

Customer Identification Program Notice

Important Information You Need to Know About Opening a New Account

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify and record information that identifies each person or entity who opens an account. This notice is designed to answer some questions about Clear Street LLC's ("Clear Street" or, the "Firm") Customer Identification Program.

What types of information will I need to provide?

When you open an account, Clear Street is required to collect information from you which includes but is not limited to: full legal name; date of birth; residential address; and government issued identification number, such as a driver's license or U.S. passport; non-U.S. passport number and country of issuance; alien identification card number; or other government-issued identification showing nationality, residence and a photograph of you.

You will also need to provide a copy of your driver's license, passport or other identifying documents and additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives and risk tolerance so that Clear Street can comply with U.S. Department of the Treasury, U.S. Securities and Exchange Commission ("SEC"), and rules of the Financial Industry Regulatory Authority, Inc. ("FINRA").

A corporation, partnership, trust or other legal entity is required to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, authorized traders, a partnership agreement or a trust agreement. Certain legal entities will also be required to provide information and identifying documents for its beneficial owners and control person(s), as well as a listed of personnel authorized to act on its behalf.

What happens if I don't provide the information requested or my identity can't be verified?

Clear Street may not be able to open an account or carry out transactions for you. If Clear Street has already opened an account for you, we may have to close it. You will be responsible for any losses or damages (including, but not limited to, lost opportunities) that may result if your account is restricted or closed.

Prohibited Accounts - Section 311 Notice

Pursuant to U.S. regulations issued under Section 311 of the USA PATRIOT Act, 31 CFR 103.193, Clear Street is prohibited from establishing, maintaining, administering or managing correspondent accounts for, or on behalf of: Bank of Dandong; Burma; Commercial Bank of Syria (Includes Syrian Lebanese Commercial Bank); Democratic People's Republic of Korea; FBME Bank Ltd.; Halawi Exchange Co.; Islamic Republic of Iran; and Kassem Rmeiti & Co. For Exchange; or other foreign jurisdictions, institutions, classes of transactions or types of accounts which are identified as a "primary money laundering concern" under the USA PATRIOT Act.

Regulations also require us to notify you that you may not provide any of the aforementioned entities or their subsidiaries with access to the account(s) that you hold with us. If we become aware that one of these entities or any of their subsidiaries is indirectly using the account that you hold with us, we will be required to take appropriate steps to prevent such access including, where necessary, terminating your account(s). Updated Section 311 Special Measures can be viewed at: <https://www.fincen.gov/resources/statutes-and-regulations/311-special-measures>.

Prohibited Accounts – US Department of the Treasury OFAC

The Office of Foreign Assets Control (OFAC) maintains lists of individuals, entities and targeted countries; Specially Designated Nationals and Blocked Persons List (SDN), Foreign Sanctions Evaders (FSE) List and the Sectoral Sanctions Identifications (SSI) List which U.S. persons and entities are generally prohibited from doing business with. Clear Street may not establish, maintain, administer or manage an account for, or on behalf of individuals or entities identified on OFAC Lists. More information concerning OFAC lists may be viewed at: <https://www.treasury.gov/resource-center/sanctions/Pages/default.aspx>

Important Information

Notice Regarding Privacy and Confidentiality of Electronic Communications

Clear Street archives electronic communications pursuant to regulatory requirements and monitors and reviews the content of electronic communications. Clear Street utilizes third party vendors in the conduct of its business, including third party vendors who provide cloud-based electronic storage solutions. Client information, including personally identifying information, is retained in cloud-based storage solutions provided by these vendors. Data which is stored in these solutions is encrypted in transit and at rest.

