

Privacy Policy

In the normal course of Moomoo Financial Canada Inc. (“**Moomoo CA**”)’s business operations, individuals seeking to access its products and services are required to provide Moomoo CA with certain personal, factual or subjective information about themselves. In plain language, this is any information that can be used to identify you individually and contact you. It includes, but is not limited to, personal and financial details such as name, address, age, citizenship, ID numbers, income, net worth, credit and employment history, etc. (herein collectively referred to as “personal information”).

Under *The Personal Information Protection and Electronic Documents Act (PIPEDA)*, Moomoo CA must obtain your consent when it collects, uses, or discloses your personal information. Subject to legal or contractual restrictions and reasonable notice, you may withdraw your consent at any time, but please note that it may affect our ability to continue providing you with the products and services that you have or would like to receive.

You have a right to access your information held by Moomoo CA and to challenge its accuracy. Personal information can only be used for the purposes for which it was collected. If Moomoo CA is going to use it for another purpose, consent must be obtained again.

We respect and protect the privacy of every former, current and prospective client. We encourage you to read this Privacy Policy which describes Moomoo CA’s personal information handling practices which will help you understand how we protect, collect, use and disclose your information; and your right to correct and access your information.

Changes to the Privacy Policy

This Privacy Policy may be amended from time to time. You are provided with this Privacy Policy when you open your account at Moomoo CA. The current version will always be available on our website.

Personal Information Collected by Moomoo CA

Moomoo CA limits the collection of your personal information to what we actually need to set up and service your account; and meet our legal and regulatory obligations. We collect and use several types of information from and about you to better provide products and services to you. Depending on the product or service you have with us, this may include:

- Personal Information, such as your name, moomoo ID, address, telephone number, email address, date of birth, employment, occupation, any other type of identification and related personnel information;
- Financial and bank information about your assets, liabilities, income and expenses;
- Account information such as your account number, account balance, account type and ID, trade transactions and account equity.

- Tax information including Social Insurance Number (SIN) and tax number;
- Device Information, such as device ID, client version, client type;
- IP Address;
- Usage information, your interaction with our services including photos or media updated;
- Information about your transactions with us and our interactions with you including call recordings; and
- Customer service data including account identifier, log data, contact information, details of request.

How Moomoo CA uses Client Personal Information

Moomoo CA uses your personal information to:

- verify your identity in compliance with FINTRAC Know Your Client (KYC) Requirements when opening your account; and fulfill our Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) obligations of the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) and other applicable legal and compliance obligations;
- perform our know-your-client (KYC) obligations in compliance with CIRO rules for order execution only dealers;
- obtain your consent to receive and send you our commercial electronic messages (CEMs) in compliance with Canada's Anti-Spam Legislation (CASL);
- allow our service provider or carrying broker to process the transferred data and perform services on our behalf under written agreements which restrict use of personal information to the limited purposes for which it is provided to them and prohibit further use or disclosure except as permitted by law;
- complete bank deposits and withdrawals;
- process and confirm your requests, orders and transactions;
- respond to your support or customer service request;
- enforce our terms and policies;
- protect our clients and users and services against cyberattacks, criminal activity, identity theft, or investigation of suspicious activity;
- facilitate analytics and improvements for your use of service; and
- continue to service your account with Moomoo CA.

Personal information collected from different sources may be consolidated and saved on our servers. Moomoo CA does not disclose, sell or make available any personal information about its former, current or prospective clients to any third parties except as stated in this Privacy Policy.

How Moomoo CA Uses Biometric Information

Moomoo Financial Canada Inc. may use selected third party providers to enhance our client experience and service. We may collect personal data to provide our service(s) and may include the following: name and contact information, demographic data, files you upload, government documents, barcodes, and identifiers, current and previous name and contact information, device information, account information, geolocation data, and biometric data.

We use personal data to provide our customers with our service so that we can verify the identity of individuals and prevent fraud. Third party providers compare the data from a scan of facial geometry extracted from the authorized identification you uploaded to the data from a scan of facial geometry extracted from the photos of your face that you upload, in order to help verify your identity (“Verification”); and may also use your information, including data from scans of facial geometry extracted from the identification document and photos of your face that you upload, to detect and prevent fraud (“Fraud Prevention”).

Our third parties store all photos of identification documents that you upload, photos of your face that you upload, and data from scans of facial geometry extracted from the photos of your face that you upload in an encrypted format. Third parties use the reasonable standards of care within its industry to store, transmit, and protect from disclosure data from scans of facial geometry extracted from the photos of your face that you upload in a manner that is the same as or more protective than the manner in which it stores, transmits, and protects other confidential & sensitive information. Our third party providers will not sell, lease, trade, disclose, or disseminate data unless: you, the customer, have requested this information to be shared (or by your legal representative), it is required by legal authorities, is required pursuant to a warrant or subpoena issued by a court of competent jurisdiction. Moomoo Financial Canada Inc. reserves the right, in its sole and absolute discretion, to change using any third-party providers of such services without notice to its clients for any reason.

