



PRIVACY POLICY (as of January 2023)

We respect your privacy. Elevation LLC (“Elevation”) collects, holds, uses, verifies, and discloses (“processes”) information about individuals that are considered personal data under applicable data protection and privacy laws. Unless advised otherwise, all references to Elevation, “we,” or “our” in this Privacy Policy includes Elevation entities (individually and collectively) located in the United States and Europe that process personal data as controllers.

This Privacy Policy describes:

- What personal data we collect
- How we collect your personal data
- What kind of personal data is obtained from other sources
- The purposes for which we use your personal data
- The monitoring we do
- When we disclose your personal data
- How we protect your personal data
- How we retain your personal data
- What marketing we do
- Your rights under applicable law
- How we update the Privacy Policy
- Our use of cookies on our website, and
- How you can contact us.

Please read this Privacy Policy carefully to understand how we handle your personal data.

1. What personal data do we collect?

If you are an **individual investor** or an **employee** or **prospective employee**, then Elevation may collect the following types of personal data depending on the relevant jurisdiction and the product or services you are seeking:

- Personal details such as name, age, date of birth, gender, citizenship, occupation, and marital status
- Contact details, such as current and previous address, telephone number and email address (both personal and work-based)
- Identification documents including a head and shoulders photograph such as a passport, national identity card or drivers licenses as required to confirm your identity and perform due diligence
- A government-issued personal identifier depending on your country of residence, such as a Social Security Number (SSN), National Insurance Number, Tax File Number, Medicare Number, or any other identifier permitted by relevant law
- Personal details relating to your immediate family members and details relating to any senior political figures to whom you are connected
- Any relevant criminal convictions that may bar you from an investment or from working in the securities industry as applicable.

If you are an **officer, employee, director and/or a principal of a corporate or institutional client**, your personal data may include:

- Your name, date of birth and contact details

- Your role/position/title and area of responsibility and certain identifying information (including any identification documents) as required by applicable law and our duty to perform due diligence on our customers
- Information related to political affiliations, trade union membership, or criminal convictions as required by applicable law

For **employees, prospective employees or individuals providing services to Elevation**, we may also request personal data relating to racial or ethnic origin, membership in trade or other associations, criminal records, and health information where required under applicable law. As with any personal data, we only request and process personal data where required under applicable law or as permitted with your consent (when legally required).

You are not required to supply any of the personal data that we request. However, failure to supply the requested personal data may result in our inability to open or maintain your account, provide services to you or your company or discuss any other opportunities with you.

While we try to ensure that all personal data that we retain is complete and up to date, we rely on you to promptly notify us of any changes in your personal data. We are not responsible for the authenticity of your personal data or any losses arising from your failure to supply us with accurate and/or current information.

2. How do we collect your personal data?

Your personal data is primarily submitted by you during the course of your relationship with us. For **customers**, we obtain your personal data from the forms and documents you use to apply for an account with us, records of your transactions with us, and from any of your access to Elevation products and services. For **employees and prospective employees**, we obtain personal data from your resume and job application form, or any other forms required for your employment.

In some cases, we may collect personal data from you during our monitoring of communications using certain technologies as described below under Question 5.

3. How do we obtain your personal data from other sources?

We may also obtain your personal data from our agents or service providers acting on our behalf, from third parties authorized to provide us with your personal data (such as credit reporting agencies), from third parties performing identification verification or due diligence or KYC checks, and/or from third parties who provide services to you such as your financial advisor, financial planner, dealer group, accountant, attorney, or other authorized professional advisor. Some of this information is publicly accessible and/or accessed through reliable and independent databases that we use to verify your identity.

The personal data that Elevation obtains from these sources may include personal details, contact details, identification documents, personal identifiers, financial account information, and where permitted by law and to the extent necessary, information related to trade union membership or criminal convictions.

