

Global Beta Advisors LLC
Privacy Policy
November 2022

Maintaining the confidentiality of personal and financial information is important to Global Beta Advisors LLC (“GBA”). This Privacy Policy (the “Privacy Policy”) is designed to tell you about our practices regarding collection, use, and disclosure of information that you may provide to GBA by accessing our online platform (the “App” or “Platform”) or the GBA website (the “Website”) or otherwise engage with GBA. Please read this entire Privacy Policy before using or submitting information to the App or the Website.

By accessing the Platform, App or Website (collectively the “Platform”) you are agreeing to the terms of our Privacy Policy.

Information We Collect

GBA collects several types of nonpublic personal information about you as a user of our Platform, App or Website. This information may include, without limitations, device related information (including browser information and IP address), account opening personal information, asking you specific questions, and permitting you to communicate directly with us, including, but not limited to, via e-mail, feedback forms and information requests. Some of the information that you submit may be personally identifiable information (that is, information that can be uniquely identified with you or your client, such as a name, address, e-mail address, phone number, electronic information, date of birth, social security number, financial status, information, and data, and so on). You may also be submitting information for you or your client to benefit from specified features (such as account registration, reports, investment strategies, newsletter subscriptions, etc.) or to participate in a particular activity, such as, use of the Platform for providing financial advisor services to your client(s). All this information is referred to as “Personal Information”.

Third-Party Service Providers

We use several third-party service providers who may collect Personal Information from you.

Information We Use and Share

We do not sell your Personal Information and we do not disclose it to anyone except as permitted or required by law. For example, we may share Personal Information we collect about you with relevant third-party service providers worldwide including, but not limited to, fund administrators, auditors, as appropriate. We may share this Personal Information with our legal counsel as we deem appropriate and with regulators. We may disclose Personal Information about you at your request, or as otherwise permitted or required by law. We may make full use of all Personal Information acquired through the Platform, App or Website that is not in personally identifiable form. Except as otherwise stated, we may use your information to improve or modify the content of the Platform, App, or Website, to customize our Platform, App, or Website to users' preferences, to communicate information to you, for marketing and research purposes, and for the purposes specified in this Privacy Policy or otherwise permitted by law.

We also use Personal Information to provide our services, including to maintain and improve our Platform, App, or Website and services to you, and to inform you about our products and services.

We may also use or share Personal Information as described below.

- In an ongoing effort to better understand our users, and our products and services, we may analyze Personal Information in aggregate form to operate, maintain, manage, and improve the

Platform, App, or Website, our products and services. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics to describe our products and services to current and prospective business partners and to other third parties for other lawful purposes.

- We may share some or all your Personal Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.
- As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Personal Information may be part of the transferred assets.

Passive Information Collection

As you navigate through a website, certain information can be passively collected (that is, gathered without your actively providing the information) using various technologies and means, such as Internet Protocol addresses, cookies, Internet tags, and navigational data collection. Our Platform, App, or Website uses Internet Protocol (IP) addresses. An IP Address is a number assigned to your computer by your Internet service provider, so you can access the Internet and is generally considered to be non-personally identifiable information, because in most cases an IP address is dynamic (changing each time you connect to the Internet), rather than static (unique to a particular user's computer). We may use your IP address to diagnose problems with our server, report aggregate information, determine the fastest route for your computer to use in connecting to our site, and to administer and improve our Platform, App, or Website.

Analytics Services

We may use third-party analytics tools, including "Google Analytics" (such tools collectively referred to as "Analytics Services") to collect information about the usage of the Platform, App, or Website. The Analytics Services collect information about how often users visit the Platform, App, or Website, what pages they visit when they do so, and what other websites they used prior to coming to the Platform, App, or Website, among other information. We use the information we get from these Analytics Services to improve our Platform, App, or Website and our services.

These Analytics Services collect the IP address assigned to you on the date you visit the Platform, App, or Website, along with other anonymized information (e.g., browser type and type of device used to visit the Platform, App, or Website), but not your name or other personally identifiable information. The Analytics Services' ability to use and share information about your visits to the Platform, App, or Website is restricted by their terms of use and privacy policies. We do not combine the information collected using Google Analytics with personally identifiable information.

You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. You can opt-out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on.

