Webull Technologies Pte. Ltd./ Webull Privacy Policy

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Welcome to Webull!

At Webull, we take privacy and security seriously. Webull Technologies Pte. Ltd. and its affiliates (collectively, "Webull", "we," "our" or "us") are committed to protecting the privacy and security of your personal information. This Privacy Policy ("Policy") applies to all products and services provided by Webull, the owner and operator of our mobile device applications and our websites. By accessing or using our services, systems, websites, and apps (the "Services"), you acknowledge that you have read, understood, and agree to our collection, storage, use, and disclosure of your personal information as described in this Policy and our Terms of Service. If you choose to register for a broker-dealer account or other financial services, those services will be provided by one of our affiliates and may have additional privacy guidelines. We will follow those additional guidelines as well as this Policy in protecting your privacy.

This Policy describes how and when we collect, use, disclose, transfer, process, and share your information, including personal information, across our websites, application programming interfaces, text messages, email notifications, applications, buttons, and our other covered Services that link to this Policy, and from our partners and other third parties. When using any of our Services you consent to the collection, processing, transfer, storage, disclosure, and use of your information, including personal information, as described in this Policy. This includes any information you choose to provide that is deemed sensitive or special personal information under applicable law. This Policy is a legally binding agreement between you ("you" or "user") and us.

When this Policy mentions "we" or "us" it refers to the controller (or the equivalent term under applicable law) of your information under this Policy. Irrespective of which country you live in, you authorize us to transfer, store, process and use your information, including personal information, in any country from which we operate. In some of these countries, the privacy and data protection laws and rules, including the laws and rules regarding when government authorities may access data, may vary from those in the country where you live.

IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, PLEASE STOP USING AND UNINSTALL THE APP IMMEDIATELY.

If you have any questions about this Policy or the Services, please contact us (see HOW TO CONTACT US below).

This Policy will help you understand the following:

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1 THE INFORMATION WE COLLECT

When you use our Services, your personal information may be collected and used in the following scenarios:

- When you choose to create a Webull account using your email address or mobile phone number, we will collect this contact information. We may send emails, text messages, or push notifications to you. You may follow the relevant notice to unsubscribe to these Services.

- When you register with Webull using your existing Google account, Facebook account or other third-party accounts, we will obtain your personal information from the third party, such as images of you, your nickname or username.

- If you do not have a Webull account or you chose to use Webull without a login, you will not be regarded as a client of Webull and there will be no business relationship between you and Webull.

- You may also add or link your mobile phone numbers, email addresses, third-party accounts to your existing Webull account. We will collect such additional information so that you can log in to Webull using this information.

- When you use our Services, we may automatically collect and store your usage information. This usage information includes how you access our Services, your actions on the Services, including your interactions with others users of the Services, photos or media you upload to the Services, and other content you provide (collectively referred to as "Usage Information").

- We will only access your device camera and photo album with your permission when you want to upload photos to Webull help centre, update your account profile image, or post photos in Webull Community.

- We will only access your device microphone with your permission when you want to search for stocks with voice command.

- We will only access your device calendar with your permission when you want to add alerts or economic data to your calendars.

- Due to anti-money laundering obligations and in accordance with laws and regulations, when you apply to open a trading account with one of our affiliates, you may be asked to provide your identity information, including, as required by local regulatory requirements, name, nationality, country of legal residence, ID number, resident address, marital status, date of birth, and to provide a copy of your identification document and proof of address.

- We process personal information in South Africa only where there is a lawful reason to do so. Depending on the circumstances, the lawful basis for processing may include one or more of the following:
    - your consent where this is required;
    - where the processing is necessary to provide our Services to you or to perform a contract with you;
    - where the processing is required by law, including financial sector, anti-money laundering and tax laws,
    - our legitimate interests or those of a third party, provided that those interests are not overridden by your rights under South African law.

- If we rely on legitimate interests, we only do so where the processing is necessary and where those interests are aligned with what you would reasonably expect from the use of our Services..

2 HOW WE USE YOUR PERSONAL INFORMATION

When you use our Services, your personal information may be used in the following scenarios:

- to provide any of our Services to you;

- to develop and improve our Services;

- to send push notifications of our products, Services and other information you may be interested in;

- to evaluate and improve the effectiveness of our promotions;

- to invite you to take surveys for the purpose of assessing our Services;

- to assess potential risks relating to our Services; and

- other circumstances, after your authorization.

