

## **STREETBEAT**

# **PRIVACY POLICY**

Last updated: May 29, 2023

Streetbeat Digital, LLC, Streetbeat, LLC, and their subsidiaries and affiliates (collectively, “Streetbeat,” “we,” “us,” or “our”), know that privacy is very important to you. We have created this privacy policy (the “Privacy Policy”) to describe what kinds of personal information we may obtain through:

- Our website, located at [www.streetbeat.com](http://www.streetbeat.com) (the “Site”);
- Our mobile application, available at the Site and in app stores (the “App”);
- Any other website, mobile application, or digital property that links to this Privacy Policy; and
- When you interact with us in any other way.

By accessing or using the Site, the App, or any other website, mobile application, or digital property that is authorized to link to this Privacy Policy (collectively, the “Digital Properties”), you may access our proprietary, interactive platform (the “Platform”), apply for and obtain certain digital wallet, investment advisory, money transmitter, and trading services (collectively with the Digital Properties and the Platform, the “Services”). Our Services are only available to individuals aged 18 or older.

By accepting this Privacy Policy, accessing or using the Services, or otherwise manifesting your assent to this Privacy Policy, you agree to be bound by this Privacy Policy and the accompanying Terms of Service, which together make up the Agreement. If you do not agree to (or cannot comply with) all of the terms of this Privacy Policy or any other terms of the Agreement, you may not access or use the Services. Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Service.

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## **I. The Information We Collect**

In the course of providing the Services, we may collect or receive the following types of information about you, which may include personal information.

### **1. Contact Information**

We collect contact information through our Services, which typically includes your name, email address, phone number, and any information you provide in messages to us ("Contact Information"). We use Contact Information for purposes such as starting your application for a Streetbeat Account, providing you with information about the Services, responding to your inquiries, sending you email alerts (including marketing emails), or providing you with the Services.

### **2. Streetbeat Accounts**

Streetbeat offers (i) a digital wallet that allows you to deposit and transfer funds, trade in crypto currency, and track payment histories ("Transactions") on devices such as mobile phones and tablets ("Digital Wallet"); and (ii) investment advisory and trading services that allow you to invest in portfolios, ETFs, and stocks ("Investment Services") (collectively with the Digital Wallet, the "Services"). You may obtain Services by opening one or more accounts (each, a "Streetbeat Account"), which requires that you provide information in addition to Contact Information such as date of birth, country of birth, nationality, passport numbers (or numbers associated with other government issued identification), Social Security Number or Tax ID, financial information, bank account and payment card details, account balance and payments, education, gender, interests, photo, employment status, occupation, employer name and address, marital status, suitability information, personal income and other sources of funds, net worth, trusted contact information, account balance, credit scores, tax information and other information about your financial situation and risk preferences.

We will refer to you as the "Account Owner" or our "Customer." If your application for a Streetbeat Account is approved you will be required to enter into a Customer Agreement with Streetbeat, and agreements with Alpaca Crypto and Alpaca Securities, respectively, in connection with the Digital Wallet and Investment Services. If you use the services of a third-party broker, you will enter into a Customer Agreement with Streetbeat and your third-party broker. We reserve the right to accept or decline any application(s) for Streetbeat Accounts in our sole and absolute discretion. If you have a Streetbeat Account, or have taken steps to apply for one, you may review our GLBA Privacy Notice for a description of our processing and disclosure activities regarding the non-public personal information that we collect from and about you in connection with opening and servicing Streetbeat Accounts.

### **3. Contacts List**

During the process of applying for a Streetbeat Account, you will be offered the opportunity to download the contacts list from your mobile device and certain other social web services including, but not limited to, names, emails and mobile numbers ("Contacts List"). Your Contacts List helps you connect with friends and family for Transactions, assists us in preventing fraud, and allows you to easily select friends and family for our Referral Program. Transactions are only available to Owners of Streetbeat Accounts. If you wish to engage in a Transaction with a contact that does not have a Streetbeat Account, then you may select and invite them to participate in the Referral Program. Streetbeat will not use your Contacts List for any purpose except implementing Transactions, and processing applications from your contacts for Streetbeat Accounts through our Referral Program. If you should want to download your Contact List at any time after opening a Streetbeat Account, you may do so by clicking [here](#) and following instructions.

#### **4. Information obtained automatically from your online activity**

When you access or use any of our Services, we use browser cookies, pixels, web server logs, web beacons, and similar technologies (collectively, "Tracking Technologies") to automatically collect or receive certain standard technical information and other data (i.e., the type of device, the advertising identifier ("IDFA" or "AdID"), the operating system and version, carrier, network type (WiFi, 3G, 4G, LTE); IP addresses (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 and URLs; date and time of access; the content you viewed; the amount of time spent on particular pages; what features of the Services you use or visit; details of your purchases; click-stream information; logs and other communications data) sent to us by your computer, mobile device, tablet, or any other device over time on our Digital Properties, and your online activity across third party websites, apps, and devices. We may also evaluate your computer, mobile phone, or other access device to identify any malicious software or activity that may affect the availability of the Services.

