

True Markets Privacy Policy

Last Updated: July 10, 2026

This Privacy Policy explains how True Markets collects, uses, discloses, and protects information when you use our websites, applications, and related services (collectively, the “Service”). It applies to the True Markets family of products. By using the Service, you agree to the practices described in this Policy.

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What information does True Markets collect?

Summary: *We collect the categories of information listed below. We do not use passwords: authentication relies on passkeys and API keys, which are keypairs generated on your device, and we only ever receive the public key, never your private key.*

Depending on how you use the Service, we may collect the following categories of information about you. The Service may also generate identifiers that mask certain categories of information.

- **Account and contact information** — your name, username, authentication credentials (for passkeys and API keys, we store only the public key), and contact information, along with other details that vary by product type.
- **Know-your-customer information** — information such as date of birth and financial account data collected to verify your identity and meet our regulatory obligations.
- **Device information** — the requested and referring URLs, browser and IP information, and analytical data about your use of the Service.

We do not collect or store your payment or billing credentials. Fiat on-ramp and off-ramp transactions are processed through third-party providers (currently Coinbase and PayPal). You log in directly to those services and authorize any transfers, so your payment credentials are handled by those providers rather than by us.

Mobile applications

If you use our mobile applications, we may also collect:

- mobile device identifiers, such as device model, operating system and version, app version, and unique device or installation identifiers;
- push notification tokens, if you enable push notifications; and
- information accessed through device permissions you grant — such as your camera or photo library for identity verification, and, where applicable, location — each of which you can manage or revoke in your device settings.

How is information collected?

Summary: *We collect information when you set up and use your account and to screen for fraud. Cookies support the functionality of the Service, and log files help us operate and improve it.*

We collect information directly from you and from third parties, such as our fraud prevention and identity verification providers.

Registering for and using the Service

You may create an account to access features of the Service. You may provide information to us directly, and to our service providers.

Cookies

When you visit our Site, cookies may be placed on your device to personalize and optimize your experience. This Privacy Policy does not govern cookies or action tags placed by third parties on their own websites or services.

Most web browsers let you manage cookies through their settings — for example, to refuse new cookies, delete existing ones, or be alerted when cookies are set. Disabling cookies may affect the functionality of the Service.

Log files

In addition to cookie data, we collect device information through log files to administer, monitor, and improve the Service.

Age requirements and children's privacy

The Service is intended only for users who are at least the age of majority in their jurisdiction of residence (generally 18 years or older), and it is not designed for or directed to minors. We do not knowingly collect personal information from anyone under the age of 13. If you believe a child under 13 has provided us with personal information, please contact us at compliance@truemarkets.co; if we learn that we have collected such information, we will promptly take steps to delete it.

How we use the information we collect

We, and the third parties we work with, may use personal information for the following purposes:

- Provide the Service;
- Process your application and transactions;

- Determine your eligibility for the Service and set up your account;
- Verify your identity;
- Prevent fraud;
- Manage and service your account;
- Operate and improve the Service;
- Maintain the safety, security, and integrity of our Service, technology assets, and business;
- Send you important information about the Service, such as changes to our terms, conditions, policies, or contact details; and
- Pursue any other lawful, legitimate business purpose, or as otherwise required or permitted by law.

We may also process your personal information for purposes disclosed to you at the time you provide it, or as otherwise set out in this Policy.

European Data Protection Laws require us to explain the legal bases for processing the personal information of European residents. We process your information:

- where you have given consent, which you may withdraw at any time without affecting the lawfulness of processing carried out before withdrawal;
- where it is necessary to perform a contract we have entered into, or are about to enter into, with you (whether in relation to the Service or otherwise);
- where it is necessary to comply with a legal obligation to which we are subject; and/or
- where it is necessary for our legitimate interests (or those of a third party) in providing or marketing the Service, and your interests or fundamental rights and freedoms do not override those legitimate interests.

Unless you request otherwise (where permitted by law), we and third parties acting on our behalf may send you electronic newsletters or contact you about the Service. Each communication we send will include an option to change your preferences. You may also opt out by emailing us at compliance@truemarkets.co.

If you contact us by email with questions, we will use your information to respond and may retain your message and information for future reference.

We also use the information we collect to send announcements about the Service or your billing account status. You cannot unsubscribe from these Service or transactional announcements, as they contain important information relevant to your use of the Service.

