

## Silo Privacy Policy

Last Updated: 01/24/2024

### Commitment to Privacy

Silo prioritizes customer privacy and security above all else. Silo is committed to maintaining information that is legally required and only collects information in accordance with this commitment. This privacy policy outlines what Silo Financial LLC ("Silo," "we," "our," or "us") collects and how we process information about you through our websites and mobile apps. Reading this privacy policy will help you understand our privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [support@silomarkets.com](mailto:support@silomarkets.com) or submit a ticket through the Silo iOS app.

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## What Information Do We Collect?

As a part of operating the Silo Platform, we collect certain information that we classify here as “Personal Information”. The two main ways that we collect information are through your voluntary disclosure or automatically through your usage.

### Personal Information you disclose to us

We collect personal information that you voluntarily provide to us when you register on Silo, whether you use the application or through our website. All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information. The information collected is sorted below. We will reference the categories of information listed below in further sections detailing how we use this information.

- Identity Data, such as your name, date of birth, marital status, social security number, biometric identifiers, and other data on government-issued identification documents;
- Contact Data, such as your email address, billing/mailling address, and telephone number;
- Financial Data, such as your bank account and payment card details, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores;
- Profile Data, such as your username and password;
- Financial Preference Data, such as your financial assessment results, your interests, preferences, feedback, and survey responses;
- Security Data, such as IP Addresses, device information, and geo-location data
- Stored Content, such as photos from your mobile phone gallery or contacts stored in your mobile device or email accounts. We only collect this information with your permission; and
- Additional Data You Provide, such as via focus groups, survey responses, contests/sweepstakes, customer support, or other means.

### Information automatically collected

Similar to other apps, Silo collects information about you automatically when you use our platforms.

- **Usage Information:** We collect information about your activity on our Services, which includes IP address, browser and device characteristics, operating system, device name, country, location, and other technical information.
- **App Activity Information:** When you perform activities on our platform such as creating an account, linking bank accounts, fund transfers, and securities transactions, we collect information about the nature of the activity you engaged in, data about the activity such as amount and timestamp, and other relevant information to enable the facilitation of the activity as well as record it for your reference.

Silo facilitates the transfer of information automatically when you visit, use, or navigate the platform. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, device name, country, location, and other technical information. This information is primarily needed to maintain the security and operation of our services. Silo also uses third-party providers such as Google Analytics to assess the usage and interactivity of our website and app.

## How Do We Use Your Information?

Silo uses your personal information to deliver, personalize, operate, improve, create, and develop our Services to provide you with a secure, smooth, efficient, and customized experience as you use them, and for legal compliance, loss prevention, and anti-fraud purposes. Silo will never sell information provided by users to third parties for compensation.

### Data necessary to fulfill obligations with our customers

- **Pre-launch Waitlist** – For our pre-launch waitlist, we collect “Identity data” limited to a customer’s name and email. We use this information to organize a user’s position on our waitlist, manage referrals, and to contact customers. Our pre-launch waitlist closed on 01/18/2024, the app is currently free to use for everyone.
- **Demo Account Program** - Silo collects and utilizes “Contact data”, “Device data”, and “Identity data” to enable the creation of demo accounts. This includes a name, email, and password, as well as device identifiers. Demo accounts are used to browse and explore the platform.
- **Account Creation** – Silo collects and utilizes “Identity data”, “Contact data”, and “Financial data” to create a customer experience that allows users to seamlessly operate on our platform. A substantial amount of this data is entered when a user initially creates an account on our app.
- **Brokerage Services** – Silo utilizes customer information to provide brokerage services available on our app.
- **Investment Advisory Services** – Services related to investment advisory, such as suitability scores, goal-oriented portfolios, or any service requiring the need for advisory. Customers will be assessed based on “Financial Preference Data” they provide to us.

- Customer Support – Silo will occasionally use “Identity data”, “Security Data”, and “Contact data” to provide customer support. Requests for support submitted through our platform will be collected and attended to using customer data.
- Platform Improvement – Silo could utilize “Security data” and customer information to garner and assess analytics regarding customer usage. Silo utilizes customer data to monitor customer engagement and identify areas of improvement in user experience.
- Communication and Promotions – Silo could utilize “Contact data” to send communications to our users and prospective users regarding product launches, new feature updates, and promotional campaigns. These methods are used primarily for marketing purposes. Promotions such as client referrals and incentives to leave reviews on the iOS App Store are examples of promotions in which contact data would be used to identify and contact individuals that are being referred and to establish a link with the referrer and referee.

#### Data necessary to adhere to legal standards by state and federal agencies

As a registered advisory firm, Silo is subject to laws and regulations that require us to collect, use, and store your personal information. Our duty to adhere to the regulatory requirements motivates our detailed account creation process.

- Identity Verification – Silo collects customer identification data, “Identity Data”, to comply with relevant anti-money laundering (AML) laws. Identification data is sent to Interactive Brokers as part of their customer identification program (CIP). This process might require you to provide a “selfie” along with your already provided government-issued identification.
- Eligibility – To be eligible to use our platform to trade securities, Silo as well as relevant government agencies require users to be permanent US residents that are above the age of 18. Silo collects customer data in an effort to comply with the eligibility requirements of our regulatory framework.
- Compliance – In compliance with the Uniform Securities Act (USA), Silo is required to retain customer records involving account information, correspondence, statements, and other records. Investment advisers are required to retain relevant records for 5 years after their creation.