No investment, legal or tax advice provided

Clear Street does not provide investment, legal or tax advice. No one associated with Clear Street is authorized to render such advice. You should not rely upon any such advice, if given. The Firm explicitly disclaims any responsibility for product suitability or its clients' investment decisions. Please refer to our Form CRS for information about the types of accounts we offer and the services that we provide. Form CRS is available on FINRA BrokerCheck by clicking on the button titled Relationship Summary:

<https://brokercheck.finra.org/firm/summary/288933>

Use of Order and Trade Data

Clear Street may use certain order and execution data (“trade data”) for bona-fide business purposes. For example, the Firm disseminates aggregated trade data to “trade advertisement” vendors. Trade data is anonymized when it is distributed externally for trade advertisement purposes. Clients may elect to opt out of having their trade data included in Clear Street’s advertised volume by sending an email to Support@clearstreet.io.

Customer Complaints

Any complaints relating to your account should be directed to the Firm’s Compliance Department at:

Clear Street LLC
4 World Trade Center
150 Greenwich Street
45th Floor
New York, NY 10007
Attention: Compliance Department

Or by email to: CSCompliance@clearstreet.io

FINRA BrokerCheck

Clear Street is a member of FINRA, which provides investors with a free tool called BrokerCheck that you can utilize to research the professional backgrounds of current and former FINRA-registered brokerage firms and personnel. The telephone number for BrokerCheck is 800-289-9999 and the website address is <https://brokercheck.finra.org>. You may access information about Clear Street by using BrokerCheck's "firm" search tool. Our CRD number is 288933.

Futures Customers

Clear Street is registered as an introducing broker (IB) with the National Futures Association ("NFA"). Information about the Firm is available on the NFA's BASIC system via the following link: <https://www.nfa.futures.org/basicnet/>.

Statement of Financial Condition: FINRA Rule 2261

Clear Street's Statement of Financial Condition is available to the Firm's customers. If you would like to request a copy please submit a written request to Clear Street LLC, Compliance Department, 4 World Trade Center, 150 Greenwich Street, 45th Floor, New York, NY 10007. The Statement of Financial Condition is also posted on the Firm's public website at www.clearstreet.io.

SIPC Coverage

Clear Street is a member of the Securities Investor Protection Corporation ("SIPC"). SIPC currently protects the securities in customer accounts up to a maximum of \$500,000.00., no more than \$250,000.00 of which may be cash. Money fund balances and repurchase/reverse repurchase transactions are excluded from this protection.

SIPC is not the same as or a substitute for FDIC deposit insurance and it does not protect against declines in the market value of your securities. Any oral communication regarding your account should be re-confirmed in writing in order to protect your rights, including your rights under the Securities Investor Protection Act ("SIPA"). You may obtain information about SIPC, including the SIPC brochure, by contacting SIPC at www.sipc.org or at (202) 371-8300. SIPC does not protect the account of a broker dealer or bank when acting for itself rather than its customers.

Margin Disclosure Statement: FINRA Rule 2264

When you purchase securities, you may pay for the securities in full or you may borrow part of the purchase price from Clear Street. If you choose to borrow funds from Clear Street, you will open a margin account. The securities purchased are collateral for the loan made to you. If the securities in your account decline in value, so does the value of the collateral supporting your loan and as a result, Clear Street can take action, such as issue a margin call and/or liquidate securities in your account, in order to maintain the required equity in your account.

It is important that you fully understand the risks associated with trading securities on margin. These risks include the following:

- You can lose more funds than you deposit in the margin account. A decline in the value of securities that are purchased on margin may require you to provide additional funds to Clear Street in order to avoid the forced sale of those securities or other securities in your account.
- Clear Street can force the sale of securities in your account. If the equity in your account falls below the maintenance margin requirements under the law, or Clear Street's higher "house" margin requirements, Clear Street can liquidate the securities in your account to cover the margin deficiency. You will be responsible for any shortfall in the account after such actions are taken.
- Clear Street can liquidate securities without contacting you. Some investors mistakenly believe that a firm must contact them for a margin call to be valid, and that the firm cannot liquidate securities in their accounts to meet the call unless the firm has contacted them first. This is not the case. Clear Street will attempt to notify you of margin calls, but we are not required to do so. Even if we have contacted you and provided a specific date by which you can meet a margin call, Clear Street can still take necessary steps to protect its financial interest, including by immediately liquidating securities without notice to the customer.
- You are not entitled to choose which security in your margin account is liquidated or sold to meet a margin call. Because the securities are collateral for the margin loan, Clear Street has the right to decide which securities to liquidate to protect its interests.
- Clear Street can increase its "house" maintenance requirement at any time and is not required to provide you with advance notice. Changes in our policy often take effect immediately and may result in the issuance of a margin call. Your failure to satisfy the call may cause Clear Street to liquidate securities in your account.

