

# MARKET CARROT INC. PRIVACY AND SECURITY STATEMENT

Last updated on September 1st, 2015

Market Carrot Inc. (“**Market Carrot**”, “**we**”, “**us**” and/or “**our**”) is an investment account portfolio tracker. We allow users to add their investment accounts to our website at [www.marketcarrot.com](http://www.marketcarrot.com) so that they can see all of their accounts in one place. Market Carrot also allows user to compare their results with other users through various rankings. In addition, we give users various different calculations based on their portfolio performance with the intention of helping them better understand their results. Our services are also available via applications that reside on mobile devices. This Privacy and Security Statement describes the specific policies and procedures we use to collect, utilize, and disclose and share with others personal information of consumer users; the use of our website and applications; and other communications with representatives of Market Carrot Inc. In this Privacy and Security Statement, we refer to those who visit our website and those who use our web and mobile applications collectively as “users” and individually as “you” or “your”. Together with our Terms of Use Agreement, this Privacy and Security Statement governs your use of our website and services.

## 1. How to Use this Statement

This Privacy and Security Statement explains, in plain English, how Market Carrot gathers and uses your information in the context of each of Market Carrot’s service offerings, including use of our website at [www.marketcarrot.com](http://www.marketcarrot.com). In particular, we describe how your personally identifiable information is shared and/or disclosed, how we collect and use other non-personal information and how we address other privacy and security matters, such as our overall security practices, deletion of your information upon request and opting-out of marketing communications. Lastly, we describe methods for contacting Market Carrot if you have privacy or security questions, comments or feedback.

## 2. How We Collect and Use Your Personal Information

“Personal Information” is your personally identifiable information such as your name, email or mailing address, phone number, account credentials, account numbers and any other identifier that we gather from our website, mobile applications, or through communications with representatives of Market Carrot.

In general, we get information about you in a range of ways:

*Information You Give Us.* We collect your name, postal address, email address, phone number, fax number, username, password, demographic information (such

as your gender and occupation) as well as other information you directly give us on our website.

*Information We Get From Others.* We may get information about you from other sources. We may add this to information we get from our website.

*Information Automatically Collected.* We automatically log information about you and your computer. For example, when visiting our website, we log your computer operating system type, browser type, browser language, the website you visited before browsing to our website, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our website.

*Cookies.* We may log information using "cookies." Cookies are small data files stored on your hard drive by a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our website. This type of information is collected to make the website more useful to you and to tailor the experience with us to meet your special interests and needs.

The specific types of information we collect about you depend on how you choose to engage with us and which of our services you choose to use. As described above, when you visit our website, we may place a Cookie on your computer so that our system can recognize you when you make a return visit. That Cookie tells us your IP address and the type of browser you are using. These are the only types of information we collect when you visit our website but do not register or download our dashboard.

When you register to create a Market Carrot Account ("Account") through our website, we may collect some or all of the following:

- Your name
- Your email address
- Your display name (publicly visible alias)
- Other optional information you may provide, such as your age, investable assets and risk tolerance, which may include your financial goals and objectives, income information and other financial planning information about your household.

If you choose to add your investment account(s) to your Account, in addition to the information we collect from you as described above we may ask you for certain information, including, but not limited to, your full legal name, contact information, birth date, Social Security Number, citizenship, investment objectives, approximate

net worth, and other regulatory disclosures that may be necessary and required under Federal and certain statutory law (see our Terms of Use). We also ask for your account login credentials for the accounts (bank or brokerage) you choose to link to your Account, any challenge and/or security questions associated with those accounts.; however, we do not store any of this information relating to your investment accounts on our servers and use a compliant third-party financial data platform to connect us with your financial institutions. Market Carrot, however, will store transaction data and other account data from your linked investment accounts on our servers. This data is linked to your Market Carrot login credentials, but it is not linked to your investment account login credentials. It is thus recommended you use caution when selecting a display name as this publicly visible display name is attached to your account transactions which are stored on Market Carrot servers.

When you register, and at times thereafter, we may present questions that ask you to submit demographic and other information. Responding to these surveys is completely optional. If you do respond by sending us other information, we collect that information and will retain it indefinitely.

