



Copper Financial Online Privacy Notice

This Online Privacy Notice applies to this Copper Financial (“CuFi”) website, ([cu.financial](https://www.cu.financial)), and to the My Investments Portal (also known as “Dashvault”) (each a “Site” or collective “Sites”), and explains how Copper Financial (“CuFi” or “we”, “us”, “our”) may collect, use, share, and protect information from or about visitors and users (“you”, “your”) of our Site. This Online Privacy Notice also covers data collected through the use of the Sites and similar data collected via other means outside of the Sites, such as through interacting with us on social media, emails you send to or receive from CuFi, and voicemail messages you leave for CuFi associated persons.

Please read this Notice carefully. This Notice may change from time to time (see *Changes to our Privacy Notice*).

Data collected by CuFi from you related to obtaining a financial product is covered by the CuFi Privacy Policy found at [cu.financial/disclosures](https://www.cu.financial/disclosures).

Information We Collect

Definition of Personal Information

“Personal Information” is information that, either alone or in combination with other information, identifies you. Examples of Personal Information include, among others, name, email address, phone number, and mailing address. Personal Information includes certain information we collect when you apply for, or obtain, a financial product or service from us, which can include your Social Security number, account number, income, account balances, payment history, credit history, and credit scores. When we combine Personal Information with other information, we treat the combined information as Personal Information.

Information You Provide

On this Site we collect Personal Information you provide via forms including your name, postal or email addresses, telephone numbers, resident state, and information regarding your financial services practice (e.g. company name, current broker/dealer, nature of broker/dealer affiliation, AUM, etc.). The exact information we need to collect will depend on the purpose of the form. We will indicate on the form whether a particular field of information is mandatory or optional. If you choose not to provide certain information, we may not be able to provide requested services. We may also collect data from you unrelated to obtaining a financial product in other manners when interacting with CuFi, such as voicemails, emails or social media posts.



If you upload documents or files to My Investment Portal those files and information in those files will be stored on the Site. CuFi can gain access to those files for support or data restoration purposes, but it is not analyzed automatically or otherwise processed for any purpose outside of your purpose. There is one small exception for image data; we process it to provide thumbnails on the Site. Any data provided by a user may contain any nature of data, including protected categories.

For information on data collected when obtaining a financial product please see the CuFi Privacy Policy at cu.financial/disclosures.

Information We Automatically Collect from You

We use technologies that automatically collect information (including Personal Information) about visitors or users of the Sites. For example, the following information is collected:

- *Web Server Logs.* Web server logs are records of activity created by the device that delivers the web pages you request to your internet browser. For example, a web server log may record the search term you entered or the link you clicked on to bring you to the web page. The web server log also may record information about your device, such as your IP address, operating system, and internet browser.
- *Cookies.* Cookies are small text files sent by a website server to your device or computer that helps us collect information on how you use the Sites. Cookies with identifiers are exchanged with end-user's browser and used to identify visitors to the Site.
- *Web Beacons.* Web beacons (also known as clear gifs, pixel tags, and single-pixel gifs) are small images on a website or email that may be used for monitoring system performance and exception monitoring. These web beacons collect data on browser window size, system and browser capabilities, and pages visited within the Site.
- *Analytics.* We use Google Analytics and other analytics services to collect information about use of our Sites. Through analytics services, we collect information such as how often users visit the Sites, what pages they visit when they do so, browser window size, browser and system capabilities, and what other sites they used prior to coming to this Sites. We use this information only to make improvements to the site. We combine the information collected using Google Analytics with a unique identifier that is related to other Personal Information stored for the user. This unique identifier must be paired with other Personal Information to identify a user's identity. Geolocation data is collected or inferred from IP addresses by Google Analytics by using public data regarding IP address allocations to public network operators. Google's ability to use and share information collected by Google Analytics about your visits to this Sites is restricted by the Google Analytics Terms of Use and Google Privacy Policy. Please refer to those policies for more information.
- We do not track our clients over time and across third-party websites or online services to provide advertising and therefore do not respond to Do Not Track ("DNT") signals.



Information Collected from Third-Party Sources

We may collect information about prospective clients from credit unions with whom we have entered into an agreement to jointly market financial products. For example, the following information may be provided to us by a credit union includes, but is not limited to, name, date of birth, address, email address, phone number, and preferred branch location.

