

Fennel Privacy Policy

Last updated April 1, 2026

Thank you for choosing to be part of our community at Fennel Financials LLC., doing business as Fennel ("Fennel," "we," "us," or "our"). We are committed to protecting your personal information and your right to privacy. Fennel maintains policies and procedures reasonably designed to safeguard customer records and information in accordance with SEC Regulation S-P. We implement administrative, technical, and physical safeguards designed to protect your nonpublic personal information, consistent with applicable federal standards including SEC and FINRA requirements.

If you have any questions or concerns about this privacy notice or our practices about your personal information, please contact us at compliance@fennel-financials.com.

This privacy notice describes how we might use your information if you:

- Visit our website at www.fennel.com
- Engage with us in other related ways — including any sales, marketing, or events
- In this privacy notice, if we refer to:
- **"Website,"** we are referring to any website of ours that references or links to this policy
- **"Services,"** we are referring to our website, and other related services, including any sales, marketing, or events.

The purpose of this privacy notice is to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

Please read this privacy notice carefully, as it will help you understand what we do with the information that we collect.

1. WHAT INFORMATION DO WE COLLECT?

Fennel may collect nonpublic personal information about our customers as follows:

- Information that you provide when creating an account may include your name, address, marital status, e-mail address, phone number, social security number, data on government issued identification, and information about income, net worth, investment goals and risk tolerance.

- Account History, including information about transactions and positions in your account(s); and
- Correspondence, written, telephonic or electronic between you and Fennel or service providers to Fennel.
- Usage and device information, including IP address, device identifiers, and interaction data.
- Collect information about you from companies that we do business with regarding identity verification and fraud prevention.

2. HOW DO WE USE YOUR INFORMATION?

We use personal information collected via our app and website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and logon process.** We will use your information for the purposes of opening and managing your account and validating your identity.
- **Connected Services.** If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.
- **To post testimonials.** We may post testimonials on our website that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to update, or delete your testimonial, please contact us at compliance@fennel-financials.com and be sure to include your name, testimonial location, and contact information.
- **Request feedback.** We may use your information to request feedback and to contact you about your use of our website.
- **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our website, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You

can opt-out of our marketing emails at any time (see control your privacy settings below).

- **Deliver targeted advertising to you.** We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.

We may process or share your data that we hold based on the following legal basis:

- **Authorized Third Party Vendors and Service Providers:** We do not disclose non-public personal information to any non-affiliated third party, except to non-affiliated third parties that may assist in servicing your account.
- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Retention:** We retain your personal information for as long as necessary to fulfill the purposes outlined in this notice, comply with legal and regulatory obligations, resolve disputes, and enforce our agreements.

Fennel uses Plaid Inc. ("Plaid") to gather your data from financial institutions. By using the Service, you grant Fennel and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from your relevant financial

institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid [end user privacy policy](#).

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We use cookies and similar technologies for functionality, analytics, and marketing purposes. You can control cookie preferences through your browser settings. Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website.

5. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

6. CHILDREN'S PRIVACY

Fennel's services are not directed at children. Should we inadvertently collect personal information from a child under the age of 18, Our services are intended only for individuals who are legally permitted to open brokerage accounts.

7. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

If you are a California resident, please see below details about the personal information Fennel collects about California residents and the rights afforded to them under the California Consumer Privacy Act ("CCPA"). Subject to certain limitations and exceptions, the CCPA provides California residents the following right:

- The ability to request a covered business to disclose the detailed personal information we collect;
- The opt-out of the sale of personal information, if applicable. Fennel does not sell personal information;
- The option to control and delete personal information. Fennel also gives everyone the option to delete cookies from visits to our products and websites. To do so, please contact us at support@fennel-financials.com.

- Not be discriminated against for exercising rights they have under CCPA.

In accordance with California law, Fennel will not share information we collect about you with nonaffiliates, except as allowed by law. For example, Fennel may share information with your consent or to service your accounts. Among Fennel's affiliates, Fennel will limit information sharing to the extent required by California law.

For exercising CCPA specific rights, please contact our customer services at support@fennel-financials.com. Fennel may verify the request by asking you to provide information that matches information we have on file about you. You can also designate an authorized agent to exercise these rights on your behalf, but Fennel will require proof that the person is authorized to act on your behalf and may also still ask you to verify your identity with us directly.

8. DO WE MAKE UPDATES TO THIS NOTICE?

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

9. CONTROL YOUR PRIVACY SETTINGS.

You may update certain account profile information through the device settings of your Fennel account. You can stop receiving promotional emails from us by clicking the "unsubscribe" link in those emails. We may still send you service-related or other non-promotional communications, such as account notifications, receipts, security notices and other transactional or relationship messages.

10. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at compliance@fennel-financials.com or by post to:

Fennel Financials, LLC
Attn: Compliance Department
450 Lexington Avenue, 4th Floor
New York, NY 10017