



Giraffe Invest, Inc.

Privacy Policy

Effective Date: April 1st, 2022.

Your Privacy Is Important to Us

Giraffe Invest, Inc. (“Giraffe”) is committed to safeguarding the use of personal information that we obtain as your Registered Investment Advisor (“RIA”), as described here in our Privacy Policy (the “Policy”). Giraffe does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below. Giraffe does not share non-public personal information with nonaffiliated third parties unless a Client specifically consents to the disclosure. Any such sharing would require an “opt-in” by signing a statement making an affirmative declaration of permission to disclose such information.

For the purposes of this Policy, the term “Giraffe” includes Giraffe’s affiliates, partners, agents, and employees. The term “Client” refers to an individual who allows Giraffe to serve as your RIA by signing the Giraffe Client Agreement.

RIAs must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information. Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Information We Collect

Giraffe collects non-public personal information from Clients in order to ensure high-quality service.

Client Information. When opening up an account with Giraffe, you must provide Giraffe with the following information so we can ensure high-quality service:

- your full legal name, address(es), email address(es), phone number(s), date of birth, Social Security or taxpayer identification number;
- your investment experience, goals, and activity; and
- your account information (including other institutions), income and expenses, assets and liabilities.



Information from Other Sources. Giraffe also collects the following Client information from other sources:

- any custody, brokerage, and advisory agreements, other advisory agreements and legal documents;
- any transactional information with us or others, account applications and forms, investment questionnaires and suitability documents; and
- any other information we may need to adequately service your account.

Cookies and Pixels. Whenever you visit our website or use our services, Giraffe may use cookies or pixels to store some personal information such as your IP address or browsing history. The collection of this information is intended to optimize website performance and user experience. You have the option of not accepting the use of cookies or pixels on Giraffe's website, but doing so could impact website performance.

How We Use Your Information

Business Use. Giraffe uses your non-public personal information for a variety of business purposes such as to deliver financial advice and services, offer customer support, optimize our products and features, maximize customer satisfaction with our services, and ensure compliance with the rules and regulations of federal bodies such as the Securities and Exchange Commission and Financial Industry Regulatory Authority.

Other Uses. We may also use your non-public personal information to contact you regarding services or resources in which you may be interested. If you no longer wish to receive these communications, please follow the opt-out instructions below.

How We Share Your Information

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons why we may share your personal information.

Servicing Our Clients. We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, consultants, and other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. Our agreements with these third parties require them to keep your information confidential.



Legal Purposes. We may share your non-public personal information when doing so is required by law such as when we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, front running or scaping, situations involving potential threats to the physical safety of any person, or suspected violations of our Terms of Use or customer agreements, in response to the service of legal process, or as part of a report to a credit bureau.

Marketing Purposes. Giraffe does not disclose and does not intend to disclose personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Giraffe or the Client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.

Authorized Users. Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s). Clients have the right to limit the disclosure of information to authorized users.

Information About Former Clients. Giraffe does not disclose and does not intend to disclose non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.

Opt-Out Information

Pursuant to federal law, Giraffe provides Clients the choice of opting out of certain uses and disclosures of your non-public personal information.

Declining to Provide. You may always decline to provide Giraffe with non-public personal information, but doing so may disqualify you from the use of Giraffe services that require such information.

Withdrawing Consent. Clients who have consented to Giraffe's use of your non-public personal information may withdraw that consent at any time by contacting us by phone or email. If a Client opts out of providing non-public personal information, they will be unable to continue using Giraffe's services. Before using any non-public personal information for new purposes, we will provide you information about that new opportunity.

Email and Telephone Communications. Giraffe may use your non-public personal information to communicate with you about certain opportunities or services. Clients have the option of



opting out of promotional or marketing emails by following the “Unsubscribe” instructions in those emails. But you cannot opt out of administrative communications, including emails that contain account statements, updates to Terms of Use or this Policy, or notifications regarding changes to your account.

How to Access and Change of Your Information

Once you become a Client, you can access your account profile, view any stored information, and change that information. If you have any problems with accessing or changing your information, you can contact us at support@giraffe.us

How to Request Deletion of Your Information

Clients may choose to close their Giraffe account by following the instructions on our website or contacting us directly. Please note that Giraffe retains information from deleted accounts as required for legal, regulatory, and security purposes.

How We Protect Your Information

Safeguards. To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect our Clients’ personal information.

Third Parties. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

Closed Accounts. If you choose to close your account or your account is terminated with us, Giraffe will continue to adhere to the practices outlined in this Policy.

Changes to Our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as



described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Privacy Rights of California Residents

Under the California Consumer Privacy Act, Clients who are California residents may request and obtain from Giraffe information concerning your non-public personal information that we have collected in the past twelve months. You have the right to request that we permanently delete this non-public personal information. Please note that Giraffe may deny this deletion request for information required for legal, regulatory, and security purposes.

Clients who are California residents can request and obtain from us twice a year, free of charge, information related to Personal Information we have collected in the twelve months preceding the request. The California Consumer Privacy Act (“Act”) also gives Clients the right to request the permanent deletion of Personal Information. Clients can request information related to Personal Information we have collected about them and/or request deletion of their Personal Information by following the “Opt-Out” procedure above.

The Act also permits Giraffe Clients who are California residents to request and obtain from Giraffe a list of third parties to whom we have disclosed non-public personal information for that third party’s marketing purposes and the type of information disclosed to those parties. As stated above, Giraffe does not sell non-public personal information to third parties.

Questions

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at support@giraffe.us



Website Cookie Policy

Last modified: Jul 9, 2023

Introduction

We at Giraffe, Inc. ("**Company**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes our use of cookies when you visit the website giraffe.us (our "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing information from cookies.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this policy as well as our general privacy policy. This policy may change from time to time (see "Changes to Our Cookie Policy"). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is only statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. Our secure login provider Auth0 uses cookies in order to function. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you will be unable to access certain parts of our



Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

- **Web Beacons.** Because we use Google Tag Manager, pages of our Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

Third-Party Use of Cookies

Some content or applications on the Website are served by third-parties, including Google, Auth0, and Hubspot. These third parties may use cookies and web beacons to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide though it.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Disclosure of Your Information



We may disclose aggregated information about our users, and information that does not identify any individual, only as allowed by law.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users is among the assets transferred, but only as permitted by law.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use ([link](#)) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Giraffe, Inc., our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. However, if you disable or refuse cookies, please note that secure parts of this site will then be inaccessible or not function properly.
- **Promotional Offers from the Company.** If you do not wish to have your contact information used by the Company to promote our products or services, you can opt-out by sending us an email stating your request to support@giraffe.us. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.



We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about California residents' privacy rights, visit [CCPA Website Privacy Policy](#).

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please email us at support@giraffe.us. To appeal a decision regarding a consumer rights request please email us with "APPEAL" in the subject line.

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: Support@giraffe.us. However, please know we do not currently sell data triggering that statute's opt-out requirements.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any personally identifiable and financial information will be encrypted per industry standards.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal



information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: compliance@giraffe.us

To register a complaint or concern, please contact us at: compliance@giraffe.us.