

California Consumer Privacy Act (CCPA) Notice to California Residents

We (“Kingston10 Exchange, Limited,” “we,” “us,” or “our”) have created this California Consumer Privacy Act (the “CCPA Notice”) for Residents of the State of California to supplement the Privacy Policy.

This CCPA Notice applies solely to all natural persons who reside in the State of California (“consumers” or “you”), who visit or use our website located at <https://www.kingston10exchange.com/> (the “Website”) or our mobile application, purchase products or services from us, or otherwise engage or interact with us (the “Services”).

We adopted this notice to comply with the requirements of the California Consumer Privacy Act of 2018 (“CCPA”). Any terms not defined in this CCPA Notice shall have the meaning ascribed to them elsewhere in the Privacy Policy or Customer Agreement, or, if not defined herein or elsewhere in the Privacy Policy or Customer Agreements, in the CCPA.

To the extent that there is any conflict between this CCPA Notice and the provisions of the Privacy Policy, this CCPA Notice shall control only with respect to consumers and their Personal Information (as defined below). If you are located outside of the State of California, this CCPA Notice does not apply to you and you should refer to our Privacy Policy.

Information We Collect

We collect information that identifies, relates-to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“Personal Information”). In particular, we have collected the following Categories of Personal Information from or about consumers within the twelve (12) months preceding the Last Update:

- **Identifiers.** Some examples of identifiers are real name, postal address, unique personal identifier, online identifier, IP address, email address, username, Social Security number.
- **Categories of Personal Information listed in Cal. Civ. Code § 1798.80(e).** Some examples of categories of Personal Information listed in Cal. Civ. Code § 1798.80(e) are name, physical characteristics or description, address, telephone number, credit card information.
- **Commercial Information.** Some examples include transactions and transaction history.
- **Internet or other similar network activity.** Some examples of internet or other similar network activity are browsing and search history on the Services, information on a consumer’s interaction with our Services.
- **Sensory Data.** Some examples of sensory data are visual or similar information.
- **Inferences drawn from other Personal Information.** Some examples of inferences drawn from other Personal Information are profiles reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal Information does not include:

- (i) publicly available information from government records,

- (ii) de-identified or aggregated Personal Information, or
- (iii) information explicitly excluded as

Personal Information under the CCPA, including:

- Personal Information (health or medical information) covered by the Health Insurance Portability and Accountability Act of 1996, the California Confidentiality of Medical Information Act, or clinical trial data, and
- Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, or the Driver’s Privacy Protection Act of 1994.

Sources of Personal Information

We obtain the Categories of Personal Information listed above from the Categories of Sources listed in the Privacy Policy.

Use of Personal Information

We may use or disclose the Personal Information we collect for one or more of the commercial or business purposes (each, a “Business Purpose”) provided in the Privacy Policy.

Sharing Personal Information

We may share your Personal Information with the following Categories of Recipients for Business Purposes:

- **Service Providers**, which include IT and cloud hosting companies, payment providers, transactions reporting providers, customer relationship management, email marketing providers, analytics providers, and providers of administrative services
- **Affiliates and subsidiaries** of eToro and other members in the eToro group of companies (“Affiliates”)
- **Other** eToro customers or users of the Services who opted-in to make their profile and trading activities public (“Other Customers”) Disclosures of Personal Information for a Business Purpose In the twelve (12) months preceding the Last Update, we may have disclosed to Recipients the following Categories of Personal Information for a Business Purpose:

Categories of Personal Information

Categories of Recipients

Identifiers. Service Providers; Affiliates; Other Customers Categories of Personal Information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). Service Providers; Affiliates Commercial information. Service Providers; Affiliates; Other Customers Internet or other similar

network activity. Service Providers; Affiliates Sensory data Service Providers; Affiliates Inferences drawn from other Personal Information Service Providers; Affiliates

Sales of Personal Information

In the twelve (12) months preceding the Last Update, we have not sold Personal Information. Your Rights and Choices The CCPA provides consumers with specific rights regarding their Personal Information. This section describes such rights and explains how to exercise them.

