



Jiko Technologies, Inc.  
Jiko Securities, Inc.

## Privacy Policy

Revised September 4, 2020

Welcome to our Privacy Policy. Jiko Technologies, Inc. and/or its affiliate, Jiko Securities, Inc. (“we,” “our” or “us”) provide you the use of features, widgets, plug-ins, applications, content, downloads and other services (collectively, referred to herein as “Service”). This Privacy Policy governs your use of any online Service location (e.g., website or mobile app) and also applies to your use of all Services provided by us and/or that post a link to this Privacy Policy, regardless of how you access or use the Service, whether via personal computers, mobile devices or otherwise.

This Privacy Policy does not apply to our data collection activities offline or otherwise outside of our Service (unless otherwise stated below) and does not apply to services provided on our site by Jiko Bank, a division of Mid-Central National Bank (“Jiko Bank”), which services are covered by Jiko Bank’s Privacy Notice that is separately provided to you.

**To the extent we provide you notice on our Service of different or additional privacy policies or practices (e.g., at the point of our collection), those additional terms shall govern such data collection and use.**

In addition, please review the Service’s Terms of Use, which governs your use of the Service. By using our Service, you consent to our Privacy Policy and Terms of Use and our collection, use and sharing of your information and data, and other activities, as described below.

### **1. What Information Does our Service Collect?**

#### **(a) Information You Provide to Us**

Personal Information and Demographic Information. On the Service, we may ask you to provide certain categories of information such as: (1) personally identifiable information, which is information that identifies you personally, such as your name, date of birth, social security number, residential address, telephone number, e-mail address, employment status, employer name, occupation, whether you are a “politically exposed person,” whether you are a “control person” (pursuant to FINRA Rule 3210), annual personal income range, and average net worth range (“Personal Information”); and (2) demographic information, such as information about your gender and age (“Demographic Information”). We may collect this information through various forms and in various places on the Service, including through “contact us” forms, if you request to receive information from us or when you otherwise interact with the Service. If we combine Demographic Information with the Personal Information we collect directly from you on the Service, we will treat the combined data as Personal Information under this Privacy Policy.



## **(b) Information We Collect and Store As You Access and Use the Service**

In addition to any Personal Information or other information that you choose to submit to us via our Service, we and our third-party service providers may use a variety of technologies that automatically (or passively) collect and store certain information whenever you visit or interact with the Service (“Usage Information”). This Usage Information may be stored or accessed using a variety of technologies that may be downloaded to your personal computer, browser, laptop, tablet, mobile phone or other device (a “Device”) whenever you visit or interact with our Service. Usage Information may be non-identifying or may be associated with you. Whenever we associate Usage Information with your Personal Information, we will treat it as Personal Information. This Usage Information may include:

- your IP address, UDID or other unique identifier (“Device Identifier”). A Device Identifier is a number that is automatically assigned to your Device used to access the Service, and our computers identify your Device by its Device Identifier;
- your Device functionality (including browser, operating system, hardware, mobile network information);
- the URL that referred you to our Service;
- the areas within our Service that you visit and your activities there, including remembering you and your preferences;
- your Device location;
- your Device characteristics; and
- certain other Device data, including the time of day, among other information.

We may use various methods and technologies to collect and store Usage Information (“Tracking Technologies”). Tracking Technologies may set, change, alter or modify settings or configurations on your Device. A few of the Tracking Technologies include, without limitation, the following (and subsequent technology and methods later developed):

**Cookies.** A cookie is a data file placed on a Device when it is used to visit the Service. A Flash cookie (or locally shared object) is a data file placed on a Device via the Adobe Flash plug-in that may be built into or downloaded by you to your Device. HTML5 cookies can be programmed through HTML5 local storage. Unlike Flash cookies, HTML5 cookies do not require a plug-in. Regular cookies may generally be disabled or removed by tools that are available as part of most commercial browsers, and in some but not all instances can be blocked in the future by selecting certain settings. Each browser you use will need to be set separately and different browsers offer different functionality and options in this regard. Also, these tools may not be effective with regard to Flash cookies or HTML5 cookies. Please be aware that if you disable or remove cookies, Flash cookies, or HTML5 cookies on your Device, some parts of our Service may not function properly, and that when you revisit our Service your ability to limit cookies is subject to your browser settings and limitations.



**Web Beacons.** Small graphic images or other web programming code called web beacons (also known as “1x1 GIFs” or “clear GIFs”) may be included in our Service’s pages and messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a page or e-mail can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Service, to monitor how users navigate the Service, to count how many e-mails that were sent were actually opened or to count how many particular articles or links were actually viewed.

**Embedded Scripts.** An embedded script is programming code that is designed to collect information about your interactions with the Service, such as the links you click on. The code is temporarily downloaded onto your Device from our web server or a third-party service provider, is active only while you are connected to the Service, and is deactivated or deleted thereafter.

**Browser Fingerprinting.** Collection and analysis of information from your Device, such as, without limitation, your operating system, plug-ins, system fonts and other data, for purposes of identification.