- You are not entitled to an extension of time on a margin call. While an extension of time to meet margin requirements may be available to customers under certain conditions, a customer does not have a right to the extension.
- The IRS requires broker-dealers to treat dividend payments on loaned securities as a “substitute payment” in lieu of a dividend. A substitute payment is not a qualified dividend.
- Industry regulations may limit, in whole or part, your ability to exercise voting rights of securities that have been lent or pledged to others. You may receive proxy materials indicating voting rights for a fewer number of share than are in your account, or you may not receive proxy materials.

Cash Investment Options

Clear Street has entered into a selling agreement with BNY Mellon Securities Corporation (“BNYMSC”) to allow Firm clients to purchase shares in the Dreyfus Treasury Securities Cash Management Money Market Mutual Fund (“DARXX”). By purchasing shares in DARXX with excess free credit balances, clients have the opportunity to earn a higher yield than excess cash balances would typically earn in a Clear Street account.

If you elect to provide standing instructions to Clear Street to invest excess cash balances in DARXX, your investments in DARXX will earn dividends based on the interest and income realized by the funds’ underlying investments. The rates of return will vary, and generally be higher than, the interest rates available on free credit balances held in your Clear Street account(s). However, there is no guarantee that the rate of return or the yields will equal or exceed rates of return or yields available at other financial institutions or invested in other similar products. Yields fluctuate, and past performance is no guarantee of future results.

An investment in a money market mutual fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency, but is protected by SIPC coverage. Although money market mutual funds typically seek to preserve the value of an investment at \$1.00 per share, there can be no assurance that this will occur, and it is possible to lose money should the fund value per share fall below \$1.00 per share.

To the extent legally permissible, Clear Street receives compensation from BNYMSC under its selling agreement, up to 0.10%, annualized, of the value of your assets invested in the fund.

Payment for Order Flow Disclosure

Clear Street may receive remuneration for directing orders to a particular broker-dealer and routes orders to market centers including national securities exchanges, alternative trading systems, electronic

communications networks and other broker-dealers that offer credits for certain types of orders while assessing fees for other types of orders. In some cases, the credits offered by a market center will exceed the charges assessed such that a market center makes a payment to Clear Street in relation to orders directed to such market center. Such remuneration is considered compensation to Clear Street and the source and amount of any compensation will be disclosed upon written request.

Order Routing

SEC Rule 606 (“Rule 606”) requires all broker-dealers that route orders in equity and option securities to make available quarterly reports that present a general overview of their routing practices. The reports must identify the significant venues to which customer orders were routed for execution during the applicable quarter and disclose the material aspects of the broker-dealer’s relationships with such venues. In addition, Rule 606 requires broker-dealers to disclose, on customer request, the venues to which the customer’s individual orders were routed. Clear Street makes routing information available on its website and upon request in compliance with Rule 606, which you may access via the following link: <https://www.abelnoser.com/606-clear-street.html>.

Please contact support@clearstreet.io to request information regarding the routing of your individual orders.

Net Trading

If you agree to net trading as part of your Execution Services Agreement (or on an order-by-order basis as required by Clear Street), you authorize Clear Street to execute not held orders as principal on a net basis. When executing orders on a net basis, Clear Street accumulates a position in a principal account to fill your order and then executes your order at a price(s) that is typically above its average accumulation cost in the case of a buy order or below its average accumulation cost in the case of a sell order. The difference between Clear Street’s average cost to accumulate a position to fill your order and the price reported to you and the consolidated tape is compensation to Clear Street for executing your order. The amount of this compensation is not disclosed on your trade confirmation or other report. Details regarding the individual executions used to fill your order(s) are available upon request. Clear Street may incur a profit (or sustain a loss) in its proprietary account as a result of executing trades on a net basis. For orders traded on a net basis, you will receive an execution at or better than your limit price.