We only process personal information for specific purposes that we explain to you. If we need to use your information for a new purpose, we will only do so where the new purpose is compatible with the original one, or where the law permits the further use. If the purpose is not compatible, we will request your permission unless the law allows us to proceed without consent.

3 HOW WE USE COOKIES AND SIMILAR TECHNOLOGIES

Our website may use cookies and similar tracking technology to automatically collect and receive certain technical and usage information such as internet protocol address, browser, internet service provider and device type when you connect with our Services. Cookies are small packets of data that a website stores on your hard drive so that your device will remember information about your visit. The data collected through cookies and similar tracking technology enables us to personalize your experience with the Services, understand how you use them, maintain a persistent session, improve, and further develop the Services, and measure and optimize advertising and promotional effectiveness. We may use session cookies (which expire once you close your web browser), and persistent cookies (which stay on your computer until you delete them). Most browsers and mobile devices allow you to manage cookies in the settings. If you refuse a cookie, or if you delete cookies from your device, you may lose functionality and/or experience some inconvenience in your use of our Services. For example, you may not be able to sign in and access your account as quickly, or we may not be able to recognize you, your device, or your online preferences. Furthermore, if you use a different device, change browsers, or delete the opt-out cookies that contain your preferences, you may need to perform the opt-out task again. For more information, see ACCESSING AND MODIFYING YOUR PERSONAL INFORMATION.

4 HOW WE SHARE, TRANSFER AND PUBLICLY DISCLOSE YOUR INFORMATION

We do not disclose your private personal information except in the limited circumstances described here.

Service providers. We engage service providers to perform certain functions and provide certain services. For example, we use a variety of third-party services to help us understand and improve the use of our Services, such as Google Analytics. We may share your private personal information with these service providers, subject to our obligations to adhere to this Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your private personal information only on our behalf and pursuant to our instructions and that there are appropriate security safeguards in place to protect your personal information.

We share your payment information, including your credit or debit card number, card expiration date, CVV code, and billing address with payment services providers to process payments, prevent, detect and investigate fraud or other prohibited activities, facilitate dispute resolution such as chargebacks or refunds, and for other purposes associated with the acceptance of credit or debit cards.

Law and harm. Notwithstanding anything to the contrary in this Policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation, legal processes, obligations to regulatory bodies or governmental requests; to protect

the safety of any person; to address fraud, security or technical issues; or to protect our or our users' rights or property. However, nothing in this Policy is intended to limit any legal defenses or objections that you may have to the request of a third-party, including a government, to disclose your information.

Business transfers and affiliates. In the event that we are involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be sold or transferred as part of that transaction. This Policy will apply to your information as transferred to the new entity. We may also disclose information about you to our corporate affiliates, including our affiliates that provide financial services, in order to help provide, understand, and improve our Services and our affiliates' services.

Public Information. Certain information you choose to make public on our Services, for example your public profile details or public comments, may be visible to other users or to members of the public to the extent that you choose to make it public. We only share or disclose public information for purposes that are consistent with the purpose for which you made the information public, or as required by law. We do not share your public information with third parties for their own separate purposes unless you have consented or the law permits us to do so.

5 HOW WE PROTECT YOUR INFORMATION

Webull uses reasonable, industry standard security measures to protect information under our control from loss, misuse, unauthorized access, disclosure, alteration, and destruction. We maintain appropriate physical, electronic and procedural safeguards, including restricting access to personal information on a need-to-know basis, and limiting the amount and type of information available for downloading or transmittal. We also regularly conduct audits to ensure the effectiveness of our system. Please understand, however, that no security system is impenetrable. We cannot guarantee that our security measures will prevent hackers from illegally obtaining this information, or that our database and/or systems will not be subject to a cyber-attack.

We have established a data breach management plan. If there is a data breach involving the personal information of our users as contemplated under applicable laws, we will activate the data breach management plan to contain the data breach to prevent data from being further compromised and take appropriate measures to inform you, including in the form of push notifications, public announcements, or other appropriate means.

You acknowledge that no safeguards are guaranteed to be completely effective. We strongly suggest that you perform all uploads in a secure internet environment and use a strong password for your account. Please contact us (see HOW TO CONTACT US below) immediately if you have reason to believe your account security has in any way been compromised.

Webull retains your personal information for as long as necessary to accomplish the purpose for which it was collected, to meet our legal and regulatory obligations including compliance with our records retention practices, or as required or permitted by applicable laws and as permitted to meet our legitimate interests. When information is no longer required, we will delete or deidentify it in a secure manner.

