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Consumer Privacy Notice

WHAT DOES KARMEQ DO WITH YOUR PERSONAL INFORMATION?

Why?	The Securities Exchange Commission has enacted Regulation S-P (“Reg S-P”), commonly referred to as “The Privacy Rule”, in response to the Gramm-Leach-Bliley Act. This rule requires all broker-dealer firms to provide all of its users a disclosure statement, outlining its procedures and policies regarding the safeguarding of non-public personal information that is obtained during the normal course of business. Users can choose to limit some sharing of information, but not all. Please read this Privacy Notice carefully and regularly to understand your rights.
What?	<p>The types of personal information we collect and share depends on the product or service you register for on Karmeq. This information can include:</p> <ul style="list-style-type: none"> • Information we receive from you in applications or other forms <ul style="list-style-type: none"> ○ Name, Phone number, email address ○ Social Security number ○ Address, citizenship ○ Job title, assets, income • your transactions history and account balances with us or others <ul style="list-style-type: none"> ○ Bank information ○ Payment history, Credit history • commercial information <ul style="list-style-type: none"> ○ records of personal property ○ investment history and holdings, investment performance data and other data • Information we receive via cookies <ul style="list-style-type: none"> ○ IP Address ○ Browser type, Operating System
How?	We need to share customers’ Personal Information to run our business. Below, we list the reasons financial companies can share their customers’ personal information, what and how Karmeq shares, and whether you can limit this sharing.

Reasons we can share your personal information	Does Karmeq Share?	Can you Limit this Sharing?
For Karmeq everyday business purposes - process your transactions, maintain your account positions, comply with and respond to legal orders	Yes	No
For Karmeq marketing purposes - to offer our own products and services to you	Yes	No
For joint marketing with other financial companies	No	We don’t share
For Karmeq affiliates’ everyday business purposes - information about your transactions and payment history	Yes	No
For Karmeq affiliates’ everyday business purposes - information about your creditworthiness	Yes	Yes
For affiliates’ marketing purposes	Yes	Yes
For non-affiliates’ marketing purposes	No	We don’t share
To Limit our Sharing	To opt out of any sharing, email us at support@karmeq.com Please note: If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer a customer, we continue to share your information as described in this notice. You can contact us at any time to limit our sharing.	
For Questions:	Email: support@karmeq.com Phone Number: (844) FOR-KRMQ (367-5767)	

Who we are	
Who is providing this notice?	This form is being provided by Karmeq, LLC.
What we do	
How does Karmeq protect my personal information?	<p>We aim to protect your Personal Information from unauthorized access and use, by implementing and maintaining reasonable security appropriate to the nature of the Personal Information that we collect, use, retain, transfer or otherwise process. Our reasonable security program is implemented and maintained in accordance with applicable law and relevant standards, including the report issued by the California Attorney General in February 2016, available at https://oag.ca.gov/sites/all/files/agweb/pdfs/dbr/2016-data-breach-report.pdf. Among other safeguards, our reasonable security program implements and maintains all 20 of the Center for Internet Security's Critical Security Controls for Effective Cyber Defense identified in Appendix A of the California Attorney General Report.</p> <p>There is no "Perfect Security." While we are committed to maintaining, monitoring and updating a reasonable information security program to manage risk, data security incidents and breaches can occur due to vulnerabilities, criminal exploits or other factors that cannot reasonably be prevented. It cannot be assumed that the occurrence of any breach results from our failure to implement and maintain reasonable security.</p> <p>We restrict access to your Personal Information to those employees who need to know that information to provide products or services to you and maintain strict physical, electronic, and procedural safeguards to guard your Personal Information.</p>
Who does Karmeq share my information with?	<p>Karmeq uses non-affiliate third-party service providers to accomplish business operations such as:</p> <ul style="list-style-type: none"> • Product design • Trading and clearing • Background checks and fraud prevention services <p>The non-affiliated third-parties with whom we share your Personal Information are bound to comply with similar and equally stringent undertakings of privacy and confidentiality. We do not share Personal Information about you with non-affiliates for their independent use unless:</p> <ul style="list-style-type: none"> • you give us express permission • it is necessary to complete a transaction on your behalf • it is necessary to protect against fraud, comply with a subpoena or other court order and is otherwise required by law • We believe in good faith that an applicable situation requires it, such as: <ul style="list-style-type: none"> ○ To respond to emergency ○ To comply with government authorities conducting an investigation ○ To detect technical security vulnerabilities <p>We do not and will not sell your Personal Information to third-parties.</p>
How long does Karmeq retain my information?	<p>We will not retain Personal Information for longer than is necessary in relation to the purpose for which it is collected, subject to Data Protection Law. Your Personal Information will be retained for the duration of your account on our platform, as applicable, and for a minimum period of six years after termination of your account, as applicable. We may retain Personal Information for a longer period for the purpose of marketing our products and services or compliance with applicable law.</p> <p>If you decide to close your account(s) or become an inactive customer, we will continue to store and share your data in adherence to the privacy policies and practices as described in this notice.</p>

