

# **Webull Financial LLC**

## **Privacy Notice**

### **Last Updated: November 19, 2024**

At Webull, we want you to have a great experience using our services. An important part of your experience is trusting that the personal and financial information we collect about you is protected. We are committed to maintaining the confidentiality and integrity of your personal information and have implemented business procedures that are consistent with this Privacy Notice ("Notice") and comply with applicable law.

This Notice describes how Webull Financial LLC ("Webull," "we," "us," or "our") processes the information about you that we collect through our websites, mobile apps, services, and when you otherwise interact with us (the "Services"), starting when you take steps to apply for a brokerage account ("Account"). We have the utmost respect for your data privacy, so this Notice also explains steps you can take to control and protect your personal information on our Services. You agree to this Notice by accessing or using our Services. If you do not agree, you may not access or use the Services. The software that you use to interact with us, including the mobile application, desktop application, and website, are owned, and operated by our affiliate, Webull Technologies Pte. Ltd. and they maintain additional privacy policies and procedures. We will follow those additional practices as well as this Notice in protecting your privacy. If you have any questions about this Notice, please contact us (see [HOW TO CONTACT US](#) below).

If you are under the age of 18 years old, you may not use our Services. We do not knowingly collect, maintain, or sell information from minors under 18 years old.

California residents may have additional rights regarding their personal information under the California Consumer Privacy Act ("CCPA") as set forth in this Notice. The CCPA, however, does not apply to certain non-public personal information collected by Webull to provide the Services, as that information is regulated instead by specific federal privacy laws.

Nevada residents may have additional rights regarding the "sale" of their personal information under the Nevada Revised Statutes as set forth in this Notice.

If you have an Account, or have taken steps to apply for an Account, you may review our Regulation SP Privacy Notice (See Appendix A below) for a description of our processing and disclosure activities regarding the non-public personal information that we collect from you in connection with opening and servicing your Account.

**This Notice will help you understand the following:**

1. [THE INFORMATION WE COLLECT](#)
2. [HOW WE USE AND SHARE YOUR INFORMATION](#)
3. [COOKIES](#)
4. [ANALYTICS, TRACKING AND ONLINE ADVERTISING](#)
5. [HOW WE PROTECT YOUR INFORMATION](#)
6. [MANAGING YOUR INFORMATION](#)
7. [TRANSFERS OF YOUR INFORMATION](#)
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11. [HOW TO CONTACT US](#)

## 1. THE INFORMATION WE COLLECT

While providing the Services, Webull collects or receives the following types of information, which includes personal information/data.

Data Source	Types of Data
From you	<ul style="list-style-type: none"><li>• Identity data such as full name, date of birth, nationality identification number (e.g., social security number, passport number), nationality/citizenship</li><li>• Contact data such as email, phone number, mailing/home address information.</li><li>• Financial data such as bank account and payment card details, suitability information, personal income, account balance, credit scores and tax information</li><li>• Content such as photos and contacts in your mobile device or email (collected with your consent)</li><li>• Profile data such as username and password, purchases or orders, knowledge assessments, interests, preferences feedback, survey responses, and inferences regarding characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</li><li>• Other information such as information submitted via focus groups, contests, sweepstakes, job applications, customer support and/or other interactions with us</li></ul>
Automatically collected through the Services	<ul style="list-style-type: none"><li>• Usage information such as device identifiers, the identifier for advertisers ("IDFA"), operating system and version, carrier and network type, internet protocol addresses ("IP address"), browser type and language, referring and exit pages and uniform resource locators (date and time, amount of time spent on particular pages), what features of the Services you use or visit, purchases, and similar information regarding your use of the Services</li><li>• Geolocation data from your mobile device, wireless carrier, or third-party service providers; you may control the collection of precise geolocation data through the user settings on your device.</li><li>• Activity data, such as purchases/sales, amount, type of transaction, time and data, and similar activity through the Services</li><li>• Tracking data collected using first and third-party cookies, pixels, web server logs, web beacons, and similar data collection and tracking</li></ul>

