

MyWallSt Advisory, LLC Privacy Notice

Dated: July 13, 2021

FACTS WHAT DOES MYWALLST ADVISORY DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect, and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none">• Social Security number and income.• Assets and income• Account balances and account transactions <p>Personal Data shall be deleted when MWSA no longer has a legitimate purpose for the continuous processing or storage of the Personal Data, or when it is no longer required to store the Personal Data in accordance with applicable legal requirements.</p>
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons we choose to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does MyWallSt Advisory Share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s) response to court orders and legal investigations, or report to credit bureaus	Yes	No
For our compliance with rules and regulations- information about your transactions and communications provided to non-affiliated brokerage or investment advisory firms when required to comply with supervisory rules and regulations	Yes	No
For our marketing purposes – to offer our products and services to you. See section 'Marketing Communications from MyWallSt Advisory LLC' for more information	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For our affiliates to market to you	Yes	Yes
For Trusted Third Parties to market to you	No	We don't share

To limit our sharing

Email us at optout@mywallstadvisory.com

Please Note:

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing to the email optout@mywallstadvisory.com

Questions? Email hello@mywallstadvisory.com

Who we are

Who is providing this notice? MyWallSt Advisory, LLC

What we do

How does MyWallSt Advisory protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include safeguards and secured files and buildings.

We restrict access to your information to those employees who need to know it to provide products or services to you.

How does MyWallSt Advisory collect my personal information?

We collect your personal information, for example, when you

- Open an account or perform transactions
- Make a wire transfer to tell us where to send money
- Give us your income information
- Tell us where to deposit money or provide employment information
- Show us your government-based ID

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why can't I limit all sharing?

Federal law requires MyWallSt Advisory to retain certain information. Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes – information about your creditworthiness
- Affiliates from using your information to market to you

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on your account.

Definitions

Affiliates	Companies related by common ownership or control. Our parent company MyWallSt Ltd.
Trusted Third Parties	Companies not related by common ownership or control. They can be financial and non-financial companies. Trusted Third Parties we share with may include financial services providers and non-financial companies and other businesses.
Joint Marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you. Our joint marketers may include financial service providers, non-financial companies, and other businesses.

Other Important Information

Vermont: We automatically treat customers with a Vermont mailing address as having limited sharing with our affiliates as provided above.

California Residents: We Share information that we collect with affiliates when a customer consents to such sharing or the information is released in connection with a written agreement for the sole purpose of providing products or services covered by such written agreement. We will not share information with affiliates when given notice and an opportunity to opt out, the customer directs us not to share."

MyWallSt Advisory, LLC GDPR Privacy Statement

Dated: July 13, 2021

MyWallSt Advisory's protection of your account information is very important to you and to us. Our GDPR Privacy Statement further explains how MyWallSt Advisory, LLC. ("MWSA", "us", "we", or "our") handles personal data and rights of residents of the European Union ("EU") and European Economic Area (EEA) by the General Data Protection Regulation. This GDPR Privacy Policy also applies to former Investors of MWSA in the EU and the EEA.

Who is MyWallSt Advisory?

MyWallSt Advisory is an SEC registered investment adviser with brokerage and custodial services provided to clients of MWSA by DriveWealth LLC ("Broker-Dealer" or "Custodian").

Information We Collect

MWSA will collect your personal data when necessary for the performance of our Investment Advisory Agreement with you. Most information MWSA collects comes directly from you as you establish your relationship with us and your brokerage account with the Custodian and from other interactions with us. This information may include identifying data like your name, date of birth, home and business address, telephone number, email address, driver's license and social security number; financial information like your income, net worth, employment and bank account information; your investment objectives; and transaction information including trades, deposits and withdrawals conducted in your account kept for official books and records pursuant to applicable law. Not all personal information is obtained from you. We may obtain personal information about you from other sources, including those publicly accessible, in order to assist us in verifying your identity.

