

Zenith Securities LLC Privacy Policy

Our Commitment to Privacy

This Privacy Policy describes the methods by which Zenith Securities, LLC (hereinafter referred to as “Zenith”, “we”, “us”, “our”) obtains, maintains, discloses, transfers, and processes your personal information to service your account with Zenith. Zenith is required to communicate its practices regarding the privacy of personal information.

You do not have to contact Zenith to benefit from these protections; they apply automatically to all customers.

Personal Information

As used in this Privacy Policy (“Policy”), **personal information** means information regarding an individual that is collected or maintained for business purposes and by which the individual can be identified. Please note that information by which an individual cannot be identified (for example, anonymous, de-identified, or aggregate information) is not considered personal information and therefore is not subject to this policy.

How and Why Zenith Obtains Personal Information

In connection with servicing of your account, Zenith may receive non-public personal information about you from you and from various sources. Some examples include:

- Your applications or forms (for example, account opening applications)
- Transactional activity in your account (for example, trading history and balances)
- Information from consumer reporting agencies (for example, to assess your creditworthiness)
- Information from other third-party data sources (for example, to verify your identity and to better understand your product and service needs)
- Other sources with your consent (for example, from other institutions if you transfer positions into Zenith)

Your Digital Privacy

When you interact with us by using our websites, online services or applications that are owned and controlled by us (“our digital offerings”), or via electronic communications, we manage personal information in accordance with all of the practices and safeguards described in this policy.

When you use or interact with Zenith via our digital offerings, or interact with us via electronic communications, we (or our service providers on our behalf) may automatically collect technical, navigational and location information, such as device type, browser type, internet protocol address, pages visited, and average time spent on our digital offerings. We may use this information for a variety of purposes, such as maintaining the security of your online session, facilitating site navigation, improving the design and functionality of our digital offerings and electronic communications, and personalizing your experience.

Additionally, the following policies and practices apply when you are online:

Cookies and Similar Technologies

We and our third-party service providers may use cookies and similar technologies (“cookies”) to support the operation of and maintain our digital offerings. Computer cookies are small text files that websites store on your computer to remember information about you and your browsing activity. Cookies help to personalize your online experience and make websites more user-friendly. Web browsers interact with cookies to enhance browsing by managing how cookies are stored and retrieved during your online sessions.

We and third-party service providers we hire may use cookies and other technologies, such as web beacons, pixel tags, or mobile device ID, in online advertising. Most browsers and mobile devices offer their own settings to manage cookies. If you use those settings to delete cookies, it may negatively impact your experience using our digital offering, as some

features and services on our digital offerings may not work properly. For example, you may not be able to sign in and access your account, or we may not be able to recognize you, your device, or your online preferences. Depending on your device and operating system, you may not be able to delete or block all cookies.

We may collect analytics data or use third-party analytics tools, such as Google Analytics, to help us measure traffic and usage trends for our digital offerings and to understand more about the demographics of our users. You can learn more about Google's practices with Google Analytics by visiting [Google's privacy policy](#). You can also view Google's currently available [opt-out options](#).

Connecting with Zenith on Social Media Platforms

Zenith may provide an experience on social media platforms that enable online sharing and collaboration among users who have registered to use them. We may collect information you provide by interacting with us via social media, such as photographs, opinions, or social media account ID. Any content you post, such as pictures, information, opinions, or any personal information that you make available to other participants on these social platforms, is also subject to the terms of use and privacy policies of those platforms. Please refer to them to better understand your rights and obligations with regard to such content.

Third-Party Websites, Online Services and Content

Our digital offerings may contain links to third-party websites and online services (for example, social media platforms) and may include embedded content that is hosted by third parties. This policy does not address the privacy, security, cookie policy and settings, or other practices of the third parties that provide such websites, online services, or content, and we are not responsible for the privacy practices or the content of these other websites, online services, or content providers. If you use a link to another website or online service or view third-party content (for example, an embedded video), please consult the privacy policy for that website/or online service for additional information on their privacy practices and advertising opt-out instructions.

How Zenith Protects Personal Information

Zenith implements and maintains physical, administrative, technical, and organizational measures designed to protect personal information, and the firm regularly adopts controls to respond to changing requirements and advances in technology. Zenith restricts access to personal information to those who require it within the company to develop, support, offer, and deliver products and services to you and to operate our business.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our digital offerings, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our digital offerings. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained in the digital offerings.