When you access or use any of the Services, advertising companies, analytics networks and providers, and other third parties may also use Tracking Technologies to collect the information described above and other information about your online activities over time on our Digital Properties and across different websites, apps, online services, digital properties and devices.

The Tracking Technologies used on the Services include the following, among others:

**Cookies:** Cookies are small packets of data that a website stores on your computer's hard drive so that your computer will "remember" information about your visit. In addition to collecting information, we use cookies to help us authenticate users, provide content of interest to you, analyze which features you use most frequently, and measure and optimize advertising and promotional effectiveness. To do this, we may use both session cookies, which expire once you close your web browser, and persistent cookies, which stay on your computer until you delete them. If you do not want the Services to place a cookie on your hard drive, you may be able to turn that feature off

on your computer or mobile device. Please consult your internet browser's documentation for information on how to do this. However, if you decide not to accept cookies from us, the Services may not function properly.

**Local Storage Technologies:** We may use local storage technologies, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.

**Web Beacons:** We use Web beacons, also known as pixel tags or clear GIFs, to demonstrate that a webpage or email address was accessed or opened, or that certain content was viewed or clicked.

**Third Party Sites:** When access to the Services is made available to you through third-party sites, such as social media, please be aware that these other sites maintain their own policies regarding Tracking Technologies and the collection and use of information. You are responsible for reviewing those policies.

## **5. Geolocation information**

To provide access to the Services while you are using an electronic device, we may automatically collect geolocation information from your mobile device, your wireless carrier, or certain third-party service providers ("Geolocation Information"). Collection of such Geolocation Information occurs only when the Services are running on your mobile device. You may control the collection of Geolocation Information through the user settings on your device. You may decline to allow us to collect such Geolocation Information, in which case we may not be able to provide certain Services to you. Please be sure to manage your mobile device and privacy preferences on the Platform on an ongoing basis.

## **6. Information obtained from other sources, including our social media pages**

We may collect Personal Information from the Owners of Streetbeat Accounts and visitors to our Digital Properties. We may also collect your Personal Information when you visit, use, or access the Services from third-party websites or apps. We will do so in accordance with the Terms of Service and privacy policies of the third-party websites and apps, and applicable law. This includes our social media pages on third-party services such as Facebook, Instagram, Twitter, and LinkedIn. For example, we may collect the information you shared on our social media pages through an application or form, which will have a link to this Privacy Policy. Personal Information may also be collected by the third-party social media sites that host our social media pages. These sites may provide aggregate information and analysis to us about their visitors' use of our social media pages. This allows us to better understand and analyze our user growth, general demographic information about the users of these pages, and interaction with the content that we post. This Privacy Policy does not cover Personal Information collected by such third-party social media sites. For more information on their privacy and security practices please review the privacy policies and Terms of Service on their respective websites.

## 7. Information obtained from third-party analytics services

We use third-party analytics services (such as Google Analytics, to evaluate your use of the Services, compile reports on activity, collect demographic data, analyze performance metrics, collect and evaluate other information relating to the Services and mobile and internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. The information used by such analytics services is generally at the aggregate level. Google may associate such data with visitation information collected from our Digital Properties.

For more information on these third parties, including how to opt out from certain data collection, please visit the sites below. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Services.

o For Google Analytics, please visit: <https://support.google.com/analytics/answer/6004245?hl=en> and <https://tools.google.com/dlpage/gaoptout>

## II. Information Use and Sharing

We use and share your Personal Information as set forth below:

- To analyze usage of our Digital Properties and improve the Services;
- To deliver to you any administrative notices, money alerts, and communications relevant to your use of the Services;
- To fulfill your requests for certain products and services;
- For market research, project planning, troubleshooting problems, and detecting and protecting against error, fraud, or other criminal activity;
- To third-party contractors and service providers that provide services to us in the operation of our business including servicing Streetbeat Accounts and providing the Services such as broker/dealers, digital account service providers, brokerage services, custodial services, administrators, payment processors, customer service organizations, IT and cloud service providers, among others;
- To enforce our Terms of Service;
- To disclose aggregated, anonymous, user statistics and other information to (i) affiliates, agents, business partners, and other third parties; (ii) describe the Services to current and prospective business partners; and (iii) other third parties for lawful purposes;
- To receive assistance from third-party advertisers and remarketers for the purpose of tailoring, analyzing, managing, reporting, and optimizing advertising you see on our Digital Properties, and elsewhere;
- To share some or all of your information with our parent company and affiliates;
- As required by law, such as to comply with a subpoena, or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights,

protect your safety or the safety of others, investigate fraud, or respond to a government request;

- As we develop our businesses, we may be involved in a corporate sale, merger, reorganization, sale of assets, dissolution, investment, or similar corporate event and we expect that your Personal Information will be part of the transferred assets; and
- Otherwise, with your consent. We will take reasonable measures to require that any party receiving any of your Personal Information from us undertakes to: (i) retain and use such information only for the purposes set out in this Privacy Policy; (ii) not disclose your personal information except with your consent, as permitted by law, or as permitted by this Privacy Policy; and (iii) generally protect the privacy of your Personal Information.

