

**PRIVACY POLICY**  
**Last Updated: January 13, 2024**

CliftonAI LLC (“Clifton” “we,” “us,” or “our”), knows that data privacy is very important to you. We have created this privacy policy (the “Privacy Policy”) to describe what kinds of personal information we may obtain, use, and share relating to your use of our website located at [www.cliftonai.com](http://www.cliftonai.com) and any computer program, website, or mobile application link to or posting this Privacy Policy that are operated by us, our affiliates, and/or any third-party that has enabled us to provide you with services (collectively, the “Platform”). By accessing or using the Platform, you may access or use our software and related services (collectively, the “Services”). Our Services are only available to individuals who are 18 years or older. If you are under the age of 18, you may not use our Services.

By accepting this Privacy Policy, accessing or using the Platform, the Services, or otherwise manifesting your assent to this Privacy Policy, you agree to be bound by this Privacy Policy. If you are accepting this Privacy Policy on behalf of your employer or another organization, you hereby certify that you are authorized to bind such party to the terms of this Privacy Policy. If you do not agree to (or cannot comply with) all of the terms of this Privacy Policy you may not access or use the Platform or the Services. Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our [Terms of Use](#).

This Privacy Policy will help you understand the following:

**I. INFORMATION WE COLLECT**

In the course of operating the Platform, providing the Services, and/or interacting with you, Clifton collects and/or receives the following types of information, which may include personal information.

1. **Contact Information.** We collect contact information through our Platform and Services, which typically includes name, email address, phone number, and any information provided in messages to us (“Contact Information”).

2. **Account Information.** We collect account information through our Platform and Services, which may include your name, contact information, date of birth, nationality, gender, financial information such as bank account and payment card details, suitability information, income, revenue, and other sources of funds, account balance, credit scores, tax information and other information about financial situation, investment objectives, stock restrictions, approximate net worth, and risk preferences and tolerance.

3. **Payment Information.** In order to purchase Services, you may be required to provide our third-party payment processor(s) (“each a “Payment Processor”) with certain credit or debit card information, ACH transfer information, or wiring instructions (collectively, the “Payment Information”). We do not obtain access to the Payment Information. Our Payment Processor(s) will collect on our behalf information about your payment for Services (“Transaction Information”). By using the Services, you acknowledge and agree that if and to the extent your Payment Information, Transaction Information, and/or any other information is collected by or transferred to the applicable Payment Processor, such information will be governed by its applicable privacy policy, and that you expressly agree to the terms of such privacy policy. You hereby expressly grant us the right, power, and authority to access and transmit your information as reasonably necessary for the Payment Processor(s) to provide its services to you in connection with your use of our Services.

**4. Information obtained through the use of our services.** When you access or use any of our Services, we may receive and use certain information you provide us to help us offer and improve our Services. Our Services allow you to interact with our generative artificial intelligence model (the “Software”), which enables you to input information (each an “Input”) which will output a response (an “Output”). If you include personal data and/or information in your Inputs, we will collect that information, and it may be reproduced to you in one or more Outputs. Additionally, our Software needs to be “trained” to function properly. While we train our Software predominantly using publicly available information, your personal, financial, and other information you provide to us in connection with your use of our Services may be used to train our Software and to provide you with Outputs. If you have any questions on how we use your personal information and data with respect to our Software or would like to opt out of your personal information and data from being used, please contact us at [support@cliftonapi.com](mailto:support@cliftonapi.com).

**5. Information obtained automatically from your online activity.** When you access or use any of our Platform and/or Services, we use browser cookies, pixels, web server logs, web beacons, and similar technologies (collectively, “Tracking Technologies”) to automatically collect or receive certain standard technical information and other data (such as traffic data, location data, logs and other communications data) sent to us by your computer, mobile device, tablet, or any other device over time on our Platform, and your online activity across third party websites, apps, and devices. We may also evaluate your computer, mobile phone, or other access device to identify any malicious software or activity that may affect the availability of our Platform and Services.

When you access or use any of our Platform and/or Services, advertising companies, analytics networks and providers, and other third parties may use Tracking Technologies to collect information about your online activities over time and across different websites, apps, online services, Platform and devices.

The data we or third parties collect automatically may include personal information and/or statistical data that may not identify you personally; however, we or third parties may maintain, combine, or associate it with personal information collected in other ways or received from third parties. We and/or third parties use this information to (i) enhance the performance and functionality of our Platform and/or Services; (ii) personalize your experience with the Platform and/or Services, understand how you use our Platform and/or Services, maintain a persistent session, and improve and further develop our Platform and/or Services; and (iii) serve targeted and other advertising, and provide custom experiences, across other sites, apps, online services, Platform and devices, measure how the ads perform, and for analytics purposes.

The Tracking Technologies used on the Platform and Services include the following, among others:

- *Cookies:* Cookies are small packets of data that a website stores on your computer’s hard drive so that your computer will “remember” information about your visit. In addition to collecting information, we use cookies to help us authenticate users, provide content of interest to you, analyze which features you use most frequently, and measure and optimize advertising and promotional effectiveness. To do this, 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. For information regarding your choices regarding Cookies, please see Section IV of this Privacy Policy.
- *Local Storage Technologies:* We may use local storage technologies, like HTML5,

that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.

