

Titan Privacy Policy

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This Titan Privacy Policy (the “Privacy Policy”) applies to all websites and mobile applications linking to or posting this Privacy Policy (each a “Platform”) that are operated by Titan Global Capital Management USA LLC (“Titan”) and Titan Global Technologies LLC (“TGT” and collectively with Titan, “our” or “we”). This Privacy Policy describes how we collect, use, store, disclose, and process information that we obtain about you through our Platforms, including information that we obtain through any of the investment advisory service that we provide, in whole or in part, through any of our Platforms (collectively, the “Service”), as well as any information related to your use of the Service that you provide to us outside of our Platforms (such as via email).

Please read this information carefully before accessing any of our Platforms or using the Service. By accessing any of our Platforms, or by setting up an account with us or using our Service, you agree to the terms of this Privacy Policy and our [Terms of Use](#).

Our Service is only available to natural persons that are at least 18 years old. If you are under the age of 18, you may not use our Service.

What types of information do we collect and/or receive through our Service?

Information you provide to us

In the course of providing the Service, we may collect or receive the following types of information about you, which may include personal information:

Contact Information

We collect contact information through our Service, which typically includes your name, email address, phone number, and any information you provide in messages to us (“[Contact Information](#)”). We use Contact Information for purposes such as starting your application for an account, providing you with information about the Service, responding to your inquiries, sending you email alerts (including marketing emails), or providing you with the Service.

Account Information

If you apply to open an account, you will be required to establish a log-in and password, and provide information in addition to Contact Information such as date of birth, Social Security Number, education, gender, interests, photo, country of birth and country of your nationality, employment status, occupation, employer name and address, marital status, passport numbers (or numbers associated with other government issued identification), financial information such as bank account and payment card details, suitability information, personal income and other sources of funds, net worth, trusted contact information, account balance, credit scores, tax information and other information about your financial situation and risk preferences.

If your application is approved, you will be required to enter into a Customer Agreement and other contracts with Titan that govern your account. If you have an account, or have taken steps to apply for

one, you may review our GLBA privacy notice for a description of our processing and disclosure activities regarding the non-public personal information that we collect from and about you in connection with opening and servicing our accounts.

Information we collect automatically

Activity and Demographics Information. When you use the Service, we may record certain details about your computer or mobile phone, the name of your Internet Service Provider (ISP), your IP Address, the website from which you visit us, the pages on our Service that you visit and in what sequence, the date and length of your visit and other statistical information about your visit to our Service. We may also collect aggregated demographic information regarding users of the Service (e.g., age, gender, and income information).

Information Collected Via Cookies, Web Beacons, and Similar Technologies. When you use the Service, we also may send “cookies” to your computer or device or use similar technologies to enhance your experience. These technologies can identify you as a unique customer and store your personal preferences as well as product preferences, to tell us which webpages you have visited and in what order, and identify your computer or device. On their own, cookies or web beacons do not contain or reveal personally identifiable information; however, if you choose to provide us with such information, it can be linked to the anonymous data stored in the cookies and/or web beacons. We may allow select third parties to place cookies on our Service to provide us with better insights into the use of the Service or user demographics, or to provide relevant advertising to you. These third parties may collect information about a user’s online activities over time and across different websites when using any of our Service. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Service may not function properly.

SMS Messages

We may send you transactional and/or marketing SMS text messages with your consent, or as otherwise permitted by applicable law.

These messages may use information automatically collected based on your actions while on our Platforms and/or using our Service, which may prompt messaging.

To the extent you voluntarily opt to have SMS notifications sent directly to your mobile phone, we receive and store the information you provide, including your telephone number or when you read a text message. By consenting to receive SMS text messages from us, you acknowledge that messaging and data rates may apply depending on your phone service provider. You may opt out of receiving SMS text messages at any time by texting “STOP” in response to the text messages you receive or by changing your notification and communication preferences in the Platforms and/or the Service. Your consent to receiving text SMS messages is not required to open an account or use our Service. However, by opting-out of receiving any text messages, certain functionality of the Platforms and/or the Service may not be available to you.

How do we use and share your information?

We may use and share your personal information as set forth below:

- To onboard you as a customer, including identity verification, credit, AML, KYC checks, or other due diligence efforts;
- Provide the Service to you, including servicing, and maintaining your account, and processing transactions in your account;
- To monitor, support, analyze, and improve the Service;
- To communicate with you regarding the Service and your accounts;
- To fulfill your requests for information regarding the Service and any new or improved products and Service;
- To engage in marketing and advertising activities, provided that, where required under applicable law, we will obtain your prior opt-in consent;
- To understand general customer trends and patterns so we can develop and support existing and ongoing marketing strategies for our products and Service;
- To engage in research, project planning, troubleshooting problems, and detecting and protecting against error, fraud, or other criminal activity;
- To protect the safety and security of our Service, businesses and customers;
- To third-party contractors and service providers that provide Service to us in the operation of our business and assistance with the Service, such as administrators, broker/dealers, custodians, payment processors, consulting service, IT and cloud service providers, among others;
- To our auditors, attorneys and similar advisors in connection with our receiving their professional Service, subject to standard confidentiality obligations;
- To disclose aggregated, anonymous, user statistics and other information to (i) agents, business partners, and other third parties; (ii) describe the Service to current and prospective business partners; and (iii) other third parties for lawful purposes;
- To share some or all of your information with our parent company, subsidiaries, affiliates or other companies under common control with us;
- To fulfill our legal and regulatory requirements;
- To comply with applicable law, such as to comply with a subpoena, lawful court order, 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;
- To assess or complete a corporate sale, merger, reorganization, sale of assets, dissolution, investment, or similar corporate event where we expect that your personal information will be part of the transferred assets; and
- Otherwise, with your consent.