How We Use Personal Information

Our primary purpose in collecting Personal Information on this site is to provide you information you've requested via submission of a form or to contact you in response to a form submission. We may also use analytics collected through Google Analytics to make improvements to this site as discussed above.

How Personal Information is Shared

We generally do not share Personal Information collected from this Site, except:

- to service providers, including affiliates, who assist us in operating the Sites and our business, to the extent access to Personal Information is necessary for the performance of their services on our behalf;
- when it is necessary for our or our affiliates' everyday business purposes, such as maintaining your account, processing a transaction, or understanding your experiences;
- to provide information to our regulators or law enforcement when we believe, in good faith, that we have been a victim of a crime or we have observed suspicious activity;
- to comply with a government agency inquiry, subpoena or court order or a valid attachment, garnishment, or other legal action;
- in accordance with your consent;
- if we sell or otherwise transfer part or the whole of our business or assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, or liquidation), any information collected through the Site, including Personal Information, may be among the items sold or transferred; or
- as otherwise permitted by applicable law and appropriate to the circumstance.

How We Protect Personal Information

We have implemented administrative, physical, and technical safeguards to reduce the risk of accidental loss or unauthorized access, use, alteration, and disclosure of Personal Information in our possession or under our control. We take reasonable security measures to ensure sensitive data entered on the Sites is encrypted and transmitted in a secure way.



While we use encryption to protect Personal Information transmitted online, we also protect your information offline. Our employees are periodically trained on the importance of information security and privacy issues to ensure compliance with all applicable laws and regulations. Only employees who need the information to perform a specific role are granted access to Personal Information. The computers and servers on which we store Personal Information are kept in a safe and secure environment.

To protect our clients' privacy, we only conduct business with organizations that agree to maintain strong confidentiality protections and limit the use of information we may provide.

Despite these efforts to store Personal Information in a secure operating environment that is not available to the public, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems. Further, while we attempt to ensure the integrity and security of Personal Information, we cannot guarantee that our security measures will prevent third parties such as hackers from illegally obtaining access to Personal Information. We do not represent or warrant that Personal Information about you will be protected against, loss, misuse, or alteration by third parties.

Retention of Personal Information

We will retain your Personal Information for at least as long as necessary to fulfill the purposes for which your Personal Information has been collected as outlined in this Online Privacy Notice or to fulfill purposes outlined in our Privacy Notice posted at [cu.financial/disclosures](https://www.cu.financial/disclosures). We also may retain Personal Information to the extent required by law.

Third Party Sites

We may link to other third-party websites not covered by this Notice. Please review the online privacy practices of that website to understand how your information may be collected, used, shared, or protected as it may differ from this Notice.

Children's Online Privacy

The Sites are not directed to individuals under the age of 16. We do not knowingly invite or collect Personal Information from children without parental consent.

Correcting, Updating, Accessing, or Removing Personal Information

In addition to other rights you may have depending on where you reside (as described below for EU and California residents), you can request that we correct or update, your Personal Information by emailing a request to us at investments@cu.financial. We will promptly process such requests in accordance with applicable law.



Individuals in the EU

In this section, we provide additional information relating to how we process Personal Information of individuals in the EU, in accordance with the GDPR. If you need more information or would like to exercise your rights under the GDPR, you may contact us at investments@cu.financial.

Basis for Processing

Our legal basis for collecting and using the Personal Information described in this Privacy Policy will depend on the Personal Information concerned and the context in which we collect it. We collect Personal Information from you:

- where we need it to perform a contract with you;
- where the processing is in our legitimate interests (including the purposes described, above, in *How We Use Personal Information*); or
- if we otherwise have your consent.

Your Privacy Rights

Depending on applicable law, you may have the right to:

- **Request access** to Personal Information about you.
- **Request correction** of the Personal Information that we hold about you.
- **Request erasure** of Personal Information about you. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of Personal Information about you where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing** of Personal Information about you. You can ask us to suspend the processing of Personal Information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of Personal Information to you or to a third party.
- **Withdraw consent** at any time where we are relying on consent to process Personal Information about you.

If you wish to exercise any of these applicable rights, please contact us at investments@cu.financial or submit a request at <https://cu.financial/privacy-request/>.



Depending on where you live, you may have a right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Information. We encourage you to first reach out to us at investments@cu.financial, so we have an opportunity to address your concerns directly before you do so.

Transfers to the U.S.

