

Privacy Policy

This Privacy Policy (“Policy”) covers Legion Invest Co., a Delaware corporation and its wholly owned subsidiary Legion Global Capital Management LLC, d/b/a Legion Invest, a Delaware corporation and Limited Liability Company (together, “Legion”, “we”, “our” or “us”). These entities are collectively referred to as “Legion” “Affiliated Companies,” “We,” “Us,” and “Our” throughout this Policy.

Overview

We are committed to maintaining the privacy and confidentiality of our customers’ personal information. In the course of offering and providing financial information and service, we collect and maintain certain personal information about you. This information can come from information you provide on applications or other forms, through your inquiries e-mail, through the Legion application, or by other means. This policy explains what personal information we collect and how we use and share such personal information. It also explains what you can do to limit the use and sharing of your personal information. We do not disclose personal information about our customers to non-affiliated third parties, except as described below.

Online Privacy

Legion may periodically collect information from you through automated means. When you browse our site, use our service, or read our emails or newsletters, we may use “cookies” or other online tracking mechanisms (including pixel tags, web beacons, clear GIFs and device fingerprints) in order to provide better service, facilitate your use of the site or service, store online preferences, track usage of the site or service, tailor the marketing of business service, or enhance security. Legion does not store login credentials used to link your Legion account information.

Some of our cookies are used for web analytics and intelligence about our site. We may also use web beacons or other technologies for similar purposes and we may include these in marketing email messages or our newsletters in order to determine whether messages have been opened

and links clicked on. Web beacons do not place information on your device but may work in conjunction with cookies to monitor online activity.

By using our site or application you agree that we can place cookies on your device and use other online tracking mechanisms as explained in this privacy notice. You may be able to control your acceptance of cookies and similar technologies on a website, and most devices and browsers offer their own privacy settings for cookies. You will need to manage your cookie settings for each device and browser you use. If you do not accept cookies, you may experience some inconvenience in your use of some sites and online products. For example, a website may not be able to recognize your device and you may need to answer challenge questions or provide additional information each time you log on.

To help us protect against fraud, provide our service to you, and improve our service, we collect location data, including current and historical information concerning a user's geographic location, GPS location, transaction location, and IP addresses that are used in conjunction with our service. We collect your precise location data with your permission, and use that information, for example, to help protect against fraud by detecting and declining fund withdrawal requests that may occur far away from your device's location. You may decline to allow us to collect such geolocational information, in which case Legion may not be able to provide certain features or functionalities to you.

We also may obtain information on the device you use, including the Universally Unique Identifier, advertising identifier ("IDFA" or "AdID"), operating system and version, wireless carrier, and network type. This information is used to identify customer device issues and for marketing purposes.

If you subscribe to any of our newsletters, we will use your name and email address to send the newsletter to you. You can unsubscribe at any time following the instructions at the bottom of these emails or you can contact us at the information below. When you open an account with

Legion, you agree to subscribe to our general marketing emails. You may opt out at any time. We also may collect information from you derived or resulting from voluntary surveys. By providing your phone number you expressly consent to Legion and/or its agents calling or texting you using an automated telephone dialing system and/or prerecorded messages for general notification and security purposes, even if you incur charges for receiving such communications. You may request to be removed from phone or text communications by emailing support@legioninvest.com.

We may access your contact list, with your permission, on your mobile device or in your email accounts so that you can identify your contacts using our service and direct the invitation of your contacts for our service. We store and use this information to suggest referrals or connections and for other reasons related to our service.

Interest-based advertising

We may use “interest-based” ads, which are known as “online behavioral advertising.” We may partner with ad networks and other advertising providers (“Advertising Providers”) who serve ads on behalf of us and others on non-affiliated sites. Some of these third parties may use cookies and other technologies to collect information about your online activities over time and across third party websites or online service to deliver advertising based on your interests and preferences, as inferred from your browsing history. Some of these ads may be personalized, meaning that they are intended to be relevant to you based on information that Legion and its Advertising Providers collect about your visits to this site and elsewhere over time.

We may use third-party analytics service (for example, we use Google Analytics, Facebook, 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. For more information on these third parties, including how to opt out of certain data collection, please visit www.google.com/analytics. Please be advised that if you opt out of any of these service, you may not be able to use the full functionality of the platform. Do Not

Track (“DNT”) is a privacy preference that users can set in certain web browsers. At this time, we do not recognize or respond to DNT signals.

Protecting information

With regard to our internal security procedures, we restrict access to your personal and account information to those employees who “need to know” the information in order to provide products and service to you. We maintain reasonable physical, administrative, and technical safeguards to protect your personal information. We conduct regular internal audits of our business practices and procedures in order to protect your personal information.

We may also disclose your personal information 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.

Retention of Your Information

We will retain your personal information for as long as it serves the purposes(s) for which it was initially collected as stated in this Privacy Policy, or subsequently authorized. We will also retain and use personal information as necessary to comply with our legal obligations, resolve disputes, or enforce our agreements. If you are no longer a client, 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.

Information connected to you that is no longer necessary and relevant to provide our service may be aggregated with other non-personal data to provide insights which are commercially valuable to Legion, such as statistics of the use of Legion’s service.