Right to Know About Personal Information

You have the right to request that we disclose certain information to you about our collection, disclosure, sale, and use of your Personal Information. Once we receive and verify your request, we will disclose to you the following (to the extent applicable to your request):

- The Categories of Personal Information we collected about you in the preceding twelve (12) months
- The Categories of Sources from which the Personal Information was collected
- Our Business Purpose for collecting or selling that Personal Information
- The categories of third parties with whom we share that Personal Information
- Categories of Personal Information that we disclosed about you for a Business Purpose
- The specific pieces of Personal Information we collected about you (also called a data portability request)

Right to Request Deletion

You have the right to request that we delete any of the Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and verify your request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

Exercising Rights to Know or Request Deletion

To exercise the right to know, please submit a verifiable consumer request to us by submitting your request to <https://www.kingston10exchange.com/customer-service/>. To exercise the right to delete, please submit a verifiable consumer request to us by submitting your request to <https://www.kingston10exchange.com/customer-service/> or by contacting us by email to privacy@kingston10exchange.com. You may only make a verifiable consumer request under the right to know twice within a 12- month period. The verifiable consumer request must:

- (i) provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and
- (ii) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information related to you. Making a verifiable consumer request does not require you to create an account with us.

Verification Process

To submit a verifiable consumer request, the consumer may be required to provide up to three data points, which may include additional Personal Information, to enable us to verify the consumer's identity with the degree of certainty required by the CCPA. We will use Personal Information provided in a verifiable consumer request solely for the purpose of verifying the requestor's identity or authority to make the request. We or a third party on our behalf may follow up with you to determine whether a

request is a verifiable consumer request under applicable law. If we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you, we will deny the consumer request in whole or in part and will not disclose the information requested or, as applicable, will not delete the information requested. We will respond to any such consumer request with a denial and will also explain why it has no reasonable method by which it can verify the identity of the requester.

Response Timing and Format

We will confirm receipt of a verifiable consumer request within ten (10) business days of its receipt.

We will endeavor to respond to a verifiable consumer request within forty-five (45) calendar days of its receipt. If we require more time, we will notify you of the extension and provide an explanation of the reason for the extension in writing, and we will provide you with a response no later than ninety (90) calendar days of receipt of the request. If you have an account with us, we may deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. If you do not have an account with us, and you do not indicate a preference for delivery, we will use our discretion in choosing the method of delivery of the information. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For data portability requests, we will select a format to provide your Personal Information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance. We may charge a reasonable fee to process or respond to your verifiable consumer requests if they are excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for this decision and provide you with a cost estimate before completing your request.

Right to Opt-Out of the Sale of Personal Information

We do not sell the Personal Information of consumers (including minors under 16 years of age). However, you do have the right to direct us to not sell your Personal Information at any time should we begin to do so.

Right to Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. We will not

- (i) deny you products or services,
- (ii) charge you different prices or rates for products or services, including through granting discounts or other benefits, or imposing penalties,
- (iii) provide you a different level or quality of products or services, and
- (iv) suggest that you may receive a different price or rate for products or services or a different level or quality of products or services.

Right to Designate an Authorized Agent

If you submit a request to know or delete your personal information using an authorized agent, we may require that you

- (i) provide the authorized agent written permission to act on your behalf, and

(ii) verify their identity directly with us. We may deny a request from an authorized agent that does not submit proof of authorization.

Other California Privacy

Rights Pursuant to California’s “Shine the Light” law (Civil Code Section § 1798.83), California residents have the right to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties.

To make a request, submit it via <https://www.kingston10exchange.com/customer-service/>

Changes to Our CCPA Notice

This CCPA Notice is effective as of the date of the Last Update stated at the top of this CCPA Notice. We may change this CCPA Notice from time to time with or without notice to you. By visiting or accessing the Website or the Services, purchasing products or services from us, or otherwise engaging or interacting with us after we make any such changes to this CCPA Notice, you are deemed to have accepted such changes.

Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your information as described below and in the CCPA Notice, your choices, and rights regarding such use, or if you wish to exercise your rights under California law, contact us at:

Kingston10 Exchange, Limited
6632 Telegraph Road
Suite #131
Bloomfield Hills, MI
48301

or at <https://www.kingston10exchange.com/>

or email us at privacy@kingston10exchange.com

or call us at 1-888-876-9443