When we disclose information to third parties

Summary: *We may disclose contact and device information to third parties to comply with law or for other legal reasons. We may also share information with professional advisors and outside contractors who provide us with business services, and, in connection with an investment in or sale of our business, with the relevant investor or purchaser.*

We disclose information gathered through the Service to the following third parties, as set forth in our Terms of Service or as separately authorized by you:

Laws and legal rights

We may disclose your information as required by law, to enforce a law or contract, or to protect the safety or security of our users or the Service.

Professional advisors

We may provide information to our professional advisors in the course of services they render to us, such as accounting or legal services.

Outside contractors

We may engage independent contractors, third-party service providers, vendors, and suppliers, located inside or outside the United States, to provide business services related to the Service. These contractors may have access to information collected through the Service. We use reasonable efforts to ensure that they (a) limit their use of your information to what is necessary to provide their services, and (b) are capable of protecting the security of your information.

Sale of business

We may transfer information to a third party in connection with an actual or proposed investment, sale, merger, or transfer of all or substantially all of the assets of True Markets.

To perform services you elect

We may provide information to third parties based on services you elect — for example, providing your information to data broker websites for the purpose of deleting your personal information from those sites.

How we secure information

Summary: *We store your information using commercially reasonable security techniques.*

We want your information to remain secure. We strive to transmit your information from your device to our servers in line with commercially reasonable standards, and we employ administrative, physical, and electronic measures to protect it from unauthorized access.

There is always risk in transmitting information over the Internet. As a result, although we strive to protect your information, we cannot ensure or warrant its security or privacy, and you transmit it to us at your own risk.

International transfers of information

Summary: *Your information may be transferred to the United States. If you are in the European Economic Area, Canada, or the United Kingdom, we ensure, where required, the degree of protection required under applicable EEA, Canadian, and United Kingdom laws, even though United States privacy laws may be less stringent than those of your home jurisdiction.*

Information collected through the Service may be transferred to countries that may not have laws of general applicability regulating the use and transfer of such information (such as the United States). By using the Service, you consent to that transfer. You further expressly consent to True Markets: (a) processing and disclosing your information in accordance with this Privacy Policy; (b) transferring your information to and from the United States; and (c) disclosing your information to comply with lawful requests by public authorities, including to meet national security or law enforcement requirements.

To the extent required by applicable law, whenever we transfer your personal data (as defined in the European Data Protection Laws) to third parties located in the United States, we ensure a similar degree of protection is afforded. We may use specific contracts approved by the European Commission or the UK Information Commissioner's Office, as applicable. If we rely on another transfer mechanism, we will keep you updated or contact you where required. Please contact us if you would like more information about the specific mechanisms we use when transferring your personal data to the United States.

If you access the Service from a jurisdiction whose laws governing the processing of personal data differ from those of the United States, please be advised that all aspects of the Service are governed by the internal laws of the United States and the State of Delaware, regardless of your location.

How long we keep information

We retain your information only for as long as necessary to fulfill the purposes for which we collected it, for reasonable legal or business purposes, or as otherwise permitted by applicable law.

To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the information, applicable regulatory requirements, the potential risk of harm, and the purposes for which we process it.

Your choices and rights

Summary: *You can opt out of marketing communications by contacting us. As described below, residents of the United States (including California), the European Economic Area, Canada, and the United Kingdom may have additional rights, which they can exercise by contacting us.*

We process information as described in this Privacy Policy and our Terms of Service. Where appropriate, we will ask for your consent to use your information for other purposes.

If you have questions or requests, or would like to update your information, please contact us at compliance@truemarkets.co.

Residents of the United States (including California)

Depending on your state of residence, you may have additional rights under applicable U.S. state privacy laws, including the California Consumer Privacy Act, as amended by the California Privacy Rights Act (the "CCPA"). These rights may include:

- the right to know the categories and specific pieces of personal information we have collected about you, the sources of that information, the purposes for collecting it, and the categories of third parties with whom we share it;
- the right to request deletion of the personal information we have collected from you, subject to certain exceptions;
- the right to request correction of inaccurate personal information;
- the right to opt out of the "sale" or "sharing" of your personal information, and to limit the use of sensitive personal information, as those terms are defined under applicable law; and
- the right not to receive discriminatory treatment for exercising any of these rights.

We do not sell your personal information for money. To the extent any sharing of personal information constitutes a “sale” or “sharing” under applicable state law, you may opt out as described in this Policy or by contacting us.