We use the Personal Information you provide us upon registration:

- To allow you to register with Market Carrot, including creating a Market Carrot user account to use our services; authenticating your device to access our services; and communicating to you about updated features or maintenance activities related to providing you with our services.
- To allow you to add accounts, including securely gathering accounts balances, transactions and holdings from your financial institutions; displaying personalized dashboards and financial visualizations for you; and providing you with contextual and relevant observations and insights.
- To provide you with customer support or service offerings such as responding to and resolving your inquiries and requests via email or by phone and offering you our other services.
- To optimize systems and performance, provide comparisons and anonymous analysis, monitoring system performance for optimization, and personalizing your experience with Market Carrot.
- To operate, maintain, and improve our sites, products, and services; respond to comments and questions and provide customer service; send information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages.
- To communicate about promotions, upcoming events, and other news about products and services offered by us and our selected partners.
- To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.

We may use certain third party service providers to help us provide you with some of the services mentioned in this Privacy and Security Statement. In doing so, we may provide your data (including your personally identifiable information) to those third party service providers, each of whom are required under contract with us to safeguard the personal information and to use it only to provide services to us. Per our contracts, only after these providers have removed all personalized information may some of them be contractually allowed to rent, sell or otherwise make commercial use of the data.

You may decline to provide Personal Information to Market Carrot. Declining to provide Personal Information may disqualify you for Market Carrot services and website features that require certain Personal Information.

### 3. With Whom We Share Your Personal Information

Except as set forth in this Privacy and Security Statement, we don't share your Personal Information with anyone. We do not share your Personal Information for third party promotional use. And we will **NEVER** sell, rent or trade your Personal Information.

*We may share your Personal Information as follows:*

- We may share Personal Information with your consent. For example, you may let us share Personal Information with others for their own marketing uses. Those uses will be subject to their privacy policies.
- We may share Personal Information when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- We may share Personal Information for legal, protection, and safety purposes.
  - We may share information to comply with laws.
  - We may share information to respond to lawful requests and legal processes.
  - We may share information to protect the rights and property of Market Carrot Inc., our agents, customers, and others. This includes enforcing our agreements, policies, and Terms of Use.
  - We may share information in an emergency. This includes protecting the safety of our employees and agents, our customers, or any person.
- We may share information with those who need it to do work for us.

We may also share aggregated and/or anonymized data with others for their own uses.

#### 4. Other Information We Collect From You

We collect and utilize Other Information to optimize, secure and simplify your experience with us. Your Other Information is not disclosed or shared outside of Market Carrot.

**Your Browser or Device:** Certain information is collected by most browsers or applications, such as your “user agent string”, to help us determine your computing device type, operating system version and Internet browser type and version. We use this information to ensure that our web sites function properly and for security purposes.

**Your Cookies:** As described above, cookies are pieces of information stored directly on the computing device you are using. Cookies we use do not contain or capture Personal Information. Cookies allow us to collect information such as your browser type, time spent on our web sites and which of our pages you visited. We use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience and to recognize authorized devices to secure your use of our services. We also gather statistical information about web site usage in order to continually improve the design and functionality and to assist us with resolving technical support questions. Additionally, we use cookies on our web sites and the sites on which we advertise to track advertising performance and to collect aggregate data on web page viewing and mobile app usage. Cookies may be connected to third-party companies or websites. The privacy practices of the companies placing such cookies are governed by the privacy policies of such third-party companies or websites. Cookies are not used to collect or disseminate any Personal Information. You can manage the placement of cookies on your computer through the features found in most Internet browsers. You can also delete cookies that have already been placed on your computer. Consult the "Help" function of your browser to explore your options. If you remove or reject our cookies, it could affect how our website works for you.

**Your IP Address:** Your IP Address is a number assigned to the device that you are using by your Internet Service Provider. An IP Address is identified and logged whenever you visit our web sites or applications, along with the page(s) that were visited. We use IP Addresses, individually and collectively, for purposes such as calculating usage levels, helping diagnose technical problems and supporting our web sites and applications. Additionally, we use your IP Address to assist in fraud detection and authentication to better protect your security.

