

California Consumer Privacy Act

Notice to California Residents

We at eToro USA LLC and eToro USA Securities Inc. (collectively “eToro,” “we,” “us,” or “our”) have created this Notice for California Residents (the “CCPA Notice”) to supplement the [Privacy Policy](#). This CCPA Notice applies solely to all natural persons who reside in the State of California (“Consumers” or “you”), and visit or use our website located at <https://www.eto.com/en-us/> (the “Website”) or our mobile application, purchase products or services from us, or otherwise engage or interact with us (the “Services”). We adopted this notice to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act, Cal. Civ. Code § 1798.100 et. seq. (“CCPA”) and their implementing regulations. Any terms not defined in this CCPA Notice shall have the meaning ascribed to them elsewhere in the Privacy Policy or Customer Agreement, or, if not defined herein or elsewhere in the [Privacy Policy](#) or [Customer Agreement](#), in the CCPA.

To the extent there is any conflict between this CCPA Notice and the provisions of the Privacy Policy, this CCPA Notice shall control only with respect to Consumers and their Personal Information (as defined below). If you reside outside of the State of California, this CCPA Notice does not apply to you and you should refer to our [Privacy Policy](#).

Definition of Personal Information

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer, household, or device (“Personal Information”).

Personal Information does not include: (i) publicly available information (a) from government records; (b) information lawfully made available to the public by the Consumer or from widely distributed media; (c) information made available by a person to whom the Consumer disclosed the information if the Consumer has not restricted the information to a specific audience; (ii) de-identified or aggregated Personal Information; or (iii) information explicitly excluded as Personal Information under the CCPA, including:

- Personal Information (health or medical information) covered by the Health Insurance Portability and Accountability Act of 1996, the California Confidentiality of Medical Information Act, or clinical trial data, and
- Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, or the Driver’s Privacy Protection Act of 1994.

How we collect, use, and disclose Personal Information

The Personal Information about you that we may collect, use, and disclose includes information within the below “Categories of Personal Information Collected.” These categories also represent the categories of Personal Information we have collected over the past 12 months. Note the

categories listed below refer to the categories of Personal Information as defined under the CCPA. Inclusion of a category in the list below indicates only that, depending on the services and products we provide you, we may collect or disclose some information within that category. It does not necessarily mean that we collect or disclose all information listed in a particular category for all of our customers.

We may disclose your Personal Information to the following categories of recipients:

- Service Providers, which include IT and cloud hosting companies, payment providers, transactions reporting providers, customer relationship management, email marketing providers, analytics providers, and providers of administrative services (“Service Providers”)
- Affiliates and subsidiaries of eToro and other members in the eToro group of companies (“Affiliates”)
- Other eToro customers or users of the Services who opted-in to make their profile and trading activities public (“Other Customers”)

Categories of Personal Information collected	Sources	Examples of how we may use Personal Information	Parties with whom each category of Personal Information may be disclosed
<p>Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.</p> <p>Any Personal Information listed in Cal. Civ. Code § 1798.80(e) such as name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p> <p>Audio, electronic, visual or similar information.</p>	<p>Information you provide to us when, for example, you create an eToro Account, participate in any interactive features of the Services, fill out a form, participate in a contest or promotion, make a purchase, communicate with us via third party social media sites, request customer support, or otherwise communicate with us</p> <p>Information automatically collected when you access or use our Services</p> <p>Information collected from third party entities, such as verification agencies, credit referencing agencies, and third party platforms when you use them to connect to eToro</p>	<p>Create and maintain your eToro Account</p> <p>Contact you about your eToro Account and/or Services including responding to your inquiries</p> <p>Comply with our regulatory and other legal obligations</p> <p>Provide you with marketing materials, including about the Services offered to members of the eToro Group</p> <p>Assess your credit risk, risk score, and eligibility as a client</p> <p>Maintain administrative records</p> <p>Set up security measures for your Account</p> <p>Administer transactions including deposits, chargebacks, and payments</p> <p>Provide our Services</p> <p>Participate in crime prevention and to assist regulatory, cybercrime, data and information protection agencies and police with their enquiries and enforcement</p>	<p>Service Providers</p> <p>Affiliates</p>

