

PRIVACY POLICY

SUMMARY

- We collect information about you as you use the Invstr Services
- We use this information in order to provide you a personalized experience
- Information we collect from you may be shared, stored or processed with our service providers. In these cases we ensure your data is treated securely
- You are in control of your data and can modify your preferences at any time
- You must be over 13 years old to use the Invstr Services

Last Modified: February, 2021

CONSENT

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified below. Consent is required for the Invstr group (consisting of but not limited to Invstr Limited, [Invstr Financial LLC](#) and Social Invstr LLC) (“We” or “Us”) to process your personal data, but it must be explicitly given by you. You may withdraw your consent at any time. Please note that if you do not upgrade the Services, specifically the Invstr app, to the latest version releases and accept our terms, You will neither be able to receive nor transfer personal data to another third party.

INTRODUCTION

We are Invstr and your privacy is important to Us. Please review this privacy policy in order to better understand our commitment to maintaining your privacy. This policy explains how We use your personal information which may be collected from your use of the Invstr application (the "App") or our website at www.Invstr.com (the "Website") and software which We make available to you via the App, the Website or third party platforms ("Invstr Software") (together, the "Invstr Services").

Personal information means information about you which is personally identifiable, including but not limited to your name, location, mobile phone number, email, sentiment data in terms of what news you read, like, share or comment on, or the choice of instruments you may add to your watchlist and interactive investment games, including game capital you purchased and your game performances.

By accepting the terms of this Privacy Policy and using our App, visiting the Website, downloading, streaming content through the App or Website, communicating with other users and/or providing your personal information to us, you consent to our processing of your personal information in accordance with this privacy policy. You agree not to allow anyone under 13 years old to access or use the Invstr Services from your device. If you are 13 or older, but under the age of 18, you should review this privacy policy with your parent or guardian to make sure that you and your parent or guardian understand it.

Please note that should you register to access the additional Invstr+ Services, You will be required to acknowledge your acceptance of its additional Privacy Statement.

Notwithstanding, you must first accept this Privacy Policy.

ARE WE REGISTERED?

We have notified the Information Commissioner's Office that We are a data controller and are registered on the Data Protection Register under registration number ZA449300.

WHAT PERSONAL INFORMATION DO WE COLLECT?

We may collect and process the following information about you:

- any personal information you provide to Us when you create an account, including details supplied by but not limited to Facebook, Twitter, Google, Instagram, LinkedIn or email, if you use the social login function, to use some or all of the Invstr Services
- any personal information you provide when using the Invstr Services (including all behavioral and activity data generated through your activity with respect to the Invstr Services), for example our messaging facilities and behavioural data generated through your participation in our interactive investment games, and interactions through the social channels;

- details of transactions you carry out via Invstr Services, including any payment or billing information you provide to Us. Notwithstanding, please note that purchase details via Apple App Store and Google Play are held by them and not Us
- if you contact us by whatever means, We may keep a record of that correspondence;
- where you agree to an error report being sent to us, any information contained in that error report, for example an error report contains details of the error and other potentially relevant information collected from your device (for example: operating system version, drivers, etc)
- details of your use of the Invstr Service, the resources you access, which may include IP addresses, ISP, clickstream data, viewed and exit pages and date or time stamps
- details about the devices you may use to access the Invstr Services, which may include the device's unique identifiers, operating system, browser type and network information; and personal information posted by other users through the messaging and chat functionalities of the App and Website
- geo-location data solely for the purpose of tailoring the layout and information on the App and Website to be most appropriate to the jurisdiction in which you are located
- Where you use Invstr+ to access brokerage and banking services, for regulatory compliance purposes, we will ask you to provide further personally identifiable information such as, but not limited to:
 - First and last name
 - Email address
 - Phone number
 - Home address
 - Social security number, driving license or passport details
 - Date of birth

HOW DO WE USE YOUR PERSONAL INFORMATION?

