



Etana Custody Privacy Policy

Protecting your personal information is an important priority for Etana Custody. This privacy policy is designed to support this objective and, where applicable, set out how Etana Custody will process personal information as a Data Controller. Etana collects non-public personal information provided by you or your representative on applications or other forms furnished use and share personal information and how to contact Etana Custody and supervisory authorities in the event you have a complaint. This Privacy Policy applies to websites owned and operated by Etana Custody and as well as all services provided by Etana Custody.

Etana Custody does not disclose any non-public personal information about you, except as permitted by law. If you decide to close your account, Etana Custody will continue to adhere to the privacy policies and practices as described in this notice.

How and Why We Obtain Information

Etana Custody may receive non-public personal information about you (the “Personal Information”) from any of the following sources: • Your applications or forms (for example, name, address, Social Security number, birth date, assets, and income);

- Transactional activity in your account (for example, trading history and balances);
- Information from other third-party data services (for example, to verify your identity and to better understand your product and service needs);
- Other sources with your consent or with the consent of your broker;

Etana Custody may process the Personal Information for the following purposes:

Managing and administering any account you may hold with Etana Custody on an ongoing basis (the “Services”);

Etana Custody will itself (or through a third party e.g. credit reference agency) process certain information about you or your directors, officers and employees, and your beneficial owners (if applicable) in order to carry out anti-money laundering (AML) checks and related actions which Etana Custody considers appropriate to meet any legal obligations imposed on Etana Custody relating to, or the processing in the public interest or to pursue Etana Custody’s legitimate interests in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with Etana Custody’s AML procedures.

- to report tax-related information to tax authorities in order to comply with a legal obligation;
- to monitor and record calls and electronic communications for investigation and fraud prevention purposes, for crime detection, prevention, investigation, and prosecution, and to enforce or defend to report tax-related information to tax authorities in order to comply with a legal obligation;
- to monitor and record calls and electronic communications for investigation and fraud prevention purposes, for crime detection, prevention, investigation, and prosecution, and to enforce or defend Etana

Custody and its affiliates' rights, itself or through third parties to whom it delegates such responsibilities or rights in order to comply with a legal obligation imposed on Etana Custody or to pursue Etana Custody's legitimate interests in relation to such matters or the processing in the public interest;

- to monitor and record calls for quality, business analysis, training, and related purposes in order to pursue the legitimate interests of Etana Custody to improve its service delivery;
- to update and maintain records and for fee billing;
- to carry out statistical analysis and market research;
- to provide you with information about products and services which may be of interest to you or to the institution you represent, and which processing is necessary to perform a relevant contract with you, comply with legal obligations, and/or which is necessary for Etana Custody's legitimate interests indicated above and/or where the processing is in the public interest; and to retain AML and other records of individuals to assist with the subsequent screening of them, including in relation to investment in other funds or the provision of other services by Etana Custody, to pursue Etana Custody's and (in some circumstances) its clients' legitimate interests.

How We Protect Information About You

We take reasonable security measures consistent with applicable law to protect the security of your Personal Information from being accidentally lost, or used, or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. We also implement the use of encryption or Secure Socket Layers connections for the transmission of any Personal Information. In so much as personal email is generally not encrypted, we request that no Personal Information be sent to us via email.

We will retain your Personal Information as long as an account is active or as needed to provide you Services. You may, at any time, instruct us to remove Personal Information, but you should be aware that it is not technologically possible to remove each and every record of the information you have provided to Etana from our servers. We will also retain your Personal Information as necessary to comply with legal obligations, resolve disputes and enforce our agreements.

User preferences and opt-out choices

Email, Direct Mail, Telemarketing, and Third-Party Sharing.

To opt-out of:

- Receiving promotional or marketing emails from Etana Custody at a specific email address;
- Receiving direct mail;
- Receiving calls;
- Receiving notifications provided as part of the Services;
- Disclosure of your information to third parties; and Use of your information for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized.

You may contact us by:

Email

support@etana.com

Mail

Etana Custody
999 17th Avenue
Denver, CO 80202

Do Not Track (DNT). Etana Custody does not currently have the capabilities to recognize the various Do Not Track signals from different web browsers. For more information on Do Not Track please visit <http://www.allaboutdnt.org/>

How We Share Information About You

We may share the personal information that we collect about our customers, prospects, or former customers with their brokers or with:

- Etana corporate affiliates, including internal service providers; Unaffiliated service providers (for example, printing and mailing companies, liquidity providers, and other entities who may provide services at Etana Custody's direction) Government agencies, other regulatory bodies, and law enforcement officials (for example, for tax purposes or for reporting suspicious transactions)
- To credit reference agencies in order to carry out money laundering and identity checks and comply with legal obligations;
- To Etana Custody affiliates and third-party vendors in order to process the data for legitimate purposes;
- Other organizations, with your consent or as directed by your broker (for example, if you request personalized performance reporting) or as permitted or required by law (for example, for fraud prevention or to respond to a subpoena) To competent authorities, courts, and bodies as required by law or requested or to affiliated for internal investigations and reporting.