How We Share Personal information

Zenith does not share or sell personal information about our customers with unaffiliated third parties for use in marketing their products and services. We may share the personal information that we collect about customers,

prospects, or former customers with:

- Our corporate affiliates provide services to us and for other business purposes
- Unaffiliated service providers (for example, entities that may provide services in our direction)
- Government agencies, other regulatory bodies, and law enforcement officials (for example, for reporting suspicious transactions)
- Other organizations as permitted or required by law (for example for fraud prevention or to respond to a subpoena)
- In connection with corporate business transactions, such as a merger or sale of a business.

Zenith's service providers are obligated to keep the personal information we share with them confidential and use it only to provide services specified by Zenith.

Choices About How We Use and Disclose Your Information

Under federal law, Zenith may share certain nonpublic personal information about you with affiliated and non-affiliated third parties to offer you financial products and services. However, you have the right to limit some, though not all, sharing of your personal information.

You Have the Right to Opt-Out of the Following Types of Sharing:

- If we share your personal information with non-affiliated third parties for their marketing purposes.
- If we share your personal financial information with non-affiliated financial institutions for joint marketing purposes (unless the third party is under a contractual agreement to market only Zenith products and services).
- If we share your personal information with our corporate affiliates for marketing purposes (i.e., Zenith affiliates using your personal information to offer their own products and services to you).

Zenith does not share your personal with third parties for marketing purposes.

How to Opt-Out:

To the extent applicable, if you prefer that we not share your personal information for the purposes outlined above, you may opt out at any time by contacting us through one of the following methods:

- By Phone: Call us at 203-253-5936
- By Email: Send your request to info@zenithsecuritiesllc.com
- By Mail: Send a written request to:
Zenith Securities, LLC
85 Washington Street Suite 1F
South Norwalk CT 06854

Please include your full name, address, and account number (if applicable) in your request.

Important Notes on Your Opt-Out Choice:

Sharing of your personal information is a critical functional component of the Website and the Services in certain instances. You cannot opt out of sharing this information without the complete closure of your accounts as noted in the Zenith Customer Agreement. Zenith does not share your personal information for marketing purposes, so there is no need to opt-out of this type of sharing. Please consider any opt-out choice carefully. In addition:

- Your choice will apply to all your accounts with us unless you specify otherwise.
- If you are a joint account holder, any account holder may opt out on behalf of all account holders.
- If you opt out, we will continue to share information as permitted by law, such as with service providers that help us maintain and service your account, comply with legal requirements, or conduct fraud prevention.

Your opt-out request will remain in effect until you notify us otherwise in writing.

Children's Privacy

In general, our digital offerings are not directed at individuals under the age of eighteen (18). We do not intentionally collect information on our websites from those we know are under eighteen (18), and we request that these individuals do not provide personal information through our digital offerings. If we do provide a digital offering that is intended to be used by individuals under the age of eighteen (18), it will have a separate privacy policy.

Your State Privacy Rights

Some states (eg. California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia) may provide, either now or in the future, that their state residents have the rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose (excluding Iowa and Utah).
- Control data portability.
- Opt-out of personal data processing for:
 - targeted advertising (excluding Iowa);
 - sales; or
 - profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- Either limit (opt-out of) or require consent to process sensitive personal data.

The exact scope of these rights may vary by state. For additional information on certain State specific rights, please see Exhibit A attached hereto. To exercise any of these rights please contact us by e-mail by sending your request to info@zenithsecuritiesllc.com. To appeal a decision regarding a consumer rights request contact us by e-mail by sending your request to info@zenithsecuritiesllc.com.

Additional Information

If you are a former customer, this policy also applies to you; we treat your information with the same care as we do information about current customers.

Revisions to Privacy Policy

Zenith reviews this Privacy Policy at a minimum annually and revises the policy from time to time as needed by posting a revised version and updating the Effective Date, upon which the revised version will be effective. Your continued use of Zenith's services after the Effective Date constitutes your consent to any changes to Zenith's Privacy Policy.

Contact

If you have any questions regarding this Privacy Policy, please contact Zenith info@zenithsecuritiesllc.com or 203-253-5936.

EXHIBIT A

STATE RELATED PRIVACY POLICIES

Additional Information for Nevada Residents

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: info@zenithsecuritiesllc.com or by phone at 203-253-5936. However, please know we do not currently sell data triggering that statute's opt-out requirements.