#### Data use based on customer consent

- Device-based information – Silo collects device-based information such as geo-location, browsing activity, or device identifiers to authenticate users when they enter and use the platform
- Notification-based communication – Customers can opt-in to message or email-based communications to receive notifications regarding order information, promotional campaigns, and account changes.

### When And With Whom Do We Share Your Personal Information?

Silo may share your personal information with our third-party service providers in an effort to deliver on our fiduciary and contractual obligations. Said information could be transferred between services, companies, and our employees in the process of fulfilling our customer responsibilities.

Data such as what is entered into our platform is stored on third-party databases and is also used by our affiliates to fulfill trades made by customers.

Information about your device, location, passwords, email addresses, and phone number may be shared with third parties that engage in authentication services. These parties are engaged to ensure the Silo is providing a secure platform which users interact with.

Silo also uses third-party advertising and analytics services, namely “Google Ads” and “Google Analytics” (includes all analytics platforms provided by google). For information about how google uses information from platforms affiliated with Silo, see <https://policies.google.com/technologies/partner-sites>. Silo also uses third-party services that utilize Google’s and Microsoft’s Email APIs to provide data related to users’ interactivity with Silo correspondence and promotional material.

Information about you could be disclosed to any exchange, clearing, or settlement system that is in connection with trades you make on our platform. Participants such as dealers, custodians, and other intermediaries associated with transacting your securities could come across your data. Silo will disclose information about you if we believe that this disclosure is in accordance with, or required by, any applicable law or legal process or to protect and defend the rights, interests, safety, and security of Silo, our users, or the public.

## How Long Do We Keep Your Information?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy. Retention periods for investment advisers are dictated by regulation. As discussed earlier, we are obligated to retain information through the life of the customer and another 5-7 years once accounts are terminated. When our business need for your specific information is gone, we will either delete or anonymize such information. If past information has been backed up and cannot be changed, it will be isolated and kept till a deletion option is available. Analytics data provided by Google Analytics is not tied to a users’ identity and therefore is intrinsically anonymous.

## Do We Collect Information From Minors?

We do not knowingly collect data from or solicit any information from children under 18 years of age. By using our platform, you represent that you are at least 18 years of age. At the time, none of our product offerings allow custodial access or in any other way facilitate the use of our platform by minors. In the event we learn that we have unknowingly collected information from a person under the age of 18, we will take action to delete concerned information. Please contact [privacy@silomarkets.com](mailto:privacy@silomarkets.com) if you believe we have any information from a minor.

## What Are Your Privacy Choices?

### Account

Clients may update certain profile information through the app. Communications preferences include email, messages, and notification preferences. All account related information we collect is due to legal necessity and cannot be limited.

### Opt-Out Capabilities and Controls

Customers can choose to opt out of certain parts of the user experience.

- **Communications:** For emails and messages that include promotional content, users can click the “unsubscribe” link or text STOP to our messaging avenues. This does not apply to

communication relevant to your account such as trade confirmations, account status, statements, security notices, and other necessary correspondence.

- **Device data:** You may use your devices settings page to disallow Silo from accessing information such as from your contact list or camera roll.
- **Data Sharing:** Silo does not sell user activity data to third parties. Providers such as Google use customer data for services including but not limited to: Firebase Authentication, Firestore, Firebase Messaging, Firebase Analytics, Google Analytics, and Google Ads. Device information and location could be collected while you are interacting with our platform. Third-party providers are used to authenticate user sessions and therefore require access to “Security Data”.
- **Cookie Controls and Trackers:** Web browsers often default to accepting cookies and similar tracking technologies by default. To change cookie preferences, you can configure the browser of your choice to reject tracking. Additionally, you may visit your email’s settings page to view and configure images to “Ask before displaying external images”.

## Do California and Virginia Residents Have Specific Privacy Rights?

Under the California Consumer Privacy Act (“CCPA”) and the Virginia Consumer Data Protection Act (“VCDPA”), California and Virginia residents have the right to request and obtain information from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for those third-parties’ direct marketing purposes in the preceding calendar year, as well as the type of Personal Information disclosed to those parties. Silo does not sell information about you to third parties. Silo allows third parties to access and collect information through the Silo website and iOS platform.

Under the CCPA and VCDPA, users who are California or Virginia residents may request and obtain from us twice a year, free of charge, information related to Personal Information we have collected in the 12 months preceding the request. As outlined in the previous section, users may request the deletion of information that we collect. However, due to our legal obligations, some information cannot be erased and therefore requests might not always be accommodated. Please submit a ticket through the app or email [privacy@silomarkets.com](mailto:privacy@silomarkets.com) to initiate a request for information.

## Do We Make Updates To This Notice?

This privacy policy will be updated to stay compliant with the latest regulations regarding customer privacy. Updates will also be made when changes to our business that affect privacy occur, such as new features, new platforms, or new forms of outreach. If a customer’s privacy is at any point affected by the operations of our firm, we will make changes to the Privacy Policy. We recommend that you review our Policy on a regular basis as you continue to use our services. Users can find the latest revision by referring to the “Effective Date”. Any changes to this Policy will be effective immediately after being posted.

## How Can You Contact Us About This Notice?

If you have questions or comments about this notice, you may email us at [support@silomarkets.com](mailto:support@silomarkets.com) or submit a request ticket. Tickets can be made through the Silo app.