

Hightop Privacy Notice

Last Updated:10/05/2025

This Privacy Notice applies to the processing of personal data by Hightop Financial, Inc. d/b/a Hightop ("**Hightop**," "**we**," "**us**," or "**our**") including on our website available at <https://hightop.com> and our other online, offline or mobile offerings which link to, or are otherwise subject to, this Privacy Notice (collectively, the "**Services**"). The purpose of this document is to provide you with information on Hightop's use of your personal data in accordance with applicable law relating to data privacy, including the Cayman Islands Data Protection Act (as amended) (together, the "**Data Protection Legislation**"). If you are an individual, this will affect you directly. If you are an institution that provides us with personal data on individuals connected to you, this will be relevant for those individuals and you should transmit this Privacy Notice to such individuals or otherwise advise them of its content.

1. UPDATES TO THIS PRIVACY NOTICE
2. PERSONAL DATA WE COLLECT
3. HOW WE USE PERSONAL DATA
4. HOW WE DISCLOSE PERSONAL DATA
5. YOUR PRIVACY CHOICES AND RIGHTS
6. INTERNATIONAL TRANSFERS OF PERSONAL DATA
7. RETENTION OF PERSONAL DATA
8. SUPPLEMENTAL NOTICE FOR EU/UK GDPR
9. CHILDREN'S PERSONAL DATA
10. CONTACT US

1. UPDATES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time in our sole discretion. If we do, we'll let you know by posting the updated Privacy Notice on our website, and/or we may also send other communications.

2. PERSONAL DATA WE COLLECT

We collect personal data that you provide to us, personal data we collect automatically when you use the Services, and personal data from third-party sources, as described below.

A. Personal Data You Provide to Us Directly

We may collect personal data that you provide to us.

- **Wallet and Transaction Information.** In order to use the Services, you will need to connect your digital Wallet. We may collect personal data and details associated with your transactions such as wallet addresses, asset types, and transaction history to provide you with recommendations in connection with the Services. Note that your interactions with third-party wallet services are subject to each wallet provider's respective privacy policy, not this Privacy Notice.
- **Your Communications with Us.** We, and our service providers, may collect and record the information you communicate to us, such as through email or when you use our AI webchat tool.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal data from you in connection with the survey.

- **Interactive Features.** We and others who use our Services may collect personal data that you submit or make available through our interactive features (e.g., digital newsletter, messaging features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered “public.”
- **Sweepstakes or Contests.** We may collect personal data you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal data from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal data from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** If you apply for a job with us, we will collect any personal data you provide in connection with your application, such as your contact information and CV.

B. Personal Data Collected Automatically and Automated Decision Making

We may collect personal data automatically when you use the Services.

- **Device Information.** We may collect personal data about your device, such as your Internet protocol (IP) address, user settings, cookie identifiers, other unique identifiers, browser or device information, Internet service provider, and location information (including, as applicable, approximate location derived from IP address).
- **Usage Information.** We may collect personal data about your use of the Services, such as the screens you view, features you access, items you search for, the types of content you interact with, information about buttons or links you tap, the frequency and duration of your app sessions, and other information about how you use the Services.
- **Cookie Notice.** We, as well as third parties, may use cookies, pixel tags, and other technologies (“Technologies”) to automatically collect personal data through your use of the Services .
 - **Cookies.** Cookies are small text files stored in device browsers.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in the Services that collects personal data about use of or engagement with the Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in emails to understand whether messages have been opened, acted on, or forwarded.

See [“Your Privacy Choices and Rights”](#) below to understand your choices regarding cookies.

C. Personal Data Collected from Third Parties

We may collect personal data about you from third parties. These parties may include, but are not limited to, the examples described below.

- **Third Party Service.** If you access the Services using a Third-Party Service , we may collect personal data about you from that Third-Party Service that you have made available via your privacy settings. In addition,

users of the Services may upload or otherwise provide personal data about others.

- **Blockchain Information.** We may collect personal data that is publicly available on the blockchain.

3. HOW WE USE PERSONAL DATA

We use personal data for a variety of business purposes, including to provide the Services, for administrative purposes, and to provide you with marketing materials, as described below.