To exercise any of these rights, please contact us at compliance@truemarkets.co. We will verify your request before responding and will not discriminate against you for exercising your rights. You may use an authorized agent to submit a request on your behalf, subject to our verification of the agent’s authority, and we will respond within the timeframes required by applicable law.

Residents of Europe

Under certain circumstances, and in compliance with the European Data Protection Laws, you may have the right to:

- request access to your information (commonly known as a “data subject access request”);
- request correction of the information we hold about you;
- request erasure of your information;
- object to our processing of your information where we are relying on a legitimate interest (or that of a third party) and something about your particular situation causes you to object on that ground;
- request that we restrict processing of your information;
- request the transfer of your information to another party; and
- lodge a complaint with the relevant supervisory authority (as defined in the European Data Protection Laws).

If you are covered by the European Data Protection Laws and want to review, verify, correct, or request erasure of your information, object to its processing, or request that we transfer a copy of it to another party, please contact us at compliance@truemarkets.co.

Residents of Canada

If you are a Canadian resident, then unless otherwise required or allowed by the laws of your province or territory of residence, we will only collect, use, or disclose your personal information with your consent (express or implied) for the purposes set out in this Privacy Policy. You are generally not obliged to provide your personal information; however, we may be unable to provide certain services if you decline to disclose it. We collect personal information only as authorized by law.

You acknowledge that your personal information may be processed and stored in foreign jurisdictions as described above. In those cases, we will comply with applicable local law requirements relating to the disclosure or release of personal information.

If you are a Canadian resident, you have certain rights regarding your personal information, as described below:

- **Access.** You have the right to access the personal information we hold about you. Upon written request and verification of your identity, we will provide you with the personal information under our control, information about how it is used, and a description of the individuals and organizations to whom it has been disclosed. We may charge a reasonable fee for doing so. In some situations we may be unable, or prevented by law, to provide access to certain personal information; if we must refuse a request, we will notify you in writing.

- **Accuracy and correction.** If you demonstrate that your personal information is inaccurate or incomplete, we will amend it as required.
- **Withdraw consent.** You may withdraw your consent to our use or disclosure of your personal information at any time by contacting us at compliance@truemarkets.co. We may be unable to offer you certain services if you withdraw your consent. Withdrawal does not affect the lawfulness of any use or disclosure that occurred beforehand, nor does it require us to delete information we are otherwise allowed or required to retain under applicable law.
- **Complaints.** On request, we will provide our complaint procedure, absent legal circumstances that prevent us from doing so.
- **Supervisory authorities.** If you have unresolved concerns, you have the right to complain to a data protection authority where you reside, where you work, or where you believe non-compliance with data protection or privacy laws has occurred.

If you are a resident of the province of Québec, the following additional rights are available to you:

- **Portability of your personal information.** You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to request that we transmit it to another organization.
- **De-indexation.** In certain circumstances, you have the right to request that we cease disseminating your personal information, or de-index any hyperlink that provides access to it by technological means, if such dissemination contravenes applicable law or a court order.

These rights may be limited — for example, if fulfilling your request would reveal personal information about another person, or if you ask us to delete information we are required by law, or have compelling legitimate interests, to keep.

All users

All users have the right to opt out of receiving marketing communications by following the directions provided in the communication, or by contacting us at compliance@truemarkets.co.

Updates, corrections, changes, and deletions will have no effect on other information we maintain, or on information we have provided to third parties in accordance with this Privacy Policy prior to the change. To protect your privacy and security, we may take reasonable steps to verify your identity before granting profile access or making corrections. You are responsible for maintaining the secrecy of your account credentials at all times.

Do Not Track

We take no action in response to automated Do Not Track signals. If you wish to stop such tracking, please contact us at compliance@truemarkets.co with your request.

Changes to this Privacy Policy

We may revise this Privacy Policy from time to time. If we make changes, we will update the “Last Updated” date at the top and bottom of this Policy. If we make material changes, we will notify you by email to your registered email address, by prominent posting on our website or online services, or through other appropriate communication channels, and will obtain your consent where required by applicable law. If a change legally requires it, we will provide an

opt-in; for minor changes, no opt-in is required. All changes are effective from the date of publication unless otherwise communicated to you. Please visit this page periodically to review any changes.

How to contact us

If you have any privacy questions, please contact us at compliance@truemarkets.co.

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