Additional Information for California Residents

This section is provided for purposes related to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights act of 2020 (collectively, the "CCPA") and applies to the personal information and your relationship(s) with ZENITH that are subject to the CCPA. As used in this section, "personal information" means information that meets the definition of "personal information" as set forth in the CCPA and is not otherwise excluded from the scope of the CCPA.

Zenith and the CCPA

Depending on your relationship and interactions with Zenith and the products and services provided to you through that relationship, some or all of the personal information that Zenith collects or maintains is covered by one or more of the exemptions described below (see the section below entitled "CCPA Exemptions" below). As a result, in some cases, Zenith may have no obligation under the CCPA to accept any CCPA requests, and in other cases, it may have no obligation to honor a particular CCPA request, because of the nature of the personal information that Zenith collects or maintains. Here are some examples of CCPA exemptions:

- If your relationship and interactions with Zenith consists solely of personal financial services (e.g. maintaining one or more personal brokerage accounts), the personal information collected and processed about you is subject to the federal Gramm-Leach- Bliley Act ("GLBA") and therefore your CCPA requests will not be honored by Zenith.
- If you are a customer of a broker-dealer for which Zenith provides services, CCPA requests should be directed to your broker-dealer.

The CCPA gives certain rights to California residents and imposes certain obligations on those businesses that are subject to the CCPA. As required by the CCPA, set forth below is a description of certain rights that California residents generally have under the CCPA. Based on your relationship with Zenith, some or all of the rights described below may not apply to you. As used below, a "consumer" means a resident of the State of California and a "covered business" means a business that is subject to the CCPA.

- Right to Know/Right to Access. A consumer has the right to request that a covered business that collects a consumer's personal information disclose to that consumer the categories and specific pieces of information the business has collected. A consumer also has the right to request that a covered business that collects a consumer's personal information disclose to that consumer the following:
 1. the categories of personal information it has collected about that consumer
 2. the categories of sources from which personal information is collected
 3. the business or commercial purpose for collecting, selling or sharing (if applicable) personal information
 4. the categories of third parties to whom the covered business discloses personal information
 5. the specific pieces of personal information that the covered business has collected about that consumer.

These disclosures are not required to include any information about activity that occurred prior to January 1, 2022. Please also note that a covered business is not required to honor more than 2 of these requests from the same consumer during any 12-month period.

- Right to Delete. A consumer has the right to request that a covered business delete any personal information that

the business has collected from the consumer, subject to certain exceptions.

- Right to Correct. A consumer has the right to request that a covered business correct inaccurate personal information that a business maintains about a consumer.
- Right to Opt-Out of Sale/ Sharing. If a covered business sells or shares personal information, a consumer has the right to opt-out of the sale or share their personal information by the business.
- Right to Limit Use and Disclosure of Sensitive Personal Information. If a covered business uses or discloses sensitive personal information for reasons other than those set forth in the CCPA, a consumer has the right to limit the use or disclosure of sensitive personal information by the business.
- Non-Discrimination. A covered business cannot discriminate against a consumer because the consumer exercised any of the consumer's rights under the CCPA.

Categories of Personal Information Zenith May Collect about You

- Personal identifiers, such as your name, postal address, email address, online identifier, internet protocol address, account name, or other similar identifiers
- Information covered by California's records destruction law (California Civil Code §1798.80), such as your signature, telephone number and financial account information
- Characteristics of protected classifications under California or US federal law, for example, gender
- Commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- Internet/Electronic network interactions, including, but not limited to, browsing history, search history, and information regarding your interactions with our digital offerings or our advertisements
- Audio, electronic, visual, and similar data, such as call recordings
- Inferences drawn from any of the information listed above to create a profile about you, such as a profile that reflects your preferences, characteristics, behavior, and attitude
- Sensitive personal information such as social security number, account log-in, password or credentials allowing access to your account(s) or to our digital offerings

The retention periods for data elements within each category vary depending on the nature of the data element and the purposes for which it is collected and used. Our retention period for the data elements within each category is set based on the following criteria: (1) the length of time that the data is needed for the purposes for which it was created or collected, (2) the length of time the data is needed for other operational or record retention purposes, (3) the length of time the data is needed in connection with our legal, compliance and regulatory requirements, for legal defense purposes and to comply with legal holds, (4) how the data is stored, (5) whether the data is needed for security purposes and fraud prevention and (6) whether the data is needed to ensure the continuity of our products and services.