We will take reasonable measures (e.g., by contract) to require that any party receiving any of your personal information from us, including for purposes of providing the Service, undertakes to: (i) retain and use such information only for the purposes set out in this Privacy Policy; (ii) not disclose your personal information except with your consent, as permitted by applicable law, or as permitted by this Privacy Policy; and (iii) generally protect the privacy of your personal information.

How long do we retain your information?

We will retain your information for at least as long as it serves the purposes for which it was initially collected or subsequently authorized. We will also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Do our Service support “Do Not Track” signals?

At this time, our Service does not support “Do Not Track” preferences that may be available in your browser. For more information about Do Not Track, visit donottrack.us.

For purposes of understanding your California Privacy Rights under the California’s Shine-the-Light Law (Cal. Civ. Code § 1798.83), do we share your information with third parties for their own direct marketing purposes?

No. We do not share your information with unaffiliated third parties for their direct marketing purposes.

What security measures do we employ to safeguard your information?

To help protect the privacy of information collected through our Service, we employ reasonable technical, physical, and organizational measures intended to protect such information against accidental or intentional manipulation, loss, misuse, or destruction, and against unauthorized disclosure or access, as well as to protect such information, both during transmission and once it is received, including encrypting the transmission of any sensitive information (such as bank account information or payment card information).

NOTWITHSTANDING THE FOREGOING, PLEASE NOTE THAT DESPITE OUR BEST INTENTIONS NO TECHNOLOGY IS COMPLETELY SECURE. PLEASE BE AWARE THAT OUR SERVICE IS OPERATED ON SOFTWARE, HARDWARE AND NETWORKS, ANY COMPONENT OF WHICH MAY, FROM TIME TO TIME, EXPERIENCE BREACHES OF SECURITY OR OTHER PROBLEMS BEYOND OUR CONTROL. Accordingly, we cannot guarantee that any information obtained about you through our Service, whether during transmission or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others who do not have your authorization. Any such transmission or sharing of that information is done at your own risk.

You also play a role in protecting your personal information. Please do not share your user name or password with others. If we receive an order or instructions using your information we will consider that you have authorized the transaction.

What are the policies of linked websites and other third parties?

Our Service may contain links to other websites that are not covered by this Privacy Policy and where information practices may be different from ours. You should consult any linked site’s privacy policies before submitting any of your personal information to such third parties, as we are not responsible for and have no control over information that is submitted to, or collected by, these third-party sites.

In addition, as noted above, when you are using our Service you may be interfacing with third-party integrated Service, such as third parties presenting or serving advertisements, third parties providing us with data collection, reporting and ad response measurement, and third parties assisting us with the delivery of relevant marketing messages and advertisements. We prohibit those third parties from collecting any information through our Service other than aggregate information and blind data about our users. In any event, please note that Titan is not responsible for the privacy practices of third parties.

How can you correct, update or make choices about your personal information that we are storing?

You can update, change or delete your personal information at any time by emailing us at support@titan.com.

You can choose not to receive promotional communications from us by following the instructions in any communications you receive from us. Please note that this will not stop us from sending emails to you about your account or your transactions with us.

What is our policy on the use of our Service by children?

Our Service is not designed or intended to be attractive to use by children under 13 years old, and we do not knowingly collect personally identifiable information from anyone under 13 years old. IF YOU ARE UNDER 13 YEARS OLD, PLEASE DO NOT USE OUR SERVICE AT ANY TIME OR IN ANY MANNER. If you learn that your child under 13 years old has provided us with personal information, please contact us. We will use commercially reasonable efforts to delete that data from our systems.

What are the terms regarding any future changes to this Privacy Policy?

We reserve the right to update or modify this Privacy Policy from time to time, with any such changes to be effective prospectively. We will indicate at the top of the Privacy Policy when it was most recently updated, and we encourage you to visit our Service periodically so that you will be apprised of any such changes. Your continued use of any of our Service after any modification to this Privacy Policy will constitute your acceptance of such modification.

Can International Users use our Service?

Our Service and its servers are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us will be transferred to the United States where the privacy laws may not be as protective as those in your country of origin. If you are located outside the United States and choose to use our Service, you do so at your own risk.

Note to Nevada Residents

We do not sell your personal information to third parties, regardless of the state in which you reside. However, we are required to give this notice to Nevada residents: If you are a resident of Nevada, you have the right to opt-out of the sale of personal information to third parties. You can exercise this right by contacting us at support@titan.com with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account.

How can you contact us?

If you have any questions or comments about this Privacy Policy, please feel free to contact us at support@titan.com.