If you would like more information or no longer wish to have your orders executed on a net basis, you need to notify Clear Street in writing to CSCompliance@clearstreet.io or to Clear Street LLC, 4 World Trade Center, 150 Greenwich Street, 45th Floor, New York, NY 10007. Orders that are not transacted on a net basis may be subject to a commission or markup/markdown and pass through of market center fees.

Not Held Order Handling

Unless otherwise approved by Clear Street, all client orders, including immediate or cancel (“IOC”) orders and those delivered electronically, will be accepted and handled as not held orders, which allows the Firm to exercise a certain degree of price and time discretion when executing the order consistent with the Firm’s duty of best execution. Clear Street does not accept Held orders.

FINRA 5320 Compliance

FINRA Rule 5320 (“Rule 5320”) generally prohibits a member from trading for its own account on terms that would satisfy a customer order. Rule 5320 provides certain exemptions that Clear Street relies upon, such as an exemption for not held orders which give Clear Street time and price discretion. Clear Street may trade in its own account prior to the completion of the client order when handling not held orders. Additionally, Rule 5320 permits a member to trade for its own account while in possession of certain large sized orders (orders of 10,000 shares or more and have a value of \$100,000 or more) for an institutional account (as that term is defined in FINRA Rule 4512(c)), provided that the member provides clear and comprehensive written disclosure at account opening and annually thereafter. Additionally, the broker-dealer is required to provide its institutional accounts with the opportunity to opt in to the protections of Rule 5320 with respect to all or a portion of its order(s). You may “opt in” to the protections of Rule 5320 by contacting the Compliance Department at CSCompliance@clearstreet.io.

If you do not opt in to the Rule 5320 protections with respect to all or a portion of your order(s), Clear Street may reasonably conclude that you have consented to the Firm trading a security on the same side of the market for its own account at a price that would satisfy your order, as described above. Even when a customer has opted in to the FINRA Rule 5320 protections, Clear Street may seek and the client may provide consent to trade along on an order-by-order basis.

FINRA Rule 5270 Disclosure

FINRA Rule 5270 (“Rule 5270”) prohibits its members from executing orders to buy or sell certain securities or related financial instruments when the member has material, non-public information (“MNPI”) concerning an imminent block transaction in those securities, related financial instruments, or securities underlying the related financial instruments, prior to the time information concerning the block transaction has been made publicly available or has otherwise become stale or obsolete. Rule 5270 permits certain exceptions to the foregoing prohibition, including transactions that are undertaken to fulfill or facilitate the execution of a client block order.

Clear Street may rely on exceptions to Rule 5270 while executing block orders for its clients. In connection with the handling of a client’s block order, we may engage in hedging, offsetting, liquidating, facilitating, or positioning transactions (“risk-mitigating transactions”) that may occur at

the same time or in advance of this order. Such activities may have an impact on market prices. Beyond these risk-mitigating transactions, Clear Street will generally refrain from conduct that could disadvantage or harm the execution of client's orders or that would place the Firm's financial interests ahead of clients. Unless client informs Clear Street otherwise in writing ("opt out"), the Firm will conclude that client understands that we may engage in risk-mitigating transactions in connection with client orders and consents to our handling block transactions in the above-described manner.

Clearly Erroneous Transactions

If FINRA, another SRO, any other applicable regulatory body or any execution venue to which a client order has been routed determines that a previously executed trade is "clearly erroneous" or should otherwise be cancelled, Clear Street will be required to cancel the trade and will not be able to honor the executed price or other terms associated with that trade, including, as applicable, any price commitment. Clear Street maintains sole discretion in the determination of whether to file Clearly Erroneous Petitions with SROs on behalf of orders handled by the Firm.