		<p>Novate, transfer or assign any of the rights or liabilities of the eToro entity</p> <p>At your request, to invite individuals to join eToro</p>	
<p>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a Consumer’s interaction with an internet website application, or advertisement.</p> <p>Geolocation data</p>	<p>Information automatically collected when you access or use our Services</p>	<p>Contact you about your eToro Account and/or Services including responding to your inquiries</p> <p>Comply with our regulatory and other legal obligations</p> <p>Provide you with marketing materials, including about the Services offered to members of the eToro Group</p> <p>Set up security measures for your Account</p> <p>Monitor and analyze our business</p> <p>Provide our Services</p> <p>Participate in crime prevention and to assist regulatory, cybercrime, data and information protection agencies and police with their enquiries and enforcement</p>	<p>Service Providers</p> <p>Affiliates</p>
<p>Inferences drawn from any of the Personal Information identified in the CCPA</p>	<p>Information automatically collected when you access or use our Services</p>	<p>Create and maintain your eToro Account</p> <p>Provide you with marketing materials, including about the Services offered to members of the eToro Group</p> <p>Assess your credit risk, risk score, and eligibility as a client</p> <p>Monitor and analyze our business</p> <p>Provide our Services</p>	<p>Service Providers</p> <p>Affiliates</p>

In addition to the categories of Personal Information above, we have collected the following Categories of Sensitive Personal Information from or about Consumers within the twelve (12) months preceding the Last Update:

Categories of Sensitive Personal Information Collected	Sources	Examples of how we may use Sensitive Personal Information	Parties with whom each category of Sensitive Personal Information may be disclosed
<p>Personal Information that reveals Consumers' social security, driver's license, state identification card, or passport numbers.</p> <p>Personal Information that reveals a consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.</p>	<p>Information you provide to us when, for example, you create and use an eToro Account, participate in any interactive features of the Services, fill out a form, participate in a contest or promotion, make a purchase, communicate with us via third party social media sites, request customer support, or otherwise communicate with us</p>	<p>Create and maintain your eToro Account</p> <p>Comply with our regulatory and other legal obligations</p> <p>Assess your credit risk, risk score, and eligibility as a client</p> <p>Maintain administrative records</p> <p>Set up security measures for your Account</p> <p>Administer transactions including deposits, chargebacks, and payments</p> <p>Provide our Services</p> <p>Participate in crime prevention and to assist regulatory, cybercrime, data and information protection agencies and police with their enquiries and enforcement</p>	<p>Service Providers</p> <p>Affiliates</p>

In the twelve (12) months preceding the Last Update, we may have disclosed to recipients the following Categories of Personal Information for a Business Purpose:

Categories of Personal Information	Business Purpose for Disclosure	Categories of Recipients
Identifiers	<p>Set up and maintain security and integrity measures</p> <p>Create and maintain your eToro account and provide customer service</p>	Service Providers; Affiliates; Other Customers
Categories of Personal Information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	<p>Set up and maintain security and integrity measure</p> <p>Create and maintain your eToro account and provide customer service</p>	Service Providers; Affiliates
Commercial information	<p>Set up and maintain security and integrity measures</p> <p>Create and maintain your eToro account and provide customer service</p>	Service Providers; Affiliates; Other Customers
Internet or other similar network activity	<p>Set up and maintain security and integrity measures</p> <p>Create and maintain your eToro account and provide customer service</p>	Service Providers; Affiliates
Sensory data	<p>Set up and maintain security and integrity measures</p>	Service Providers; Affiliates

	Create and maintain your eToro account and provide customer service	
Inferences drawn from other Personal Information	Set up and maintain security and integrity measures Create and maintain your eToro account and provide customer service	Service Providers; Affiliates

Retention of Personal Information

We store the information we collect on you for as long as is necessary for the purpose(s) for which we originally collected it, including to meet our legal, regulatory, or other compliance obligations. The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation.

If you have an eToro Account, we will store your personal information for as long as you maintain that account, and after you cease holding an account, for as long as we are required to by laws and regulations that are applicable to us.

Sales and Sharing of Personal Information

In the twelve (12) months preceding the Last Update, we have not sold Personal Information or shared Personal Information with third parties for cross-context behavioral advertising.

Your Rights and Choices

The CCPA provides Consumers with specific rights regarding their Personal Information. This section describes such rights and explains how to exercise them.

Right to Know About Personal Information

You have the right to request that we disclose certain information to you about our collection, disclosure, sale, and use of your Personal Information. Once we receive and verify your request, we will disclose to you the following (to the extent applicable to your request):

- The Categories of Personal Information we have collected about you in the preceding twelve (12) months
- The Categories of Sources from which the Personal Information was collected
- Our Business or Commercial Purpose for collecting that Personal Information
- The categories of third parties to whom we disclose that Personal Information
- Categories of Personal Information that we disclosed about you for a Business Purpose
- The specific pieces of Personal Information we collected about you

Right to Request Deletion

You have the right to request that we delete any of the Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and verify your request, we will delete (and direct our service providers and contractors to delete) your Personal

Information from our records, unless an exception applies (such as a regulatory requirement to maintain such information).

