



## **Privacy Policy**

**Effective as of December 11, 2018**

We at Avenue Securities LLC ("Avenue," "we," "us," or "our") have created this privacy policy (this "Privacy Policy") because we want you to know how information you provide to us is used and shared. This Privacy Policy relates to the information collection and use practices of Avenue in connection with our website located at <https://avenue.us> (the "Website") and services provided through our investment platform (the "Platform") made available to you through our Website and our mobile application (the "App").

### **Description of Users and Acceptance of Terms**

This Privacy Policy applies to visitors to the Website that view publicly-available content ("Visitors") and end users who create an account on, or submit an application for full use of (e.g., investment capabilities), our Platform ("End Users").

By visiting our Website or creating an account on, or submitting an application for full use of, our Platform, you are agreeing to the terms of this Privacy Policy and the accompanying [Terms of Use](#).

Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use.



## **Scope of This Policy**

The Website and App are operated by Avenue in the United States (US), and complies with US law. If you are located outside of the US, please be aware that any information you provide to us may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your home country, where the data protection laws may not be as protective as those in your jurisdiction.

## **Information We Collect and How We Use It**

### **Contact Information**

We collect contact information on our Website from Visitors who wish to, as applicable, obtain information or support, receive product and service offers from us and from our marketing partners, purchase our products or services, or enter our waitlist for Platform access. Contact information typically includes your name, email address, and company name.

### **Use of the Platform**

In order to have full use of the Platform, End Users must create an account via a login and password and submit an application. When submitting an application, End Users are asked to provide certain personal information, such as their name, physical address, employment details, number of dependents, tax identification number (or similar government identifier), and bank account details. This information is used to assess the End User's financial situation and credit standing to allow use of the Platform and facilitate proper account funding. Access to and review of such information is consented to in our Terms of Use.



### **From Your Activity**

In an ongoing effort to improve our Website and App, we automatically collect certain information regarding the activity of Visitors and End Users. This information includes the device from which you access our Website or App, your IP addresses, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Website or App you visit, and similar information concerning your use of the Website or App.

### **From Cookies**

Cookies are small packets of data that a web server stores on your computer's hard drive so that your computer will "remember" information about your visit. 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. However, if you decide not to accept cookies from us, the Website may not function properly.

### **Third-Party Analytics**

We may use one or more third-party analytics services (such as Google Analytics) to evaluate your use of the Website and the App to compile reports on activity (based on their collection of IP addresses, Internet service provider, browser type, operating system and language, referring and exit pages and URLs, data and time, amount of time spent on particular pages, what sections of the Website or the App you visit, number of links clicked while on the Website or the App, search terms and other similar usage data), and analyze performance metrics. These third parties use cookies and other technologies to help analyze and provide us the data. By visiting the Website or App, you consent, to the extent permitted under applicable law, to the processing of data about



you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. For more information on these third parties, including how to opt out from certain data collection, please visit the sites below.

Google Analytics: <https://www.google.com/analytics>

### **Aggregate Data**

In an ongoing effort to better understand our users, we might analyze your information in aggregate form to operate, maintain, manage, and improve our Website and App. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our products and services to current and prospective business partners and to other third parties for other lawful purposes.

### **Sharing with Third Parties**

We may engage other companies and individuals to perform certain business-related functions on our behalf. Examples may include providing technical assistance, customer service, financial services, and marketing assistance. These other companies will have access to the personal information only as necessary to perform their functions and to the extent permitted by law. We may also share your personal information with any of our parent companies, subsidiaries, affiliates, or other companies under common control with us for the purposes described herein.



## **Business Transfers**

In the event of a merger, dissolution or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal information, would be transferred to the surviving entity in a merger or the acquiring entity. All such transfers shall be subject to our commitments with respect to the privacy and confidentiality of such personal information as set forth in this Privacy Policy.

## **Disclosure to Public Authorities**

We are required to disclose personal information in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements. We may also disclose personal information to other third parties when compelled to do so by government authorities or required by law or regulation including, but not limited to, in response to court orders and subpoenas.

## **Personal Information Rights**

You have the right to access, correct, or amend your personal information by sending an email to us at [customer@avenue.us](mailto:customer@avenue.us) with "Privacy Policy" in the subject line or, as applicable, by logging into an account you have with us. Please allow us a reasonable time to respond to your request.

## **Opt Out for Direct Marketing**

You may opt out at any time from the use of your personal information for direct marketing purposes, or transfer of your personal information to third parties for direct marketing purposes,



by sending us an email at [customer@avenue.us](mailto:customer@avenue.us). Please allow us a reasonable time to process your request.

You may also manage your receipt of marketing communications by clicking on the "Unsubscribe" link located on the bottom of any Avenue marketing email and following the instructions found on the page to which the link takes you. You cannot opt out of receiving transactional or administrative e-mails, such as those relating to your account on the Platform. Please allow us a reasonable time to process your request.

### **Retention of Personal Information**

We will retain your personal information in a form that identifies you only for as long as it serves the purpose(s) for which it was initially collected as stated in this Privacy Policy, subsequently authorized, or as allowed under applicable law.

### **How We Protect Your Information**

We take very seriously the security and privacy of the personal information that it collects pursuant to this Privacy Policy. Accordingly, we will implement reasonable and appropriate security measures to protect your personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in processing and the nature of such data, and comply with applicable laws and regulations.



## **External Websites**

The Website may contain links to third party websites. Avenue has no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third party websites. You should check the applicable third party privacy policy and terms of use when visiting any other websites.

## **Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time, and will post any changes on the Website or notify you via e-mail, at our option, as soon as they go into effect. By using the Website or App after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

## **Language Disclaimer**

This Privacy Policy is presented in English and Spanish. Spanish version is presented merely for reference. In case of any inconsistency between English and Spanish versions, English version shall prevail for all purposes.



## How to Contact Us

If you have questions about this Privacy Policy, please e-mail us at [customer@avenue.us](mailto:customer@avenue.us).