In addition, Clear Street reserves the right to adjust, cancel, correct or take any other appropriate action when it deems a transaction to be erroneous in nature, even if such transaction would not be subject to modification or cancellation pursuant to the various clearly erroneous rules referenced above.

Commission Sharing

The Firm from time to time may enter into an arrangement with other broker-dealers whereby the entities may share in commissions charged on certain transactions. Details are available upon request.

Extended Hours Trading Risk Disclosure Statement: FINRA Rule 2265

Clients should be aware of the following risks when submitting orders for execution in the pre-market and post-market sessions:

1. Risk of Lower Liquidity. Liquidity refers to the ability of market participants to buy and sell securities. Generally, the more orders that are available in a market, the greater the liquidity. Liquidity is important because greater liquidity makes it easier for investors to buy or sell securities, and as a result, investors are more likely to pay or receive a competitive price for the securities purchased or sold. There may be lower liquidity in extended hours as compared with regular market hours. As a result, your order may be only partially executed, or not at all or you may receive an inferior price in the extended hours trading session.
2. Risk of Higher Volatility: Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be

greater volatility in extended hours trading than during regular market hours. As a result, your order may only be partially executed or not executed at all, or you may receive an inferior price in extended hours than you would during regular hours.

3. Risk of Changing Prices: The prices of securities traded in extended hours may not reflect the prices either at the end of regular market hours, or upon commencement of trading the following business day. As a result, you may receive an inferior price in extended hours trading than you would during regular market hours.
4. Risk of Unlinked Markets: Depending on the extended hours trading system or the time of day, the prices displayed on a particular extended hours system may not reflect the prices in other concurrently operating extended hours trading systems dealing in the same securities. Accordingly, you may receive a different price in one extended hours trading system than you would in another extended hours trading system.
5. Risk of News Announcements: Normally, issuers make news announcements that may affect the price of their securities after regular market hours. Similarly, important financial information is frequently announced outside of regular market hours. In extended hours trading, these announcements may occur during trading, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of a security.
6. Risk of Wider Spreads: The spread refers to the difference between the price you can buy a security for and what you can sell it for. Lower liquidity and higher volatility in extended hours may result in wider than normal spreads in the extended hours session.
7. Risk that the Current Underlying Index Value or Intraday Indicative Value (“IIV”) is Unavailable: For certain Derivative Securities Products, an updated underlying index value or IIV may not be calculated or publicly disseminated in extended trading hours. Since the underlying index value and IIV are not calculated or widely disseminated during the pre-market and post-market sessions, an investor who is unable to calculate implied values for certain Derivative Securities Products in those sessions may be at a disadvantage to market professionals.

ETF/ETN Clients

Clients should consider the investment objectives, risks, and charges and expenses of exchange traded funds (“ETFs”) and exchange traded noted (“ETNs”) carefully before investing. Each U.S. listed ETF and ETN has filed a registration statement (including a prospectus) with the SEC which contains important information about the ETF or ETN as applicable. Before you invest in an ETF or ETN, you should obtain and read the prospectus in the registration statement and other documents the issuer has filed with the SEC (or other relevant international regulatory body) carefully for more

complete information about the product. You may get these documents for free by visiting EDGAR on the SEC website at www.sec.gov or by requesting via email to CScompliance@clearstreet.io.

ETFs are redeemable only in creation unit sizes and may not be individually redeemed; are redeemable only through authorized participants; and are redeemable on an “in kind” basis. The public trading price of a redeemable lot of an ETF may be different from its net asset value. ETFs can trade at a discount or premium to the net asset value. Leveraged and inverse ETFs have unique risks, including leverage, derivatives, complex investment strategies and compounding risk. Designed for intraday trading, they require active monitoring and management and are not suitable for all investors.

For more information, SEC’s Alert on Leveraged and Inverse ETFs at <http://sec.gov/investor/pubs/leveragedetfs-alert>. There is always a fundamental risk of declining stock prices, which can cause losses to your investment.

