

# **PRIVACY POLICY**

## **Introduction**

Welcome to Growin! We work hard to protect your personal information and ensure your information is kept private and secure. As Growin Service (“Growin”) is developed and run by TradingValley Inc., the following privacy policy outlines the types of personal information that TradingValley Inc. (“TradingValley” “we,” or “us,”) collect, including through the Growin’s app (the “APP”) or Growin’s website (the “Website”). It also explains why we collect your information and how we use it.

Privacy is important to Growin. We will never rent or sell your information to anyone. If you have any questions or if you believe that we has not adhered to this privacy policy, please send us a note at [support@growin.tv](mailto:support@growin.tv)

## **Information We Collect and Why**

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

## **Visitor Information**

We collect various types of anonymous information about visitors to Growin, 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 app or website, browsing activity, and any site that referred you to Growin). We also collect information that you input into our website, e.g., by beginning the account application process or by commenting on the Growin’s blog. We use this information to better understand our visitors and our business, facilitate site navigation, provide the services or information you request, and enhance our service.

## **Customer Information**

When you choose to create an account with Growin, 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 this information to provide you with financial services. If you do not wish to provide this information, you cannot become a Growin customer.

## **Retirement Plan Sponsor and Participant Information**

When a company creates an account with us as a retirement plan sponsor, 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.

## **Other Ways We Collect Information**

Apart from through the account opening process and from visitors to the site, we may collect various other types of personal information if you or a friend engages with Growin. We collect your email address as part of our customer referral service or if you subscribe to the website. 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 the website and actions you take within your Growin account while logged in to your Growin account.

## **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 Growin service and improve your experience with the site. Cookies store anonymous information, such as whether you viewed the site from your mobile device. We may store some personal information in a cookie and/or pixel, such as the site that you visited immediately prior to visiting Growin 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 that only stores anonymous information to track visitors across 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 this site. However, refusing to accept cookies or pixels will make the use of Growin more cumbersome and less accessible.

## **Advertising Companies**

Growin advertises our services on websites not affiliated with TradingValley, and we contract with third-party advertising companies to display these ads. These third-party advertising companies, along with data exchanges and similar providers, may use cookies and similar technologies to collect technical and web navigational information, such as device type, browser type, IP address, and pages visited. We do not provide any information to these advertising companies that could personally identify our users or clients, and they do not collect such information for us.

We and third-party advertising companies may use the data collected to provide you with ads relevant to you and personalized content while you are on the website, the app or other sites. If you prefer to not receive targeted advertising, you can opt out of some network advertising programs that use your information by visiting the NAI Opt-Out Page. Please note that even if you choose to remove your information by opting out, you will still see advertisements while you are browsing online.

Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The NAI Opt-Out Page provides a tool that identifies its member companies that have cookies on your browser and provides links to those companies.

Because mobile devices may vary in how they operate and may not use cookies, the choice management options listed above may not work for all mobile devices and mobile apps.

## **Analytics Services**

We use third-party analytics tools, including “Google Analytics” (such tools collectively referred to as “Analytics Services”) to collect information about the usage of this site. The Analytics Services collect information about how often users visit this site, 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. We do not combine the information collected through the use of Google Analytics with personally identifiable information.

You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. You can opt-out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on [here](#).

## **How We Use Your Personal Information**

We use your personal information to enhance your customer experience, provide customer support, operate and maintain your account in accordance with US law, investigate and understand how Growin is used, monitor and protect the security and integrity of Growin, and better market and advertise Growin’s services. You understand and agree that Growin 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 analysis, 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 may use your personal information to contact you regarding our own services, resources that we think may be of interest to you. Please note that if you hold an account with Growin, 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 consumer identification verification services, public accounting firms and other professional firms, and certain other vendors and service providers who perform marketing, advertising, research and analytics services on our behalf. 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 Growin 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.

