



Privacy Policy

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Privacy Policy

This Privacy Policy ("Policy") covers the following affiliated companies: BBAE Holdings LLC, Redbridge Securities LLC, and BBAE Advisors LLC. These entities are collectively referred to as "BBAE," "affiliated companies," "we," "us," and "our" throughout this Privacy Policy.

Overview

We are committed to maintaining the privacy and confidentiality of our customers' personal information. In the course of offering and providing financial products and services, 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 by mail, e-mail, or telephone, 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

BBAE may periodically collect information from you through automated means. When you browse our site, use the iOS and Android applications, use our services, 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 services, store online preferences, track usage of the site or services, tailor the marking of business services, or enhance security. BBAE does not store login credentials used to link 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 applications 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 services to you, and improve our services, 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 services. We collect your precise location data with your permission, and use that information, for example, to help protect against fraud by detecting and declining debit card transactions or account withdrawals that may occur far away from your device's location. You may decline to allow us to collect such geolocation information, in which case BBAE 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.

By providing your phone number you expressly consent to BBAE and/or its agents calling or texting you using an automated telephone dialing system and/or prerecorded messages, even if you incur charges for receiving such communications. You may request to be removed from phone or text communications by emailing service@rbsecurities.com.

Interest-based Advertising

We 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 services 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 BBAE and its Advertising Providers collect about your visits to this site and elsewhere over time.

We may use third-party analytics services (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 services, you may not be able to use the full

functionality of the platform. Additionally, all browsing information is collected in the aggregate, de-identified and anonymized.

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 services 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.

Third Party Services

We use Electronic Verification Systems LLC (“EVS”) to gather and verify customer data. By using our service, you grant us and EVS the right, power, and authority to act on your behalf to access and transmit your personal and financial information. You agree to your personal and financial information being transferred, stored, and processed by EVS in accordance with the EVS Privacy Policy.

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 customer, 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 services may be aggregated with other non-personal data to provide insights which are commercially valuable to BBAE, such as statistics of the use of BBAE Services.

Children’s Privacy

We do not knowingly collect or solicit any information from anyone under the age of 18 on our services. 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 service@rbsecurities.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 services. The CCPA, however, does not apply to all BBAE entities.

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

- 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.

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, services, 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 service@rbsecurities.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 Services.

Contact Us

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