

FACT

WHAT DOES 15 EQUITY 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.

The collection of the personal information of California state residents is regulated by the California Consumer Privacy Act ("CCPA"). CCPA grants California residents the rights to access their personal information, have it deleted, and to opt out of its "sale." Please see additional information relevant to CCPA, below under the "California Consumers" section. Please note that while California residents have the right to the deletion of their information, as a regulated financial entity, 15 Equity is not always able to ensure full erasure, pursuant to recordkeeping requirements. As such, where this is not possible, 15 Equity will instead take "good-faith" measures to comply with the rule by restricting such information and making it accessible only to the Chief Compliance Officer, who will only access or share it as required to comply with a request or investigation by regulators or law enforcement.

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
- Checking account and/or credit/debit card information
- IP address, browser type, and operating system. We accomplish this through the use of "cookies." No personal information is stored in our cookies. For more information about cookies and how to disable them please visit <http://www.allaboutcookies.org> and review [out cookie policy](#)
- email address

When you are *no longer* our customer, we continue to share your information as described in this notice.

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 15 Equity chooses to share; and whether you can limit this sharing.

Information Collected by Cookies and Similar Tracking Technologies: We use cookies, web beacons (also known as "tracking pixels") and similar tracking technologies to collect information about you when you interact with our websites or emails, including information about your browsing and purchasing behavior. We may combine this information with other information we collect about you and use it for various purposes, such as improving our websites and your online experience, understanding which areas and features of our sites are popular, counting visits, tailoring our communications with you, determining whether an email has been opened and links within the email have been clicked, and for other internal business purposes. For more information about how we use cookies, please see the cookie policy.

Reasons we can share your personal information	Does 15 Equity 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.	We don't share.

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.	Yes.
For our affiliates to market to you	No.	We don't share.
For nonaffiliates to market to you	No.	We don't share.
To limit our sharing	<ul style="list-style-type: none"> <input type="checkbox"/> To Opt Out <input type="checkbox"/> Email us at: support@15equity.com <input type="checkbox"/> Visit 15 Equity's "Do Not Sell My Personal Information" webpage (CA residents only) <p>Please note:</p> <p>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.</p>	
California Consumers	<p>Relative to information collected in the past 12 months, CA resident consumers have the following additional rights under the California Consumer Privacy Act ("CCPA"):</p> <ul style="list-style-type: none"> <input type="checkbox"/> Right to opt out <input type="checkbox"/> Right to access information <input type="checkbox"/> Right to delete personal information <p>In addition, please see 15 Equity's "Do Not Sell My Personal Information" page on our website, located here: www.15equity.com</p>	
Questions?	E-mail: support@15equity.com	

Section 2

Who we are

Who is providing this notice?

This form is being provided by 15 Equity, LLC.

What we do

How does 15 Equity protect my personal information?

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 and buildings.

When you access our Account holder areas, you are required to provide your username and your password. Do not share your password and change it frequently.

How does 15 Equity collect my personal information?

We collect your personal information, for example, when you

- open an account
- provide account information
- direct us to sell securities
- direct us to buy securities

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- 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

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else?

Pick either:

- "Your choices will apply to everyone on your account" or
- "Your choices will apply to everyone on your account unless you tell us otherwise"

Use of Google Analytics?

We use cookies to collect data through the use of Google Analytics.

For more information, please review our cookie policy, and reference "How Google uses data when you use our partners' sites or apps" located at: www.google.com/policies/privacy/partners/

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Our affiliates include financial companies such as Lucia Capital Group, LLC., and nonfinancial companies, such as Lucia Management Company, LLC.

Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none">□ 15 Equity does not share with nonaffiliates so they can market to you.□ We are using the services of our trusted service provider in order to help us prevent online frauds. Our service provider may use and process your personal information in accordance with applicable privacy and data protection laws. You can read about the ways by which our service provider may use and process your personal information in this address https://www.forter.com/service-privacy-policy/
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Section 3

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">□ 15 Equity does not jointly market
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Do Not Sell My Personal Information Page

Data Rights Request

Under the California Consumer Privacy Act of 2018, if you are a California resident, you have certain rights concerning your personal information, as outlined in our [Privacy Policy](#).

To make a rights request, please complete the form below. The information provided here will only be used to respond to your request.

Tell us about your request

- Access my personal information.
- Request more information about how my personal information is collected, used, and disclosed.
- Delete my personal information.
- Opt out of the sale of my personal information.

State of residence

I hereby certify under penalty of perjury I am the individual who is the subject of this request (or that I have authority to submit this request on behalf of such individual).

Cookie Policy Language

Our Privacy Policy explains how we collect and use information from and about you when you visit our website, create an account with us, or otherwise interact with us. This policy explains more about how we use cookies and your choices concerning cookies.

What Are Cookies?

Like most websites, we use cookies and similar technologies to remember things about you so that we can provide you with a better experience.

- Cookies are small data files stored on your browser or device. They may be served by the entity that operates the website you are visiting (“first-party cookies”) or by other companies (“third-party cookies”). For example, we partner with third-party analytics providers, like Google, that set cookies when you visit our websites. This helps us understand how you are using our services so that we can improve them.
- Pixels are small images on a web page or in an email. Pixels collect information about your browser or device and can set cookies.
- Local storage allows data to be stored locally on your browser or device and includes HTML5 local storage and browser cache.

How We Use Cookies

We use cookies for a number of reasons, like helping us see which features are most popular, counting visitors to a page, improving our users’ experience, keeping our services secure and generally providing you with a better experience. The cookies we use typically fall into one of the following categories.

Category of Cookies	Why We Use These Cookies
Technical	These cookies are essential for our services to function properly. Like the other cookies we use, technical cookies may be either first-party cookies or third-party cookies.
Preferences	We use these cookies to remember your settings and preferences. For example, we may use these cookies to remember your language preferences.
Security	We use these cookies to help identify and prevent security risks.
Performance	We use these cookies to collect information about how you interact with our services and to help us improve them. For example, we may use these cookies to determine if you have interacted with a certain page.
Analytics	We use these cookies to help us understand and improve our services. For example, we can use these cookies to learn more about which features are the most popular with our users and where we may need to make improvements.
Advertising	We and our advertising partners use these cookies to deliver advertisements, make the ads more relevant and meaningful to visitors to our website and track the efficiency of our advertising campaigns, both on our services and on other websites.

Your Choices

You have a number of options to control or limit how we and our partners use cookies and similar technologies, including for advertising.

- Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do so, some features of this site might not work as intended.
- Although most browsers and devices accept cookies by default, their settings usually allow you to clear or decline cookies.
- To prevent your data from being used by Google Analytics, you can install Google's opt-out browser add-on.
- For information on how our advertising partners allow you to opt out of receiving ads based on your web browsing history, please visit <http://optout.aboutads.info/>. European users may opt out of receiving targeted advertising through the European Interactive Digital Advertising Alliance.
- To opt out of ads on Facebook, Pinterest or Google that are targeted to your interests, use your Facebook, Pinterest or Google Ads settings.

Contact Us

If you have any questions about our use of cookies, please contact us at: support@15equity.com