Right to Request Correction

You have the right to request correction of any mistakes in your Personal Information. We may not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect; data solely retained for data backup purposes is generally excluded.

Exercising Your Rights

To exercise any of the rights described above, please submit a verifiable Consumer request to us by submitting your request to <https://www.eto.com/customer-service/>. You can also submit a request via email to privacy@eto.com or via phone at 1-888-271-8365. You may only make a verifiable Consumer request under the right to know twice within a 12-month period.

The verifiable Consumer request must: (i) provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and (ii) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information related to you.

Making a verifiable Consumer request does not require you to create an account with us.

Verification Process

To submit a verifiable Consumer request, the Consumer may be required to provide additional Personal Information, to enable us to verify the Consumer's identity with the degree of certainty required by the CCPA.

We will use Personal Information provided in a verifiable Consumer request solely for the purpose of verifying the requestor's identity or authority to make the request. We or a third party on our behalf may follow up with you to determine whether a request is a verifiable Consumer request under applicable law.

If we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you, we will deny the Consumer request in whole or in part and will not disclose, delete, or correct the information requested, as applicable. We will respond to any such Consumer request with a denial and will also explain why it has no reasonable method by which it can verify the identity of the requestor.

Response Timing and Format

We will confirm receipt of a verifiable Consumer request within ten (10) business days of its receipt. We will endeavor to respond to a verifiable Consumer request within forty-five (45) calendar days of its receipt. If we require more time, we will notify you of the extension and provide an explanation of the reason for the extension in writing, and we will provide you with a response no later than ninety (90) calendar days of receipt of the request.

If you have an account with us, we may deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. If you do not have an account with us, and you do not indicate a preference for delivery, we will use our discretion in choosing the method of delivery of the information.

If applicable, the response we provide will explain the reasons we cannot comply with a request. For data portability requests, we will select a format to provide your Personal Information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We may charge a reasonable fee to process or respond to your verifiable Consumer requests if they are excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for this decision and provide you with a cost estimate before completing your request.

Right to Opt-Out of the Sale or Sharing of Personal Information

We do not sell or share for cross-context behavioral advertising the Personal Information of Consumers (including minors under 16 years of age). However, you do have the right to direct us to not sell or share your Personal Information at any time should we begin to do so.

Right to Limit Use and Disclosure of Sensitive Personal Information

We only use or disclose sensitive Personal Information to the extent necessary to perform the services or provide the goods requested by you or as otherwise permitted under applicable law. However, if we use or disclose sensitive Personal Information for other purposes in the future, you will have the right to limit the use and disclosure of sensitive Personal Information we collect or maintain, to only those purposes necessary to provide our services or as otherwise permitted by law.

Right to Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. We will not (i) deny you products or services, (ii) charge you different prices or rates for products or services, including through granting discounts or other benefits, or imposing penalties, (iii) provide you a different level or quality of products or services, and (iv) suggest that you may receive a different price or rate for products or services or a different level or quality of products or services.

Right to Designate an Authorized Agent

If you submit a request to know, correct, or delete your personal information using an authorized agent, we may require that you (i) provide the authorized agent written permission to act on your behalf, and (ii) verify their identity directly with us. We may deny a request from an authorized agent that does not submit proof of authorization.

Other California Privacy Rights

Pursuant to California's "Shine the Light" law (Civil Code Section § 1798.83), California residents have the right to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. To make such a request, please submit your request to <https://www.eto.com/customer-service/>.

Changes to Our CCPA Notice

This CCPA Notice is effective as of the date of the Last Update stated at the top of this CCPA Notice. We may change this CCPA Notice from time to time with or without notice to you. By visiting or accessing the Website or the Services, purchasing products or services from us, or otherwise engaging or interacting with us after we make any such changes to this CCPA Notice, you are deemed to have accepted such changes. You can find the latest version of this document in the [Privacy section](#) of eToro's [Disclosure Library](#).

Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your information, your choices, and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

eToro USA
221 River Street, 9th Fl
Hoboken, New Jersey 07030
[https://www.eto.com/en-us/
privacy@eto.com](https://www.eto.com/en-us/privacy@eto.com)
1-888-271-8365