### **III. User Access and Choice**

If the Personal Information on file for you changes, or if you no longer desire our Services, you may correct or update it by making the change in your Streetbeat Account, or by contacting us as set forth in Section XII of this Privacy Policy.

You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any of our marketing emails. Please note that Streetbeat Account Owners cannot opt out of receiving transactional e-mails related to their Streetbeat Accounts. If you opt-in to our text messaging program, you may opt-out of receiving marketing and non-transactional text messages by texting “STOP” in response. Additionally, if you opt-in to push notifications, you may opt-out by visiting your account and following the instructions.

We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our databases. We will retain and use your information as necessary to comply with our legal and/or regulatory obligations, resolve disputes, and enforce our agreements.

### **IV. External Websites and Third Parties**

Certain Services offered through the Platform are provided by independent third parties. Brokerage, custodial, and securities payment transactions for Streetbeat Accounts are provided by Alpaca Securities, LLC (“Alpaca Securities”). The Digital Wallet and Trading services for cryptocurrency are provided by Alpaca Crypto, LLC (“Alpaca Crypto”). Certain brokerage or custodial services, at the discretion of the customer, are provided by independent, third-party brokers. Alpaca Securities and Alpaca Crypto (collectively, “Alpaca”), and any third-party broker, are not affiliated with Streetbeat. Neither Alpaca or any third-party broker makes recommendations or offers investment, financial, legal or tax advice. Streetbeat may collect your personal information, and then transfer such information to Alpaca or a third-party broker to enable provision of the Services.

Unless explicitly stated otherwise, our Privacy Policy addresses only our use and disclosure of information we collect from and/or about you in your interactions with Streetbeat. If you disclose information to third parties, or we transfer your personal information to Alpaca or other third parties in accordance with this Privacy Policy, the use and disclosure restrictions contained in this Privacy Policy will not apply, as we do not control the privacy policies of such third parties, nor are we subject to them. For more information on the privacy practices of the above-mentioned third parties, please go to:

- Alpaca Securities: [https://files.alpaca.markets/disclosures/privacy\\_notice.pdf](https://files.alpaca.markets/disclosures/privacy_notice.pdf)
- Alpaca Crypto: <https://s3.amazonaws.com/files.alpaca.markets/disclosures/PrivacyPolicy.pdf>

The Digital Properties may also contain links to other third-party websites (“Linked Sites”). We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those Linked Sites. You should check the applicable third-party privacy policy and Terms of Service when visiting any other websites.

## **V. Security**

We follow commercially reasonable and generally accepted standards to protect the Personal Information submitted to us, both during transmission and once we receive it. Please understand, however, that no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about security regarding our Services, please contact us.

## **VI. Children’s Privacy**

Our Services are only available to individuals aged 18 or older, and we do not knowingly collect Personal Information from any person under the age of 18. If an individual under the age of 18 has provided us with Personal Information, a parent or guardian of that child may contact us and request that such information be deleted, and we will endeavor to delete that information from our databases.

## **VII. Do Not Track**

As discussed above, third parties such as advertising networks and analytics providers may collect information about your online activities over time and across different websites when you access or use the Services. Currently, various browsers offer a “Do Not Track” option, but there is no standard for commercial websites. At this time we do not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

## **VIII. Notice to California Residents**

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the preceding calendar year, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. If you wish to submit a request pursuant to Section 1798.83, please contact us via email at [support@streetbeat.com](mailto:support@streetbeat.com). Please note, however, that we have not shared your Personal Information with third parties for this purpose.

## **IX. Notice to Nevada Residents**

We do not sell your personal information as defined under Nevada law. Nonetheless, if you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Information to third parties. You can exercise this right by contacting us at [support@streetbeat.com](mailto:support@streetbeat.com) with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your Streetbeat Account.

## **X. Important Notice to Non-U.S. Residents**

The Services are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us maybe 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 jurisdiction. If you are located outside the United States and choose to use the Services, you consent to any transfer and processing of your Personal Information in accordance with this Privacy Policy, and you do so at your own risk.

## **XI. Changes to this Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may update this Privacy Policy from time to time without notice to you. We will indicate at the top of this Privacy Policy when it was most recently updated, and we encourage you to revisit this page periodically to stay aware of any changes. By accessing the Services after we change this Privacy Policy, you are deemed to have accepted such changes.

## **XII. Contacting Us**

If you have any questions about our Privacy Policy, our privacy practices, or if you would like to exercise your rights and choices, please contact our Customer Service at: [support@streetbeat.com](mailto:support@streetbeat.com) or by phone at +16502040399.

