

Third-Party Brokerage Account Connection Disclosure

Effective Date: November 15, 2025

Before you connect your third-party brokerage accounts to the Compass AI platform, please take a moment to read and understand the following information about how we collect, use, and protect your brokerage account data.

Third-Party Brokerage Accounts

Compass AI Data Services, LLC ("Compass AI", "we", "us", or "our") provides the option to connect third-party brokerage accounts through our partnership with Plaid for enhanced portfolio tracking and information filtering. By choosing to connect your brokerage accounts, you acknowledge that these accounts are not directly managed or controlled by Compass AI.

Important: Compass AI provides READ-ONLY access to your brokerage data. We DO NOT have the ability to execute trades, transfer funds, or make any transactions on your behalf.

Brokerage Account Connections & Use of Portfolio Data

When you choose to connect a brokerage account to our Platform via Plaid or through a direct partnership with your brokerage firm, you instruct and authorize us to retrieve and process certain account information on an ongoing basis.

Information We Collect

The types of information we may collect from your connected brokerage accounts include:

Holdings and Positions:

- Security identifiers (ticker symbols, CUSIP, ISIN)
- Quantity of shares or units held
- Cost basis (where available)
- Current market value
- Account balances
- Deposit and withdrawal history

Trading Activity and History:

- Order history
- Execution details (buy/sell side, price, quantity)
- Trade timestamps
- Transaction types

We collect only what is reasonably necessary to provide the features you elect to use. The specific data accessed depends on what your brokerage makes available through Plaid and the permissions you grant.

How We Use This Information

We use connected brokerage account information to provide the following features and services:

News & Event Notifications

Purpose: Identify securities you hold and generate notifications or updates when relevant market events occur.

Examples:

- News articles mentioning stocks in your portfolio
- Earnings announcements for held securities
- Significant price movements in your holdings
- Regulatory filings (SEC filings, 8-K, 10-K, 10-Q)
- Corporate actions (dividends, splits, mergers)
- Market developments affecting your holdings

Analytics & Reporting

Purpose: Create and deliver portfolio analytics, performance summaries, exposure assessments, and other analysis derived from your holdings and trading activity.

Examples:

- Portfolio composition and sector exposure
- Performance tracking and attribution
- Sentiment analysis for held securities
- Risk metrics and diversification analysis
- Historical performance comparisons
- Holdings-based insights generation

Personalization & Improvement

Purpose: Tailor content delivery and filter information to show data most relevant to your tracked securities.

Examples:

- Filtering news streams to prioritize holdings
- Organizing insights by portfolio relevance
- Customizing dashboard views
- Improving platform functionality based on usage patterns
- Supporting fraud prevention and security measures
- Ensuring compliance with platform policies

Aggregated/De-identified Use

Purpose: Produce aggregated or de-identified statistics and insights that do not reasonably identify you individually.

Examples:

- Market-wide holding trends
- Popular stock holdings across user base
- Aggregated sector allocations
- Platform usage analytics
- Product improvement research

We may use aggregated or de-identified data to enhance our products and services, conduct research, or share anonymized market insights publicly.

Limits on Use and Disclosure

What We DON'T Do

We DO NOT:

- Use brokerage account information for purposes inconsistent with this disclosure or our Privacy Policy
- Provide personalized investment advice based on your portfolio
- Make recommendations to buy, sell, or hold specific securities based on your holdings
- Execute trades or initiate transactions on your behalf

- Act as a fiduciary or investment adviser
- Sell your personal brokerage account information to third parties

Important Compliance Note: Features that filter or organize information based on your portfolio are designed to improve information delivery efficiency and relevance. These features DO NOT constitute personalized investment advice. We are an information provider, not an investment adviser.

When We May Share Your Data

We share portfolio data only in the following limited circumstances:

Service Providers: With contracted third-party service providers who process data on our behalf under strict confidentiality and security obligations. Examples include:

- Cloud hosting providers
- Data analytics services
- Security and fraud prevention services
- Customer support platforms

Plaid: With Plaid Technologies, Inc., our brokerage connection partner, to facilitate account linking and data retrieval. Plaid's use of your data is governed by their Privacy Policy.

Legal Requirements: When required by law, regulation, legal process, or governmental request, including:

- Compliance with court orders or subpoenas
- Enforcement of our Terms of Service
- Protection of our rights or property
- Investigation of fraud or security issues

Business Transfers: In connection with a merger, acquisition, or sale of assets, subject to confidentiality obligations.

With Your Consent: When you explicitly authorize us to share your data for a specific purpose.