REG SHO

Under Rule 204 of Regulation SHO, all fail to deliver positions in equity securities must be closed out by borrowing or purchasing securities of like kind and quantity by no later than 9:30am on T+3 for short sales and T+5 for long sales. If the fail to deliver is not closed out by the applicable close out date, Clear Street will place the security in the penalty box and will not accept short sale orders unless a pre-borrow or bona-fide arrangement to pre-borrow the shares has been entered into. The security can be removed from penalty only after the purchase of securities to cover the fail to deliver position has cleared and settled at the registered clearing agency.

When you enter an order to sell a security “long,” you represent to us that you own the securities being sold without restriction and that you will deliver them to us by the settlement date. Failure to deliver the securities by the settlement date may result in the purchase of like securities for your account as necessary to complete the sale transaction (“buy-in”) or the borrow of securities to satisfy delivery requirements. If such a purchase/borrow is made, you may not be given notice of the purchase/borrow and you assume any transaction risk, including any market losses, associated with the purchase/borrow.

In the event that you enter an order with Clear Street to sell securities “short” for your account and you do not deliver them to us by the settlement date, your sale transaction will be marked as a “fail-to-deliver” position. While Clear Street will make its best effort to minimize the impact of any fail-to-deliver trade status, in compliance with applicable exchange and SRO regulation we may be required to borrow or purchase securities from another source to cover your position, should you be unable to deliver the securities in time for settlement. If a buy-in occurs or we borrow securities to cover your fail-to-deliver, you will bear the risk of any loss as a result of the buy in or costs associated with the borrow of shares.

Risk of Options Trading

Options involve risk and are not suitable for all investors. Options trading is considered speculative and may result in the loss of a portion of or all of your initial investment and/or funds in excess of the principal invested. Prior to buying or selling an option, you should read “Characteristics and Risks of Standardized Options,” which is known as the options disclosure document (“ODD”). All clients must receive a copy of the ODD prior to conducting any option trades. Hard copies of the ODD can be obtained by contacting your representative or CScompliance@clearstreet.io. Electronic copies of the ODD and any supplements are provided with Clear Street’s Options Account Forms provided to clients interested in opening an options account and available on the Options Clearing Corporation website: <http://www.optionsclearing.com>.

Marking Requirements Related to Options Trading

When engaging in options trading, please be aware of the following options exchange rules:

- Option exchange rules require all option orders to be marked with the appropriate account origin code, such as Customer, Broker-Dealer, Professional Customer, or Firm. Therefore, you must ensure your option orders are marked with the correct account origin code when routing option orders to the Firm.
- A Professional customer is any person or entity that is not a broker or dealer in securities and who places more than 390 options orders per day on average during a calendar month. “Professional” customer orders are not treated with the same marketplace advantages given to public customer orders. Clear Street will designate your options orders as “Professional” orders if the Firm determines you meet the requirements of a “Professional” customer. Once you meet the standard for a Professional customer, all of your options orders will be marked as Professional for the quarter following the month in which the threshold was exceeded.
- If by your own determination, you are to be deemed a Professional customer, you must notify us by email to support@clearstreet.io in writing so that the Firm can properly document your designation and appropriately mark your options orders as “Professional.”
- Option exchange rules require all option orders to be marked as either opening (buy/sell to open) or closing (buy/sell to close) transactions. Therefore, you must ensure your option orders are marked appropriately when routing option orders to the Firm.

Restricted Securities

Restricted securities are securities acquired in unregistered, private sales from the issuing company or from an affiliate of the issuer. Investors typically receive restricted securities through private placement

offerings, Regulation D offerings, employee stock benefit plans, as compensation for professional services or in exchange for providing seed money or start-up capital to the issuer.

Control securities are those held by an affiliate of the issuing company. An affiliate is a person, such as an executive officer, a director or large shareholder or another individual in a control relationship with the issuer. Control means the power to direct the management and policies of the issuer whether through the ownership of voting securities, by contract or otherwise. If you buy securities from a controlling person or affiliate, you acquire restricted securities, even if they were not restricted when owned by the affiliate.