For **prospective employees**, in the event you are offered employment, Elevation will verify your identity as part of your background check, which requires the disclosure of your name, date of birth and address to a credit agency as required by law. The credit reporting agency will perform an assessment of your personal data and report its records to us. Should you wish to not disclose this information to a credit reporting agency, please use the contact details below to explore other options to obtain the necessary information.

If you are an **individual associated with a corporation or institution**, your personal data may be provided to us via the corporation or institution. This personal data may include personal and contact details, financial information, identification documents, and where required by applicable law and only to the extent necessary, information related to political affiliations or criminal convictions.

4. What do we use your personal data for and what is the legal basis?

We do not collect or process any personal data for which we do not have a valid legal basis and only to the extent necessary to conduct our business and comply with all applicable regulations. We will only process and use your personal data in the following circumstances:

- If necessary for our legitimate interests (provided these are not overridden by your privacy interests) or to enter into a contract with you for the products and services that you request, your suitability for any investments or for carrying our obligations under a contract, including: administration and services in accordance with customer documents (such as authorizing or confirming transactions or for billing purposes), providing operational support and development of our businesses including the evaluation of customer service efficiency and costs and risk management, contacting you about other services and products (with your prior consent as required by law), monitoring purposes as described in the response to Question 5 below, and for any other legitimate purpose as more fully discussed in the following paragraphs.
- For **employees**, to enter an employment contract that requires you to provide us with your personal data to confirm your references and educational background and to consider your qualifications for the role, to fulfill our rights and duties as an employer and for internal training purposes.
- For Elevation, to exercise and defend our legal rights anywhere in the world including in relation to matters requiring Elevation to assist under applicable law with investigations, complaints, regulatory requests, litigation, arbitration, mediation, or requests from individuals.
- For Elevation's compliance with applicable legal and regulatory obligations and requests applicable to us anywhere in the world, including carrying out credit, money laundering or conflict checks, for fraud and financial crime prevention, for reporting (including, without limitation, transaction reporting) to national and international regulatory, enforcement or exchange bodies, for compliance with any court orders, and for the monitoring purposes specified in Question 5.

5. What monitoring do we conduct that may involve your personal data?

To the extent required by applicable law, we or our affiliates or third parties acting on our behalf may access, review, disclose, intercept, monitor and/or record (i) verbal and electronic messaging and communications (e.g., telephone, fax, SMS, instant message, email, Bloomberg, and any other electronic or recordable communications) with you and/or your agents, and (ii) your use of technology owned or made accessible by us, our affiliates or any other persons on our or their behalf, including, but not limited to systems that may be used to facilitate communications with you or your agent, information processing, transmission, storage and access, as well as remote access.

We only monitor communications and systems to the extent necessary and required under applicable law for the following purposes:

- To establish the existence of facts (e.g., keeping records of transactions)
- To ascertain compliance with regulatory or self-regulatory practices or procedures that relate to our business
- To ascertain or demonstrate standard which should be achieved by persons using communications or systems, including their compliance with the terms and conditions of use for the communications and systems

- To prevent, detect or investigate crime, money laundering, fraud, financial crime and/or other breaches of applicable law
- To comply with applicable laws and regulations, including this Privacy Policy and any related processes or procedures
- To safeguard against the loss, theft, unauthorized and unlawful collection, use, disclosure, destruction or other processing or misuse of confidential and proprietary information
- To prevent, detect or investigate unauthorized use of communications and systems and/or data (such as monitoring to ensure compliance with our policies and procedures, including those related to information security and cybersecurity)
- To ensure the effective operation of Elevation's systems (including any systems used for communications)
- For security or health and safety purposes
- To assist with investigations, complaints, regulatory requests, litigation, arbitration, mediation, or requests from individuals, or
- To evaluate the quality of customer service, efficiency, cost, and risk management

We use various methods to conduct monitoring, including: (i) the use of "intelligent" automated monitoring tools, (ii) IT filtering tools that randomly review communications and systems, (iii) through random monitoring of communications and systems such as by authorized supervisors selecting certain communications for review, (iv) specific monitoring of key communications and systems in relation to investigations, regulatory requests, subject access requests, litigation, arbitration or mediation, (v) data tracking, aggregation and analysis tools that pull data from various disparate data sources to draw linkages and/or detect behavioral patterns, interactions or preferences for analysis (including predictive analysis), and/or (vi) using any new monitoring technology for the foregoing purposes as it becomes available from time to time.