6 ACCESSING AND MODIFYING YOUR PERSONAL INFORMATION

We take reasonable steps to ensure that the personal information we hold is complete, accurate, not misleading and updated where necessary. If you are a registered user of our Services, you can help us keep your information current by using the tools and account settings to access, correct, delete, or modify the personal information you provided to us in connection with your account. You also can download certain account information, including your portfolio.

You can permanently delete your Webull account. When your account has been deactivated, information relating to your account, including your name, username, and public profile, is no longer viewable on our Services, including the Webull app. For up to 30 days after deactivation it is still possible to restore your account if it was accidentally or wrongfully deactivated. Absent a separate arrangement between you and us to extend your deactivation period, after 30 days, we will begin the process of deleting your account from our systems, which can take up to a week.

Keep in mind that search engines and other third-parties may still retain copies of your public information, such as any posts and comments you made in the Webull Community, even after you have deleted the information from the Services or deactivated your account.

7 HOW WE PROTECT THE INFORMATION OF MINORS

The Services are not directed to children, we do not intentionally collect information from children, and we request that children not provide any personal information to us. If you have any concerns about your child's privacy, please contact us (see HOW TO CONTACT US below). Should we discover that we have unintentionally collected personal information from your child without your consent, we will take steps to delete the information as soon as possible.

8 HOW YOUR INFORMATION MOVES GLOBALLY

We store your personal information on servers in the country or region that we provide our Services from and you will be deemed to accept their jurisdiction over your information.

Our products and Services are available across a number of jurisdictions, each of which has different data protection laws that vary in the amount of protection they provide. In all cases, we will make reasonable efforts to ensure that your personal information is adequately protected and that we comply with applicable laws. In providing our Services, your personal information may be accessed by our affiliates in jurisdictions other than where you use our Services and by using our Services you hereby consent to this transfer of your personal information.

Webull will not transfer any personal data relating to a natural person located in the European Economic Area, the United Kingdom, or any other jurisdiction that restricts outbound data transfer, from the country of origin without appropriate safeguards as required by applicable law and regulations. You may receive a copy of those safeguards by contacting us (see HOW TO CONTACT US below). Furthermore, Webull will not transfer personal information that is collected in South Africa to locations outside South Africa that do not have adequate data protection laws unless there is a justification under applicable laws for the transfer.

9 CALIFORNIA RESIDENTS

Under the CCPA, California residents have certain rights (set forth below) regarding their personal information.

Right to know. California residents (and their households) have the right to request certain information about whether we collect, use, disclose and sell personal information about them, and to request to know the personal information that we have. To make such a request, please contact us. Please be advised that we will verify all such requests prior to providing any personal information including by requiring you to respond to an email sent to the email you used when making your request and/or the email that pertains to your account. Please be advised that we are only required to respond to two requests per consumer each year. These reports will be provided free of charge.

Right to request deletion. If you are a California resident, you may request the deletion of personal information we have collected from you. To make such a request, please contact us. Please be advised that we will verify all such requests prior to providing any personal information including by requiring you to respond to an email sent to the email you used when making your request and/or the email that pertains to your account.

Right to opt out of the "sale" of personal information. California residents have the right to request that we not sell their personal information to third parties, as those terms are defined by California Civil Code Section 1798.140. We do not sell information about you to third parties. In order to help us deliver advertising and marketing on other platforms, we do allow third parties to collect information through our Services. Please see HOW WE SHARE, TRANSFER AND PUBLICLY DISCLOSE YOUR INFORMATION above for more details, including choices available to you.

In the past twelve months, we collected personal information as described in THE INFORMATION WE COLLECT above. We share this information as described in HOW WE USE YOUR PERSONAL INFORMATION above.

Non-discrimination. We will not discriminate against California residents who exercise their privacy rights.

Authorized agent. California residents may use an authorized agent to make requests on their behalf. We require the authorized agent to provide us with proof of the California resident's written permission (for example, a power of attorney) that shows the authorized agent has the authority to submit a request for the California resident. In addition to providing this proof, the authorized agent must follow the appropriate process described above to make a request.

California shine the light law. We do not share your personal information with other businesses or third parties for their own direct marketing purposes.

Do not track notice. We do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide users the ability to exercise choice regarding the collection of personal information about that user's online activities over time and across third-party web sites or online services. We may allow third parties, such as companies that provide us with analytics tools, to collect personal information about your online activities over time and across different apps or web sites when you use our Services.

