

## **Privacy Policy**

**Last updated: [12/20/16]**

Thanks for using our website and/or mobile application and our products and services (collectively, "Services"). The Services are provided by Divy Inc. ("Divy", "we", "us" or "our"), located at 5828 Wilshire Blvd., Los Angeles, CA 90036 United States. We have prepared this Privacy Policy to explain how we collect, use, protect and disclose information and data when you use the Services.

### **Information We Collect**

The purpose of collecting your data is to understand how and why you use our Services.

The following personally identifiable information is collected by our broker-dealer partners, including our affiliated entity Divy Equities Inc., in order to adequately service your account: full name, email address, phone number, investments, watch lists, address book and/or contact list. Information collected may come from the following sources: name, address, telephone number, social security number, occupation, and income. Information may be received from other sources with your consent. By using our mobile application, you agree to allow Divy to display your data in the application for your use. You also agree to allow us to release data to third party individuals.

Account Information: When you create an account with Divy, you provide us with personal information such as full name, email address, password, school, major, and graduation year. Your name, school, major, class year, watched/owned stocks, portfolio performance, and social activity is public information, unless otherwise changed under your privacy settings.

Divy gathers customers' non-personally identifiable demographic information in a form that does not permit direct association with any specific individual. This data includes the following non-personally identifiable information: level of education, college/university, major, graduation year, operating system version, device or browser type, IP address, referring/exit pages and URLs, platform type, landing pages, pages viewed, order of pages viewed, time spent on specific pages, date and time of request.

Divy, along with our partners, use cookies, web beacons, and similar technologies to aggregate statistics on our users who use our Services. These tracking technologies are used to collect visitor site usage and preferences. Cookies are data packets designed to hold a modest amount of data that are sent from your device or browser to our server to ultimately enhance your experience with our Services. At this time, Divy does not recognize automated browser signals regarding tracking, including "do-not-track" signals. If you wish to disable cookies, please visit your device or browser settings. However, certain features of the Services may not work if you delete or disable cookies.

### **How We Use Information**

The purpose of collecting your information, personal and non-personal alike, is to create a higher value experience. Outlined in *Information We Collect*, we track and analyze

user data to enhance our Services by creating new product offerings, functionality, features, and design. Except as otherwise provided in this Privacy Policy, we do not share your *personally identifiable information* with third parties. We may, however, provide your *non-personally-identifiable information* to third parties for marketing purposes and to help us better understand customer behavior in relation to tailoring our Services for you. We reserve the right for administrative purposes to send Services updates and changes or respond to customer service requests to the email address associated with your account.

## **How We Share Information**

From time to time, we may share your information with our broker-dealer partners in order to provide you with our Services and other services. We may also establish a business relationship with other businesses that we believe to be trustworthy ("Service Providers"). For example, we may contract with Service Providers to provide certain services, such as hosting and maintenance, data storage and management, and marketing and promotions and we may disclose your information to them. Please note that third parties may collect, but we do not authorize them to collect, personally identifiable information about your online activities over time and across different websites when you use the Services.

We will release personally and non-personally identifiable information if required to do so by law, or in the good-faith belief that disclosure of information is necessary to protect Divy, its users, the public, or respond to a government request.

Should Divy be involved in a merger, acquisition, bankruptcy, or sale of assets, user information would be transferred or sold as part of that process. If this occurs, you will be notified via email and/or prominent notice on our Services of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information. You acknowledge such transfer of information may occur by use of our Service.

## **How We Protect Information**

The protection of your personal information is of the utmost importance to Divy. Divy follows generally accepted standards to protect your personal information, both during transmission and once we receive it. When you enter sensitive information on our forms, such as financial information, we encrypt the transmission of that data using secure socket layer technology (SSL) and 256-bit encryption. However, no data transmission over the Internet or other network can be guaranteed to be 100% secure. As a result, while we strive to protect information transmitted on or through the Services, we cannot and do not guarantee the security of any information you transmit on or through the Services.

If you send Divy a customer support request through any one of our support channels, we reserve the right to publish the information for the benefit of the Community. If you

have any additional questions about security, please feel free to contact us at [support@divy.com](mailto:support@divy.com).

### **Children Under 13**

To access or use the Divy website and/or mobile application or provide information to Divy, you must be at least 13 years old or have the permission of a legal guardian. Children under the age of 13 are prohibited from using the Divy website and/or mobile application without permission of a legal guardian.

### **Privacy Policy Changes**

We may alter our Privacy Policy periodically, as evidenced by a new date above. Should we make any changes to our Privacy Policy, you will be notified by the email associated with your account and/or a notice provided via our Services. The continued use of our Services after the changes have gone into effect indicates agreement of the new and revised Privacy Policy.