The disclosure of personal information to the affiliates and other third parties set out above may involve the transfer of data to the USA and other jurisdictions outside the European Economic Area (EEA). Such countries may not have the same data protection laws as your jurisdiction. Etana Custody has put in place the Standard Contractual Clauses approved by the European Union Commission for such transfers of personal data. Please contact admin@etana.com should you require more information on Etana Custody's international data transfer solution.

Our service providers are obligated to keep the personal information we share with them confidential and use it only to provide services specified by Etana Custody.

Online Privacy

Privacy, security, and service in Etana Custody's online operations are just as critical as in the rest of our business. We use firewall barriers, encryption techniques, and authentication procedures, among others, to maintain the security of your online session and to protect Etana accounts and systems from unauthorized access.

When you interact with us through online channels (for example, websites and mobile applications) owned and controlled by Etana Custody ("Etana websites"), Etana Custody manages personal information in accordance with all of the practices and safeguards described previously.

When you visit Etana Custody's websites, we may collect technical and navigational information, such as device type, browser type, Internet protocol address, pages visited, and average time spent on Etana Custody's websites. We use this information for a variety of purposes, such as maintaining the security of your online session, facilitating site navigation, improving Etana Custody's website design and functionality, and personalizing your experience on Etana Custody's websites. Additionally, the following policies and practices apply when you are online:

Etana Custody provides information to its clients through electronic means only. These include Email, website, and online platform. Kindly note that to receive information electronically from Etana Custody, a valid Email address is required. Etana Custody provides information through our website which may not be addressed personally to you.

Cookies and similar technologies

We use cookies and similar technologies to support the operation of Etana Custody websites. Cookies are small amounts of data that website exchanges with a web browser or application on a visitor's computer or mobile device. Cookies help us to collect information about visitors to Etana Custody websites, including date and time of visits, pages viewed, amount of time spent on our sites, or general information about the device used to access the site. Etana Custody cookies are also used for security purposes and to personalize your experience, such as customizing your screen layout.

You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. If you refuse a cookie when on an Etana Custody website, or if you delete cookies, you may experience some inconvenience in your use of Etana Custody websites. For example, you may not be able to sign in and access your account, or we may not be able to recognize you, your device, or your online preferences.

Connecting with Etana on social media sites

Etana Custody provides experiences on social media platforms that enable online sharing and collaboration among users who have registered to use them. We may collect the information you provide by interacting with us via social media, such as photographs, opinions, or Twitter handle. Any content you post, such as pictures, information, opinions, or any personal information that you make available to other participants on these social platforms, is also subject to the Terms of Use and Privacy Policies of those platforms. Please refer to them to better understand your rights and obligations with regard to such content.

Etana mobile applications

Etana Custody mobile applications ("apps") allow you to access your accounts, trade securities, move money, and access third-party news and research using wireless or mobile devices. Our privacy practices apply to any personal information or other information that we may collect through the apps.

Protecting children's privacy online

Etana Custody websites are not directed to individuals under the age of thirteen (13). Etana Custody does not intentionally collect information on Etana Custody websites from those we actually know are under 13, and we request that these individuals do not provide personal information through the sites.

Access to Your Information

You may access and, if necessary, correct your account information through a variety of media offered by your broker and Etana (e.g., statements or online services). Please contact your broker if you require any additional information.

Data Subject Rights

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to access your personal information.
- Right to rectify your personal information.
- Right to restrict the use of your personal information.
- Right to request that your personal information is erased.
- Right to object to processing of your personal information.
- Right to data portability (in certain specific circumstances).

Where you have provided your consent to processing (e.g. to receive information about products and services which may be of interest to you or to the institution you represent), you may withdraw your consent at any time by contacting Etana Custody by email at admin@etana.com

Where Etana Custody requires your personal information to comply with AML or other legal requirements, failure to provide this information means Etana Custody may not be able to provide the Services or the service to the institution you represent.

You have the right to lodge a complaint with a supervisory authority.

Additional Information

If you are a former customer, your information is treated in the same manner as the information of current customers. Etana offers several options for accessing and, if necessary, correcting your account information. You can review your information using your statements, or through our automated telephone or Internet services. You may also write or call us with your request for information. If we serve you through an affiliate, please contact them directly.

CCPA Privacy Rights (Do Not Sell My Personal Information)

Under the CCPA, among other rights, California consumers have the right to:

- Request that a business that collects a consumer's personal data disclose the categories and specific pieces of personal data that a business has collected about consumers.
- Request that a business delete any personal data about the consumer that a business has collected.
- Request that a business that sells a consumer's personal data, not sell the consumer's personal data.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

GDPR Data Protection Rights

We would like to make sure you are fully aware of all of your data protection rights.

Every user is entitled to the following:

- The right to access – You have the right to request copies of your personal data. We may charge you a small fee for this service.
- The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.
- The right to erasure – You have the right to request that we erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions.
- The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

How To Complain

We hope that we can resolve any query or concern you raise about our use of your information. Those in Designated Countries (being the European Union, European Economic Area or Switzerland) may contact our Privacy Office or their country's supervisory authority to lodge a complaint.

For questions or concerns about this Privacy Policy or the information we maintain, or to instruct us to remove Personal Information, you may contact ETANA at: support@etana.com