If you conduct business with us through Growin for Advisors, we may exchange information we collect with your investment professional or with others they may authorize. In order to provide workplace services to employers or plan sponsors, such as retirement savings plan services and record keeping services, we may exchange any information received in connection with such services with the employer or plan sponsor or others they may authorize. We may also share information, including but not limited to account positions, contributions, distributions, and cash flows, with a third-party financial institution that serves as a directed trustee to 401(k) plans serviced by Growin for Business and its affiliates.

## **How Your Personal Information is Protected**

Growin works diligently to protect your personal information. We employ several physical and electronic safeguards to keep your information safe. We use the strongest available browser encryption, store all of our data on servers in secure facilities, and implement systematic processes and procedures for securing and storing data. We limit access to your personal and financial information to only those employees with authorized access who need to know the information in order to perform their jobs, and we require third parties who perform services for TradingValley to agree to keep your information confidential. Furthermore, if you choose to close your account or your account is terminated with us, we will continue to adhere to the privacy policies and practices outlined here. If you maintain a Growin account that you access through our website or mobile apps, you are responsible for protecting and maintaining the confidentiality of your account and password and restricting access to your computer.

## **How You Can Access or Change Your Personal Information That We Have Collected**

Once you have registered with Growin, you can access your profile, review the information that is stored, and revise that information. If you have any problems, you may also contact us at [support@growin.tv](mailto:support@growin.tv). Due to US regulatory requirements, we do not delete residual copies of outdated information and must preserve all customer data for a minimum of three years.

## **Other Important Information**

### **Former Customers**

If you are a former customer, these policies also apply to you; we treat your information with the same care as we do information about current customers.

## **How We Respond to Do Not Track Signals**

Online tracking is the collection of data about an individual's Internet activity used to deliver targeted advertisements and for other purposes. Customers using certain modern browsers have the ability to activate a "Do Not Track" signal. Growin does not currently respond to the "Do Not Track" signal.

## **How You Accept This Policy**

By using and continuing to use the Growin mobile apps and/or services and Growin Website, or otherwise providing us with personal information (such as an email address) you agree to the terms and conditions of this privacy policy and any updates thereto. This policy may change from time to time. This is our entire and exclusive privacy policy and it supersedes any earlier version. Our Terms and Conditions take precedence over any conflicting privacy policy provision.

## **Changes to the Policy**

We may modify this privacy policy over time without prior notice by posting a new version of this privacy policy, which is your responsibility to review. Any changes to the privacy policy will be reflected on this page and will become effective immediately upon posting. We encourage you to periodically review this privacy policy to stay informed about how we are protecting the personally identifiable information we collect. If changes to the privacy policy are material, we will do our best to notify you via email or through a notification on the site or app. Please check the effective date below to determine if there have been any changes since you have last reviewed the Growin privacy policy.

## **Children**

Growin is not directed towards anyone under the age of 18. If a parent or guardian becomes aware that his or her child under the age of 18 has created an account with Growin and/or provided us with personally identifiable information, please contact us at support@growin.tv. Additionally, if we become aware at any point that a child under the age of 18 is using our service, we will terminate his or her account.

## **Your Rights as a California Resident**

Residents of California have the right to request from us certain information with respect to the types of personal information we share with third parties for those third parties' direct marketing purposes and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To exercise your rights, you may make one request each year by emailing us at support@growin.tv. Your request should specify your full name and the email address you used when submitting personal information to us.

## **Your Rights as a Vermont Resident**

We do not share nonpublic personal financial information we collect about Vermont residents to non-affiliated third parties except for our everyday business purposes or as otherwise permitted by law. If you wish to revoke any authorization to share your nonpublic personal financial information, which you have provided to us by entering into our Customer Agreement, please contact us at support@growin.tv. Please note, however, that we will not be able to provide you with services through Growin without the ability to share this financial information.

## **International Visitors**

This Service is hosted in the United States. If you are an international visitor, you should note that by providing your personal information, you are: (i) permitting the transfer of your

personal information to the United States which may not have the same data protection laws as the country in which you reside; and (ii) permitting the use of your personal information in accordance with this privacy policy.

**Questions**

If you have any questions on the privacy policy, please contact us at: [support@growin.tv](mailto:support@growin.tv)

**LAST AMENDED DATE: 2019/11/18**