

Privacy Policy

Effective March 1, 2023

Introduction

We at Fingage work hard to protect and keep the information collected on our site private and secure. This privacy policy (“Policy”) describes the collection and use of personal and non-personal information of users of our website at www.fingage.com (“Site”) and any other service or website that displays this Policy.

If you are a California consumer, for more information about your privacy rights, please see the section of this Privacy Policy called California Consumer Privacy Statement.

Information Collection

We collect personal information from you when you voluntarily provide such information through our Site and platform services, referred to in this Policy as “Services”, and in order to use and access our Services:

1. We collect personal information such as name, email address, address, and telephone number, employer name from all users of our Site.
2. We also collect credentials from investment advisors which are used to obtain information about the accounts that the advisors manage at the different custodians and to automate trading process for these accounts.
3. We collect personal information imported or uploaded to our platform by Fingage customers (such as investment advisors) for processing on their behalf. In this case, we act as a process of the data on behalf of our customers who act as the data controllers. This information may include information about a customer’s clients such as name, email address, and financial account data, in order to perform wealth management services for those clients via our platform and services. Fingage customers may electronically submit such data to our platform or instruct third parties to do so. Fingage may access this data except where prohibited by the agreement between Fingage and customers or as otherwise prohibited by law.
4. We also collect age, DOB, salary, investable assets, saving rate, risk tolerance, desired retirement age, and other financial information about your household as well as your portfolio holdings when you use our services to obtain a personalized asset allocation strategy or to have Fingage Advisors LLC manage your account.

Fingage automatically records certain information about your use of the Site such as browsing activity, clicked UI elements and links, and other information such as browser type, IP address, date and time of access, and referrer URL.

Use of Information

Fingage stores, processes, and maintains personal information to securely provide our Services and manage our business. We may process your personal information to:

1. Provide our services to users and customers.
2. Communicate with users and customers about our Services and their inquiries.
3. Comply with the rules of regulatory bodies such as the Securities and Exchange Commission.

4. Prevent fraudulent activity on our platform and prevent or take action against activities that are or may be in violation of our Terms of Use.
5. Communicate with you about our services, any actions required from you regarding your online account at Fingage.
6. Share some of your information with third parties such as custodians, brokers, or data aggregators solely for the purpose of providing our Services to you.
7. Fingage may use your personal data to communicate with you about our product and services. If you decide at any time that you no longer wish to receive these marketing communications from us, please follow the “unsubscribe” instructions provided in the communications. Please note that you cannot opt-out of administrative communications such as regulatory, billing or service notifications.

Information Sharing

We will not sell, rent, or trade your personal data with any third parties except as required by law, such as when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud, front running or scalping, situations involving potential threats to the physical safety of any person, or violations of our Terms of Use.

Fingage will share some of your information with third parties such as custodians, brokers, or data aggregators solely for the purpose of providing our Services to you.

Except as required by law or requested by regulatory authorities, Fingage agrees to maintain your non-public personal data in strict confidence.

Your Choices and Obligations

You may request deletion of personal information by emailing support@Fingage.com and providing us enough information to identify your account and prove that you are the owner of the identified account. We will endeavor to make any deletion request effective as soon as reasonably practicable. However, we may retain residual information related to your account, as well as any data related to your trades, in accordance with applicable laws. In no case will we share any individual trading data unless required by regulators or other government bodies.

Other Important Information

Security

Fingage takes reasonable steps to protect your personal data from loss, misuse, and unauthorized access, alteration, disclosure, or destruction. No Internet, email, or electronic operating system that enables the transmission of data is ever fully secure or error free so, please take special care in deciding what information you send to us in this manner.

Social Media and Links to Other Web Sites and Apps: “Third Parties”

This Privacy Policy and these terms apply only to Fingage operated services and applications. This Site may contain links that access other web sites and apps that are not operated or controlled by Fingage. The policies described herein do not apply to Third Party websites or applications.

Business Transfer

Personal information may be disclosed and otherwise transferred to an acquirer, or successor as part of any merger, acquisition, sale of Fingage assets or similar transaction as well as in the event of an insolvency,

bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of Fingage assets.

Minors

Fingage is not to be used by anyone under the age of 18 and, as such does not knowingly collect personal data from anyone under the age of 18. If you are under the age of 18, please do not submit any personal data to Fingage. If a parent or guardian becomes aware that his or her child under the age of 18 has provided us with personally identifiable information without his or her consent, he or she should contact us at support@Fingage.com and we will delete such information from our files.

Advertising

We do not allow third-party advertising on our Site.

California consumer privacy statement

This California consumer privacy statement (“Statement”) supplements Fingage’s privacy policy and it is applicable solely to personal information which we collect online from California consumers.

Notice of collection and use of personal information

We may have collected the following types of information about you: name, address, phone number, employer, eligibility to your 401(k) plan, financial account number, social security number, gender, and your online activity on our Site.

We may have used this information for the purpose of conducting business and providing our services to you as described in the Policy as well as identifying bugs, errors on our site or internal research to improve the quality of our services.

Sources of information

We obtained personal information about you from you directly or from one of our customers who shared your data with us in order to provide our Services to you.

Sharing of personal information

We may have shared some of your information with third party financial service providers such as custodian solely in order to perform our services. Fingage does not sell and has never sold personal information of any user.

California consumer privacy rights

You have certain choices regarding your personal information as described below:

Access: You have the right to request, twice in a 12-month period, that we disclose to you the personal information which we have collected, used, disclosed or sold about you during the past 12 months.

Deletion: You have the right to request that we delete certain personal information that we have collected about you.

To submit a request to a deletion or access request, please email us at support@fingage.com. Note that to help protect your personal data, we will need to verify your identity in order to comply with your request. If you have an account with us, we may verify your identity by asking you to sign in to your account. If you do not have an account with us and you request access to or deletion of your personal information, we may require you to provide any of the following information: name, email address, date of last contact with Fingage, declaration

under penalty of perjury that you are the consumer whose personal information is the subject of the request. If you designate an authorized agent to make an access or deletion request, on your behalf we may ask you to provide the agent with a written permission to do so and to verify your identity directly with us.

Updates to this policy

This Privacy Policy may change from time to time. We will post any Privacy Policy changes and, if the changes are substantial, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes). Each version of this Privacy Policy will be identified at the top of the page by its effective date.

Contacting us

If you have questions or comments about this Privacy Policy, please email us at support@fingage.com or via physical mail at:

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