

# Privacy Policy

We work hard to protect your personal information and ensure your information is kept private and secure. The following privacy policy outlines the types of personal information that Carbon Collective Investing LLC (“CCI”) collects through our website ([www.carboncollective.co](http://www.carboncollective.co)) and web app. It also explains how we use it.

Privacy is important to CCI and we will not rent or sell your information to anyone. If you have any questions or if you believe that CCI has not adhered to this privacy policy, please send us a message at [info@carboncollective.co](mailto:info@carboncollective.co)

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## INFORMATION WE COLLECT AND WHY

In order to provide a high-quality service, CCI collects various types of information when you visit the website or mobile app, sign-up as a customer, or otherwise engage with CCI.

### Visitor Information

We collect various types of anonymous information about visitors to CCI, such as device-related information (including browser type and IP address) and server log information (including the date and time of day of your visit, average time spent on the CCI site, browsing activity, and any site that referred you to CCI). We also collect information that you input into our website, such as your name or email address when you begin the account application process, even if you don’t complete the account opening process. We use this information to better understand our visitors and our business, facilitate site navigation, provide the services or information you request, and enhance the CCI service. To the extent you enter identifying information as part of the account application process, we are required by law to store that information to comply with federal regulations.

### Customer Information

When you choose to create an account with CCI, we will also collect certain personal information, including your full legal name, email address, permanent address, date of birth, social security number and information about financial status. We are required by law to collect and store this information to provide you with financial services. If you do not wish to provide this information, you cannot become a CCI customer.

CCI Personal accounts are opened with Altruist Financial LLC as broker-dealer which must also collect personal information in order to open and service your account. Such information is subject to Altruist Financial LLC's Privacy Policy currently located at <https://altruist.com/m/Altruist-Privacy-Notice-Privacy-Policy-2022.04.13.pdf>. CCI Personal accounts are custodied by APEX Clearing with which CCI and Altruist Financial LLC must share information in order to service CCI Personal accounts and provide investment advice. APEX Clearing's Privacy Policy is currently located at <https://www.apexclearing.com/privacy-policy/>

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### **Plan Sponsors and their Participants**

When a company creates an account with CCI as a retirement plan sponsor through CCI Employer, we will collect information on both the company and its employees as plan participants, including but not limited to, the company's name, the company's employer identification number, details about the company's existing retirement plans, an email address of the company's contact person and other relevant plan information. We will also collect certain personal and financial information about the plan participants, including, but not limited to, names, social security numbers, dates of birth, annual incomes, addresses, length of service with the company, gender, marital status, dates of hire, email addresses and other contact information, occupation, industry, personal interests, bank account balance, salary information, contribution rates and tax bracket. CCI Employer accounts are held in custody with and traded through the retirement plan sponsor's chosen recordkeeper.

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### **Other Ways We Collect Information**

Apart from through the account opening process and from visitors to the website, we may collect various other types of personal information if you or a friend engages with CCI. We collect your email address as part of our customer referral service. We may also collect personal information if you enter it into our live chat program or contact us or otherwise give it to us (e.g., in an email, phone call, or live chat with a member of our customer support team). Further, we may collect information regarding your browsing activity when you visit CCI's websites.

### **Cookies and Pixels**

Cookies are small pieces of data that are stored on your computer, mobile phone or any other device used to access the internet. Pixels are small code blocks on a website that allow for another server to measure viewing of a webpage and often are used in connection with cookies.

We use these technologies to customize CCI and improve your experience with the site. Cookies store information, such as whether you viewed the site from your mobile device, browser type and version, the internet protocol (IP) address used to access our website or mobile application, and your general geographic location (e.g., city, state or zip code). We may store some personal information in a cookie and/or pixel, such as the site that you visited immediately prior to visiting CCI and relevant financial information that allows us to enhance your user experience and for marketing purposes. Additionally, we may use a cookie and/or pixel to track visitors across various websites or devices to better customize our marketing and advertising campaigns.

Cookies, pixels, and similar technologies are not required for site functionality. You are not required to accept any cookies or pixels to use our website or app. However, refusing to accept cookies or pixels will make the use of CCI more cumbersome and less accessible.

### **Analytics Services**

We use third-party analytics tools, including Google Analytics and Lucky Orange (such tools collectively referred to as “Analytics Services”) to collect information about the usage of this site and our app. The Analytics Services collect information about how often users visit, what pages they visit when they do so, and what other sites they used prior to coming to this site, among other information. We use the information we get from these Analytics Services to improve this site.

These Analytics Services collect the IP address assigned to you on the date you visit this site, along with other anonymized information (e.g., browser type and type of device used to visit the site), but not your name or other personally identifiable information. The Analytics Services’ ability to use and share information about your visits to this site is restricted by their terms of use and privacy policies. You can prevent most Analytics Services from recognizing you on return visits to this site by disabling cookies on your browser. You can also opt-out of Google Analytics by installing the [Google Analytics Opt-out Browser Add-on](#).