We may use your personal information in the following ways:

- To provide customer care and support

- to store and retrieve your account data, so that your preferences and customisations can be remembered as well as your achievements and progress in our interactive investment games
- to help Us improve the Invstr Services
- to help Us protect against attacks to the Invstr Services
- to help Us fix problems with the Invstr Services
- to ensure that content from the Invstr Services is presented in the most effective manner for you and for your device
- to provide you with information about the Invstr Services, but We will not send you marketing information if you have asked Us not to
- to allow you to participate in interactive features of the Invstr Services (including our interactive investment games, Stats and Portfolio Builder products)
- to notify you about changes to the Invstr Services
- to send you marketing emails, unless you have asked Us not to. You can unsubscribe from our emails at any time by following the unsubscribe link at the bottom of each message, or by changing your marketing communication settings in your profile settings
- to send you our newsletter, unless you have asked Us not to. You can unsubscribe from our newsletters at any time by following the unsubscribe link at the bottom of each newsletter, or by contacting Us using the contact details provided at the end of this policy
- to send you in-app notifications related to marketing, or to direct you to relevant information within the Invstr Services. You can opt-out of in-app notifications via the App store or Google Play store settings
- to support our marketing, retargeting and behavioral targeting activities (your personal data is anonymized)
- to conduct legal and regulatory customer identification checks
- to set up a trading or banking account, maintain your account activity and contact you with account information
- to process any transactions you make via the Invstr Services and to monitor, prevent and detect fraud
- to send you transactional messages via app or email related to the management of your Invstr account and your use of the Invstr app. These messages are critical

to the use of the service and you are not able to opt-out of them. They will not be used to send you marketing messages

WILL WE SHARE YOUR PERSONAL INFORMATION?

Invstr may disclose your Personal Data in the good faith that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of Invstr
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of users of the Service or the public
- Protect against legal liability

With your permission, we may also disclose your personal information to third parties for the following purposes:

- Games promotions: We may use your name in any publicity material should you win a Game competition, in accordance with current UK data protection legislation
- Service providers: We contract with service providers who perform certain functions on our behalf. Examples include e-commerce platform providers, website hosts, content delivery providers and businesses which assist Us in undertaking communications or monitoring and analysis of our website and the Invstr app. Their access is limited only to the personal information needed to perform the functions carried out on our behalf, and only for the purpose of performing those functions
- Reviews: If you have permitted marketing from us, we may disclose your contact details to review sites to enable it to email you inviting you to leave a review about your experience with Invstr. You will be able to opt-out of these communications at any time
- Third party contact details: if you supply Us with a third party's personal information (such as email) when referring that person to the Invstr app, we will use that information only to transmit the referral message
- Exchanges: We source market data from financial exchanges. We might be under an obligation to provide the exchanges with your details in order for them to verify usage of the market data supplied by them

- Research Providers: We source research reports and commentaries from various research providers. We might provide your details to those providers on an aggregated and anonymized basis
- Payment processors: If you conduct a transaction via the Invstr Services, We will be required to share certain personal information with third party payment processors in order to process your payment
- Money Transfer and eDebit Card. Should We be required to transfer monies to You, for instance for winning a game competition prize, We will be required to process the transfer in accordance with the third party money transfer services requirements, including corroboration of the name and account details to which monies will be remitted
- Transactional Order Management and Customer Identification. If you carry out an investment transaction through the Invstr Services, We are required to share personal information with the third party order management service and, or broker in order to on-pass order messages, and for customer identification verification purposes (KYC/AML regulatory requirements)
- Fraud prevention. If false or inaccurate information is provided, including in relation to a person's identity and fraud is suspected or identified, details about this information, including your personal information, will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent and detect crime, fraud and money laundering, for example when: checking details on applications for credit and credit-related and other facilities; managing credit and credit-related accounts or other facilities; recovering debt; checking details on proposals and claims for all types of insurance; and checking details of job applicants and employees. We and other organisations may access and use from other countries the information recorded by fraud prevention agencies. For further details of the relevant fraud prevention agencies please contact Us as described at the end of this privacy policy
- if We (or any one of our group companies) are bought or sold, or our assets (or the assets of any of our group companies) are bought, sold or consolidated, in which case We may disclose your personal information to the prospective seller or buyer of such business or assets

- if We share or sell anonymized data on an aggregated basis to third parties (in each case so that it is not capable of identifying you) for the purpose of providing an indication of prevailing market sentiment
- if We are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to comply with or enforce our terms and conditions and other agreements We have with you; or to protect the rights, property, or safety of Invstr Limited, our group companies, our customers, or others

SECURITY OF DATA

We maintain strict security standards and procedures with a view to preventing unauthorised access to your data by anyone, including our own staff. We use leading technologies such as (but not limited to) data encryption, firewalls and server authentication to protect the security of your data.

