



AtomicVest Inc.
Privacy Notice
11/8/2021

This Privacy Notice is designed to help you understand how AtomicVest Inc. and its affiliates (“**Atomic**”, “**we**”, “**us**”, and “**our**”) collects, uses, and shares your personal information and to help you understand and exercise your privacy rights.

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- 1. SCOPE**

This Privacy Notice applies to personal information processed by us, including on our websites, mobile applications, and other online or offline offerings. To make this Privacy Notice easier to read, our websites, mobile applications, and other offerings are collectively called “**Services.**”

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. Information You Provide to Us Directly

We may collect the following personal information that you provide to us.

- **Account Information.** We may collect information when you create an account, such as name, user name, alias, Social Security number, taxpayer identification number, driver’s license, passport number, other government-issued identification, alien registration number, signature, financial account information, birthdate, email address, home and work phone number, mobile phone number, mailing address, employment information, and other information you provide to us.



- **Investments, Balances, and Transactions.** We may collect personal information and details associated with your investments, account balances, and transactions you enter into in connection with the Services.
- **Your Communications with Us.** We may collect personal information, such as email address, phone number, or mailing address when you request information about our Services, register for our newsletter, request customer or technical support, or otherwise communicate with us.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, you may be asked to provide certain information which may include personal information.
- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., messaging and chat features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Services. You may reply to one of these postings by submitting your application, CV, cover letter, and/or other information to us.

B. Information Collected Automatically

We may collect personal information automatically when you use our Services:

- **Automatic Data Collection.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- **Cookies, Pixel Tags/Web Beacons, and Other Technologies.** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags,



local storage, and other technologies (“**Technologies**”) to automatically collect information through your use of our Services.

- **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity and improve security or that allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics below*);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party websites.

See “[Your Privacy Choices and Rights](#)” below to understand your choices regarding these Technologies.

- **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Services, including:
 - **Google Analytics.** For more information, please visit [Google Analytics’ Privacy Policy](#). To learn more about how to opt-out of Google Analytics’ use of your information, please click [here](#).
 - **Session Replay Providers.** We use FullStory for session replay analytics, which allows us to record and replay an individual’s interaction with the Services. This helps us understand our user’s experience and how we can improve our Services. For more information about FullStory, please visit: [FullStory Privacy Policy | FullStory](#). To learn more about how to opt-out of FullStory’s use of your information, please click [here](#).

C. Information Collected from Other Sources



We may obtain information about you from other third parties, including third-party organizations. For example, if you use our Services in connection with an account you have with a Third-Party Service (defined below), we may collect information about you from that Third-Party Service that is made available to us. In addition, we may obtain supplemental information about you from third-party sources.

3. HOW WE USE YOUR INFORMATION

We use your information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfil our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Facilitating your investments and transactions on the Services;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Know Your Customer (KYC), Customer Identification Program (CIP), Anti-Money Laundering (AML), and other similar activities;
- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Improving, upgrading or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions and other compliance activities;
- Enforcing our agreements and policies; and
- Complying with our legal obligations.

C. Marketing and Advertising our Products and Services



We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we market to you include email campaigns, custom audiences advertising, and “interest-based” or “personalized advertising,” including through cross-device tracking.

If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in [“Contact Us”](#) below.

D. Other Purposes

We also use your information for other purposes as requested by you or as permitted by applicable law.

- **Consent.** We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.
- **De-identified and Aggregated Information.** We may use personal information and other information about you to create de-identified and/or aggregated information, such as de-identified demographic information, [de-identified location information,] information about the device from which you access our Services, or other analyses we create.
- **Share Content with Friends or Colleagues.** Our Services may offer various tools and functionalities. For example, we may allow you to provide information about your friends through our referral services. Our referral services may allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Only share with us contact information of people with whom you have a relationship (e.g., relative, friend, neighbor, or co-worker).

4. HOW WE DISCLOSE YOUR INFORMATION

We disclose your information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your information are described below.

- **Service Providers.** We may share your personal information with our third-party service providers who use that information to help us provide our Services. This includes service providers that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Third-Party Services.** Our Services may allow you to interact with, access, use, disclose personal information to, and/or transfer personal information from third-party services, products, technology, and applications (collectively, “**Third-Party Services**”). In addition, we may also share your personal information with Third-Party Services in connection with your use of the Services.



Some of these Third-Party Services may include your bank or other financial institution and the online platforms which you use to make money and interact with the Services (e.g., ridesharing services and online rental marketplaces).