	technologies, such as IP address, browser, type, internet service provider (“ISP”), platform type, device type
Other sources	<ul style="list-style-type: none"> <li>• Service providers and partners, such as fraud risk assessments and protection, identity verification, credit records, payment processing information, bank account verification, brokers party to a transfer, ad campaign information (e.g., the ads you click on), and data from other users (e.g., you appear in a contact list provided to us)</li> <li>• Social media and connected services, such as information from your interactions with our social media platforms, the Webull Community, and from services that you connect with Webull, such as when you link, connect, or log into your Account through social media, Google, or Apple</li> <li>• Third-party analytics services, such as demographic data, mobile and internet usage, analyses of performance metrics, reports regarding your activity and use of the Services</li> <li>• Publicly available data, such as contact information, public records, and information you have designated as publicly available on other sites</li> </ul>

## 2. HOW WE USE AND SHARE YOUR INFORMATION

We will use and process your information for the following purposes:

- onboard you as a customer, including identity verification, credit or anti-money laundering checks, or other due diligence efforts.
- provide and personalize the Services for you.
- communicate with you regarding your Account.
- monitor, support, analyze and improve the Services.
- conduct marketing and advertising programs, provided that, where required under applicable law, we will obtain your prior opt-in consent to send electronic marketing communications.
- service, maintain, and protect your Account.
- process transactions in your Account.
- respond to inquiries from you.
- newsletters, product announcements, surveys.
- develop, offer, and deliver new products and Services.
- facilitate contests, sweepstakes, and promotions.
- protect the safety and security of our Services, business, and customers.
- fulfill legal and regulatory requirements.
- protect or exercise our legal rights; and

- as otherwise permitted by applicable law, or with your consent.

We make reasonable efforts to ensure that your personal information is sufficiently accurate, complete, and up to date. If the personal information that you have provided to us changes, please update by logging into your Account (see [MANAGING YOUR INFORMATION](#) below) or by contacting us.

We may share your information as described below:

- with various vendors and service providers, such as securities clearinghouses, identification verification providers, data analysis providers, and marketing companies, who provide services to us.
- in connection with corporate transactions or proceedings, such as mergers, acquisitions, obtaining financing, bankruptcy or dissolution, or a sale or other transfer of all or a portion of our business or assets.
- with any person or institution with which you have or propose to have dealings, such as companies whose securities you purchase using the Services.
- with our affiliates, to operate our business, provide the Services to you, and conduct promotional offers more effectively.
- as required by applicable law or legal process.
- to report suspicious transactions or assist law enforcement with an investigation.
- to protect the rights, interests, safety, and security of Webull, our customers, or the public.
- with other third parties, if you request or authorize the disclosure, such as implementing, administering, or enforcing a transaction; and
- as otherwise permitted by applicable law, or with your consent.

We may aggregate or otherwise de-identify your personal information so that it does not identify you and share such information with third parties.

### **3. COOKIES**

Our website may use cookies and similar tracking technology to automatically collect and receive certain technical and usage information such as IP address, browser, ISP, and device type when you connect with our Services. Cookies are small packets of data that a website stores on your hard drive so that your device will remember information about your visit. The data collected through cookies and similar tracking technology enables us to personalize your experience with the Services, understand how you use them, maintain a persistent session, improve, and further develop the Services, and measure and optimize advertising and promotional effectiveness. We may use session cookies (which expire once you close your web browser), and persistent cookies (which stay on your computer until you delete them). Most browsers and mobile devices allow you to manage cookies in their settings. If you refuse a cookie, or if you delete cookies from your device, you may lose functionality and/or experience some inconvenience in your use of our Services. For example, you may not be able to sign in and access your Account as quickly, or we may not be able to recognize you, your device, or your online preferences. Furthermore, if you use a different device, change browsers, or delete the opt-out cookies that contain your preferences, you may need to perform the opt-out task again. For more information, see [MANAGING YOUR INFORMATION](#) below.