- *Web Beacons:* We use Web beacons, also known as pixel tags or clear GIFs, to demonstrate that a webpage or email address was accessed or opened, or that certain content was viewed or clicked.
- *Third-Party Sites:* When access to the Platform and/or Services is made available to you through third-party sites, such as social media, please be aware that these other sites maintain their own policies regarding Tracking Technologies and the collection and use of information. You are responsible for reviewing those policies.

**6. Information Obtained From Third-Party Analytics Services.** We may use third-party analytics services (such as Google Analytics) to evaluate your access and use of the Platform and the Services, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to device and internet usage. These third-party analytics services use cookies and other Tracking Technologies to help analyze and provide us the data. By accessing or using any of the Platform and/or the Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. The information used by such analytics services is generally at the aggregate level. Google and other services may associate such data with visitation information collected from our Platform.

We may add to or change these third-party analytics services from time to time. For more information on our analytics services, including how to opt out from certain data collection, please visit the sites below. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Platform or the Services. If you have any questions, or to request a current list of our third-party analytics services, please contact us as set forth in Section XIII (“How to Contact Us”).

For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>

## **7. Information Obtained From Other Sources**

- *Social Media:* We maintain a presence on LinkedIn, Facebook, Twitter and other social media and third-party sites, including our accounts, pages and related activities. We may collect personal information when you visit or use social media, including when you access our Platform or Services from social media. We will do so in accordance with the terms of use and privacy policies of those sites, apps and applicable law. Personal information may also be collected by the third-party social media sites that host our social media pages. These sites may provide aggregate information and analysis to us about visitors’ use of our social media pages. This allows us to better understand and analyze our user growth, general demographic information about the users of these pages, and interaction with the content that we post. Overall, this information may be used to help us understand the types of visitors and users of our social media pages and use of the content. This Privacy Policy does not cover personal information collected by such third-party social media sites. For more information on their privacy and security practices please review the privacy policies and terms of use on their respective websites.
- *Service Providers:* We may collect or receive your personal information from third party service providers such as credit bureaus and service providers (e.g., providers of Anti-Money Laundering (“AML”) or Know Your Customer (“KYC”) services).

- *Government and Public Sources:* As permitted by applicable law, we may also collect or receive your personal information from publicly available government records, directories, and sources such as courts, tax authorities, government agencies, regulatory authorities, and law enforcement.
- *Inferences:* We may collect or receive inferences, which are assumptions or extrapolations that have been drawn from your information to create a profile which may include your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

## **II. INFORMATION COLLECTED THROUGH THE PLATFORM AND/OR SERVICES THAT IS NOT COVERED BY THIS PRIVACY POLICY**

You may voluntarily post and share information including, but not limited to comments through forums and other similar features available from time to time through the Platform and/or the Services. None of the information you provide through the use of these features is protected by this Privacy Policy including any personal information. THIS PRIVACY POLICY DOES NOT APPLY TO ANY INFORMATION (INCLUDING PERSONAL INFORMATION) THAT YOU PROVIDE USING ANY SUCH FEATURES. ALL SUCH INFORMATION IS PUBLIC INFORMATION AND MAY BE VIEWED, COLLECTED, USED, MODIFIED AND/OR DISCLOSED FOR ANY PURPOSE BY CLIFTON, AND ANY USER OF THE PLATFORM AND THE SERVICES.

## **III. INFORMATION USE AND SHARING**

We may use and share your personal information as set forth below:

- When you use the Services, for identity verification, credit, AML, KYC checks, or other due diligence efforts;
- To monitor, support, analyze, and improve the Services;
- To communicate with you regarding the Services;
- To fulfill your requests for information regarding new or improved products and services;
- To engage in marketing, advertising, and tracking activities, and evaluate the efficacy of our efforts, provided that, where required under applicable law, we will obtain your prior opt-in consent to send electronic marketing communications and/or our newsletter;
- To engage research, project planning, troubleshooting problems, and detecting and protecting against error, fraud, or other criminal activity;
- To protect the safety and security of our Services, businesses and customers;
- To third-party contractors and service providers that provide services to us in the operation of our business and assistance with the Services, such as technical support for our Platform, and providing services such as administrators, custodians, marketing and advertising companies, payment processors, consulting service organizations, IT and cloud service providers, among others;
- To create and disclose aggregated, anonymous, user statistics and other information to (i) affiliates, agents, business partners, and other third parties; (ii) describe the Services to current and prospective business partners; and (iii) other third parties for lawful purposes;
- To share some or all of your information with our parent company, subsidiaries, affiliates or other companies under common control with us;
- To fulfill our legal and regulatory requirements;
- To comply with applicable law, such as to comply with a subpoena, or similar legal process, and when we believe in good faith that disclosure is necessary to protect our

rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;

- To assess or complete a corporate sale, merger, reorganization, sale of assets, dissolution, investment, or similar corporate event where we expect that your personal information will be part of the transferred assets;
- To audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- To prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activity, including cyberattacks and identity theft; and
- Otherwise, with your consent.