We also use cookies and similar technologies to collect information about you when you visit our websites or interact with us online (e.g., via email or other electronic means). To find out more about how we use cookies, see Question 12 below.

6. When do we disclose personal data that we collect about you?

You should know that:

- Elevation does not sell, rent, or trade your personal data, and
- Elevation does not disclose your personal data except as described in this Privacy Policy

We disclose your personal data for the following purposes as applicable:

- Between us and our affiliates
- To other persons processing your personal data on our behalf in conjunction with professional services, including any of our associated firms or vendors conducting operational, technology and customer service functions in various jurisdictions
- To third parties such as settlement agents, overseas banks or exchange or clearing houses to whom we disclose personal data while providing products and services to you
- To credit bureaus, fraud prevention and/or other similar agencies and financial institutions with whom information must be shared to perform credit check or for anti-money laundering and fraud prevention purposes
- To persons to whom we assign or novate our rights or obligations
- To a prospective seller or buyer if we sell or buy any business or assets or if all or substantially all our assets are acquired by a third party
- To national and international regulatory, enforcement or exchange bodies or courts anywhere in the world as required by applicable law or regulations anywhere in the world at their request, and

- To any third party to whom you authorize us to disclose your personal data

Any of the above disclosures may involve storage overseas or any other overseas transfer, processing and use of your personal data, and disclosure to authorized third parties, including those in countries or territories where the law may provide a different level of data protection. Without limiting the foregoing, your personal data may be disclosed by us to our affiliates and vendors that conduct operational, technology and customer service functions in various jurisdictions, including the United Kingdom and the United States of America and any other country where Elevation may operate in the future. If personal data is transferred to any country or territory which is not recognized as requiring an adequate level of data protection as required by United States laws and regulations, we have implemented appropriate data transfer mechanisms to ensure personal data remains protected as described in our response to Question 7 below.

7. How do we protect your personal data?

Elevation maintains appropriate physical, technical, and procedural safeguards designed to protect any information that you provide to us from accidental or unauthorized loss, misuse, damage, modification, access, or disclosure.

Elevation has established information security procedures and processes designed to:

- Safeguard the confidentiality and privacy of information resources
- Properly classify information resources
- Meet legal and regulatory obligations concerning the protection of information resources
- Implement and maintain information security policies and procedures
- Integrate protection of information resources into the process lifecycles of the business
- Educate those working for or on behalf of Elevation on policies and procedures related to Information Security and Cybersecurity, and
- Authenticate users and limit access to information resources based on authorizations that have been granted

Any third parties who process your personal data on our behalf are required to adhere to appropriate security standards designed to protect such information against unauthorized access, destruction, or loss.

8. How do we retain your personal data?

We retain personal data in an identifiable form in accordance with our records retention policy, which establishes general standards and procedures regarding the retention, handling, and disposition of personal data. Personal data is retained as long as necessary to meet legal, regulatory, and business requirements. Retention periods will be extended if we are required to preserve personal data in connection with litigation, investigations, and proceedings. Upon request, we and/or our affiliates will provide you with more information regarding the applicable retention periods for your personal data.

9. What marketing do we conduct?

If there are any products or services that we or our affiliates believe may be of particular interest to you, with your prior consent, we will contact you using the contact information that you designate. Should you not wish us to use your personal data for future business with us, please notify us in writing to compliance@elevationsecurities.com at any time.

10. What rights do you have including the right to opt-out of our sharing with third parties?

To the extent allowed by applicable law and subject to exemptions thereunder, you have the right to request the correction or erasure of your personal data, to restrict use of your personal data, object to marketing using your personal data, and to the portability of your personal data. While Elevation does not currently share your personal data with unaffiliated third parties (apart from regulators), should you wish to opt out of any future sharing, you can let us know by sending your request to the contacts listed below in Question 13.

