



SCORE PRIORITY CORP. PRIVACY POLICY

Score Priority Corp. ("SPC") understands that confidentiality and security of the personal information ("Personal Information") that you share with us is important. SPC is responsible for the Personal Information that we may collect in the manner discussed below. SPC (which is, at times, referred to using phrases such as "we", "us" or similar phrases) is committed to protecting the privacy of Personal Information, including Personal Information related to individuals who may be clients, employees, agents, job applicants or others. In this regard, we have developed policies and practices designed to protect the privacy of your Personal Information. By opening an account at SPC or by utilizing the products, services and applications available through SPC, you have consented to the collection and use of your Personal Information in accordance with this privacy policy ("Privacy Policy"). Please read this Privacy Policy carefully.

This Privacy Policy is based on the privacy and data protection principles common to the countries in which we operate. This Privacy Policy is intended to summarize the SPC's data protection practices generally and to advise our clients, prospective clients, job applicants, website visitors and other third parties about privacy policies that may be applicable.

This Privacy Policy is specifically addressed to those who provide Personal Information to SPC or who visit or use the SPC's websites, trading platforms, software applications and/or social media sites.

How do we collect your Personal Information and what Personal Information do we collect?

SPC collects and processes Personal Information from you. This may include, among other things, information:

- provided during the account application processes or during use of any SPC website applications (for example, your name, email address, telephone number, birth date, tax ID number, investment objectives, etc.);
- acquired as a result of the transactions you conduct through SPC systems or in connection with services offered by SPC;
- received from consumer-reporting agencies; and
- collected through Internet cookies (for further information on our use of cookies, please see our Cookie Policy).

Are you required to provide Personal Information?

In order for you to utilize our services, you will provide us with your Personal Information entirely voluntarily. In many circumstances SPC cannot take action without utilizing certain of your Personal Information, for example, because this Personal Information is required to process your instructions or orders or provide you with access to our services or marketing materials. In many cases, it would be impossible for us to provide the services to you without the relevant Personal Information.

For what purposes will we use your Personal Information?

We may use your Personal Information for the following purposes ("Permitted Purposes"):

- To provide you with brokerage and other services available on our platforms, and/or to deal with any requests or inquiries you may have;
- To pursue legitimate interests, including to carry out, monitor and analyze our business or operations;
- To conduct our recruiting processes;
- To contact you (unless you tell us that you prefer us not to) regarding features and functionality that may be of interest to you;
- To enter into or carry out contracts of various kinds;
- To conduct monitoring by us or any other person on our behalf using various methods, including: (i) the use of "intelligent" automated monitoring tools; (ii) through random monitoring of systems, for example systematically via electronic communication recording tools; (iii) specific monitoring of systems for example in relation to investigations, regulatory requests, subject access requests, litigation, arbitration or mediation; (iv) data tracking, aggregation and analysis tools that pull data from various disparate data sources to draw linkages



and/or detect behavioral patterns, interactions or preferences for analysis (including predictive analysis); and/or (v) using other similar monitoring technology that may become available from time to time;

- To comply with applicable laws or regulations in any country;
- To provide third parties information in connection with the proposed or actual financing, insuring, sale, securitization, assignment, or other disposal of all or part of our business (including accounts) for the purposes of evaluating and performing the proposed transaction; and
- For any other purpose for which your Personal Information was provided to us.

We may process your Personal Information for the following purposes after obtaining your express consent where legally required:

- To communicate with you through the channels you have approved to keep you up to date on the latest developments, announcements and other information about SPC services, products and technologies;
- To conduct client surveys, marketing campaigns, market analysis, or promotional activities; and
- To collect information about your preferences to create a user profile to personalize and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).

Where legally required, with regard to marketing-related communication, we will only provide you with such information after you have opted in and we will also provide you with the opportunity to opt out at any time if you do not wish to receive further marketing-related communication from us. We like to keep our clients, personnel and other interested parties informed of company developments, including news relating to SPC that we believe is of interest to them. If you do not wish to receive publications or details of events or seminars that we consider may be of interest to you, please let us know by contacting us at cs@scorepriority.com. Where legally required, we will not use your Personal Information for taking any automated decisions affecting you or creating profiles other than described above.