#### 4. ANALYTICS, TRACKING AND ADVERTISING

Webull uses third-party advertising and analytics services (e.g., Google Analytics) to better understand your online activity and to provide you with content that is relevant to your interests and preferences. These services collect information about your use of our Services and other websites and online services over time through cookies and other tracking technologies. The data collected may include your IP address, web browser, mobile network, pages viewed, time spent, links clicked, and conversion information. We and our third-party partners use this information to, among other things, analyze and track data, determine the popularity of content, and deliver targeted advertisements on our Services and other platforms. Analytics companies may also provide advertising-related services to us such as reporting, attribution, analytics, and market research. By accessing and using the Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Notice. For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://support.google.com/analytics/answer/6004245>. For more information about interest-based ads, including to learn about options for opting out of having your web browsing information used for targeted advertising purposes, please visit <https://www.aboutads.info/choices>. You should also review your mobile device settings and controls for features that allow you to opt out or opt in to having certain information collected for behavioral advertising purposes. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Services. Webull does not advertise on behalf of specific securities or investment options on our Services.

#### 5. HOW WE PROTECT YOUR INFORMATION

Webull uses reasonable, industry standard security measures to protect information under our control from loss, misuse, and unauthorized access, disclosure, alteration, or destruction, including:

**Data encryption.** We use advanced encryption technologies to protect your data both in transit and at rest. This ensures that your information is secure from unauthorized access during transmission over networks and when stored on our systems.

**Access controls.** We maintain appropriate physical, electronic, and procedural safeguards, including restricting access to personal information on a need-to-know basis, and limiting the amount and type of information available for downloading or transmittal.

**Regular security audits and assessments.** We also regularly conduct audits to ensure the effectiveness of our system. Please understand, however, that no security system is impenetrable. We cannot guarantee that our security measures will prevent hackers from illegally obtaining this information, or that our database and/or systems will not be subject to a cyber-attack.

**Policies and procedures.** Webull retains your personal information for as long as necessary to accomplish the purpose for which it was collected, to meet our legal and regulatory obligations including compliance with our records retention practices, and as permitted to meet our legitimate interests.

**Secure communications channels.** We use secure communication channels, including encrypted email and secure messaging platforms when handling sensitive information. This helps prevent data interception and unauthorized access.

**Employee training and awareness.** All employees undergo regular training on data privacy and security best practices. We emphasize the importance of protecting customer information and ensure that our staff is aware of the latest threats and how to mitigate them.

**Additional Protective Measures.** In addition to the areas highlighted above, we have implemented numerous additional practices designed to protect customer information, including developing incident response plans, implementing controls designed to detect unauthorized access to customer

information, performing regular penetration testing, providing customers with educational material on safeguarding their accounts, implementing a vendor risk management program, and more.

In the unfortunate event of a data breach that compromises your personal information, we will promptly notify you. This notification will include details about the nature of the breach, the types of information that were compromised, and steps you can take to protect yourself from potential harm.

## 6. MANAGING YOUR INFORMATION

There are several ways for you to manage the information collected and processed by Webull, including the following:

**Access and change your information.** If you have an Account, you may access, review, delete and update your information by using our Services. You may also request that we rectify any inaccuracies or incomplete information in your personal data. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases. In a case, we will provide you the reason the modification or removal was not possible.

**Withdraw the consent.** If you have an Account, you may withdraw your consent to our processing of your personal information at any time by contacting us (see [HOW TO CONTACT US](#) below). If you withdraw your consent to any or all use, collection, disclosure, transfer and/or processing of your personal information or do not consent to the collection of your personal information by us, we may not be able to provide or continue providing you with all features or aspects of our existing Services. Please note that withdrawing consent does not affect our right to collect, use, transfer, process and disclose personal data where such collection, usage and disclosure without consent is permitted or required under applicable laws in any jurisdiction.

**Delete your account and/or your personal information.** You may delete your Account at any time through the Webull app (Settings → Account & Security → Delete Account), and your personal information will be deleted in the normal course of business pursuant to our current data retention practices. You may also request to have all your personal information deleted by contacting us. We will comply with deletion requests within a reasonable time to the extent permissible by law; however, we will not delete data that we are legally required to maintain, such as information regulators require for audit or substantiation purposes.

**Limit access to your device data.** You may disconnect our mobile app's access to certain stored device information through your device's settings. For instance, you can withdraw permission for the app to access your contact list or photo gallery.