Categories of Sources from which Personal Information is Collected

In addition to the sources described in the section above titled "How and why we obtain personal information", depending on the nature of your relationship and your interactions with us, and on the products and services that we provide to you, we may obtain personal information from the following sources:

- you or your representative, such as when using our products, services or digital offerings, when interacting with us or any of our service providers regarding our products, services or digital offerings or when otherwise communicating with us;
- your broker-dealer, investment professional and/or other financial services firms
- providers of publicly available information
- third parties that provide products or services to you through your relationship with us

- third parties that perform services for us or on our behalf
- other third-party sources, including government sources, data brokers and social networks
- automatically, via technologies such as cookies and web beacons, when you interact with our digital offerings or electronic communications

Why Zenith Collects personal information

Please see the section above entitled “How and why we obtain and use personal information” for a description of some of the business or commercial purposes for which we collect personal information, including sensitive personal information. In addition to those purposes described above, below are additional business or commercial purposes for which we collect personal information:

- To provide you with information about products and services that may interest you
- To maintain the accuracy and integrity of our records
- For marketing and communication purposes
- For reporting and analytical purposes
- For personalizing your interactions and experiences with us
- For training and quality-control measures
- To verify your identity
- To protect against malicious, fraudulent, or illegal activity
- For business analysis, planning, and reporting
- For customer education
- For effectiveness measurement

Categories of Personal Information Disclosed for Business Purposes

Like most businesses, we disclose personal information, including certain sensitive personal information, to third parties for our business purposes.

Depending on the nature of your relationship and your interactions with us, and on the products and services that we provide to you, we disclose to third parties for business purposes the personal information that is encompassed by one or more of the categories described in the “**Categories of Personal Information Zenith May Collect about You**” section above, with the categories of third parties listed in the section entitled “**Categories of Sources from which Personal Information is Collected**” above.

Selling/Sharing of Personal Information

In the 12 months preceding the date of this policy, we have not “sold” and/or “shared” (personal information for “cross context behavioral advertising” (as those terms are used in the CCPA) with respect to California residents covered by the CCPA. We do not knowingly “sell” or “share” for “cross-context behavioral advertising” personal information of minors under 16 years of age.

CCPA Exemptions

Please note that certain types of personal information collected or maintained by a covered business are exempt from the CCPA. For example, a covered business has limited obligations, or in some cases no obligations, under the CCPA with regard to the following types of personal information:

- Personal information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act, (Public Law 106-102), and implementing regulations, or pursuant to the California Financial Information Privacy Act (Division 1.4 [commencing with Section 4050] of the California Financial Code)
- Medical information governed by the Confidentiality of Medical Information Act or protected health information that is collected by a covered entity or business associate pursuant to the Health Insurance Portability and Accountability Act of 1996

In addition, some businesses are not subject to the CCPA, such as:

- A business that does not do business in the State of California
- A business that is not organized or operated for the profit or financial benefit of its shareholders or other owners
- A business that does not determine the purposes and means of the processing of consumers' personal information
- A business that has annual gross revenue of \$25,000,000 or less

Furthermore, under the CCPA there are a number of situations where a covered business under the CCPA may refuse to honor a CCPA request to delete a consumer's personal information and is allowed to continue to maintain the personal information. Some examples include situations where retention of personal information is necessary to:

- complete the transaction for which the personal information was collected, provide a good or service requested by the consumer or reasonably anticipated within the context of the covered business's ongoing business relationship with the consumer, or otherwise perform a contract between Zenith and the consumer
- help to ensure security and integrity to the extent the use of personal information is reasonably necessary and proportionate for those purposes
- exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law
- debugging to identify and repair errors that impair existing intended functionality
- to enable solely internal uses that are reasonably aligned with consumer expectations based on the consumer's relationship with the business and compatible with the context in which the consumer provided the information.
- comply with a legal obligation

Please note that the description of the CCPA set forth in this privacy policy is a summary of only certain aspects of the CCPA and is not and should not be considered a complete description of the CCPA. In addition to what is described above, the CCPA includes other exemptions that apply to particular types of personal information and particular businesses, as well as additional situations where a covered business is not required to honor a consumer's request to delete the consumer's personal information.

Submitting a CCPA Request

Please note: if you are a customer of a broker-dealer for which ZENITH provides services, **CCPA requests should be directed to your broker-dealer.**