What We Don't Share

- We do not sell your personal information to third parties
- We do not share brokerage account information for cross-context behavioral advertising
- We do not share your data with marketers or advertisers without your consent

Your Choices & Retention

Disconnecting Your Account

You may disconnect your brokerage account at any time through:

- Your account settings on the Platform
- Contacting us at support@compassaihq.com
- Revoking access through Plaid's portal

After disconnection:

- We stop retrieving new data from your brokerage account
- We will delete or de-identify previously retrieved brokerage data in accordance with our retention policy
- Some data may be retained if required for legal, regulatory, audit, or security reasons
- Aggregated/de-identified data that does not identify you may be retained indefinitely

Managing Preferences

You may manage notification and alert preferences in your account settings, including:

- Types of notifications you receive
- Frequency of alerts
- Delivery methods (email, in-app)

Data Retention

We retain brokerage account data for as long as your account is active and your brokerage connection is maintained. After disconnection or account closure, we will delete or de-identify your data according to our retention schedule, unless retention is required by law.

Rights Under GDPR (EEA/UK)

If you are located in the European Economic Area (EEA) or the United Kingdom, you have rights under the General Data Protection Regulation (GDPR) and UK GDPR, subject to certain conditions and exceptions:

Your Rights

Right of Access: To obtain a copy of the personal data we hold about you, including brokerage account information.

Right to Rectification: To request correction of inaccurate or incomplete data.

Right to Erasure ("Right to be Forgotten"): To request deletion of your personal data, where applicable and legally permissible.

Right to Restriction of Processing: To limit how we use your data in certain circumstances.

Right to Data Portability: To receive your data in a structured, commonly used, and machine-readable format and transmit it to another controller.

Right to Object: To object to processing based on our legitimate interests or for direct marketing purposes.

Right to Withdraw Consent: Where processing is based on consent, you may withdraw it at any time without affecting prior lawful processing.

Legal Bases for Processing

We process your brokerage account information based on:

Performance of Contract: Where access to brokerage data is required to deliver requested services and features you have elected to use.

Legitimate Interests: Our legitimate interests in operating, securing, and improving the Platform, analyzing usage patterns, preventing fraud, and developing new features.

Compliance with Legal Obligations: To comply with applicable laws, regulations, or legal processes.

Consent: Where required by law, we will obtain your explicit consent before processing certain categories of data.

Exercising Your Rights

To exercise any of your GDPR rights, please contact us at support@compassaihq.com. We will respond to your request within the timeframes required by applicable law (generally within 30 days).

You also have the right to lodge a complaint with your local supervisory authority if you believe we have violated your data protection rights.

Rights Under California Law (CCPA/CPRA)

If you are a California resident, you may have rights under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA).

Your California Rights

Right to Know: You have the right to request:

- Categories of personal information we collect about you
- Categories of sources from which we collect personal information
- Our business or commercial purposes for collecting or selling personal information
- Categories of third parties with whom we share personal information
- Specific pieces of personal information we hold about you

Right to Delete: You have the right to request deletion of personal information we have collected from you, subject to legal exceptions such as:

- Completing transactions
- Detecting security incidents or fraud
- Complying with legal obligations
- Internal uses reasonably aligned with your expectations

Right to Correct: You have the right to request correction of inaccurate personal information.

Right to Opt-Out: You have the right to opt out of the "sale" or "sharing" of personal information.

Note: We do not sell or share brokerage account information as defined under CCPA/CPRA.

Right to Non-Discrimination: You have the right to not receive discriminatory treatment for exercising your CCPA/CPRA rights.

Right to Limit Use of Sensitive Personal Information: While brokerage account data may constitute sensitive personal information, we do not use it for purposes that would trigger the right to limit use under CPRA.

Exercising Your California Rights

To exercise your California privacy rights, you may:

- Email us at support@compassaihq.com
- Submit a request through your account settings
- Call our support line (if available)

Verification: We will verify your request consistent with CCPA requirements. We may ask for additional information to confirm your identity before processing your request.

Authorized Agents: You may designate an authorized agent to submit requests on your behalf. We will require verification of the agent's authority.

Response Time: We will respond to verifiable requests within 45 days, with an option to extend by an additional 45 days if necessary.

Automated Processing & Disclaimers

AI-Powered Features

Some Platform features use automated processing and AI analysis to:

- Surface relevant news and events related to your holdings
- Generate analytics and insights based on your portfolio
- Assess market trends affecting your tracked securities
- Identify anomalies or noteworthy patterns

Important Disclaimers

These AI-powered outputs are for informational purposes only. They are not intended to:

- Provide personalized investment advice
- Recommend specific investment actions
- Produce legal or other professional advice
- Create significant effects concerning your legal rights or status

The outputs do not constitute investment advice, recommendations, or trading instructions. All investment decisions are your responsibility.

AI systems can make errors: Automated analysis may contain inaccuracies, outdated information, or fail to account for relevant factors. Always conduct independent verification before making decisions.