Marketing Communications from MyWallSt Advisory LLC

We may use your Personal Data to contact you with marketing emails and other information that may be of interest to you. Under the GDPR, to receive our Marketing Communications we require your consent to be in the form of "clear, affirmative actions". We can opt you in only when you have performed a positive action to provide your consent, such as actively ticking a box. You can also opt-in to any email marketing by following the subscribe links on our website. We gear our marketing emails to ideally providing value to the recipient, and to be something they want to receive. Under the GDPR we seek to make it easy for people to change their mind and opt-out. All of our marketing emails present the option to 'unsubscribe'. You can also send us an email at any time to opt out of our emails at optout@mywallstadvisory.com

Recipients of Personal Data

As a registered investment advisor, we share client personal information for everyday business purposes with employees and affiliated/trusted third parties who need to know that information in order to provide the services you have requested and authorized and to those trusted third parties as permitted or required by law. In certain cases, we may share information [with trusted third parties](#) used to store information or prepare analytics and reporting for your

account. Such analytics will consist of identifying trends and other statistical references. We may also, in certain circumstances, share your information with cloud storage providers we use to securely store all of our data, including customer details; communication vendors to send you information related to your account or store your communications; custodians and broker-dealers to process and store your investment activity; and regulators, auditors and legal authorities to comply with legal obligations.

Transfer Of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and exclusively process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

MWSA will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Retention Time

MyWallSt Advisory will retain your Personal Data only for as long as is necessary for the purposes set out in this Policy. Personal Data shall be deleted when MWSA no longer has a legitimate purpose for the continuous processing or storage of the Personal Data, or when it is no longer required to store the Personal Data in accordance with applicable legal requirements.

MWSA will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold in order to hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are tags and scripts to collect and track information and to improve and analyze our Services.

You have the right to object to this processing, and if you wish to do so by selecting 'Manage Options' on the Cookie Consent banner that appears on mywallst.com/advisory.

Alternatively, you can instruct your browser to refuse all cookies or to indicate when a cookie is being sent.

Examples of Cookies we use:

- Session Cookies: We use Session Cookies to operate our Service.
- Preference Cookies: We use Preference Cookies to remember your preferences and various settings.
- Security Cookies: We use Security Cookies for security purposes.

Legal Requirements

MWSA may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation;
- To protect and defend the rights or property of MyWallSt Advisory LLC
- To prevent or investigate possible wrongdoing in connection with the Service;
- To protect the personal safety of users of the Service or the public;
- To protect against legal liability.

Security Of Data

The security of your data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

If MWSA learns of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. By using the MWSA Service or providing personal information to us, you agree that we can communicate with you electronically regarding security and privacy issues relating to your use of the MWSA Service. MWSA may post a notice on the MWSA Site if a security breach occurs. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

Within MWSA, access to information about your account is restricted to those employees who need to know the information. 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. We use physical, electronic and procedural safeguards to keep your information secure.

We may disclose your information to external trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with EU law on data protection rules.

What type of External Third Parties do MyWallSt Advisory use?

Cloud storage providers - we use cloud computing platforms that securely store all of our data, including customer details.

Email service providers - in order to send you marketing content and transactional emails, we share your details with our email service providers.

Analytics tools - we use analytics tools to track the way that users interact with our website.

Profiling tools - we use profiling tools to understand how you engage with our Services so that we can continue to deliver top class investment products to you.

Marketing and insights providers - marketing and insights tools allow us to understand our customers better so that we may provide you with the best possible website, products and customer service experience. We may share certain information about our customers to facilitate this process.

Customer service platforms - when you interact with our customer service team, your details are shared with our customer service platform providers.

Electronic messaging retention platforms – all electronic communication is required, by law, to be retained and stored remotely as set out and determined by the Advisers Act Rule 204-2 and the Compliance Program Rule of the Investment Advisers Act of 1940.

Clearing /custodial service providers - we use clearing broker dealer(s) to execute your trades and provide custodial services.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. MyWallSt Advisory aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us at hello@mywallstadvisory.com.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data by contacting us on hello@mywallstadvisory.com.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where MWSA relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

Also, please be aware that client records are subject to minimum retention requirements in the Investment Advisers Act of 1940, Rule 204-2. Currently, client records shall be maintained not less than five years from the end of the fiscal year during which the last entry was made on such record.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Changes To This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We may let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Data Controller

MyWallSt Advisory LLC is the Data Controller for your personal data. Our address is 345 Park Ave., 17th Floor New York, NY.

For data protection purposes under GDPR our representative in the EU is John Smyth, Strategic Programs Manager, MyWallSt Limited, 5 Merrion Row, Dublin 2, Ireland.