

## Copper Privacy Policy

**Last Updated: November 20, 2023**

Welcome to Copper! We are a digital financial services platform that instantly delivers the tools, access and education you need to save, invest, spend and send money to friends through our website ([www.getcopper.com](http://www.getcopper.com)) (the “Website”) and mobile app (the “App”). When you use our services (as defined below), you will share personal information with us that could be used to identify you or that is associated with information that identifies you. This Privacy Policy describes the information we collect, how we use it, and whom we share it with. This Privacy Policy applies to Personal Information that we gather or collect via the Website or our App (collectively, the “Platform”). It does not apply to any Personal Information collected by third party websites not operated by Copper.

Our services, products, features, functions, technologies, and content offered through the Platform or by contacting our customer service are collectively referred to as the “Services.” “Personal Information” as the term is used in this Privacy Policy describes information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, household, or device. We do not consider Personal Information to include information that has been aggregated and/or otherwise de-identified such that it does not identify a specific individual, household or device.

Our Terms of Service (available online at <https://www.getcopper.com/termsofservice>), contain more detail about our Services that are available to consumers and should be reviewed in that regard. Any capitalized terms appearing in this Privacy Policy and not defined herein shall have the meanings ascribed to them in the Terms of Service. This Privacy Policy is limited to discussing the Copper Services to the extent they bear on our information collection and handling practices.

Individuals who apply for or establish an account on Copper should review our [GLBA Privacy Notice](#).

If after reading this Privacy Policy you still have questions about anything in it, please contact us at [support@getcopper.com](mailto:support@getcopper.com).

### **1. The Personal Information We Collect**

There are three basic categories of Personal Information we collect:

- Personal Information you provide to us;
- Automatically-collected data; and
- Information we get from third parties.

#### **1.1 Personal Information You Provide To Us**

When you use, access or interact with our Platform, we collect Personal Information that you share with us. For example, when you set up an account with us, we need to collect a few important details about you, such as your full name, email address, street address, phone number, date of birth, and your Social Security number. This Personal Information is used to verify your identity and set up the account. We may also collect other information such as a copy of your government-issued identification and your Social Security or Individual Taxpayer Identification Number for verification purposes. Additionally, when

you use our Services, we will collect information about your transactions and activity, including financial and payment information. Copper has contracted with Synapse Financial Technologies, Inc. (“Synapse”), a backend technology service provider that owns or otherwise has relationships with, (i) Synapse Brokerage LLC, an SEC-registered broker-dealer and member of [FINRA](#) and [SIPC](#); (ii) Synapse Credit LLC, a state-licensed lender; and (iii) certain banks and financial institutions and service providers (each of the foregoing being a “Partner Financial Institution”). Your Personal Information will be shared with Synapse and will be subject to the [Synapse Privacy Policy](#). Synapse will share your information as necessary with its Partner Financial Institutions and other service providers in connection with providing their services. The privacy policies of Synapse, its affiliates and its Partner Financial Institutions can be found [here](#).

When you contact customer support or communicate with us in any other way, we will collect whatever information you volunteer, in addition to your name and email address.

When an individual requests that an account be created, we ask for the applicant’s date of birth in order to determine whether the applicant is a minor, or is 18 years old or older and eligible to set up their own account. If the requestor is younger than 18, we require that the child’s parent or legal guardian complete the account creation process and disclose the minor’s Personal Information to us.

When you sign up for an investment account with our affiliated investment adviser, Next Financial Advisors, LLC (“NFA”), NFA will collect answers to regulatory questions as well as information about your investment objectives and your risk profile in order to make investment recommendations. You also consent to NFA or their service providers sharing your Personal Information with DriveWealth, NFA’s executing and clearing broker-dealer, in order to verify your identity for DriveWealth’s records and otherwise as necessary to comply with applicable legal requirements. You also consent to DriveWealth’s delivery of your Personal Information to NFA including, without limitation, information about your brokerage account opened at DriveWealth such as your Invest Account number, securities positions, market values, transaction histories and balances.

## 1.2 Automatically-Collected Data

Like many digital platforms, when you visit our Website or use our Services, we automatically collect information about which of the Services you’ve used and how you’ve used them. Examples of this information include:

- Usage information on our Website or mobile app (e.g., pages you visit on the Website, webpage from which you linked to our Website);
- Time and date of your activities;
- Location from which you browsed the Website;
- Device ID;
- Your IP address;
- The kind of browser and computer you use;
- Name of your internet service provider; and

- Operating system version.