If we have collected personal data with your consent, please note that you have the right to withdraw this consent at any time, subject to the applicability of law and relevant regulations. If you wish to exercise any of your rights regarding your personal data or if you believe that we have violated your rights, please contact us using the contact information listed in Question 13. You may be required to supply a valid means of identification as a security precaution to assist us in preventing the unauthorized disclosure of your personal data. If you wish to submit a complaint regarding Elevation's use of your personal data, please submit it using the contact information listed in Question 13.

In the case where you make a request for your personal data, Elevation reserves the right to charge an appropriate fee with notice to you of the amount, where applicable and permitted by law.

11. How and when do we update this Privacy Policy?

We may change or update portions of this Privacy Policy to reflect changes in our policies and procedures and/or applicable laws and regulations. The latest version and issuance date of our Privacy Policy is always available at the bottom right corner of our [company website](#). If also required by applicable law, you will be notified of any change to the Privacy Policy by individual message or may receive updates on an annual basis.

12. How do you use cookies and similar technology on your website?

We, our affiliates and/or other persons acting on our or their behalf use cookies and similar technology to collect, use, and potentially share information when you visit our websites or interact with us online (e.g., via email or other electronic means).

Cookies are small, usually randomly encoded, text files that help your browser navigate through our websites. The cookie file is generated by our website when you access it and is accepted and processed by your computer's browser software or when you interact with us online. The cookie file is stored in your browser's folder or subfolder.

Cookies and similar technology enable Elevation to capture and compile statistical information about how you use our websites and interact with us online, including information relating to the frequency of visits, IP addresses, readership data, (such as the average length of visits, which pages are viewed or shared during a visit or other interactions with our content such as time spent viewing videos, PDFs read and links clicked), authentication information, acceptance or rejection of website terms, periods of inactivity, time zones, language preferences and other regional information.

Information held in cookies or similar tracking technology set by Elevation are kept to a minimum and can only be read by Elevation, our affiliates, their authorized third parties or by someone who has physical access to your personal computer. We use this information for the following purposes:

- To assess the effectiveness of advertising and readership content
- To improve website content and performance
- To estimate our audience size and usage patterns
- To speed up your searches

- To enable log in and authentication when you log onto our sites
- To recognize you when you return to our sites
- To deliver a better and more personalized service by allowing us to customize our site according to your individual interests, and
- To deliver marketing communications that may be of interest to you, including ads or offers tailored to you.

Unless you have adjusted your browser setting so that it will reject cookies, our system will issue cookies when you access or use our websites or online services. **By accessing or using our websites or online services you consent to Elevation using cookies.** In the event you refuse to accept cookies by adjusting your browser setting, some or all areas of our website or online services may not function properly or may not be accessible.

Many web browsers allow you to control the use of most cookies through their browser settings. To learn more about cookies, including information on what cookies have been set on your computer and how cookies can be managed and deleted, visit www.allaboutcookies.org. Our website uses Google Analytics to track your activity. To opt out of being tracked by Google Analytics across our website visit: [please click](#) for the Google browser add-on. In addition to the cookies noted above, our website may also serve third party cookies, which allows us, our service providers, and our third-party business partners to deliver more relevant and tailored content. For more information about the specific cookies that may be served, and to opt out of receiving these cookies, [click here](#).

We may change or update portions of this Cookie Policy to reflect changes in our practices and our applicable law and regulation. Please check this Cookie Policy from time to time so you are aware of any changes or updates to the Cookie Policy, which may be indicated by a change in the effective date noted at the beginning of this Cookie Policy.

13. How can you contact us?

If you would like to contact us regarding any of the information in this Privacy Policy, please use the following contact information.

By email: compliance@elevationsecurities.com

By post: Compliance Officer
Elevation LLC
6836 Carnegie Blvd, Ste 240
Charlotte, NC 28211
USA