You acknowledge and agree that you will not place an order to sell any restricted securities subject to Rule 144 or 145(d) under the Securities Act of 1933, as amended, or any other securities transactions requiring a “Broker’s Representation Letter,” unless you first notify Clear Street regarding the status of such securities and furnish Clear Street with any and all necessary documentation (including opinions of legal counsel, if requested) to permit legal transfer of such securities. You are responsible for any costs and expenses associated with compliance or failure to comply with the requirements of Rules 144 and 145(d). Furthermore, you recognize and acknowledge that even if all necessary documentation is provided to Clear Street in a timely manner, there may be delays in processing securities transactions subject to Rule 144 or 145(d).

As with all transactions, Clear Street reserves the right to refuse to accept orders and may cancel trades to the extent that we are able if we suspect the transaction involves the sale of restricted securities and you have not informed Clear Street of the nature of the transaction(s) in advance and provided sufficient information to help us ensure that we can handle the transactions in compliance with applicable regulations.

Cost Basis Reporting

Section 403 of the Energy Improvement and Extension Act of 2008 amended the Internal Revenue Code to mandate that every broker required to file a return with the IRS reporting gross proceeds from the sale of a covered security additionally report a customer’s adjusted basis in the security and whether any gain or loss on the sale is classified as short-term or long-term. A security is a “covered security” and therefore subject to the cost basis reporting requirements if it is acquired after its corresponding applicable date. For equity securities, the applicable date is January 1, 2011. Brokers therefore are not required to report basis for any securities acquired before 2011. Clear Street utilizes the FIFO (First in First Out) methodology for calculating adjusted cost basis. If you wish to elect a different methodology, please contact your CSCCompliance@clearstreet.io or your introducing firm.

Privacy Policy and Opt Out

Clear Street has a policy of protecting the confidentiality and security of information that it collects about its customers. We restrict access to nonpublic personal information about you to those employees and agents who need to know that information in order to provide products and services to you.

We maintain physical, electronic and procedural safeguards to protect your nonpublic, personal information. If you decide to close your account(s) or you become an inactive customer, we will still adhere to the privacy policies and practices as set forth in this notice.

Collection of Information: Clear Street collects and uses the information it receives to provide quality services to you. Such services include maintaining your accounts with the Firm and processing securities transactions or funds movements at your direction. Clear Street obtains most of the information it requires directly from you at the time of account opening - whether in person, by telephone or electronically. Clear Street may verify this information or receive additional information, including creditworthiness or credit history, from other financial institutions or service providers with whom you may have authorized to provide such information and/or consumer reporting agencies, verification services or public sources. This information may relate to your finances, employment, avocations or other personal characteristics, as well as interactions with or through Clear Street or others. In accordance with federal law, Clear Street may use any information it receives to satisfy its regulatory obligation to verify your identity.

Disclosure of Non-public Personal Information: Clear Street may not disclose information about you to affiliates or nonaffiliated third parties except as permitted by law, rule, or regulation, as specifically consented by you, and to the following:

- To its attorneys, accountants, auditors, administrators or other service providers;
- To respond to a subpoena or court order, judicial process or governmental or regulatory inquiry (including but not limited to, anti-money laundering inquiries);
- In connection with a proposed or actual sale, merger, or transfer of all or a portion of Clear Street's business;
- To protect or defend against fraud, unauthorized or violative transactions (such as money laundering violations, anti-terrorist due diligence), law suits, claims or other liabilities.

Clear Street does not make disclosures of information to other companies who may want to sell their products or services to you.

To Whom This Policy Applies: This Privacy Policy applies to Clear Street's direct and introduced customers.

Categories of Information that Clear Street Discloses: Clear Street may share personal and confidential information collected from you with its affiliates and service providers as needed to service your account unless you have notified Clear Street in writing via the “opt out” procedure described below.

Access to your information: You may access your account information through a variety of media offered by your introducing firm or by Clear Street. Please contact your introducing firm or CSCompliance@clearstreet.io if you require additional information.