#### 5. Additional Privacy and Security Information

To protect Personal Information from unauthorized access and use, we use security measures that comply with relevant laws and regulations. Beyond this Privacy and Security Statement, we provide additional security measures, such as:

**Bank Level Security:** Market Carrot is powered using technologies and practices that many banks and other financial institutions use to protect customer information, such as SSL encryption for data in transit and AES encryption for sensitive data at rest. After initial account aggregation, we do not store your financial institution credentials in our systems or in our applications. As described above, we do not store any of this information relating to your investment accounts on our servers and use a compliant third-party financial data platform to connect us with your financial institutions (see our Terms of Use). That service employs comprehensive financial data security standards and is subject to ongoing multi-agency financial institution regulatory examinations.

While we take reasonable steps to protect your Personal Information from loss, misuse and unauthorized access, alteration, disclosure or destruction, no Internet, e-mail or electronic operating system that enables the transmission of data is ever full secure and you should take special care in deciding what information you send to us in this manner.

## **6. Reviewing and Updating your Personally Identifiable Information**

You can view and update the profile and account information we collect for you by going to the “edit profile” function in our website and in our app. The credibility and relevance of our services depend on your providing us with complete, accurate and up-to-date information about yourself and your accounts, both now and in the future.

## **7. Email Marketing Opt-out**

When we communicate our own marketing offers to you, these communications are CAN-SPAM compliant, including the ability for you to opt-out of marketing communications. If you opt out, we may still send you non-marketing emails. Non-marketing emails include emails about your accounts and our business dealings with you.

## **8. Deletion/Retention of Personal Information**

Unless you request otherwise, we will retain the Personal Information we collect from you indefinitely.

We will respond to any requests we receive asking that we delete Personal Information that we possess from those who use our services or registered and established a user profile. However, we will not delete information that we are required to retain in order to comply with applicable laws and regulations. If you wish to delete your account, you will need to email us at [support@marketcarrot.com](mailto:support@marketcarrot.com) using your registered email address with Market Carrot to request that your account be deleted. After confirming you are the account owner we will remove Personal Information from our records and will only continue to retain such information as required by law.

## **9. Market Carrot's Statement Regarding "Do Not Track" Signals**

Most browsers can be set to send signals to third party websites requesting them not to track the user's activities. At this time, Market Carrot does not respond to "do not track" signals. Consequently, Market Carrot, its third party service providers, and other third party websites and online services may indeed track and collect Personal Information about your online activities over time while navigating to, from and on our website and our mobile app and across those third party websites and online services, notwithstanding any "do not track" signals we may receive.

## **10. Advertising**

We do not allow third party advertising on our website or applications.

## **11. Social Media**

Market Carrot may integrate authentication or social experiences on social media platforms such as Facebook®, Twitter®, Google Circles and LinkedIn® that enable login or online sharing and collaboration among users who have registered to use such social media platforms. Any content you post, such as pictures, information, opinions, or any Personal Information that you make available to other participants on these social platforms, is subject to the terms of use and privacy policies of those platforms. Please refer to them to better understand your rights and obligations with regard to such content.

## **12. Protecting Children's Privacy Online**

Market Carrot is not directed to individuals under the age of thirteen (13), and those children should not provide Personal Information through our web sites or applications. We do not knowingly collect information from children under 13 without parental consent. For more information about the Children's Online Privacy Protection Act ("COPPA"), visit the Federal Trade Commission website.

### 13. Modifications to Our Privacy and Security Statement; Entire Agreement

We change our privacy practices from time to time as the need arises. When we do, we will revise this Privacy and Security Statement and we will post the revised document on our website at <https://www.marketcarrot.com/privacy-policy>. If the changes are substantial, we will provide a more prominent notice (including, for certain services, email notification of Privacy and Security Statement changes). Each version of this Privacy and Security Statement will be identified at the top of the page by its effective date.

This document constitutes Market Carrot's complete Privacy and Security Statement for Market Carrot, its website and its services.

### 14. Do You Have any Privacy and Security Questions, Comments or Feedback?

If so, please contact us at:

Attention: Privacy & Security  
Market Carrot Inc.  
645 High Street  
Palo Alto, California 94301

Call: 650-204-0112

Visit [www.marketcarrot.com](http://www.marketcarrot.com)  
Email us at [support@marketcarrot.com](mailto:support@marketcarrot.com)