Children’s Privacy

Legion’s service is permitted only for individuals over the age of 18. We do not knowingly collect or solicit any information from anyone under the age of 18 on our service. In the event that we

learn that we have inadvertently collected personal information from a child under age 18, we will take reasonable steps to delete this information. If you believe that we might have any information from a child under 18, please contact us at support@legioninvest.com.

California Privacy Rights

If you are a California resident, California law requires us to provide you with some additional information regarding how we collect, use and share your “personal information” (as defined in the California Consumer Privacy Act (“CCPA”)), other than the personal information we collect in connection with providing financial products and service.

Depending on how you interact with our website, application and service, we may collect the following categories of personal information about you, in addition to the information we collect in connection with providing financial information and service:

- Identifiers, such as your name and contact information, IP address, and mobile device identifiers.
- Internet usage information, such as browsing history, access history, and use and interaction with our website.

This information is used and disclosed for the purposes and to the categories of third parties described in the main privacy policy, above.

Your California Privacy Rights

If you are a California resident, you may have certain rights. California law may permit you to request that we:

- Provide you the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or distributing your personal information; and the categories of third parties with whom we shared personal information.
- Provide access to and/or a copy of certain information we hold about you.

-Delete certain information we may have about you.

We do not sell Personal Information to third parties. We do allow third parties to collect personal information through our service and share personal information with third parties for the business purposes described in this Privacy Policy, including without limitation advertising and marketing on our service and elsewhere based on users' online activities over time and across different sites, service, and devices.

California law permits consumers to request, once per year, that we disclose the identity of any third parties with whom we have shared personal information for the third parties' direct marketing purposes within the previous calendar year, along with the type of personal information disclosed. Please contact support@legioninvest.com for such requests.

Updates to this Policy

As required by federal law, we will notify you of our privacy policy annually. We reserve the right to modify this policy at any time. If we do change it, we will revise the "Effective Date" above and post the new policy. To stay informed of our privacy practices, we recommend you review this Policy on a regular basis as you continue to use our service.

Contact Us

For questions about our policy, or for additional copies of this notice, please email us at support@legioninvest.com

Facts: What does Legion do with your personal information?

Why? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What? The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security Number and income
- Account balances and transaction history
- Investment experience and checking account information

When you are no longer our customers, we continue to share your information as described in this notice and the main privacy policy.

How? All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reason Legion chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information

- For our everyday business purposes –such as to maintain your account(s), run know your client anti-money laundering and anti-terrorism compliance checks, communicate with broker and custodian, or respond to court orders and legal investigations. **Does Legion share? YES**
- For our marketing purposes —To offer our products and service to you. **Does Legion share? YES**
- For joint marketing with other financial companies. **Does Legion share? YES**
- For our affiliates everyday business purposes — information about your transactions and experiences. **Does Legion share? YES**
- For our affiliates to market to you. **Does Legion? YES**
- For nonaffiliates to market to you. **Does Legion share? NO**

Can you limit this sharing?

- For our everyday business purposes –such as to maintain your account(s), run know your client anti-money laundering and anti-terrorism compliance checks, communicate with broker and custodian, or respond to court orders and legal investigations. **NO**
- For our marketing purposes — To offer our products and services to you. **NO**
- For joint marketing with other financial companies. **YES**

-For our affiliates everyday business purposes — information about your transactions and experiences. **NO**

-For our affiliates to market to you. **YES**

-For nonaffiliates to market to you. **We don't share**

What we do

How does Legion collect my personal information? We collect your personal information, for example, when you:

-Open an account or give us your income information

-Seek information about your investments, plan or strategies.

-We also collect your personal information from others, such as affiliates, or other companies.

How does Legion protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

Why can't I limit all sharing?? Federal law gives you the right to limit only:

-Sharing for affiliates' everyday business purposes – information about your creditworthiness

-Affiliates from using your information to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under certain state laws.

What happens when I limit sharing for an account I hold through an entity? Your choices will apply to the entity and everyone associated with it account.

Definitions

-Affiliates: Companies related by common ownership or control. They can be financial and nonfinancial companies.

-Nonaffiliates: Companies not related by common ownership or control. They can be financial and nonfinancial companies.

Legion does not share with nonaffiliates so they can market to you.

-Joint marketing: A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Legion jointly markets.

Other important information State and International Laws

For Vermont Residents: In accordance with Vermont Laws, we will not share information we collect about Vermont residents with companies who are not affiliates, except as permitted by law, such as with your consent or to service your accounts. We will not share information about your creditworthiness with our affiliates without your authorization or consent, but we may share information about our transactions or experiences with you with our affiliates without your consent.

For Nevada Residents: Nevada law requires us to disclose that you may request to be placed on Legion's internal "do not call" list at any time by calling (312) 600-2883, and that we are providing this notice to you pursuant to state law, and that you may obtain further information by contacting the Nevada Attorney General, 555 E. Washington Ave., Suite 3900, Las Vegas, NV 89101; phone 702-486-3132; email BCPINFO@ag.state.nv.us.

For California Residents: In accordance with California law, we will not share information we collect about you with nonaffiliates, except as allowed by law. For example, we may share information with your consent or to service your accounts. Among our affiliates, we will limit information sharing to the extent required by California law.