Disclosure of Client Personal Information

General prohibition on disclosure of Client personal information: Moomoo CA will not disclose your personal information to third parties, including to any foreign government, except if disclosure is (a) required by a valid and applicable court order, or (b) required to provide you Moomoo CA products or services you requested, provided you have granted prior written consent to the disclosure. All personal information collected by Moomoo CA will be stored exclusively on servers located in Canada.

Subject to the general prohibition on disclosure described above, Moomoo CA may disclose personal information of former, current or prospective clients to affiliated and non-affiliated third-party entities such as:

- Moomoo CA’s agents, affiliates, service providers or carrying broker in the ordinary course of business and only if required for the purpose of providing you with the products and services requested by you;
- our legal counsels, accountants and auditors in the ordinary course of business;
- persons holding a legal or beneficial interest, and persons acting in a fiduciary, representative, or power-of-attorney capacity relating to a client account;
- third-party credit rating agencies;
- Canadian government, regulatory or law enforcement agencies to comply with applicable legal requirements of civil, criminal or regulatory investigations, or judicial process, subpoena, summons or warrant to protect against actual or potential fraud, unauthorized transactions, claims or other liability;

- foreign governments, only if required by a valid and applicable court order;
- third-party sponsors of sweepstakes, contests, and similar promotions– if you choose to participate, your information will be shared to facilitate the relevant promotion, contest or sweepstake;
- third-party service providers, these may include website hosting, data analysis, payment processing, trade clearing and settlement, information technology and related infrastructure provision, customer service, email delivery, auditing, targeted advertising identification and delivery, mailing service, tax and accounting services, contest fulfillment and other services in connection with the overall delivery of the Services;
- other users or members of the public– if you post content to the forum or other message boards, within chat, on a profile page, to a blog, or any other services to which you are able to post information and content (including, without limitation, social media pages), then the information you post will be available to any person who can view that page or service. If you choose to share using your connected social media account, then your shared content will be visible to your friends, other users of the platform, and the social media account provider. If you choose to share information using the share function, you authorize us to facilitate the sharing of the information you have selected, and you understand that the use of shared information will be governed by the social media provider’s privacy policy; and
- in connection with a sale or business transaction– we may disclose or transfer information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

We will not, however, share or sell clients’ mobile information (including name and mobile phone numbers) that is used for a 10DLC campaign to other parties for their marketing and/or promotional purposes.

Provincial securities commissions and self-regulatory organizations including the **Canadian Investment Regulatory Organization (CIRO)** and the **Canadian Investor Protection Fund (CIPF)** may require access to personal information of former and current Moomoo CA clients, for the following regulatory purposes:

- surveillance of trading-related activity;
- regulatory audits of financial and business conduct compliance;
- investigation of allegations of regulatory and statutory violations,
- management of regulatory databases;
- enforcement or disciplinary proceedings;
- reporting to securities regulators, or
- information sharing between securities regulatory authorities, regulated marketplaces, other self-regulatory organizations and law enforcement agencies in any jurisdiction in connection with any of the preceding purposes.

Subject to the general prohibition on disclosure described above, personal information may be transferred across national and provincial borders only as permitted under this Privacy Policy, including as required under written agreement with our service provider or carrying broker and our trade repository for the purpose of providing you with the products and services requested

by you; and may be accessible to law enforcement agencies, securities regulators, self-regulatory organizations and foreign governments, as described above. The personal information protection laws of those other countries might be different from the laws of the jurisdiction in which you reside, and might permit courts, government, law enforcement agencies, regulatory agencies and security authorities to access your personal information without notice. By providing your personal information to Moomoo, you consent to the transfer of the personal information to facilities located in other countries and the processing and storage of the personal information at those facilities.

Permission to Collect, Use and Disclose Personal Information

Except as permitted in this Privacy Policy, Moomoo CA will not share your personal information with any third-party entities without your prior written consent.

Consent to Communications

By providing us with your contact information, you agree to allow us to contact you via email, mail, phone, or pre-recorded voice messages about our products, services, promotions, and information about the products, services, and promotions of our selected partners.

Withdrawing Consent

Subject to legal or contractual restrictions and reasonable notice, you may withdraw your consent to receive communications, have your information collected, used, and disclosed at any time, but please note that it may affect our ability to continue providing you with the products and services that you have or would like to receive. If you wish to withdraw your consent to the collection, use or disclosure of your personal information; or you do not wish to receive information about our current and future product offerings, special promotions or other services, please contact us at 1-800-806-0667 or privacy@ca.moomoo.com.