Whilst the security of your data is important to us, remember that no method of transmission over the internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. In the event of a personal data breach, We will, where feasible not later than 72 hours after having become aware of it, notify the breach to the supervisory authority (Information Commissioner's Office) unless the personal data breach is unlikely to result in a risk to the rights and freedoms of said persons.

DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA?

Personal data collected by us may be stored and processed in your region or in any other country where We or our service providers maintain facilities. So the information that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff in destinations outside the EEA who work for Us or for one of our third party service providers. These destinations may not have the same legal protections for personal data as you enjoy under English and EU law. We will take all steps per the EU General Data Protection Regulation (GDPR) reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. Please note, whenever we work with any third

party, We ensure that agreements adhere to International Personal Data Processing and Transfer standards.

YOUR PREFERENCES

Through your account settings, you can choose to keep your personal information private and, should you decide to leave the Invstr Services, the 'right to erasure' by which any data referencing you is removed from the Service. We shall use our best efforts to process your personal information in accordance with your account settings but please do note, however, that it may not be possible to make certain information private, such as your avatar.

MESSAGING FACILITIES

Our messaging facilities may include: private chat, public chat, public posts to the social feed, quick comment and comment forums and other ways of communicating with other users of the Invstr Services.

If you choose to use any messaging facility which We provide, your messages may be visible to other users of the Invstr Services, and may be shared externally. By posting messages via messaging facilities, you are consenting to your message being published on the Invstr Services and you acknowledge and agree that it may be visible to the public. For your safety, We recommend that you do not post any personal information using our messaging facilities, and do not post any information which you do not wish to be shared, seen or used by others. Our messaging facilities may not be encrypted, so do not use them to make available any sensitive or private information. Our messaging facilities are intended only for chatting about the Invstr Services. We may store content, information and data sent via our messaging facilities in order to satisfy regulatory compliance and reporting requirements in any jurisdiction

DISCLOSURES. STORAGE, ANALYSIS, COOKIES AND OTHER TRACKING TECHNOLOGIES

We may use cookies or other forms of tracking including beacons, tags and scripts in order to customize the Website for return visitors.

These technologies are not required for site functionality. Additionally, third-party widgets such as Twitter, Facebook, Google+, YouTube and Instagram may install cookies, depending on their configuration.

Additionally, we use the following services (but not limited to);

AWS

We use Amazon's virtual computer services to store and process all our data, including your personal data. This includes Amazon's S3 storage and delivery component and DynamoDb and Redshift databases.

Crashlytics.

We use Crashlytics to monitor your in-app sessions for service performance purposes.

Google Analytics

We use a tool called "Google Analytics" to collect information about your use of the Website. Google Analytics collects information such as how often users visit the Website, what pages they visit, when they do so, and what other sites they used prior to coming to the Website. We use the information we get from Google Analytics only to improve the Website. Google Analytics collects only the IP address assigned to you on the date you visit the Website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit the Website, this cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the website is restricted by the Google Analytics Terms of Use ([here](#)) and the Google Privacy Policy ([here](#)). You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser.

Google Firebase

We use Google Firebase services for two purposes: a) monitoring and reporting of application crashes (we share Person IDs to identify the user who crashed and nothing else; b) analysing and reporting of time spent in various sections of the Invstr app. We do not share any other information with Google Firebase and do not use it for any other purpose. Google Firebase's privacy and security statement can be read [here](#)

Facebook & Twitter Conversion Tracking Cookies

We use a technology called Facebook Conversion Tracking. This allows Us to track those visitors who have been referred through a Facebook page, application or advertisement and then visited the Website within a 30 day period.