These technologies include “cookies” (small data files, including cookies, pixel tags, and/or other local storage provided by your browser or associated applications) on your computer, browser, mobile phone, or other device. You are free to decline optional cookies if permitted by your computer, browser, mobile phone, or other device, although doing so may affect your use of our Services. We use both session cookies, which expire and no longer have any effect when you log out of your account or close your browser, and persistent cookies, which remain on your device until you erase them or they expire. For more information on our use of cookies, please review the Cookies & Analytics Technology section below.

### 1.3 Information We Get From Third Parties

We may collect Personal Information about you from other users, our affiliates, and third parties or vendors such as DriveWealth and Plaid as permitted by law. For example, we may collect information from third-party verification services, credit bureaus, financial institutions, mailing list providers, and publicly available sources to verify your identity. We may also collect information about you from third parties in connection with any identity or account verification process, fraud detection process, or collection procedure, or as may otherwise be required by applicable law.

When you use the App, it may collect information from your wireless operator such as your mobile number, name, address, email, unique mobile device identifier and other subscriber details. For fraud protection purposes only, (i) we collect your Battery Usage, Device Identifier, Device Storage, MAC Address, and SIM information; (ii) we also collect enough information to determine if you are trying to fake your current location by using a VPN, VPN apps with location spoofing, or other related tools.

When you choose to fund your account with us, you may choose to use Plaid to complete your request by inputting your online banking credentials instead of full bank account and routing numbers. Plaid has its own separate privacy policy that you can click to review on the Plaid enrollment screen when you initially select Plaid to verify your bank account information or you can review Plaid privacy policy at the following link: <https://plaid.com/legal/#end-user-privacy-policy>. The Plaid services allows us to (i) verify you own the bank account you elect to use as a funding source, (ii) verify the amount requested is available to fund your Copper account, and (iii) complete the transfer of funds to your Copper account. In order for this to occur, you consent to allow Plaid to share certain Personal Information with us. That Personal Information includes: the name of the bank account owner(s), the address, phone number(s), and email address(es) associated with the bank account, the account name, type, subtype, and balance, the last 2-4 digits of the account number for verification purposes, and a tokenized account number. We use this Personal Information to verify the bank account owner is the same person as the Copper accountholder or secondary approver.

## **2. How We Use Your Information**

### 2.1 Personal Information

#### *2.1.1 To provide the Services:*

Copper may use your Personal Information to fulfill requests for products, Services, or information, including information about potential or future Services, including to:

- Manage individual information and accounts;
- Respond to questions, comments, and other requests;
- Process payment for products or Services purchased;
- Process applications and transactions;
- Provide access to certain areas, functionalities, and features of our Services; and
- Allow you to register for events.

#### *2.1.2 For internal business purposes:*

Copper may use Personal Information for its internal business purposes, including to:

- Measure interest in Copper's Services;
- Develop new products and Services or improve existing products and Services;
- Ensure internal quality control;
- Communicate about individual accounts and activities on Copper's Services and systems, and, in Copper's discretion, changes to any Copper policy;
- Comply with regulatory requirements;
- Prevent potentially prohibited or illegal activities;
- Enforce our Terms of Use;
- Protect the safety of any person, to address fraud, security or technical issues, or to protect the Company's rights or property;
- If required by applicable law, perform identity verification on our own behalf and on behalf of our broker dealer, DriveWealth;
- Display your DriveWealth account information such as securities positions, market values, transaction histories
- Open an investment account with DriveWealth on your behalf;
- Comply with applicable laws, rules and regulations or court orders; and
- For any other purpose for which you have given express permission or consent to Copper.

#### *2.1.3 For marketing and advertising purposes:*

Copper may analyze and use Personal Information to provide you with materials about offers, products, and Services that may be of interest, including new content or Services. Copper may provide you with these materials by phone, postal mail, email, as permitted by applicable law. Such uses include:

- To tailor content, advertisements, and offers;
- To notify you about offers, products, and services that may be of interest to you;

- To provide Services to you and our sponsors;
- For other purposes disclosed at the time you provide Personal Information; and
- Otherwise with your consent.