Atomic does not provide any aspect of the Third-Party Services and is not responsible for the use of or sharing of information with the Third-Party Services. Once your personal information has been shared with the Third-Party Service, it will also be subject to the Third-Party Service's privacy policy and the Third-Party Service may use your personal information for its own purposes. We encourage you to closely read each Third-Party Service's privacy policy with whom you interact. You acknowledge sole responsibility for and assume all risk arising from the use of or sharing of information with any Third-Party Services.

- **Affiliates.** We may share your personal information with our company affiliates.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information to business partners with whom we jointly offer products or services
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as "interest-based advertising" or "personalized advertising."
- **APIs/SDKs.** We may use third-party application program interfaces ("APIs") and software development kits ("SDKs") as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in "[Contact Us](#)" below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.



5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email and Telephone Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Notice).

We process requests to be placed on do-not-mail, do-not-phone, and do-not-contact lists as required by applicable law.

- **Text Messages.** You may opt out of receiving text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us.
- **Mobile Devices.** We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device. With your consent, we may also collect precise location-based information via our mobile application. You may opt out of this collection by changing the settings on your mobile device.
- **“Do Not Track.”** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies and Interest-Based Advertising.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#) and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Digital Advertising Alliance](#), and [the Digital Advertising Alliance of Canada](#).

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Access Personal Information** about you, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; and



(iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company (the “right of data portability”);

- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion** of your personal information;
- **Request Restriction of or Object to** our processing of your personal information; and
- **Withdraw your Consent** to our processing of your personal information.

If you would like to exercise any of these rights, please contact us as set forth in “[Contact Us](#)” below. We will process such requests in accordance with applicable laws.

6. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Notice but no system is fully secure; therefore, we cannot ensure nor warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosures of your information.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on our Services, by mail or by sending an email to you.

7. INTERNATIONAL DATA TRANSFERS

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

8. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Notice for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

9. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

This Supplemental California Privacy Notice only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (“**CCPA**”). The CCPA provides California residents with the right to know what categories of personal information Atomic has collected about them and



whether Atomic disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months. California residents can find this information below:

Category of Personal Information Collected by Atomic	Categories of Third Parties Personal Information is Disclosed to for a Business Purpose
Identifiers	<ul style="list-style-type: none">● Service providers● Third-Party Services you share or interact with● Advertising partners
Personal information categories listed in Cal. Civ. Code § 1798.80(e)	<ul style="list-style-type: none">● Service providers● Third-Party Services you share or interact with
Protected classification characteristics under California or federal law	<ul style="list-style-type: none">● Service providers● Third-Party Services you share or interact with
Commercial information	<ul style="list-style-type: none">● Service providers● Third-Party Services you share or interact with
Internet or other electronic network activity	<ul style="list-style-type: none">● Service providers● Third-Party Services you share or interact with● Advertising partners
Sensory data	<ul style="list-style-type: none">● Service providers● Third-Party Services you share or interact with
Professional or employment-related information	<ul style="list-style-type: none">● Service providers● Third-Party Services you share or interact with
Inferences drawn from other personal information to create a profile about a consumer	<ul style="list-style-type: none">● Service providers● Third-Party Services you share or interact with● Advertising partners

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth above.

Additional Privacy Rights for California Residents



“Sales” of Personal Information under the CCPA. For purposes of the CCPA, Atomic does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 16 years of age.

Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To designate an authorized agent, please contact us as set forth below.

Verification. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include confirming the email address associated with any personal information we have about you.

If you are a California resident and would like to exercise any of your rights under the CCPA, please [Contact Us](#) as set forth below. We will process such requests in accordance with applicable laws.

10. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth below.

11. CHILDREN’S INFORMATION

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in [“Contact Us”](#) below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child’s account.

12. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These may include our business, bank, or platform partners. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.



Supervisory Authority. If you are located in the European Economic Area, Switzerland, or the United Kingdom, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

Changes to our Privacy Notice. We may revise this Privacy Notice from time to time in our sole discretion. If there are any material changes to this Privacy Notice, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Notice if you continue to use our Services after the new Privacy Notice takes effect.

13. CONTACT US

Atomic is the controller of your personal information. If you have any questions about our privacy practices or this Privacy Notice, or to exercise your rights as detailed in this Privacy Notice, please contact us at:

AtomicVest, Inc.
1160 Battery Street, East Suite 100, San Francisco, CA 94111

privacy@atomicvest.com

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