A. Provide the Services

We use personal data to provide the Services, such as:

- Managing your account;
- Providing access to certain areas, functionalities, and features of the Services;
- Answering requests for support;
- Communicating with you;
- Sharing personal data with third parties as needed to provide the Services; and
- Facilitating transactions that you enter into.

B. Improve the Services and Develop New Products and Services

We use personal data to improve the Services and to develop new products and services, such as:

- Developing, training, and fine-tuning models, algorithms, and artificial intelligence technologies; and
- Improving, upgrading, or enhancing the Services.

C. Operate Our Business

We use personal data to operate our business, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Carrying out analytics;
- Creating de-identified and/or aggregated information.
- Processing applications if you apply for a job we post on our Services;
- Allowing you to register for events;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

D. Marketing

We may use personal data to tailor and provide you with marketing and other content promoting our Services.

We may provide you with these materials as permitted by applicable law.

E. With Your Consent or Direction

We may use personal data for other purposes that are clearly disclosed to you at the time you provide personal information, with your consent, or as otherwise directed by you.

F. Automated Decision-Making

We may engage in automated decision-making, including profiling, which under the GDPR means any form of automated processing of your personal data to evaluate or predict certain personal aspects relating to you. This includes analyzing your trading behavior, investment preferences, economic situation, or other related characteristics to provide personalized investment recommendations.

4. HOW WE DISCLOSE PERSONAL DATA

We disclose personal data to third parties for a variety of business purposes, including to provide the Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide the Services

We may disclose any of the personal data we collect to the categories of third parties described below.

- **Disclosures to the Blockchain.** Aspects of the Services may be hosted on or interact with the blockchain. Where you use aspects of the Services that are hosted on or interact with the blockchain, information about your interactions and/or transactions will be provided to the applicable blockchain network and may be accessible to third parties due to the nature of the blockchain protocol.
- **Service Providers.** We may disclose personal data to third-party service providers that assist us with the provision of the Services. This may include, but is not limited to, service providers that provide us with hosting, customer service, analytics, marketing services, IT support, AI or machine learning services, and related services. In addition, personal data and chat communications may be disclosed to service providers that help provide our chat features. Service providers are generally processors acting on the instructions of Hightop. Additionally, a service provider may use your personal data where this is necessary for compliance with a legal obligation to which it is directly subject (for example, to comply with applicable law or where mandated by a court order or regulatory sanction). A service provider, in respect of this specific use of personal data, may be deemed to be acting as a data controller in its own right.
- **Other Users You Share or Interact With.** The Services may allow Hightop users to share personal data or interact with other users of the Services.
- **Third-Party Services You Share or Interact With.** The Services may link to or allow you to interface, interact, share information with, direct us to share information with, access and/or use third-party websites, applications, services, products, and technology (each a “**Third-Party Service**”).

Any personal data shared with a Third-Party Service will be subject to the Third-Party Service’s privacy policy. We are not responsible for the processing of personal data by Third-Party Services.

- **Business Partners.** We may share your personal data with business partners to provide you with a product or service you have requested. We may also share your personal data with business partners with whom we jointly offer products or services.

Once your personal data is shared with our business partner, it will also be subject to our business partner’s privacy policy. We are not responsible for the processing of personal data by our business partners.

- **Affiliates.** We may share your personal data with our corporate affiliates.

- **Regulatory or Government Authorities:** In certain circumstances, we may be legally obliged to share your personal data and other financial information with relevant regulatory or government authorities. They, in turn, may exchange this information with foreign authorities.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing, reorganization, bankruptcy, receivership, purchase or sale of assets, transition of service to another provider, or other similar corporate transaction, your personal data may be disclosed, sold, or transferred as part of such a transaction.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal data are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe functionality found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails. We may also send you certain non-promotional communications regarding us and the Services, and you will not be able to opt out of those communications (e.g., communications regarding the Services or updates to this Privacy Notice).
- **Mobile Devices.** We may send you push notifications through our mobile application. You may opt out of receiving these push notifications by changing the settings on your mobile device. With your consent, we may also collect precise location-based information via our mobile application. You may opt out of this collection by changing the settings on your mobile device. To request deletion of your account, please use the standard deletion functionality available via the Services or contact us using the information set forth in "Contact Us" below.
- **"Do Not Track."** Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies.** You may stop or restrict the placement of cookies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, the Services may not work properly.

Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of certain tracking on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Confirm Whether We Are Processing Your Personal Data;**

- **Be Informed About the Purposes for which Your Personal Data is processed;**
- **Request Access to or Portability of Your Personal Data;**
- **Stop Direct Marketing;**
- **Request Correction of Your Personal Data;**
- **Request Deletion of Your Personal Data in some limited circumstances;**
- **Be Informed of a Personal Data Breach (unless the breach is unlikely to be prejudicial to you);**
- **Complain, including to the Cayman Islands Data Protection Ombudsman;**
- **Request Restriction of or Object to our Processing of Your Personal Data; and**
- **Withdraw Your Consent to our Processing of Your Personal Data.** Please note that your withdrawal will only take effect for future processing, and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in [“Contact Us”](#) below. We will process such requests in accordance with applicable laws.

6. INTERNATIONAL TRANSFERS OF PERSONAL DATA

All personal data processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. These countries may or may not have adequate data protection laws as defined by the data protection authority in your country.

We may transfer personal data from the Cayman Islands, European Economic Area, Switzerland, and/or the United Kingdom to a country that does not provide an adequate level of protection under the Data Protection Legislation. In such cases, we will process personal data or procure that it be processed in accordance with the requirements of the Data Protection Legislation, which may include having appropriate contractual undertakings in legal agreements with service providers who process personal data on our behalf. One of the safeguards we may use to support such transfer is the [EU Standard Contractual Clauses](#).

For more information about the safeguards we use for international transfers of your personal data, please contact us as set forth below.

7. RETENTION OF PERSONAL DATA

We store the personal data we collect as described in this Privacy Notice for as long as you use the Services, or as necessary to fulfill the legitimate business purpose(s) for which it was collected, provide the Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

To determine the appropriate retention period for personal data, we may consider applicable legal requirements, the amount, nature, and sensitivity of the personal data, certain risk factors, the purposes for which we process your personal information, and whether we can achieve those purposes through other means.

We will generally retain your personal data throughout the lifecycle of the Services. Some personal data will be retained after your relationship with us ends. We expect to delete your personal data (at the latest) once there is no longer any legal or regulatory requirement or legitimate business purpose for retaining your personal data.

8. SUPPLEMENTAL NOTICE FOR EU/UK GDPR

This Supplemental Notice for EU/UK GDPR only applies to our processing of personal data that is subject to the EU or UK General Data Protection Regulation.

In some cases, providing personal data may be a requirement under applicable law, a contractual requirement, or a requirement necessary to enter into a contract. If you choose not to provide personal data in cases where it is required, we will inform you of the consequences at the time of your refusal to provide the personal information.

Hightop's processing of your personal data may be supported by one or more of the following lawful bases:

<u>Privacy Notice Section</u>	<u>Lawful Basis: Performance of a Contract (i.e., to provide the Services to you)</u>	<u>Lawful Basis: Legitimate Interest</u>	<u>Lawful Basis: Consent</u>	<u>Lawful Basis: For Compliance with Legal Obligations</u>
<u>Section 3A: Provide the Services</u>	✓	✓	✓	✓
<u>Section 3B: Improve the Services and Develop New Products and Services</u>	✓	✓	✓	✓
<u>Section 3C: Operate Our Business</u>	✓	✓	✓	✓
<u>Section 3D: Marketing</u>		✓	✓	
<u>Section 3E: With Your Consent or Direction</u>	✓	✓	✓	
<u>Section 3F: Automated Decision-Making</u>	✓	✓	✓	✓

9. CHILDREN'S PERSONAL DATA

The Services are not directed to children under 18 (or other age as required by local law outside the United States), and we do not knowingly collect personal data from children.

If you are a parent or guardian and believe your child has uploaded personal data to the Services in violation of applicable law, you may contact us as described in "[Contact Us](#)" below.

10. CONTACT US

Hightop is the controller of the personal data we process under this Privacy Notice.

If you have any questions about our privacy practices or this Privacy Notice, or to exercise your rights as detailed in this Privacy Notice, please contact us at: team@hightop.com