We will take reasonable measures (e.g., by contract) to require that any party receiving any of your personal information from us, including for purposes of providing the Services, undertakes to: (i) retain and use such information only for the purposes set out in this Privacy Policy; (ii) not disclose your personal information except with your consent, as permitted by applicable law, or as permitted by this Privacy Policy; and (iii) generally protect the privacy of your personal information. Additionally, certain services may be provided through independent third parties, including but not limited to, tax preparation, estate document drafting and investment management, that are not affiliated with Clifton, and may operate under their own privacy policies.

#### **IV. YOUR CHOICES**

- *Update Information:* If the personal information we have for you changes, you may correct, update, or delete it by contacting us as set forth in Section XIV of this Privacy Policy. We will use commercially reasonable efforts to process all such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our databases. Additionally, we will retain and use your information (or copies thereof) as necessary to comply with our legal and/or regulatory obligations, resolve disputes, and enforce our agreements.
- *Marketing Communications:* You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any of our marketing emails. Please note that you cannot opt out of receiving transactional e-mails.
- *Cookie Management:* Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies or other Tracking Technologies, the Platform, and/or the Services may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

You will need to apply these opt-out settings on each device from which you wish to opt-out. We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above.

#### **V. HOW WE PROTECT YOUR INFORMATION**

We take commercially reasonable steps to protect your information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. We use Secure Sockets Layer (SSL) and other transmission technologies to encrypt your information so as to prevent unauthorized access in transit.

Please understand, however, that no security system is impenetrable. Please note that although we employ industry-standard security measures to safeguard the security of your information, no transmissions made on or through the Internet are guaranteed to be secure. Therefore, we cannot ensure the absolute security of any information you transmit to us, and you use our Platform and Services and provide us with your information at your own risk.

## **VI. RETENTION OF YOUR INFORMATION**

We will retain your personal information for as long as it serves the purpose(s) for which it was initially collected as stated in this Privacy Policy or subsequently authorized. We will also retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If your customer relationship with Clifton ends, we will not destroy your information unless required or permitted by law. We will continue to treat your personal information in accordance with this Privacy Policy and applicable laws.

## **VII. CHILDREN'S PRIVACY**

Our Services are only available to individuals 18 years or older, and we do not knowingly collect personal information from any person under the age of 18. If an individual under the age of 18 has provided us with personal information, a parent or guardian of that child may contact us and request that such information be deleted, and we will endeavor to delete that information from our databases.

## **VIII. EXTERNAL WEBSITES AND THIRD PARTIES**

Unless explicitly stated otherwise, our Privacy Policy addresses only our use and disclosure of information we collect from and/or about you in your interactions with Clifton and the Services. If you choose to disclose information to third parties, the use and disclosure restrictions contained in this Privacy Policy will not apply, as we do not control the privacy policies of such third parties, nor are we subject to them.

The Platform and Services may also contain hyperlinks to other third-party websites or apps ("External Websites"). We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or External Websites to which we provide hyperlinks. As such, we are not responsible for the content or the privacy policies of those External Websites. You should check the applicable third-party privacy policy and terms of use when visiting any External Websites.

## **IX. DO NOT TRACK**

As discussed above, third parties such as advertising networks and analytics providers may collect information about your online activities over time and across different websites when you access or use the Services. Currently, various browsers offer a "Do Not Track" option, but there is no standard for commercial websites. At this time, we do not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals.

## **X. NOTICE TO CALIFORNIA RESIDENTS**

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the preceding calendar year, including the names and addresses of those

third parties, and examples of the types of services or products marketed by those third parties. If you wish to submit a request pursuant to Section 1798.83, please contact us via email at [support@cliftonapi.com](mailto:support@cliftonapi.com).

#### **XI. NOTICE TO NEVADA RESIDENTS**

We do not sell your personal information as defined under Nevada law. Nonetheless, if you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties. You can exercise this right by contacting us at [support@cliftonapi.com](mailto:support@cliftonapi.com) with the subject line “Nevada Do Not Sell Request” and providing us with your name and email address..

#### **XII. IMPORTANT NOTICE TO NON-U.S. RESIDENTS**

The Platform, the Services and our servers are operated in the United States. Please be aware that your information, including your personal information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your country of origin. If you are located outside the United States and choose to use the Platform and/or Services, you consent to any transfer and processing of your personal information in accordance with this Privacy Notice, and you do so at your own risk.

#### **XIII. UPDATES TO THIS PRIVACY POLICY**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may update this Privacy Policy from time to time and without prior notice to you to reflect changes in our privacy practices. We will indicate at the top of this Privacy Policy when it was most recently updated, and we encourage you to revisit this page periodically to stay aware of any changes. By accessing the Platform or the Services after we change this Privacy Policy, you are deemed to have accepted such changes.

#### **XIV. HOW TO CONTACT US**

If you have any questions or comments about this Privacy Policy, our privacy practices, please email us at [support@cliftonapi.com](mailto:support@cliftonapi.com) or write to us at:

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