

Sarna Finance LLC

Privacy Policy

Our Commitment to Customer Privacy

Your privacy is important to us. We are committed to protecting the confidentiality of our customers' personal information. By using our platform, you agree to our collection and use of your personal information, as described in greater detail below.

Types of Information We Collect and How We Use It

Sarna collects certain information to facilitate your use of our platform. The kinds of information we collect include:

1. The Internet Domain and Internet Protocol (IP) address from which you access our platform, and GPS and transaction information.
2. The Internet browser and version you are using (e.g., Internet Explorer, Chrome, Safari, Firefox).
3. The operating system you are using (e.g., Windows 10, Mac OS, iOS, or iPadOS, Android).
4. The date and time of your visit.
5. If you linked to our platform from another website, the address of that website.
6. If you linked to our platform from a search engine, the name of the search engine.
7. The device you accessed our platform from (PC, Mac, iPhone, iPad, Android).
8. "Cookies" or other online tracking mechanisms such as device fingerprints, pixel tags, web beacons and clear gifs.

Cookies are tiny packets of information that websites store on your computer so that your computer will "remember" information about your visit. These cookies are essential for you to browse our platform and use its features such as accessing secure areas of the site. Sarna collects certain information for our internal purposes which include facilitating your access to, tracking your use of, and enhancing your experience while using our platform. We also use this information to help us provide better products and services to you and protect you against fraud.

Some areas of our platform are interactive. Sarna may invite you to register for our platform or join one of our emailing lists. When you provide your name, address and other contact information in connection with a product or service inquiry, we may share that information with service providers that provide this information to you on our behalf.

Our platform also allows our customers to access their accounts, whether they be accounts for virtual trading or accounts for trading buying and selling securities with funds they deposit in their accounts. In these cases, one or more of the following types of information is collected to provide you with services in connection with your account:

1. Your name
2. Your date of birth
3. Your mailing address
4. Your phone number(s)
5. Your e-mail address
6. Your personal and financial information (e.g., income, net worth, marital status, etc.)
7. Your social security or tax identification number
8. Your chosen username and password
9. Security questions, security image and security phrase
10. The identifying information automatically collected from our platform users, as described above.

You will be asked to provide your username and password to access your account with us.

Whether and Why We May Share Your Personal Information

We will never sell, lease, barter or trade your personal or financial information. To provide you with the best service, we may provide certain information about our customers on a limited basis to parties affiliated with Sarna, including our affiliates and certain third parties, which perform services for our customers or us, including our clearing broker.

Whenever we share your information with service providers, we maintain agreements with these providers that contain provisions to protect the confidentiality of the information shared, limit the access to that information to employees of those service providers with a need to use it, and mandate that it be used only for the purposes of providing the services under the particular agreement.

Sarna may disclose your personal information, without notice, if required to do so by law or by a governmental or self-regulatory agency and in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with any legal process served upon Sarna or the Sarna client interfaces; (b) protect and defend the rights or property of Sarna; and/or (c) act under exigent circumstances to protect the integrity of the Sarna client interfaces.

Changing Your Information

Registered platform users are permitted to change their personal information by logging in to their accounts through our platform. We also allow customers to change their registered e-mail address and our other electronic delivery services by logging in to account access and changing their e-mail address in the appropriate account maintenance area.

Retention of Your Personal Information

We will retain your personal information for as long as is necessary to comply with our legal obligations, resolve disputes or enforce our agreements, regardless of whether you continue to be a customer, unless otherwise required by law.

Rights Under State Laws

State law may afford additional rights to you with respect to certain personal information that you have provided to us. Sarna does not discriminate against users or customers based on their exercising any rights afforded them by applicable state laws. To request access to your personal information or request that we delete certain personal information, you may contact us via email at compliance@sarnafinance.com. Please specify in your request the details of which personal information you would like us to delete. You may also authorize an agent to submit a request on your behalf, so long as you provide the authorized agent written permission, and your authorized agent is able to verify their identity with us.

Security

We are committed to providing a safe and secure online environment. Therefore, we maintain reasonable physical and technical safeguards to protect your personal information whenever personal information is made available via our platform. In addition, for Sarna customers who want to access their account information online, we use usernames, passwords, security questions, and device matching to secure access to your information. As part of our overall commitment to your privacy, we limit access to your personal and financial data to those personnel at Sarna and our service providers who have a bona fide need for this information.

Changes to this Policy

If we make any material changes to this Policy in the future, we will provide notice of such changes by sending a notice to the primary email address specified in your account, by placing a notice on the Sarna interfaces that you use to access your account and/or by updating this page of our platform. For administrative changes, this notification may entail changing the effective date at the bottom of this Policy. Your continued use of the Sarna Interfaces after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by this Policy.

Effective 6/2023

FACTS

WHAT DOES SARNA FINANCE LLC DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Account balance and transaction history
- Investment experience and banking information

How?

All financial companies need to share **customers'** personal information to run their everyday business. In the section below, we list the reasons financial companies can share their **customers'** personal information; the reasons Sarna Finance LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Sarna Finance LLC share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	Yes	No
For our affiliates to market to you	Yes	No
For nonaffiliates to market to you	No	N/A

To limit our sharing

Please email us at info@sarnafinance.com.

Please note:

If you are a *new* customer, we can begin sharing your information **30** days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

Questions?

Please email us at info@sarnafinance.com.

Who we are	
Who is providing this notice?	Sarna Finance LLC
What we do	
How does Sarna Finance LLC protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files.</p> <p>We secure your Personal Information from unauthorized access, use or disclosure using modern security methods. When certain Personal Information is transmitted to or from us, the information is protected using encryption software.</p>
How does Sarna Finance LLC collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ Open an account or provide us with your income information. ■ Make deposits to or withdraws from your account. <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you <p>See below for more on your rights under state law.</p>
What happens when I limit sharing for an account that I hold jointly with someone else?	Your choices will apply to everyone on your account.
Definitions	
Affiliates	<p>Companies related by common ownership or control.</p> <ul style="list-style-type: none"> ■ <i>Sarna Finance LLC affiliates include Sarna Holdings Inc. and Sarna Technologies LLC.</i>
Nonaffiliates	<p>Companies not related by common ownership or control.</p> <ul style="list-style-type: none"> ■ <i>Sarna Finance LLC does not share your information with nonaffiliates.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Sarna Finance LLC does not conduct any joint marketing activities.</i>
Other important information	
Affiliates State and International Laws	
<p>California Residents: In accordance with California law, we will not share any information that we collect about you with non-affiliates, except as provided by law. We will limit our information sharing amongst our affiliates to the extent required by law.</p> <p>Nevada Residents: Nevada law requires us to provide this notice and to disclose that you may request to be placed on Sarna Finance LLC's internal "do not call" list at any time by emailing us at info@sarnafinance.com.</p> <p>Vermont Residents: In accordance with Vermont law, we will not share any information we collect about Vermont residents with companies who are not affiliates, except as permitted by law. We will not share information about your creditworthiness with our affiliates without your authorization or consent.</p>	