## 2.2 Non-Personal Information

We may also use non-personally identifiable information that does not personally identify you, including by aggregating and/or de-identifying Personal Information, in order to understand better how our visitors use the Website, research our visitors' demographics, interests, and behavior, improve the Website, provide visitors with customized services and information, and for other similar purposes. We may share this information with others for information or promotional purposes, and may use non-personally identifiable information in any manner permitted by law. When any non-personally identifiable information is combined with other information that identifies you, it will be treated as Personal Information in accordance with this Privacy Policy.

## **3. How We Share Information**

We may share Personal Information about you in the following ways:

- With identity verification providers. For example, we may share information about you with credit reporting agencies to verify your Social Security number.
- With vendors and service providers for: (i) provision of IT and related services; (ii) provision of information and Services you have requested; (iii) payment processing; (iv) customer service activities; (v) fraud prevention; (vi) analytics services; and (vii) in connection with the provision of the Services. These service providers have contracted with us to only use the Personal Information for the purpose(s) for which the data were originally collected or may otherwise be lawfully processed.
- With advertising partners. We may share Personal Information with third-party advertising companies, including for the marketing and advertising purposes described above.
- With professional advisors. We may disclose Personal Information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.
- With our business partners and affiliates, for our affiliates' internal business purposes or to provide you with a product or service that you have requested. We may also share Personal Information with business partners with whom we may jointly offer products or services, or whose products or services we believe may be of interest to you.
- With third parties if we reasonably believe that disclosing the information is needed to:
  - Comply with any valid legal process, governmental request, or applicable law, rule, or regulation;
  - Investigate, remedy, or enforce potential Terms of Service violations;
  - Protect the rights, property, and safety of us, our users, or others; or

- Detect and resolve any fraud or security concerns.
- In the event of a transaction or proposed transaction involving the transfer of substantially all of the assets of Copper or one or more of its businesses to another entity, whether an affiliate or a third party, or in connection with a bankruptcy, we may share your Personal Information in the diligence process or to otherwise facilitate the transaction, and with individuals assisting in the transaction or in connection with a bankruptcy. Your Personal Information may also be one of the transferred assets as part of the transaction or bankruptcy.

#### 4. **Cookies & Analytics Technology**

In operating the Services, we may use a technology called “cookies.” A cookie is a piece of information that the computer that hosts our Services gives to your browser when you access the Services. Our cookies help provide additional functionality to the Services, including helping us analyze Services usage more accurately. For instance, our Website may set a cookie on your browser that allows you to access the Services without needing to remember and then enter a password more than once during a visit to the Website. On most web browsers, you will find a “help” section on the toolbar. Please refer to that section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Services’ features.

Some of our business partners (including advertisers) may also use cookies on the Website. For example, on occasion an advertiser may run a banner campaign on our Website. This Privacy Policy covers the use of cookies by this Website only and does not cover the use of cookies by any business partners or advertisers on our Website.

We also engage our advertising partners, including third party advertising companies and social media companies, to display ads around the web. These companies may use cookies and similar technologies to collect information about your interaction over time across our Services, our communications and other online services, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the “Online tracking Preferences” section below.

We may also use analytics tools such as Google Analytics to collect information regarding visitor behavior and visitor demographics on our Website, and to develop website content. This analytics data is not tied to any Personal Information. For more information about Google Analytics, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can opt out of Google’s collection and Processing of data generated by your use of the Website by going to <http://tools.google.com/dlpage/gaoptout>.

#### 5. **Clear Gifs (Web Beacons)**

We may employ a software technology called clear gifs (a.k.a. Web Beacons) that help us better manage content on our Website by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user’s computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We may tie the

information gathered by clear gifs to our customers' Personal Information. We may use clear gifs in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns.

## **6. How Long We Keep Your Information**

We will retain your information for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our products and Services, resolve disputes, establish legal defenses, conduct audits, enforce our agreements, and comply with applicable laws.

## **7. External Websites**

Our Services may contain links to other websites and other websites may reference or link to our Services. These websites are operated by third parties not controlled by us, and by linking to them or being linked from them Copper does not endorse, approve or make any representations about Third-Party websites or domains. We encourage you to read the privacy policies of each and every website and domain that you interact with. We are not responsible for the privacy practices or content of such other websites or domains and you visit them at your own risk.