**Manage communications preferences.** 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.

**Limit mobile ad tracking.** You may set your mobile device to limit ad tracking, in which case we will not be able to see your advertising ID or IDFA. However, we will still share other personal information with our advertising partners as described in this Notice.

**Disabling certain data sharing.** You can limit how we share your data with our marketing partners to market our Services more effectively to you across sites and apps by contacting us. When disabled, we will no longer share personal information with these partners for these purposes.

**Posting information.** Posting personal information in the Webull Community or other public areas will make it publicly available. The personal information you post or share with others may in turn be shared by them with still other users and it may also show up when someone uses a public search

engine (even if that person is not a user of our Service). Do not post personal information in public areas of our Service that you want to keep private.

## **7. TRANSFER OF YOUR INFORMATION**

Our Services are intended for use in the United States. If you are located outside the United States, you may have limited or no access to the Services and your information may be processed in other countries that may not provide levels of data protection that are equivalent to those of the United States. Our Services are hosted in the United States, and we utilize the servers and cloud infrastructure of Amazon Web Services ("AWS") for storage of your data. All data collected by Webull is stored electronically in the U.S.-based infrastructure of AWS, specifically in AWS's North America Cloud with a physical location in Virginia. Our backup data center is located in AWS's North America Cloud with a physical location in California. , Webull will not transfer any personal data relating to a natural person located in the European Economic Area, the United Kingdom, or any other jurisdiction that restricts outbound data transfer, from the country of origin without appropriate safeguards as required by applicable law and regulations. You may receive a copy of those safeguards by contacting us (see [HOW TO CONTACT US](#) below).

## **8. THIRD PARTY SITES**

This Privacy Notice does not apply to the privacy practices of companies that we do not own or control, such as companies that advertise on our Services or with whom we partner for certain services. We are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

## **9. PRIVACY RIGHTS UNDER U.S. STATE LAWS**

Our collection, use, and disclosure of any of your Non-public Personal Information, as such term is defined in the GLBA, is subject to the provisions of the GLBA and implementing regulations. If you are a U.S. resident, you may have additional rights under applicable state privacy laws with respect to our collection, use, and disclosure of your personal information, including without limitation under the laws of the States of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Nevada, Oregon, Tennessee, Texas, Utah, and Virginia. Depending on the state in which you are a resident, such rights may include some or all the following:

- to confirm whether he has collected or processed any of your personal information.
- to request additional information about the type of personal information we collect.
- to correct inaccurate personal information.
- to compel deletion of your personal information; and
- to opt out of the sale or sharing of your personal information for certain purposes or in certain circumstances.

Please note that all information regarding privacy rights under state laws in this Section 9 are provided for informational purposes only and is not intended to provide an exhaustive list of applicable state and federal laws, nor of your potential rights under any such laws. The availability and scope of any additional rights to which you are entitled under applicable state law will vary by state. If you wish to exercise any such right under state law, please contact us by mail at [privacy-us@webull.com](mailto:privacy-us@webull.com) or call us toll free at +1 (888) 828-0618. Please be advised that we will verify all such requests prior to providing any personal information including by requiring you to respond to an email sent to the email you used when making your request and/or the email that pertains to your Account.

### California Residents



California residents have certain rights in respect of their personal information under applicable state laws, including without limitation the California Consumer Privacy Act (“CCPA”) and the California Financial Information Privacy Act. Under the CCPA, California residents have certain rights (set forth below) regarding their Personal Information.

**Right to know.** California residents (and their households) have the right to request certain information about whether we collect, use, disclose and sell personal information about them, and to request to know the personal information that we have. To make such a request, please contact us by mail at [privacy-us@webull.com](mailto:privacy-us@webull.com) or call us toll free at +1 (888) 828-0618. Please be advised that we will verify all such requests prior to providing any personal information including by requiring you to respond to an email sent to the email you used when making your request and/or the email that pertains to your Account. Please be advised that we are only required to respond to two requests per consumer each year. These reports will be provided free of charge.

**Right to request deletion.** If you are a California resident, you may request the deletion of personal information we have collected from you. To make such a request, please contact us by mail at [privacy-us@webull.com](mailto:privacy-us@webull.com) or call us toll free at +1 (888) 828-0618. Please be advised that we will verify all such requests prior to providing any personal information including by requiring you to respond to an email sent to the email you used when making your request and/or the email that pertains to your Account.

