Third-Party Sites"). The policies and procedures we describe here do not apply to the Third-Party Sites. The links from the Platform do not imply that FIRMA endorses or has reviewed the Third-Party Sites. We suggest contacting those sites directly for information on their privacy policies.

In addition, we may integrate third-party content from other websites, such as YouTube videos, into the Platform. Our use of YouTube's API services subjects you to Google's Privacy Policy available at <http://www.google.com/policies/privacy> when you access YouTube content through our Services and you agree to certain of your information being collected by YouTube as applicable and in accordance with such privacy policy.

How We Handle "Do Not Track" Settings

Presently, FIRMA does not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals.

International Data Transfers

The Platform and the Services are intended for natural persons who are citizens or other lawful residents of the United States and who are located in the United States. The Platform, the Services and their servers are controlled and operated in the United States. Please be aware that your Information may be transferred

to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your country of origin. If you are located outside the United States and choose to use the Platform and/or the Services, you do so at your own risk.

Changes to FIRMA's Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes to this Privacy Policy we will notify you by email (sent to the email address specified in your account) or by means of a notice on the Platform prior to the change becoming effective. By visiting and/or using the Platform after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect such information. We encourage you to periodically review this page for the latest information on our privacy practices.

Contacting FIRMA

Please feel free to contact us if you have any questions about FIRMA's Privacy Policy or our information practices at info@firma.finance.