Cookie Policy of Wealthica

This document informs Users about the technologies that help Wealthica to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with Wealthica.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Wealthica uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

Activities strictly necessary for the operation of Wealthica and delivery of the Service

Wealthica uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

Third-party Trackers

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on Wealthica in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

Other activities involving the use of Trackers

Experience

Wealthica uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of Wealthica and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Wistia widget (Wistia, Inc.)

Wistia is a video content visualization service provided by Wistia, Inc. that allows Wealthica to incorporate content of this kind on its pages.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – Privacy Policy.

Google Fonts (Google LLC)

Google Fonts is a typeface visualization service provided by Google LLC that allows Wealthica to incorporate content of this kind on its pages.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

YouTube video widget (Google LLC)

YouTube is a video content visualization service provided by Google LLC that allows Wealthica to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

- PREF: 8 months
- VISITOR_INFO1_LIVE: 8 months
- YSC: duration of the session

Font Awesome (Fonticons, Inc.)

Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows Wealthica to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy.

Measurement

Wealthica uses Trackers to measure traffic and analyze User behavior to improve the Service.

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of Wealthica, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

- AMP_TOKEN: 1 hour
- _ga: 2 years
- _gac*: 3 months
- _gat: 1 minute
- _gid: 1 day

MixPanel (MixPanel)

MixPanel is an analytics service provided by Mixpanel Inc.

Personal Data processed: Cookies and Usage Data.

Place of processing: US - Privacy Policy - Opt Out.

Meta Events Manager (Meta Platforms Ireland Limited)

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on Wealthica.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

Storage duration:

• _fbp: 3 months

Content performance and features testing (A/B testing)

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of Wealthica.

Google Optimize

Google Optimize is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google").

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Storage duration:

- _gaexp: 3 months
- opt awcid: 1 day
- _opt_awgid: 1 day
- _opt_awkid: 1 day
- _opt_awmid: 1 day
- _opt_expid: 10 seconds
- _opt_utmc: 1 day

Marketing

Wealthica uses Trackers to deliver personalized marketing content based on User behavior and to operate, serve and track ads.

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Wealthica, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers for identifying Users, behavioral retargeting i.e. displaying ads tailored to the User's interests and behavior, or to measure ads performance. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Google Ads conversion tracking

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on Wealthica.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Storage duration:

- IDE: 2 years
- test_cookie: 15 minutes

Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on Wealthica. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt out.

Storage duration:

- fbp: 3 months
- \overline{fr} : $\overline{3}$ months

Content commenting

Content commenting services allow Users to make and publish their comments on the contents of Wealthica. Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

Disqus with advertising enabled (Disqus)

Disque with advertising enabled is a hosted discussion board solution provided by Disque that enables Wealthica to add a commenting feature to any content. Disque and its third-party partners use Trackers in order to serve Users personalized ads. Users can opt out of such use of Trackers by visiting this <u>opt-out page</u>.

Personal Data processed: Data communicated while using the service, Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt out.

Storage duration:

- __jid: 1 month
- disqus_unique: 1 year
- disqusauth: 3 months
- disqusauths: 3 months
- sessionid: 3 months

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

OneSignal (Lilomi, Inc.)

OneSignal is a message sending service provided by Lilomi, Inc.

OneSignal allows the Owner to send messages and notifications to Users across platforms such as Android, iOS, and the web. Messages can be sent to single devices, groups of devices, or specific topics or User segments. Depending on the permissions granted to Wealthica, the Data collected may also include precise location (i.e. GPS-level data) or WiFi information, apps installed and enabled on the User's device. Wealthica uses identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the OneSignal service.

The Data collected may be used by the service provider for interest-based advertising, analytics and market research. In order to understand OneSignal's use of Data, consult <u>OneSignal's privacy policy</u>.

Push notifications opt-out

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then changing those settings for some or all of the apps on the particular device.

Interest-based advertising opt-out

Users may opt-out of OneSignal advertising features through applicable device settings, such as the device advertising settings for mobile phones. Different device configurations, or updates to devices, may affect or change how these indicated settings work.

Personal Data processed: email address, geographic position, language, Trackers, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy - Opt out.

Remarketing and behavioral targeting

This type of service allows Wealthica and its partners to inform, optimize and serve advertising based on past use of Wealthica by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the <u>Network Advertising</u> <u>Initiative opt-out page</u>.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

Google Ads Remarketing

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of Wealthica with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's Ads Settings.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- ____gads: 2 years
- __gsas: 2 years
- _gac_: 3 months
- _gac_gb_: 3 months
- _gcl_au: 3 months
- _gcl_aw: 3 months
- _gcl_dc: 3 months
- _gcl_gb: 3 months
- _gcl_gf: 3 months
- _gcl_ha: 3 months
- id: 2 years
- test_cookie: 15 minutes

How to manage preferences and provide or withdraw consent

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences privacy widget, if available.

It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent preferences.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

Locating Tracker Settings

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- <u>Google Chrome</u>
- Mozilla Firefox
- Apple Safari
- <u>Microsoft Internet Explorer</u>
- <u>Microsoft Edge</u>
- Brave
- <u>Opera</u>

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by <u>YourOnlineChoices</u> (EU and UK), the <u>Network</u> <u>Advertising Initiative</u> (US) and the <u>Digital Advertising Alliance</u> (US), <u>DAAC</u> (Canada), <u>DDAI</u> (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

Consequences of denying the use of Trackers

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help Wealthica to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

Owner and Data Controller

Data Protection Officer (DPO) Wealthica Financial Technology Inc. 1100 Boulevard René-Lévesque O, 25th Floor Montréal, QC H3B 5C9

Owner contact email: security@wealthica.com

Since the use of third-party Trackers through Wealthica cannot be fully controlled by the Owner, any specific references to thirdparty Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by Wealthica.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through Wealthica (or third-party services employed in Wealthica), which can include: the IP addresses or domain names of the computers utilized by the Users who use Wealthica, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using Wealthica who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Wealthica. The Data Controller, unless otherwise specified, is the Owner of Wealthica.

Wealthica (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by Wealthica as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy policy relates solely to Wealthica, if not stated otherwise within this document.

Latest update: March 07, 2024