**ETag, or entity tag.** A feature of the cache in browsers. It is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. If the resource content at that URL ever changes, a new and different ETag is assigned. Used in this manner, ETags are a form of Device Identifier. ETag tracking may generate unique tracking values even where the consumer blocks HTTP, Flash and/or HTML5 cookies.

**Recognition Technologies.** Technologies, including application of statistical probability to data sets, which attempt to recognize or make assumptions about users and devices (e.g., that a user of multiple devices is the same user).

We may use Tracking Technologies for a variety of purposes, including:

**Strictly Necessary.** We may use cookies or other Tracking Technologies that we consider are strictly necessary to allow you to use and access our Service, including cookies required to prevent fraudulent activity, improve security or allow you to make use of Service functionality.

**Performance-Related.** We may use cookies or other Tracking Technologies that are useful in order to assess the performance of the Service, including as part of our analytic practices or otherwise to improve the content, products or services offered through the Service.

**Functionality-Related.** We may use cookies or other Tracking Technologies that are required to offer you enhanced functionality when accessing the Service, including identifying you when you visit our Service or keeping track of our specified preferences, including in terms of the presentation of content on our Service.

**Targeting-Related.** We may use Tracking Technologies to deliver content relevant to your interests on our Service and third-party sites based on how you interact with our content. This includes using Tracking Technologies to understand the usefulness to you of the content that have been delivered to you.

There may be other Tracking Technologies now and later devised and used by us in connection with the Service. Further, third parties may use Tracking Technologies in connection with our Service, which may include the collection of information about your online activities over time and across third-party web sites or online services. We may not control those Tracking Technologies and we are not responsible for them. However, you consent to potentially encountering third-party Tracking Technologies in connection with use



of our Service and accept that our statements under this Privacy Policy do not apply to the Tracking Technologies or practices of such third parties.

**(c) Information Third Parties Provide About You**

We may, from time to time, supplement the information we collect directly from you on our Service with outside records from third parties for various purposes, including to enhance our ability to serve you, to tailor our content to you and to offer you opportunities that may be of interest to you. To the extent we combine information we receive from those sources with your Personal Information we collect on the Service, it will be treated as Personal Information and we will apply this Privacy Policy to such combined information, unless we have disclosed otherwise. In no other circumstances do our statements under this Privacy Policy apply to information we receive about you from third parties.

**(d) Interactions with Third Party Services**

The Service may include functionality that allows certain kinds of interactions between the Service and your account on a third-party web site, application or other service. The use of this functionality may involve the third-party operator providing certain information, including Personal Information, to us. For example, we may provide third-party sites' interfaces or links on the Service to facilitate your sending a communication from the Service. For example, we may use third parties to facilitate emails, Tweets or Facebook postings. These third parties may retain any information used or provided in any such communications or other activities and these third parties' practices are not subject to our Privacy Policy. Jiko may not control or have access to your communications through these third parties. Further, when you use third-party sites or services, you are using their services and not our services and they, not we, are responsible for their practices. You should review the applicable third-party privacy policies before using such third-party tools on our Service.

**(e) California Do Not Track Disclosures**

Various third parties are developing or have developed signals or other mechanisms for the expression of consumer choice regarding the collection of information about an individual consumer's online activities over time and across third-party web sites or online services (e.g., browser do not track signals). Currently, we do not monitor or take any action with respect to these signals or other mechanisms.

## **2. How Do We Use the Information Collected?**

We may use your Personal Information, Demographic Information or Usage Information for various purposes, including:

- to provide you with information such as to send you electronic newsletters or to provide you with special offers or promotional and marketing materials on our behalf, including to let you know about upcoming events;
- to enable you to participate in a variety of the Service's features such as to enable you to participate in online surveys, entry sweepstakes, contests or other promotions;
- to improve the Service or our Service offerings;



- to customize your experience on the Service or to serve you specific content that we believe is relevant to you;
- to provide customer support;
- to contact you with regard to your use of the Service and, in our discretion, changes to the Service and/or Service's policies;
- to improve the overall experience at the Service;
- for internal business purposes; and
- for purposes disclosed at the time you provide your information or as otherwise set forth in this Privacy Policy.

### **3. How and When Do We Disclose Information to Third Parties?**

We may share non-Personal Information, such as aggregated user statistics, with third parties. Further, we may share your Device Identifiers with third parties along with data related to you and your activities. In addition, we may share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information and as described below or otherwise in this Privacy Policy. We may disclose your information as follows:

**(a) Third Parties Providing Services on our Behalf.** We may use third-party vendors to perform certain services on behalf of us or the Service, such as: (i) to assist us in Service operations; (ii) hosting the Service; (iii) designing and/or operating the Service's features; (iv) tracking the Service's activities and analytics; (v) enabling us to perform other administrative services; and (vi) other services designed to assist us in maximizing our business potential. We may provide these vendors with access to user information, including Device Identifiers and Personal Information, to carry out the services they are performing for you or for us.

