



June 2024

PRIVACY POLICY

This Privacy Policy (“Privacy Policy” or “Policy”) explains how Union Square Advisors (“we,” or “us,” or “our”) collects personal information based on your interactions with us both offline and online on our website (the “Services”). This Policy describes our practices with respect to the collection and use of personal information and describes rights you may have with respect to your personal information. By using this website and otherwise interacting with us, you agree to the terms of our Terms of Service, including this Policy.

This Policy does not cover the personal information we collect about employees and independent contractors.

Notice at Collection: Personal Information We Collect

We collect the following categories of personal information:

- **Personal identifiers:** name, email address, physical address, telephone number, account or tax identification number, IP address
- **Protected class information:** age; sex/gender
- **Commercial and financial information:** account or tax identification number, types and amounts of investment, participation in other investment programs, ownership of other types of accounts (*e.g.*, IRAs), other account information
- **Internet or other electronic activity information:** your device and browser type, information regarding your interaction with our website
- **Professional information:** job title, information about your employer, current or past job history, professional licenses, certificates or other qualifications, employment references or referrals
- **Education information:** past education history, degrees, certificates, transcripts, other educational qualifications

- **Audio, visual information:** recordings of client calls for quality assurance purposes; recordings of video webinars; security camera footage
- **Inferences drawn from personal information we collect**
- **Sensitive personal information:** Social Security number

We have collected the same categories of personal information in the 12 months prior to the date of this Privacy Policy.

Notice at Collection: Purposes for Collection of Personal Information

We collect your personal information to provide Services to you; to enter into a business transaction; to contact you from time to time; to provide you with information about our business; materials about Services we think may be of interest to you; to respond to your inquiries; and to customize your experience.

We also use personal information to monitor or improve our website; for internal business analysis; to prevent fraud, activities that violate our Terms of Service or other contracts, or that are illegal; and to protect our rights and the rights and safety of our users or others.

For those who interact with us as job applicants, we collect your personal information during the recruiting and application process to review your application for a job position; determine your eligibility; and recruitment and interview process.

Notice at Collection: Categories of Personal Information We Sell or Share or Use for Targeted Advertising

We do not sell personal information or share it for purposes of cross-context behavioral advertising.

Notice at Collection: Retention Periods

We retain the categories of personal information we collect for the length of time necessary to provide our Services and to comply with legal obligations or to protect our legal rights.

Sources From Which We Collect Personal Information

We collect personal information directly from representatives of entities with which we do business or may do business, as well as our website visitors.

Use or Disclosure of Sensitive Personal Information

We do not use or disclose sensitive personal information to create profiles about or infer characteristics about individuals, or for any purposes other than providing our Services.

Disclosure of Personal Information For Business Purposes in the Past 12 Months

The following chart describes the categories of personal information we disclosed to third parties for a business purpose in the 12 months prior to the date of this Policy:

Categories of Personal Information	Categories of Third Parties to Which We Disclosed Personal Information for Business Purposes
Personal identifiers: name, email address, physical address, telephone number, account or tax identification number, IP address	Service providers that process investment information, manage client information and provide client services, facilitate email communications, provide security services and cloud-based data storage, host our website and assist with other IT-related functions, provide analytics information, and provide legal and accounting services.
Protected class information: age, sex/gender	Service providers that process investment information, manage client information and provide client services, facilitate email communications, provide security services and cloud-based data storage, host our website and assist with other IT-related functions, provide analytics information, and provide legal and accounting services.
Commercial and financial information: account or tax identification number, types and amounts of investment, participation in other investment programs, ownership of other types of accounts (e.g., IRAs), other account information	Service providers that process investment information, manage client information and provide client services, facilitate email communications, provide security services and cloud-based data storage, host our website and assist with other IT-related functions, provide analytics information, and provide legal and accounting services.
Internet or other electronic activity information: your device and browser type, information regarding your interaction with our website	Service providers that provide security services and cloud-based data storage, host our website and assist with other IT-related functions, and provide analytics information.
Professional information: job title, information about your employer, current or past job history, professional licenses, certificates or other qualifications, employment references or referrals	Service providers for the purposes of assessing your application and verifying the information that you have provided; cloud-based data storage, host our website and assist with other IT-related functions, and provide analytics information.
Education information: past education history, degrees, certificates, transcripts, other educational qualifications	Service providers for the purposes of assessing your application and verifying the information that you have provided; cloud-based data storage, host our website and assist with other IT-related functions, and provide analytics information.

Categories of Personal Information	Categories of Third Parties to Which We Disclosed Personal Information for Business Purposes
Audio, visual information: recordings of client calls for quality assurance purposes, recordings of video webinars, security camera footage	Service providers that process investment information, manage client information and provide client services, facilitate email communications, provide security services and cloud-based data storage, host our website and assist with other IT-related functions, provide analytics information, and provide legal and accounting services.
Inferences drawn from personal information collected	We assess information disclosed by individual investors in order to comply with Regulation Best Interest.
Sensitive personal information: Social Security number	Services providers that process investment information, manage client information and provide client services, and provide accounting services.

Business Purposes for Such Disclosures

We disclosed the aforementioned categories of personal information to the categories of third parties identified above for the following purposes: to manage client, supplier and vendor accounts and relationships; verify clients’ identities; fulfill transactions; engage in advertising and marketing; operate our IT systems and secure our systems; prevent fraud and other illegal activities; and to obtain professional advice about legal and accounting matters.