Procedures to Safeguard Personal Information

Moomoo CA has implemented Privacy Procedures to safeguard the personal information of its clients in both physical and electronic forms. We restrict access to personal information to only those employees on a need-to-know basis to provide you with our products or services. We maintain physical, electronic and procedural controls to safeguard personal information.

We protect your account information by keeping it on secure servers located in Canada, using firewalls and other security technology to protect our network and systems from external attacks, and by requiring clients to enter a unique user ID and password to access trading systems. We conduct periodic internal audits of our business practices and procedures, examining our internal controls, security protocols and information access policies, in order to best protect the personal information of our clients.

Moomoo CA is accountable for the protection of your personal information in the hands of its service providers. We have reviewed the Privacy Policy, procedures and employee training programs of the third-party processor under contract to us and are reasonably assured that its



personal information handling practices adequately safeguard your information in a manner comparable to how it would be protected at Moomoo CA. We have a contractual right to audit and inspect how the third party handles and stores personal information, and will exercise the right to audit and inspect at least annually during our due diligence visit to our service provider, or when warranted.

Retention of Personal Information

Moomoo CA will retain your personal information for only as long as necessary for the identified purposes or as required by law and securities regulation, unless we are required to retain your personal information for a longer period to comply with our legal and compliance obligations. We will use care in the disposal, destruction, or de-identification of personal information to prevent unauthorized parties from gaining access.

Use of Cookies

Moomoo CA uses cookies and other tracking mechanisms to enhance the user experience of its website by customizing features to store your preferences and avoid re-entry of data; to facilitate your use of mobile applications; to enable us to conduct research and analysis on web metrics and to offer, and track responses to, on-line promotions.

Cookies stored on the visitor's web browsers by Moomoo CA are not shared with third parties. You can opt out of accepting these cookies by resetting your browser preferences.

Third-party vendors who advertise on the Moomoo CA web pages may use cookies to collect your details and other data on website visits in order to market or promote goods and services of particular interest to you. The Network Advertising Initiative provides information on this practice and how to opt out at http://www.networkadvertising.org/managing/opt_out.asp.

The Google ad and content network privacy policy accessible at http://www.google.com/privacy_ads.html provides information on Google's DoubleClick DART cookie opt-out.

Links to Non-Moomoo CA Websites

Links to third-party websites on the Moomoo CA website are for client convenience and easy access to information. Once you access those links you will leave the Moomoo CA website and be re-routed to the third-party website. We do not control third-party sites or their privacy practices, which may differ from our own policies. We make no endorsement, representation or warranty about third-party websites. The personal data that you choose to provide third parties is not covered by this Moomoo CA Privacy Policy.

You should review the privacy policy of any third-party website before submitting your personal data. Some third-party entities may choose to share your data with Moomoo CA in which case your personal data will be governed by the privacy practices of the disclosing third-party entity.

Third-party Services

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates. We strongly recommend that you review the terms and conditions and privacy policies of those third-party websites to find out how they collect, use and disclose your personal information.

In addition, please note that we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

Third-party Advertising

We use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites or online services, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

Notification of Policy and Policy Changes

The Privacy Officer is responsible for ensuring that every client opening a new Moomoo CA trading account is provided with this Privacy Policy. Changes or updates to this Privacy Policy or procedures regarding our personal information handling practices; privacy breach risk mitigation and containment measures are posted on our website.

This Privacy Policy may be updated from time to time. The current version of this Privacy Policy is available with our account opening documents and on the Moomoo CA website. You are responsible for regularly reviewing this Privacy Policy. If you use this website or other service we provide after any changes are made and published, that will constitute your agreement to those changes.

Language

Except as otherwise prescribed by law, in the event of any discrepancy or inconsistency between the English version and any other language version of this Privacy Policy, the English version shall prevail.

Accuracy and Access to your Personal Information

You may login to client portal and update your account profile to update your personal information. You are also encouraged to inform us of any changes to your information, because it is important that the personal information that you have provided us is accurate, complete and



up to date. Please direct all privacy-related enquiries to: privacy@ca.moomoo.com or

Privacy Officer
Moomoo Financial Canada Inc.,
5140 Yonge St., Level 5,
North York, Ontario M2N 6L7
Tel: 1-800-806-0667

You may also, at any time, contact our Privacy Officer to request access to your personal information, verify its accuracy and, if required, correct it. Moomoo CA will provide you with access to your personal information except where we are prohibited by law from doing so, or are permitted by law to restrict your access and have legitimate reasons for doing so.