Depending on which of the above Permitted Purposes we use your Personal Information for, we may process your Personal Information on one or more of the following legal grounds:

- Because processing is necessary for the performance of a client instruction or other contract with you or your organization;
- To comply with our legal obligations (for example, to keep pension records or records for tax purposes);
- Since processing is necessary for the purposes of our legitimate interest or those of any third-party recipients that receive your Personal Information, provided that such interests are not overridden by your interests or fundamental rights and freedoms; and
- Since processing is useful or necessary in our discretion and is not prohibited under the law of the relevant jurisdiction.

In addition, the processing may be based on your consent where you have expressly given that to us.

Who we share your Personal Information with, and in what circumstances

We may share your Personal Information in the following circumstances:

- We may share your Personal Information with affiliates on a confidential basis as allowed by applicable law or where required for the purpose of providing products or services and for administrative, billing and other business purposes. An affiliate is a company that we own or control or with which there is common ownership with us and our parent company;
- We may instruct our service providers, domestically or abroad, to process Personal Information for the Permitted Purposes on our behalf and in accordance with our instructions. SPC generally require these service providers to enter into confidentiality agreements with SPC that limit their use of the information that they receive. Such agreements prohibit the service provider from using SPC's client information that they receive other than to carry out the purposes for which the information was disclosed. If required by law, SPC will retain control over and will remain responsible for your Personal Information and will use appropriate safeguards to ensure the integrity and security of your Personal Information when engaging service providers;
- We may share information with joint marketing partners and alliances who offer products and services that might be a value to our clients. These offers will require that they be identified that an offer is being extended



because of your relationship with SPC. The use of Personal Information is limited to the purposes identified in our relationship with the partner or alliance;

- We may share your Personal Information with companies providing services in the areas of fraud and crime prevention and with companies providing similar services, including financial institutions such as credit reference agencies and regulatory bodies;
- We may share your data with third parties to assist us with the conduct of our recruitment processes;
- Consistent with applicable law, we may share your Personal Information with courts, law enforcement authorities, regulators or attorneys or other parties for the establishment, exercise or defense of a legal or equitable claim or for the purposes of a confidential alternative dispute resolution process; and
- We may also use aggregated Personal Information and statistics for the purpose of monitoring website usage in order to help us develop our website and our services.

Otherwise, we will only disclose your Personal Information when you direct us or give us permission to do so, when we are allowed or required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

Personal Information about other people that you provide to us

If you provide Personal Information to us about someone else (such as one of your directors or employees or someone with whom you have business dealings), you must ensure that you are entitled to disclose that Personal Information to us and that, without our taking any further steps, we may collect, use and disclose that Personal Information as described in this Privacy Policy. In particular, you must ensure that the individual concerned is aware of the various matters detailed in this Privacy Policy, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our Personal Information disclosure practices (including disclosure to overseas recipients), any right the individual may have to obtain access to the Personal Information and make complaints about the handling of the Personal Information and the consequences if the Personal Information is not provided (such as our inability to provide services).

Keeping Personal Information about you secure

To the extent required by law, we will take appropriate technical and organizational measures to keep your Personal Information confidential and secure in accordance with our internal procedures covering the storage, disclosure of and access to Personal Information. Personal Information may be kept on our information technology systems, those of our service providers or in paper files.

Updating your Personal Information

If any of the Personal Information that you have provided to us changes, for example if you change your email address or if you wish to cancel any request that you have made of us, please let us know by contacting SPC Client Support at cs@scorepriority.com. We will not be responsible for any losses arising from any inaccurate or incomplete Personal Information that you provide to us.

How long do we retain your Personal Information?

We retain your Personal Information in an identifiable form in accordance with our internal policies which establish general standards and procedures regarding the retention, handling and disposition of your Personal Information. Personal Information is retained for as long as necessary to meet legal, regulatory and business requirements. Retention periods may be extended if we are required to preserve your Personal Information in connection with litigation, investigations and proceedings or it may be retained for other reasons.

Notice to California Residents: Subject to certain exceptions and limitations, you have the following rights with respect to covered personal information.