For additional information about limitations of liability and disclaimers, please see:

- **Main Disclaimer:** <https://compassaihq.com/agreement/CompassAI-Disclaimer.pdf>
- **Terms of Service:** <https://compassaihq.com/agreement/Terms-of-Service.pdf>
- **Privacy Policy:** <https://compassaihq.com/agreement/Privacy-Policy.pdf>

Security and Privacy

Our Security Measures

Compass AI employs advanced security measures to protect your brokerage account data, including:

- Encryption of data in transit and at rest
- Secure authentication protocols
- Regular security audits and assessments
- Access controls and monitoring
- Compliance with industry security standards

Plaid Security

Plaid Technologies, Inc. is a leading financial technology company that facilitates secure connections to financial institutions. Plaid uses bank-level encryption and security protocols to protect your credentials and data.

Important: When connecting your brokerage account, you provide your credentials directly to Plaid, not to Compass AI. Plaid encrypts and securely stores this information. Compass AI never receives or stores your brokerage login credentials.

For more information about Plaid's security practices, please review Plaid's Privacy Policy and security documentation.

Your Responsibility

While we implement robust security measures, no system is completely secure. Please ensure that:

- You use a strong, unique password for your Compass AI account
- You enable two-factor authentication if available
- You keep your devices and software up to date
- You monitor your account for suspicious activity
- You review the security protocols of your brokerage provider

Please review the Compass AI Privacy Policy at <https://compassaihq.com/agreement/Privacy-Policy.pdf> to learn more about how we protect your information.

Authorization and Consent

By connecting your third-party brokerage accounts to Compass AI, you:

1. **Grant Authorization:** You authorize Compass AI to access and retrieve financial data from your connected brokerage accounts through Plaid or direct integrations.
2. **Acknowledge Read-Only Access:** You understand that this access is limited to READ-ONLY permissions. Compass AI will not make any transactions, trades, transfers, or withdrawals on your behalf.
3. **Confirm Ownership:** You represent that you are the authorized account holder or have permission to connect the brokerage accounts.
4. **Accept Data Use:** You consent to our use of brokerage account data as described in this disclosure and our Privacy Policy.
5. **Understand Limitations:** You acknowledge that we are an information provider, not an investment adviser, and that filtered information based on your portfolio does not constitute personalized investment advice.

Accuracy of Information

Compass AI relies on the accuracy of information provided by connected third-party brokerage accounts through Plaid. It is your responsibility to ensure that:

- Your brokerage account information is current and accurate
- You review our analysis and insights for accuracy
- You verify critical information through your brokerage's official statements
- You report any discrepancies to us promptly

Compass AI is not liable for any inaccuracies in information obtained from third-party sources, including brokerages, Plaid, or data providers.

Risk and Responsibility

Investment Risks

Investing in financial markets involves inherent risks. Compass AI does not provide investment advice, and any information, analysis, or insights generated based on data obtained from linked accounts are for informational purposes only.

Past performance is not indicative of future results. You should:

- Conduct your own independent research
- Assess your own risk tolerance
- Consult with licensed financial professionals as appropriate
- Verify information before making investment decisions
- Not rely solely on Platform content for investment decisions

Technical Compatibility and Limitations

Compatibility: Ensure that your third-party brokerage accounts are compatible with Compass AI's linking system through Plaid. Not all brokerage firms are supported.

Technical Issues: Technical issues, changes in third-party APIs, network outages, system maintenance, or data inaccuracies may impact the linking process or data quality.

Compass AI is not responsible for:

- Brokerage API changes or discontinuations
- Network outages or connectivity issues
- System issues at your brokerage or Plaid
- Data inaccuracies originating from your brokerage
- Compatibility issues with certain brokerages
- Service interruptions or data delays

Review and Updates

Periodic Review: We recommend that you periodically review your connected accounts and update authorization settings as necessary.

Policy Changes: We reserve the right to modify or discontinue third-party brokerage linking features without prior notice. Changes to this disclosure will be reflected in the "Effective Date" at the top of this document.

Notification of Changes: We will make reasonable efforts to notify you of material changes to how we use your brokerage account data, but your continued use of connected accounts after changes constitutes acceptance.

Contact and Support

If you have questions, concerns, or issues related to connected brokerage accounts, please contact us:

Compass AI Data Services, LLC

Email: support@compassaihq.com

Website: compassaihq.com

For issues specifically related to Plaid connections, you may also contact Plaid support or visit their help center.

Confirmation

By proceeding to connect your third-party brokerage accounts to Compass AI, you confirm that you have read, understood, and agreed to the terms outlined in this disclosure.

If you do not agree with these terms, please do not connect your brokerage accounts to the Platform.

Compass AI Data Services, LLC

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Additional Resources:

- **Terms of Service:** <https://compassaihq.com/agreement/Terms-of-Service.pdf>
- **Main Disclaimer:** <https://compassaihq.com/agreement/CompassAI-Disclaimer.pdf>
- **Privacy Policy:** <https://compassaihq.com/agreement/Privacy-Policy.pdf>