## **8. Social Media**

Our Services may contain links and interactive features with various social media platforms. If you already use these platforms, their cookies may be set on your device when using our Services. You should be aware that Personal Information which you voluntarily include and transmit online in a publicly accessible social media platform, blog, or chat room, or otherwise online, or that you share in an open forum, may be viewed and used by others without any restrictions. We have no control over such uses of your information when interacting with a social media platform, forums or otherwise online and by using such services you assume the risk that the Personal Information provided by you may be viewed and used by third parties.

## **9. Security**

We take commercially-reasonable steps to protect the data you have given us from accidental or intentional manipulation, loss, destruction or access by unauthorized persons. However, please be aware that no transmission of Personal Information over the Internet or the electronic storage of this information can be absolutely guaranteed to be free from unauthorized use or access. Before submitting any Personal Information via the Website or Services, please keep in mind these risks and know that you do so at your own risk.

## **10. Your Choices**

### **10.1. Communications Preferences**

If you no longer want to receive email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. You will continue to receive transaction-related emails regarding products or services you have requested. We may also send you certain communications regarding Copper and you will not be able to opt out of those communications (e.g., communications regarding updates to our Privacy Policy).

### **10.2. Sharing Preferences**

We may give you choices regarding the sharing of your information with affiliates and third parties. Choices you have about the sharing of your information will be described in the privacy policies or notices you receive in connection with the products or Services you obtain from us.

### 10.3 Account Choices

If you have an account, you can review and update certain account information, including information pertaining to your authorized users, by logging into your account. Account holders may also contact us to request deletion of their account, their authorized users' accounts, and certain personal information.

### 10.4. Online Tracking Preferences

There are a number of ways to opt out of having your online activity and device data collected through our services, which we have summarized below:

- **Blocking cookies in your browser.** Most browsers let you remove or reject cookies, including cookies used for interest-based advertising. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).
- **Blocking advertising ID use in your mobile settings.** Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.
- **Using privacy plug-ins or browsers.** You can block our services from setting cookies by using a browser with privacy features, like Brave, or installing browser plugins like [Privacy Badger](#), [DuckDuckGo](#), [Ghostery](#) or [uBlock Origin](#), and configuring them to block cookies/trackers.
- **Platform opt-outs.** The following advertising partners offer opt-out features that let you opt out of use of your information for interest-based advertising:
  - [Google](#)
  - [Facebook](#)
  - [LinkedIn](#)
  - [Microsoft](#)
- **Advertising industry opt-out tools.** You can also use these opt-out options to limit use of your information for interest-based advertising by participating companies:
  - [Digital Advertising Alliance](#)
  - [Network Advertising Initiative](#)

Note that because these opt-out mechanisms are specific to the device or browser on which they are exercised, you will need to opt out on every browser and device that you use.

### 10.4 Changes to this Privacy Policy



We may change this Privacy Policy from time to time. If we do, we will post the revised policy on this page with a new “Last Updated” date. All changes will become effective when posted unless indicated otherwise. If we make any material changes we will notify you. We encourage you to periodically review this page for the latest information on our privacy practices.

## **11. Other Rights and Important Information**

### **11.1 Children’s Privacy**

We do not knowingly collect Personal Information, as defined under COPPA, directly from children under 13 years of age. If a primary account holder adds an individual to their account under the age of 13 as an authorized user, the primary account holder (parent or legal guardian) will provide the information to Copper that is necessary to add the individual as an authorized user. After adding the individual as an authorized user to the primary account, Copper will only collect and use Personal Information related to the authorized user for the purpose of providing Copper services, and any such information will not be shared with third parties for any purpose not required or permitted by law.

If you learn that your child has provided us with Personal Information without your consent, please let us know by contacting us at [support@getcopper.com](mailto:support@getcopper.com).

## **12. How We Respond to “Do Not Track” Signals**

Our Website currently does not respond to “Do Not Track” (DNT) signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do so in the future, we will describe how we do so in this Privacy Policy.

## **13. Contact Us**

If you have questions or comments about this Privacy Policy, please contact us at [support@getcopper.com](mailto:support@getcopper.com).