10 NEVADA RESIDENTS

We do not sell consumers' covered information for monetary consideration (as defined in Chapter 603A of the Nevada Revised Statutes). However, if you are a Nevada resident, you have the right to submit a request directing us not to sell your personal information. To submit such a request, please contact us using the contact details in HOW TO CONTACT US below.

11 EUROPEAN ECONOMIC AREA AND UNITED KINGDOM RESIDENTS

If you are a resident of the European Economic Area or the United Kingdom, you have the following rights regarding your personal data:

- If you wish to access, correct, update or request deletion, restrict processing, object to processing, or request porting of your personal information, you can do so at any time by contacting us.

- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" link in the marketing emails we send you. You can manage your account settings and email marketing preferences as set forth in ACCESSING AND MODIFYING YOUR PERSONAL INFORMATION.

- Similarly, if we have collected and processed your personal information with your consent (such as for advertising), then you can withdraw your consent at any time by contacting us. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. Please note that if you opt-out of having your data shared with advertisers, you will still see ads, they just will not be tailored to your interests.

- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Notwithstanding the foregoing, we reserve the right to keep any information in our archives that we deem necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

12 PERSONAL INFORMATION PROCESSED IN SOUTH AFRICA

This section applies if your personal information is processed by Webull in South Africa. Where personal information is processed by Webull in South Africa reference to "personal information" or "personal data" throughout this policy includes personal information of natural persons as well as juristic persons (companies). Therefore, the data subject rights below apply to both natural persons and juristic persons.

If your personal information is processed by Webull in South Africa, you have the following rights regarding your personal information:

- You have the right to request access to, and information regarding the nature of personal information held by us and to whom it has been disclosed. Such request for access may be refused on the basis of the grounds of refusal in the Promotion of Access to Information Act, 2000 (POPIA).

- You have the right to request us to rectify or correct your personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.

- You have the right to revoke your consent to us for processing your personal information at any time. Please note that the revocation will not affect the lawfulness of the processing carried out up to that point. You can declare a written revocation by email or courier it to our address detailed below.

- You have the right to object to the processing of your personal information where the processing is on the basis that (a) it protects your legitimate interests; or (b) it is necessary for pursuing our legitimate interests or that of a third party to whom it is disclosed. We will then cease to process your personal information unless we can show grounds for the processing.

- You have the right to request us to delete your personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully or where we are no longer authorized to retain it.

- You have the right to request the restriction of processing of your personal information in the circumstances contemplated in POPIA.

- You have the right to opt-out of direct marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" link in the marketing emails we send you. You can manage your account settings and email marketing preferences as set forth in ACCESSING AND MODIFYING YOUR PERSONAL INFORMATION.

- Similarly, if we have collected and processed your personal information with your consent (such as for advertising), then you can withdraw your consent at any time by contacting us. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. Please note that if you opt-out of having your data shared with advertisers, you will still see ads, they just will not be tailored to your interests.

- If you believe that we have not handled your personal information correctly, you have the right to lodge a complaint with the Information Regulator. You can contact the **Information Regulator** at:

  Woodmead North Office Park
  54 Maxwell Drive Woodmead
  Johannesburg
  South Africa
  2191
  Email address: POPIAComplaints@inforegulator.org.za

- You have the right to institute civil proceedings regarding the alleged interference with the protection of your personal information.

If you wish to exercise any of your rights under South African law, including access, you can contact us and following the procedure outlined in our Access to Information Manual (PAIA Manual) We may require you to verify your identity before responding to a request. We respond to all requests we receive from data subjects wishing to exercise their data protection rights in accordance with applicable data protection laws. Notwithstanding the foregoing, we reserve the right to keep any information in our archives that we deem necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

13 HOW THIS PRIVACY POLICY IS UPDATED

We may revise this Policy from time to time. The most current version of the Policy will govern our use of your information. If we make any change to this Policy that, in our sole discretion, is material, we will update the Policy on our website or our app without a separate notification sent to you. Please refer to the most updated version of this Policy on our Webull app or our website. By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Policy.

While all Services of Webull are subject to this Policy, some Services have their own specific privacy notice or policy. Some specific privacy notice or policy may describe how we process your information in the performance of that service more specifically. If this Policy is inconsistent with the privacy notice or policy of a particular service, the privacy policy of that service shall prevail.

14 HOW TO CONTACT US

Our physical address is The Link, 173 Oxford Road, Rosebank, Gauteng, 2196.

If you have any questions, comments or suggestions about this Policy please contact us via email at support@webull.co.za

We will normally reply to you within fifteen (15) business days.