

# FeeX Privacy Notice for California Residents

Last Revised on August 20, 2020

For Residents of the State of California Only

Solely to the extent that the following privacy notice applies to Users of the FeeX Order Management System (either end-user(s) and/or Advisor(s) (“OMS”) and/or other FeeX Services which reside in the State of California (hereinafter the “**California Privacy Notice**” or “**Notice**”) the California Consumer Privacy Act (the “**CCPA**” or “**Act**”) provides consumers with specific rights regarding their personal information. It should be noted that personal information under the Act does not include publicly available information from governmental records and de-identified or aggregated consumer information. To the extent the CCPA is applicable, this Privacy Notice section describes your rights under the Act and explains how to exercise those rights.

The terms “**personal information**”, “**business purpose**”, “**commercial purpose**”, “**sale**” and “**service provider**” as used in this Notice have the meanings ascribed to them in the CCPA. Capitalized terms used but not defined in this California Privacy Notice will have the meanings set out in the FeeX [Privacy Policy](#) (the “**Privacy Policy**”). If there is any conflict or inconsistency between the terms of this Notice and the Privacy Policy, the terms of this Notice will govern.

## 1. CATEGORIES OF PERSONAL INFORMATION WE COLLECT FROM CALIFORNIA CONSUMERS

In the preceding 12 months, we have collected the following categories and types of personal information from California consumers, and intend to continue doing so subject to the requirements under the CCPA:

- **Identifiers**, such as First Name, Last Name, Position, Company Name, Email, Country, Phone Number.
- **Consumer characteristics**, which includes the categories of personal information described in the California Customer Records statute (California Civil Code Section 1798.80), including physical characteristics, payment information and, for employment candidates, education and employment history, and characteristics of protected classifications under California law, such as gender and age (over 40).
- **Commercial Information**, including information relating to investments preferences and strategy, such as investment priorities, choices of service providers, and other relevant commercial information provided.
- **Financial Data**, including individual retirement account(s), 401(k) plan and other workplace retirement plan accounts, brokerage accounts and mutual fund accounts, including account numbers, account access information, identity of financial service providers, investment holdings, fee billings and deductions, fee disclosure documents, purchases, sales and other transactions.
- **Technical Identifier**, such as internet and other similar network activity, such IP Address, Ad ID and website activity.
- **Inferences**, which are drawn from the above information to create consumer profiles reflecting certain preferences and behaviours and customized content/offerings.

For more information about the types of personal information we collect, please see the “Which information may we collect on our users?” section in our [Privacy Policy](#).

## **2. BUSINESS OR COMMERCIAL PURPOSE FOR COLLECTING, SHARING AND SELLING INFORMATION.**

We collect and share your personal information for the following business and commercial purposes: to authenticate you when you use our Properties/Services, to provide customer support, to audit our products and services, to detect security incidents, to debug and fix errors associated with our Properties and Services, research, activities to maintain the quality of our Properties, Services and products and services, to encourage and enable purchases such as through our various promotions, to provide personalized marketing offers and programs, to enroll you in our newsletter subscription program, and other commercial transactions that occur from time to time.

We do not make your data publicly available, we do not act as data brokers and we do not trade in your data. However, certain standard generally accepted business practices may be deemed as “Sale” of data under the CCPA, such as when we utilize third party service providers that provide us with services, while they retain certain rights to use your data for their own business needs (e.g. AWS, Google Analytics, Tableau, Envestnet Yodlee, Snowplow, Stripe and others).

To the extent applicable, if you are a California consumer, you may have a right under the new definition of “sale”, to request to opt-out of certain data transfers and sharing of personal activities which we operate. Please refer to section 3 - “Your California Consumer Rights” below, for information on how you can exercise your rights.

For more details on how and to whom we share your data please refer to “Sharing Information with Third Parties” in our [Privacy Policy](#).

## **3. YOUR CALIFORNIA CONSUMER RIGHTS.**

To the extent applicable, California consumers have the right to request access to the specific pieces of personal information we have collected about them in the last 12 months. You may make this request up to two times in a 12-month period.

To the extent applicable, You may also request additional details about our information practices, including the categories of personal information we have collected about you, the categories of sources of such collection, the business or commercial purpose for collecting or selling personal information, the categories of third parties with whom we share and sell your personal information, the categories of personal information we have disclosed and “sold” about you in the preceding 12 months, and the categories of third parties to whom we sold personal information in the preceding 12 months.

To the extent applicable, if you are a California consumer, you also have the right to request deletion of your personal information (subject to certain exceptions), to opt out of sales of personal information and to receive equal service and price and not be discriminated against even if you exercise any of your CCPA rights to the extent applicable (unless permitted by applicable law, such as if the differences are reasonably related to your information).

FeeX has not sold your personal information in the preceding 12 months and does not sell your personal information. We use and share your information as described in our privacy policy and do not believe this use and sharing is a sale as defined by the CCPA (to the extent applicable).

To the extent applicable, if you wish to send us a request, your request must include sufficient information that allows us to reasonably verify you are the person about whom we collected personal information, which may include your email address, name and account id (which is required only if you already have an account with us). To the extent this section is applicable, please send your requests to [support@feex.com](mailto:support@feex.com).