<p>How do I access or request deletion of my personal information?</p>	<p>You can log into your account to access or request deletion of certain information about yourself, or you can do so by using the contact details set out in this Privacy Notice. For security purposes, you may be required to provide additional information to verify your identity and validate your request. Moreover, we may not be able to grant all requests, as an exception may apply and/or we may be required to retain information for record keeping or other legal compliance purposes.</p> <p>You have the right to request access to Information we collect and share about you. We are committed to ensuring that you know what information we collect about you. You can submit a request to us for the following information, with respect to certain Personal Information we have collected:</p> <ul style="list-style-type: none"> • The categories of Personal Information we have collected about you. • The categories of sources from which we collected the Personal Information. • The business or commercial purposes for which we collected or sold the Personal Information. • The third-parties with whom we shared the information. • The specific pieces of information we collected about you. <p>We are also committed to ensuring that you know what information we share about you. You can further submit a request to us for the following information:</p> <ul style="list-style-type: none"> • The categories of Personal Information (if any) that we have sold about you, • the third-parties to whom we sold that Information, and the categories of Personal Information sold to each third-party. • The categories of Personal Information that we have shared with Service Providers who provide services to us. <p>Our responses to any of these requests will cover the 12-month period preceding our receipt of the request.</p>
<p>How does Karneq use cookies?</p>	<p>Karneq uses small data files stored on your computer called cookies. Session cookies enable us to recognize your actions during the browsing session, are temporary and expire when you close your browser. Persistent cookies remain stored on your device until they expire or you delete them.</p> <p>Cookies gives us the insight into how people use our website to help us keep improving it. Cookies do lots of different things such as helping us to:</p> <ul style="list-style-type: none"> • avoid asking you to register or complete details twice; • estimate the number of visitors to our site, including the source and patterns relating to this traffic; and • understand how visitors use the site, and how we can enhance this experience. <p>Certain cookies are strictly necessary to access and operate the site. You are able to accept or reject all cookies, including cookies that are necessary to the functioning and accessibility of our website, via your browser settings. Rejecting necessary cookies may have an impact on the functioning of the website.</p>
<p>How is Information shared with other Karneq users?</p>	<p>To facilitate transfers of securities (gifts) on the platform, Karneq may share some of your Personal Information with other Karneq users. Your email address, phone number, securities on your Wishlist, and securities you have previously received for gifts may be available to those wishing to gift securities to you.</p> <p>Karneq may facilitate SMS messages and emails between users in a gifting transaction. Please note Karneq can't prevent users from divulging their or another user's personal information when they send a personal message via Karneq's SMS or email messaging system. Karneq shall not be held liable for any information that is received by an unintended recipient that you voluntarily shared on the Karneq platform.</p> <p>You can dictate what information other Karneq users may see on the</p>

	Karmeq platform by editing your settings. If you decline to provide Karmeq or other Karmeq users access to certain data, you may be unable to participate in some of the services made available by the Karmeq platform.
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Definitions	
Data Protection Law	<p>Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. It does not include identified or aggregate information.</p> <p>Refers collectively to the laws under which the privacy notice is being provided in accordance with, including:</p> <ul style="list-style-type: none"> • California Consumer Privacy Act (“CCPA”) • US Gramm-Leach-Bliley Act of 1999, as amended • Any other law, statutory instrument, order, rule and regulation implemented thereunder, relating to privacy or processing of personal data
“Personal Information”	Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. It does not include identified or aggregate information.
Affiliates	Includes companies related to Karmeq by common ownership or control. Our affiliates include financial companies such as Poplar Global Wealth Management, LLC.
Non-affiliates	Companies that are not related to Karmeq. Karmeq uses third-party service providers to accomplish business operations such as: <ul style="list-style-type: none"> • Product design • Trading and clearing • Background checks and fraud prevention services
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.