



alooola, LLC

Privacy Pledge 2023

At alooola, LLC, we are committed to maintaining and pledging the privacy of the personal information we obtain about you and using it in a fair and lawful manner. This Pledge explains alooola, LLC's privacy commitment to our clients. It describes 1) The non-public personal information we collect about you; 2) Why we collect it; 3) When we may share it with others and 4) Where you can receive more information about this policy.

To whom and what does the Pledge apply?

All current and former alooola, LLC clients are covered by this Pledge. The Pledge covers the personal information of other individuals with whom alooola, LLC has a prior, or prospective relationship where either (a) such protection is required by applicable laws, rules or regulations; or (b) alooola, LLC has made a separate and specific commitment to that effect. In this Pledge "personal information" refers to any information relating to an identified individual, or any "non-public personal information."

What personal information do we collect and how do we collect it?

By law and by the corporate policy of alooola, LLC and our clearing firms, it is important that we collect and maintain accurate information about you. We obtain this information from various account applications and other forms you submit to us, from your business dealings with us, from customer reporting agencies, and other third-party sources. The personal data gathered generally varies depending on the products or services you request and may include your basic contact information such as name, address, phone number, and e-mail address. In addition, your tax identification number, date of birth, marital status and number of dependents, occupation, employer, income, assets, and source of wealth. This is not an all-inclusive list; the data may be collected depending on appropriate business needs. In addition, we may photocopy and/or scan documents that verify your identity such as your driver's license or passport.

How do we use personal information?

alooola, LLC uses your personal information to help deliver the best possible service to you. This may include, depending on the nature of your relationship with us, using it to evaluate financial needs; offer a broad range of products and services; deliver integrated financial services; process and service transactions; respond to inquiries and requests; fulfill our obligations to you; verify income, assets, and obligation information; resolve disputes, prevent fraud; and perform risk control. Additionally, we may use your personal information to verify your identity, including where applicable, verification in accordance with the USA PATRIOT Act.

Where permitted and appropriate, we may also use personal information for alooola, LLC's marketing and product research and/or development purposes. Additionally, we use personal information to comply with legal and regulatory requirements, and in accordance with applicable laws, rules, and regulations.

What personal information do we share externally with non-affiliated third parties and why do we share it?

It is important to note that alooola, LLC does not rent or sell any client or former clients' personal information to any third party.

We may transfer some or all of your personal information to non-affiliated third parties that provide the technology we use to deliver you better service. Confidentiality and protection of client information are a part of the agreements we sign with each provider. The provider cannot use individual alooola, LLC client information for their own purposes.

We may also transfer some or all of your personal information to non-affiliated third parties to provide you the products and services you request of us. These non-affiliated third parties may be financial service



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providers (such as broker-dealers, banks, or insurance companies) or others (such as professional services organizations or other service providers).

Finally, we may also transfer personal information to: (a) government agencies, exchanges and other self-regulatory organizations as well as regulatory and law enforcement authorities as necessary or required; (b) other non-affiliated third parties such as your accountant or lawyer as requested by you or your authorized representative or as permitted or required by law, rule and/or regulation. If you decide to terminate our services or become an inactive customer, we will continue to adhere to our privacy policy regarding your information, as may be amended from time to time.

How do we protect the confidentiality and security of personal information?

We restrict access to your personal data to those who require it to develop, support, offer and deliver products and services to you. We maintain and monitor our physical, electronic, and procedural safeguards to comply with all applicable laws and regulations. Each member of our team is required to sign a confidentiality agreement that covers all sensitive client data.

How can you verify that your personal information is accurate?

We endeavor to keep personal information only for so long as is necessary for business purposes or to meet our legal and regulatory requirements, and keep our records of your personal information current and complete. If you become aware of any discrepancies in your personal information, please notify us and we will make the necessary corrections. During the normal course of business, we may ask you if there are any updates to the information you previously provided to the Firm, and we are happy to review the information we have about you at any time.

What if you have questions regarding this Pledge or our privacy practices?

If you have any questions regarding this Pledge or our privacy-related practices, please contact us by email at compliance@alooola.com. You can also contact us by mail at alooola, LLC, 4422C Route 27 PO Box 399 Kingston, NJ 08528-0399 and Reference: Privacy Pledge. As always, your alooola, LLC representative is available to assist you and direct your inquiries on these matters. Our policy about obtaining and disclosing information may change from time to time to align with appropriate laws and regulations. We will provide you with notice of any material change to this policy before it is implemented.