We will share information regarding your visit to the Website with Facebook but this will not include any information specific to your application or other personal information. Facebook will use this information to monitor, on our behalf, the effectiveness of our advertising and applications.

The information we share with Facebook will only be used in accordance with Facebook's data use policy ([here](#)). Facebook Conversion Tracking may also enable Us and our partners to serve ads on and off Facebook.

We also use Twitter Conversion and Remarketing tracking which will track your activity. Twitter's Privacy Policy ([here](#)).

Appsflyer

We use Appsflyer, a marketing analytics and attribution platform, to analyse your in-app behavior for advertising and marketing purposes.

Mailchimp

We use Mailchimp marketing automation platform and email marketing service tools, to gather certain information that helps Us to better understand your needs related to the Invstr service, and to ensure relevant email communication with yourself. This information will never be shared with third parties unless explicitly allowed by you.

Slack

We use the collaboration tool Slack to track and respond to users' feedback and incident records.

Mobile Identifiers. When you are using our Services, we may also automatically record your Google Advertising ID (if you are using an Android device) or your Advertising Identifier (IDFA – if you are using an iOS device), together "Mobile Advertising IDs"), for advertising or analytics purposes. The Google Advertising ID is an anonymous identifier, provided by Google Play services. If your device has an Advertising ID, we may collect and use it for advertising and user analytics purposes. If your device does not have Advertising ID, we may use other persistent identifiers. The information collected may be also stored on your device.

Disabling Cookies. You should refer to your browser or device help material to learn what controls you can often use to remove or block cookies or other similar technologies or block or remove other data stored on your computer or device (such as by using the

various settings in your browser). Be aware, if you do this, it may affect your ability to use the Services as well as other websites and apps.

ACCESS TO AND CORRECTING YOUR PERSONAL INFORMATION

To find out more about how your data is used, or to make a complaint, please contact Us using the details provided at the end of this policy, or via the feedback feature in Settings.

GDPR and CCPA require us to disclose data we have about you, and may have shared, to carry out the Invstr Services as described above. You have the right to request a copy of the personal information that We hold about you. If you would like a copy of some or all of the personal information We hold about you, you can contact Us using the contact details provided at the end of this policy, or via the 'My Report' feature in Settings. We want to make sure that your information is accurate and up to date. You may update your personal data through the 'Settings' screen of the App or you may ask Us to correct or remove personal information you think is inaccurate by contacting Us using the contact details provided at the end of this policy, or via the feedback feature in Settings.

RIGHT TO ERASURE

Under the EU's General Data Protection Regulation (GDPR) You have the right to request for your personal information to be deleted (Right to be Forgotten). You can request this by going to your Profile setting in the app, selecting Contact Support / Deactivate My Account, or emailing Us at infor@invstr.com. (You can also request to see your data by selecting Contact Support / Request My Data.) In order to comply, we may require further information from You in order to confirm that it is You making such a request.

You also agree that for regulatory and legal purposes, Invstr has an obligation to store certain personal data in a secure and encrypted way. Furthermore, You acknowledge that Invstr may continue to use certain personal data in an anonymized non-reverse engineering form for back-testing and community-level performance models. You also acknowledge that comments You posted in the Invtr Feed or direct or group messaging, may remain visible to other users in order to ensure a logical continuity of perspective in a post or messaging conversation. Notwithstanding, as per the Community Guidelines, We have the right to remove any content we may deem offensive or unsuitable.

CONTACT DETAILS

If you have any questions, complaints or comments about Us or the Services then please contact Us by going to your Profile in the app, selecting Help / Contact Support, or by email using info@invstr.com or in writing by post to Invstr Limited, 17 Waterloo Place, London, SW1Y 4AR, United Kingdom, or 845 Third Avenue, New York, NY 10022, USA.

CHANGES TO THIS PRIVACY POLICY

We are constantly looking for new ways to improve the Invstr Service. We may amend this privacy policy from time to time. We will use all reasonable efforts to give you notice of any material changes. If you do not agree with any changes We make to this privacy policy, please do not continue using the Invstr Services. Your continued use of Invstr Services will be deemed by Us to be an acceptance of the Privacy Policy.