Additional Information About How We May Disclose Personal Information and Purposes for Disclosures

We may also disclose your personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and regulatory authorities. We may also disclose your personal information to third parties to help detect and protect against fraud or data security vulnerabilities. And we may disclose or transfer your personal information to a third party in the event of an actual or potential sale, merger, reorganization of our entity or other restructuring.

Our Use of Cookies and Analytics

We may use cookies or other similar tracking technologies (“tracking technologies”) to automatically collect information through our website. Tracking technologies are small data files placed on your computer, tablet, mobile phone, or other devices that record certain pieces of information when you visit our website. We may use these tracking technologies to provide services to you (for example, to provide you with access to our Outlook Report), help identify irregular behavior, prevent fraudulent activity and improve security, as well as making it possible for you to save your preferences and help us understand how you interact with our website.

You may set your browser to notify you when you receive a cookie. Many web browsers also allow you to block cookies. You can disable cookies from your computer system by following the instructions on your browser or at www.youradchoices.com.

Personal Information of Minors

Our products and website are not directed to minors under the age of 13 and we do not knowingly sell or share for purposes of behavioral advertising the personal information of minors, including minors under 16 years of age.

Do Not Track Signals

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.

Third Party Websites

Our website may contain links to third party websites, including social media buttons that link to social media platforms. This Policy does not govern how those third parties or social media platforms collect or use personal information and we do not endorse or have control over their practices. The privacy policies and terms of use for those third parties’ websites/apps or social media platforms govern those companies’ privacy practices. We are not responsible for the content or privacy practices of any third-party websites or platforms.

How We Keep Your Personal Information Secure

We implement and maintain reasonable security appropriate to the nature of the personal information that we collect, use, retain, transfer or otherwise process. However, there is no perfect security, and reasonable security is a process that involves risk management rather than risk elimination. While we are committed to maintaining a reasonable information security program, no such program can be perfect; in other words, all risk cannot reasonably be eliminated. Data security incidents and breaches can occur due to factors that cannot reasonably be prevented. Accordingly, it cannot be assumed that the occurrence of any given incident or breach results from our failure to implement and maintain reasonable security.

Changes to This Policy

We will review and update this Policy from time to time. If changes are made, we will update the Privacy Policy and reflect the date of such modification in the date above. If the changes are material, you will be notified via email or a notice on our website.

Accessibility

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at info@usadvisors.com.

Contact Us

If there are any questions regarding this Privacy Policy or to request a copy of this Privacy Policy in another format you may contact us at info@usadvisors.com.

US State Data Privacy Rights

Laws in certain US states give residents of those states specific rights with respect to the personal information collected about them. See below for more information.

CALIFORNIA PRIVACY RIGHTS

If you are a California resident, the California Consumer Privacy Act (“CCPA”) and other laws provide you with the following rights with respect to your personal information:

Your Right To Know About Personal Information We Collect

You can ask us for the following information from us with respect to the personal information we have collected about you since January 1, 2022:

- Specific pieces of personal information we have collected about you;
- Categories of personal information we have collected about you;
- Categories of sources from which such personal information was collected;
- Categories of personal information that the business disclosed for a business purpose about the consumer;
- Categories of third parties to whom the personal information was disclosed for a business purpose; and
- The business or commercial purpose for collecting your personal information.

Your Right To Request Deletion of Personal Information We Have Collected From You

Upon your request and subject to exceptions in the law, we will delete the personal information we have collected from you.

Your Right to Request to Correct Personal Information We Hold About You

You have the right to request that we correct personal information we hold that you believe is not accurate. We will take steps to determine the accuracy of the personal information that is the subject of your request to correct, and in doing so will consider the totality of the circumstances relating to the personal information you have identified as being incorrect. We may ask that you provide documentation regarding your request to correct to assist us in evaluating the request.

California Shine the Light

California Civil Code Section 1798.83, also known as the “Shine the Light” law, permits California residents to annually request, free of charge, information about the personal information (if any) disclosed to third parties for direct marketing purposes in the preceding calendar year. To make a request, please contact us at info@usadvisors.com.

Our Commitment to Honoring Your Rights

If you exercise any of the rights explained in this Privacy Policy, we will continue to treat you fairly. If you exercise your rights under this Privacy Policy, you will not be denied or charged different prices or rates for goods or services, or provided a different level or quality of goods or services than others.

Exercising Your Rights and How We Will Respond

To exercise your rights to know, delete or correct your personal information, or to ask a question, contact us at info@usadvisors.com. For such requests, we will first acknowledge receipt of your request within 10 business days of receipt of your request. We will then provide a substantive response to your request as soon as we can, generally within 45 days from when we receive your request, although we may be allowed to take longer to process your request in certain jurisdictions or under certain circumstances. If we expect your request is going to take us longer than normal to fulfill, we will let you know.

We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information in certain situations. In some cases, the law may allow us to refuse to act on certain requests. When this is the case, we will endeavor to provide you with an explanation as to why.

Verification of Identity – Requests to Know, Delete or Correct

We will ask you for two pieces of personal information and attempt to match those to information that we maintain about you.

If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to the request. We will notify you to explain the basis of the denial.

Authorized Agents

You may designate an agent to submit requests on your behalf. The agent can be a natural person or a business entity.

If you would like to designate an agent to act on your behalf, you and the agent will need to comply with our verification process:

- Requests to Know, Delete or Correct Personal Information: If the agent submits a request, the agent will need to provide us with your signed permission indicating the agent has been authorized to submit the request on your behalf. We will also require that you verify your identity directly with us or confirm with us that you provided the agent with permission to submit the request.

Please note that this subsection does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.