**Right to opt out of the “sale” of personal information.** California residents have the right to request that we not sell their personal information to third parties, as California Civil Code Section 1798.140 defines those terms. We do not sell information about you to third parties. To help us deliver advertising and marketing on other platforms, we do allow third parties to collect information through our Services. Please see “Analytics, Tracking and Advertising” above for more details, including choices available to you.

In the past twelve months, we collected personal information as described in [THE INFORMATION WE COLLECT](#) above. We share this information as described in [HOW WE USE AND SHARE YOUR INFORMATION](#) above.

**Nondiscrimination.** We will not discriminate against California residents who exercise their privacy rights.

**Authorized agent.** California residents may use an authorized agent to make requests on their behalf. We require the authorized agent to provide us with proof of the California resident’s written permission (for example, a power of attorney) that shows the authorized agent has the authority to submit a request for the California resident. In addition to providing this proof, the authorized agent must follow the appropriate process described above to make a request.

**California shines the light law.** We do not share your personal information with other businesses or third parties for their own direct marketing purposes.

**Do not track notice.** We do not currently respond or take any action with respect to web browser “do not track” signals or other mechanisms that provide users the ability to exercise choice regarding the collection of personal information about that user’s online activities over time and across third-party web sites or online services. We may allow third parties, such as companies that provide us with analytics tools, to collect personal information about your online activities over time and across different apps or web sites when you use our Services.

## 10. CHANGES TO THIS NOTICE

We may update or revise this Notice at any time with or without notice to you. We will post the latest version of this Notice on our website. Your continued use of our Services is deemed your consent to the revised version.



## **11. HOW TO CONTACT US**

If you have any questions, comments, or suggestions about this Notice or your personal information, please contact us by phone at +1 (888) 828-0618 or via email at [privacy-us@webull.com](mailto:privacy-us@webull.com).

# FACTS

## WHAT DOES WEBULL FINANCIAL LLC DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect, and share depend on the product or service you have with us. This information can include but not limited to:</p> <ul style="list-style-type: none"> <li>• Social Security number and income.</li> <li>• Name, Address, and Phone number.</li> <li>• Account balances and transaction history.</li> </ul>
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Webull Financial LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Webull Financial LLC share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
<b>For our marketing purposes—</b> to offer our products and services to you	YES	NO
<b>For joint marketing with other financial companies</b>	NO	WE DON'T SHARE
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	YES	NO
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	YES	YES
<b>For our affiliates to market to you</b>	YES	YES
<b>For nonaffiliates to market to you</b>	NO	WE DON'T SHARE

To limit our sharing	<ul style="list-style-type: none"> <li>• Email <a href="mailto:support@webull-us.com">support@webull-us.com</a></li> <li>• Call <b>(888) 828-0618</b>—our menu will prompt you through your choice(s)</li> </ul> <p><b>Please note:</b></p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
Questions?	Call (888) 828-0618 or Contact our Help Desk at <a href="mailto:support@webull-us.com">support@webull-us.com</a>

## Who we are

### Who is providing this notice?

Webull Financial LLC & its affiliates

## What we do

### How does Webull Financial LLC protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

To learn more about security at Webull, please visit [www.webull.com](http://www.webull.com).

### How does Webull Financial collect my personal information?

We collect your personal information, for example, when you

- Open an account or give us your income information.
- Make deposits or withdrawals from your account.

We also collect your personal information from other sources.

### Why can't I limit all sharing?

Federal law gives you the right to limit only.

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you.
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

### What happens when I limit sharing for an account, I hold jointly with someone else?

Your choices will apply to everyone on your account.

## Definitions

### Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include Webull Advisors LLC, and Webull Technologies PTE. LTD.

### Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies. Webull Financial LLC does not share your personal information with nonaffiliates so they cannot market to you

### Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

## Other valuable information

California residents: Please go to [www.webull.com](http://www.webull.com) to learn more about our Privacy Notice for California Residents.

Nevada residents: We do not sell consumers' covered information for monetary consideration.

Vermont residents: We will automatically limit sharing of your information.