**(b) Administrative and Legal Reasons.** We may access, use, preserve, transfer and disclose your information (including Device Identifiers and Personal Information) to third parties: (i) to satisfy any applicable law, regulation, subpoenas, governmental requests or legal process if in our good faith opinion such is required or permitted by law; (ii) to protect and/or defend the Service's Terms of Use or other policies applicable to the Service, including investigation of potential violations thereof; (iii) to protect the safety, rights, property or security of the Service or any third party; and/or (iv) to detect, prevent or otherwise address fraud, security or technical issues. Further, we may use IP addresses or other Device Identifiers, to identify users, and may do so in cooperation with third parties such as copyright owners, internet service providers, wireless service providers and/or law enforcement agencies, including disclosing such information to third parties, all in our discretion, subject to applicable law. Such disclosures may be carried out without notice to you.

**(c) Affiliates and Business Transfer.** We may share your information, including your Device Identifiers and Personal Information, Demographic Information and Usage Information with our



parent, subsidiaries and affiliates. We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the Service or applicable database; or (ii) in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other corporate change, including, during the course of any due diligence process.

#### **4. Ads and Information About You**

Data about your activities online is being collected on our Service for use in providing advertising tailored to your individual interests. We may use third parties such as network advertisers and ad exchanges to serve advertisements across the Internet and may use third-party analytics service providers to evaluate and provide us and/or third parties with information about the use of these ads on third-party websites and viewing of ads and of our content. Third parties may offer you a choice as to whether or not to have your information collected for that purpose. This section of the privacy policy provides details and explains how to exercise that choice.

You may see certain ads on our Service as well as on other third-party websites across the Internet because we participate in advertising networks administered by third parties. These networks track your online activities over time and across third-party websites by collecting information through automated means, including through the use of the tracking technologies described elsewhere in this Privacy Policy, and they use this information to show you advertisements (including our ads) that are tailored to your individual interests. The information they collect includes information about your visits to our Service, such as the pages you have viewed. These third-party tracking technologies may be set to, among other things: (a) help deliver advertisements to you that you might be interested in; (b) prevent you from seeing the same advertisements too many times; and (c) understand the usefulness to you of the advertisements that have been delivered to you. You acknowledge and agree that associated technology may access and use your device and may set or change settings on your device in connection with the associated operations. Note that any images (or any other parts of content) served by third parties in association with third-party ads or other content may act as web beacons, which enable third parties to carry out the previously described activities.

#### **5. How Do I Change My Information and Communications Preferences?**

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of registration. The Service may allow you to review, correct or update Personal Information you have provided through the Service's forms, and you may provide updates and changes by calling us toll free at 1-833-333-JIKO (1-833-333-5456) or if calling from outside the United States at 1-510-788-8810 or mailing us c/o Jiko Technologies, Inc., at 2000 Allston Way, PO Box 327, Berkeley, CA 94701. If so, we will make good faith efforts to make requested changes in our active databases as soon as reasonably practicable (but we may retain prior information as business records). Please note that it is not always possible to completely remove or delete all of your information from our databases and that residual data may remain on backup media or for other reasons.

You may cancel or modify our email marketing communications you receive from us by following the instructions contained within our promotional emails or, if available, by logging into your Service account and changing your communication preferences. If your opt-out is limited to certain types of emails, the opt-



out will be so limited. Subsequent or different subscriptions will be unaffected. Please note that we reserve the right to send you certain communications relating to your account or use of our Service, such as administrative and Service announcements and these transactional messages may be unaffected if you choose to opt-out from receiving our marketing communications. If you have any questions about the Privacy Policy or practices described in it, you should call us toll free at 1-833-333-JIKO (1-833-333-5456) or if calling from outside the United States at 1-510-788-8810 or mail us c/o Jiko Technologies, Inc., at 2000 Allston Way, PO Box 327, Berkeley, CA 94701.

## **6. What About Transfer of Information to the United States?**

Our Service is operated in the United States and intended for users located in the United States. If you are located outside of the United States, please be aware that information we collect, including Personal Information, will be transferred to, and processed, stored and used in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your Personal Information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By using the Service or providing us with any information, you consent to the transfer to, and processing, usage, sharing and storage of your information, including Personal Information, in the United States as set forth in this Privacy Policy.

## **7. What Should Parents Know About Children?**

The Service includes a general audience web site and mobile application and we do not knowingly collect any personal information from children younger than the age of eighteen (18) as required by U.S. law. We will delete any personal information collected that we later determine to be from a user younger than the age of eighteen (18). If you are a parent or guardian of a child under the age of eighteen (18) and believe he or she has disclosed personal information to us, please call us toll free at 1-833-333-JIKO (1-833-333-5456) or if calling from outside the United States at 1-510-788-8810 or mailing us c/o Jiko Technologies, Inc., at 2000 Allston Way, PO Box, 327, Berkeley, CA 94701

## **8. What About Security?**

We endeavor to incorporate commercially reasonable safeguards to help protect and secure your Personal Information. However, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure the security of any information you transmit to us, and you use our Service and provide us with your information at your own risk.

## **9. What About Changes to the Privacy Policy?**

We reserve the right to change this Privacy Policy at any time without notice to you. Any changes will be effective immediately upon the posting of the revised Privacy Policy and your use of our Service indicates your consent to the privacy policy posted at the time of use. However, we will not use your previously collected Personal Information in a manner materially different than indicated at the time it was collected without your consent. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