## **HOW WE USE YOUR PERSONAL INFORMATION**

CCI uses your personal information to provide financial advice and other services; enhance your customer experience; improve our products and features; provide customer support; open, operate, and maintain your account in accordance with US law; investigate and understand how CCI’s services are used; monitor and protect the security and integrity of CCI; and better market and advertise CCI’s services. You understand and agree that CCI will compare your identifying information with government-provided lists of suspected terrorists.

As part of this process, we may from time to time include, compile, or aggregate some of your personal information in certain data analyses, reports, or other interpretations of investment trends for both internal and external purposes. When including, compiling, or aggregating personal information for such purposes, we make sure that the information is anonymized such that it is not identifiable to any particular customer.

Additionally, we, or our service providers, may use your personal information to contact you regarding CCI's services, resources or products that we think may be of interest to you. Please note that if you hold an account with CCI, you cannot opt-out of certain communications related to the administration of your account, including communications related to billing, statement and trade confirmation delivery or certain regulatory matters.

## **HOW WE SHARE YOUR INFORMATION**

We do not sell, rent, or trade your personal information with any third parties other than with your consent or as required by law.

In order to provide financial services and in connection with our everyday business purposes and activities, we may share your personal information with third parties who perform services on our behalf. Examples of these third parties and services include broker-dealers, custodians, consumer identification verification services, public accounting firms, client relationship management firms and software, and other professional firms. We have entered into agreements that require that these third parties keep this information confidential. We may also disclose your information to other third-party financial institutions, e.g., if you ask to transfer assets from CCI to such financial institutions.

We may also disclose personal information in response to service of legal process, such as a court order, summons, or subpoena, or as permitted or required by law when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud (including identity theft), frontrunning or scalping, situations involving potential threats to the physical safety of any person, or suspected violations of our Terms of Service or customer agreements.

Furthermore, we may disclose personal information in specific other cases with your consent.

## OPT-OUT INFORMATION

**Cookies and Online Tracking.** You may manage cookies and online tracking through your web browser or device operating system, however optimal functionality may be impacted if cookies are disabled.

**Do Not Track Signals.** Most web browsers and some mobile operating systems have incorporated "Do Not Track" features. Most of these features, when turned on, send a signal or preference (the "DNT Signal") to the web sites you visit indicating that you do not wish to be tracked. Because there is not yet a common understanding of how to interpret DNT Signals, nor a common definition of "tracking", we do not currently respond to DNT Signals on the CCI Website. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

You can opt-out of Google Analytics by installing the [Google Analytics Opt-out Browser Add-on](#).

## HOW WE SAFEGUARD YOUR PERSONAL INFORMATION

CCI takes your information privacy seriously and has implemented precautions to protect your information. Our website employs various security features, visible and invisible, to help keep you safe. When you submit sensitive information via the website or mobile applications, your information is protected both online and offline. Whenever we collect sensitive information (e.g., social security number), that information is encrypted and transmitted to us in a secure way.

CCI limits the systems in which we store personal information and restricts access to personal information to those employees who require the information to provide CCI's products or services.

**Safeguard your account information.** For your protection, you should not provide your account information, username, or password to anyone. If you become aware of any suspicious activity relating to your account or if you suspect fraud, please call us at [925-268-8041](tel:925-268-8041) or email us at [james@carboncollective.co](mailto:james@carboncollective.co)

## HOW LONG DO WE KEEP YOUR INFORMATION

We will maintain your personal information only so long as is necessary for the purposes in which it was provided unless a longer retention period is required or permitted by law. Personal Information about customers who have accounts with CCI are typically maintained for at least 6 years following the termination of services for the account in accordance with federal law, however, other legal requirements may require longer retention periods.

When we have no ongoing business need to process your personal information, we will either delete or anonymize such information, or if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from processing until deletion is possible.

**Account Information**

If you would like to review or change the information in your account or terminate your account, you can do so by notifying [info@carboncollective.co](mailto:info@carboncollective.co). Upon your request to terminate your account, we will deactivate your account or delete your account and information from our active databases. However, we are required to retain certain information in our files to prevent fraud, assist with investigations, enforce our legal terms and /or comply with legal requirements.

**UPDATES OR QUESTIONS ABOUT THIS POLICY OR CCI'S PRIVACY NOTICE**

CCI will update this privacy policy and its privacy notice from time to time. The updated version will be indicated by an updated "revision" date and the updated version will be effective as soon as it is published. If we make material changes to our privacy notice, we may be required to send you a copy of such changes directly via email. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

**If you have questions or comments about this privacy policy or CCI's privacy notice, you may email us at [info@carboncollective.co](mailto:info@carboncollective.co) or by post to:**

Client Relations

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