- You have the right to request the following information from us.
 - Specific pieces of personal information we have about you;
 - Categories of personal information we have collected about you;
 - Categories of sources from which the personal information is collected;



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- Categories of personal information sold or disclosed, if any;
- Categories of third parties with whom the personal information was sold or disclosed; and
- The purpose(s) for collecting or selling the personal information.
- You have the right to request that we delete the personal information we have collected about you.
- You have the right to request to be opted out from the sale of your personal information.
- In certain circumstances, you may have the right to receive personal information concerning you in a portable format.
- You have the right not to be denied goods or services, charged different prices or rates for goods or services, or receive a differing level of quality of goods or services as a result of exercising the above rights.

The rights described above do not apply to certain categories of personal information. The personal information excluded from coverage under the California Consumer Privacy Act (“CCPA”) includes, among other things:

- Personal information we collect from or about you when you apply for or obtain a product or service for personal, family or household purposes;
- Personal information about communications or transactions with you when you are acting on behalf of a company or government agency to do business with us; and
- Personal information sold or bought from a consumer reporting agency for use in a consumer report in compliance with applicable law.

We will apply verifiable consumer requests to covered personal information. You or your authorized agent may submit a CCPA request via email at compliance@scorepriority.com. We will respond to authorized requests as soon as practicable and as required by law. The above rights are subject to our ability to reasonably verify your identity and authority to make these requests. In order to verify that you are authorized to submit a request, you may be required to provide the following information.

Your CCPA rights are subject to various exclusions and exceptions under the law. Under certain circumstances, we may be unable to implement your request, pursuant to applicable law. We will advise you of any reason for denying or restricting a request to the extent permitted by law.

We will not provide social security numbers, driver’s license numbers or government issued identification numbers, financial account numbers, health insurance or medical identification numbers, account passwords or security questions and answers, or other specific pieces of personal information if the disclosure presents an unreasonable risk to the security of personal information, customer accounts or our systems and network security.

Updates to this Privacy Policy

This Privacy Policy was last updated in December 2020. We reserve the right to update and change this Privacy Policy from time to time, for example, in order to reflect any changes to the way in which we process your Personal Information or changing legal requirements. In case of any such changes, we will post the changed Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they are posted on our website.

How to contact us

We welcome your views about our website and our Privacy Policy. If you have any questions about this Privacy Policy, please contact SPC Client Support at cs@scorepriority.com.

SPC Cookie Policy

What are Cookies and Web Beacons?

Cookies are pieces of data that a website transfers to a user's hard drive for record-keeping purposes. Web beacons are transparent pixel images that are used in collecting information about website usage, e-mail response and tracking. Generally, cookies may contain information about your Internet Protocol (“IP”) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the website or your usage of our services, including a history of the pages you view.



How We Use Cookies and Web Beacons

SPC collects information from cookies and web beacons and stores it in an internal database. This information is retained in accordance with our Privacy Policy. This website uses the following cookies and web beacons:

Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can configure your browser to block or alert you about these cookies, but certain areas of the site will not function properly. These cookies do not store any personal data.

Performance Cookies and Web Beacons

These cookies and web beacons allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information that these cookies and web beacons collect is aggregated and, therefore, anonymous. If you do not allow these cookies and web beacons our aggregated statistics will not have a record of your visit.

Functional Cookies

These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, some or all of these services may not function properly.

Targeting Cookies and Web Beacons

These cookies and web beacons may be set throughout our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites. They do not store personal information that could identify you directly but are based on uniquely identifying your browser and internet device. If you do not allow these cookies and web beacons, you will experience less targeted advertising. The website does not track users when they cross to third party websites, does not provide targeted advertising to them and therefore does not respond to Do Not Track signals.

Managing Your Cookie Preferences

You have many choices with regards to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. However, if you do decide to disable cookies you may not be able to access some areas of our website or the website may function incorrectly. To learn more about your ability to manage cookies and web beacons and how to disable them, please consult the privacy features in your browser or visit www.allaboutcookies.org.

This website may link through to third party websites which may also use cookies and web beacons over which we have no control. We recommend that you check the relevant third parties privacy policy for information about any cookies and web beacons that may be used.