About Cookies

A "cookie" is a bit of information that a website sends to your web browser that helps the site remember information about you and your preferences. "Session" cookies are temporary bits of information that are erased once you exit your web browser window or otherwise turn your computer off. Session cookies are used to improve navigation on website and to collect aggregate statistical information. Our Platform, App, or Website uses session cookies. "Persistent" cookies are more permanent bits of information that are placed on the hard drive of your computer and stay there unless you delete the cookie. Persistent cookies store information on your computer for several purposes, such as retrieving certain information you have

previously provided (e.g., passwords), helping to determine what areas of a website visitors find most valuable, and customizing the website based on your preferences. Our Platform, App, or Website uses persistent cookies. When a new registration is recorded on the Platform, App, or Website, the information is sometimes recorded and stored by a third-party via a cookie. Although third parties manage the use of these technologies, the information is only used for the purpose of managing GBA's marketing materials and its Platform, App, or Website. Third parties are contractually obligated to keep the information confidential and are prohibited from using it for any purpose not expressly permitted by GBA.

About Internet Tags

"Internet tags" (such as single-pixel GIFs, clear GIFs, invisible GIFs, and 1-by-1 GIFs) are smaller than cookies and tell a website server information such as the IP address and browser type related to the visitor's computer. We may use Internet tags on our Platform, App, or Website.

About Log Files

"Navigational data" ("log files," "server logs," and "clickstream" data) are used for system management, to improve the content of a website, market research purposes, and to communicate information to visitors. Our Platform, App, or Website uses navigational data.

Information Security

We take reasonable steps to protect personally identifiable information as it is transmitted from a User's computer to the Platform, App, or Website and to protect such information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. You should keep in mind that no Internet transmission is ever 100 percent secure or error-free. E-mail sent to or from our Platform, App, or Website may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail. Moreover, where you use passwords, ID numbers, or other special access features on our Platform, App, or Website, it is your responsibility to safeguard them. Within GBA, access to information about you is restricted to those employees who need to know the information. We maintain physical, electronic, and procedural safeguards to protect your Personal Information. Our employees are trained to follow our procedures to protect your privacy and are instructed to access information about you only when they have a business reason to obtain it.

Links to Other Websites

For your convenience, our Platform, App, or Website may contain links or references to other websites, applications, and social media accounts, which are not operated by GBA. Please be aware that we do not control other websites, applications, and social media accounts, and, in all cases, this Privacy Policy does not apply to those other websites, applications, and social media accounts. We encourage you to read the privacy policy of every website you visit. We are not responsible in any way for the content of such other websites, applications, and social media accounts.

Children

Our service is not directed towards anyone under the age of 18. If we become aware at any point that a child under the age of 18 is using our service, we will terminate his or her account. If a parent or guardian becomes aware that his or her child under the age of 18 has created an account with GBA or provided us with personally identifiable information, please contact us at support@helloartha.com.

Access, Change or Delete Your Personal Information

Once you have opened an account with GBA, you can access your profile, review the information that is stored, and revise or delete that information. If you have any problems, you may also contact us at

support@helloartha.com. To delete any Personal Information, you will have to provide enough information to identify your account and prove that you are the owner of the account. We may retain residual information related to your account, as well as any data related to your transactions and investments, in accordance with applicable laws.

Your Rights as a California Resident

Residents of California have the right to request from us a list of third parties to whom we have disclosed certain types of Personal Information for those third parties' direct marketing purposes, as well as the Personal Information shared during the immediately preceding calendar year. To exercise your rights, you may make one request each year, free of charge, by emailing us at **support@helloartha.com**. Your request should specify your full name and the email address you used when submitting personal information to us.

Your Rights as a Vermont Resident

We do not share nonpublic personal financial information we collect about Vermont residents to non-affiliated third parties except for our everyday business purposes or as otherwise permitted by law. If you wish to revoke any authorization to share your nonpublic personal financial information, which you have provided to us by opening a GBA account, please contact us at **support@helloartha.com**. Please note, however, that we will not be able to provide you with services through GBA without the ability to share this financial information.

International Visitors

Our Platform, App and Website are hosted in the United States. If you are an international visitor, you should note that by providing your Personal Information, you are permitting and consenting to: (i) the transfer of your Personal Information to the United States which may not have the same data protection laws as the country in which you reside; and (ii) the use of your personal information in accordance with this Privacy Policy.

Changes to Our Privacy Policy

We reserve the right to change our privacy policy in the future at our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law.

Questions

For questions about our privacy policy, or for additional copies of this Privacy Policy, please contact GBA Inc. via email at support@helloartha.com.