If you are using the Sites from outside the United States, please be aware that Personal Information will be transferred to, stored, and processed in the United States and other jurisdictions outside of the United States based on third-party service providers used by CuFi. Although we take steps to provide adequate safeguards, the data protection laws of the United States and other jurisdictions might not be as comprehensive as those in your country.

We endeavor to apply suitable safeguards to protect the privacy and security of Personal Information transferred to us in the United States, and to use it only consistent with your relationship with us and the practices described in this Privacy Policy.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Sites who are California residents to request certain information regarding our disclosure of “personal information” (as defined by California law) to third parties for their direct marketing purposes. To make such a request, please email investments@cu.financial, call 888-695-3477 or submit a request at <https://cu.financial/privacy-request/>

In addition, the state of California provides California residents with certain other rights concerning their Personal Information. This section describes (1) the categories of Personal Information, collected and disclosed by CuFi, subject to California privacy law, (2) your privacy rights under California privacy law, and (3) how to exercise your rights.

The categories include data collected through the use of this Site and data collected via other means outside of the Site unrelated to obtaining a financial product through CuFi. For example, if you provide your email address to CuFi to receive marketing communications we will maintain that data. In addition, we collect comments and other electronic content from you when you interact on our social media sites. Data collected by CuFi from you related to obtaining a financial product is covered by the CuFi Privacy Policy found at cu.financial/disclosures.

1. Collection and Disclosure of Categories of Personal Information under California Privacy Law

In accordance with California law, we collected the following categories of Personal Information within the preceding 12 months:



- Identifiers (for example, name, postal address, email address, date of birth);
- Internet or other electronic network activity information, including information on your usage of our Site;
- Geolocation data
- Audio or electronic information;
- Professional or employment-related information;

CuFi discloses each of these categories of Personal Information with our service providers for our business purposes (to enable the service providers to provide their services) and as otherwise described in the “Sharing of Personal Information” section above.

2. Your Privacy Rights Under California Law

Under California law, California consumers have the following rights with respect to their Personal Information:

Privacy Right	Description
Notice	You have the right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.
Access	You have the right to request information on the categories of Personal Information that we collected in the previous twelve (12) months, the categories of sources from which the Personal Information was collected, the specific pieces of Personal Information we have collected about you, and the business purposes for which such Personal Information is collected and shared. You also have the right to request information on the categories of Personal Information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your Personal Information.
Erasure	You have the right to request to have your Personal Information deleted from our servers and we will direct our service providers to do the same. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required to retain your Personal Information for one or more of the following categories of purposes: (1) to complete a transaction for which the Personal Information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law; (4) to otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.
Opt Out of a Sale	CACU has not sold personal information about consumers within the 12 preceding months.



3. How to Enforce Your California Privacy Rights

If you would like to exercise your rights listed above, please submit (or have your authorized agent submit) a request at cu.financial/privac-request, email us at investments@cu.financial, or call us toll-free at: 888-695-3477. You have a right not to receive discriminatory treatment by any business when you exercise of your California privacy rights.

While we take measures to ensure that those responsible for receiving and responding to your request are informed of your rights and how to help you exercise those rights, when contacting us to exercise your rights, we ask you to please adhere to the following guidelines:

- ***Tell Us Which Right You Are Exercising:*** Specify which right you want to exercise and the Personal Information to which your request relates (if not to you). If you are acting on behalf of another consumer, please clearly indicate this fact and your authority to act on such consumer's behalf.
- ***Help Us Verify Your Identity:*** Provide us with information to verify your identity. Please note that if we cannot initially verify your identity, we may request additional information to complete the verification process. Any Personal Information you disclose to us for purposes of verifying your identity will solely be used for the purpose of verification.
- ***Direct Our Response Delivery:*** Please provide us with an e-mail or mailing address through which we can provide our response. If you make the request by email, unless otherwise requested, we will assume that we can respond to the email address from which you made the request.

Changes to this Notice

We reserve the right to make changes to this Notice at any time. Changes will be effective as of the time the revised content is posted online. When we do, we will revise the updated date at the bottom of this page. If we make material changes to this Notice, we will notify you here, by email, or by means of a notice on the Sites prior to the change becoming effective.

How to Contact Us

If you have any questions about this Notice, or how we use or protect your Personal Information, please contact us at:

Copper Financial
9777 Ridge Drive
Lenexa, KS 66219
Toll-Free: 888-695-3477
investments@cu.financial

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