Opt Out Provision: Please be advised that you have a right to “opt out” of the information sharing as set forth above however, Clear Street will be unable to establish an account for you as the sharing that occurs is necessary to establish and maintain your account. Further, all other information sharing in which we participate is required by the Firm’s regulators and/or the federal/state law enforcement agencies. Additionally, the Firm reserves its right to share appropriate personal information about you with our attorneys, accountants, auditors and service providers in order to effectively discharge its obligations with federal securities laws and other securities regulations.

Opt Out Instructions: To opt out of the Clear Street information sharing as set forth above send an email to CSCompliance@clearstreet.io stating that you wish to opt out of information sharing.

Protection of Information: Clear Street strives to maintain systems that are secure and that meet industry standards. The Firm maintains physical, electronic and procedural safeguards that comply with federal standards to protect customer information. Clear Street restricts access to the personal and account information of customers to those employees, affiliates, and service providers who are required to possess that information to fulfill their job responsibilities.

Access to and Correction of Information: If you desire to review any file Clear Street may maintain regarding your information, please contact Support@clearstreet.io. If you or your broker notifies Clear Street that any information is incorrect, Clear Street will review it. If Clear Street agrees, Clear Street will correct its records. If Clear Street does not agree, you may submit a statement of dispute, which Clear Street will include in future disclosures of the disputed information. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available.

Notice to California Residents: On June 28, 2018, California enacted the California Consumer Privacy Act of 2018 (“CCPA”), which went into effect on January 1, 2020. The CCPA provides California residents with specific rights regarding their Personal Data (as such term is used in the CCPA). If you reside in California, you can exercise these rights by contacting us at CSCompliance@clearstreet.io.

California Civil Code Section 1798.83 permits California residents to request and obtain from us a list of what Personal Data (if any) we disclosed to third parties for that third party’s direct marketing

purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge. Under Section 1798.83, if we were to share your Personal Data with third parties for their marketing purposes, you may opt-out of this disclosure at any time by submitting a request to us in writing.

Please note that the CCPA does not apply to what is referred to as *nonpublic personal information* collected by financial institutions (like Clear Street), as that information is subject instead to other financial privacy laws. As a result, the CCPA does not apply to most of the information that Clear Street collects and retains.

Over the past 12 months, the only type of information we have collected potentially subject to the CCPA is web-browsing information (i.e. ‘cookies’) regarding passive visitors to our website who are California residents, but are not our clients and do not provide us with any specific personal information (name, email address, street address, social security number, etc.) to request information about our services, start an account application, or become a client. Information collected from these anonymous, passive visitors to our website may include IP address and browser-specific tags. We do not sell this information to third parties. We only use this information for internal purposes, such as identifying which content on our website is most interesting to visitors. Under the CCPA, California residents connected to this type of web-browsing data have a right to request access to it or request that it be deleted. However, we are unable (and not required) to process such requests because we cannot connect such passive web-browsing information collected with an email address or other personal information that we can use to verify that a requesting party is in fact connected to a specific web-browser or IP address.

Further Information: Clear Street reserves the right to change its Privacy Policy. The examples contained within the Firm’s Privacy Policy are illustrations and are not intended to be exhaustive. This notice complies with Federal law and SEC regulations regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.

For our Canadian Clients

Pursuant to the international dealer registration exemption in NI 31-103, Clear Street wishes to inform you of the following:

1. It is not registered as a dealer in any of the following provinces: Ontario, British Columbia, Quebec and Nova Scotia. In these provinces, the Firm is trading with you, its client, in reliance upon an exemption from the dealer registration requirement under NI 31-103.
2. The Firm’s principal place of business is located in New York, U.S.A.
3. There may be difficulty enforcing legal rights against the Firm because all or substantially all of its assets may be situated outside of Canada.

4. The name and address of its agent for service of process in the each of the provinces is listed below:

Nova Scotia

Stewart McKelvey
Queen's Marque
600-1741 Lower Water Street
Halifax, Nova Scotia B3J 0J23
Attention: Charles Reach

British Columbia

Borden Ladner Gervais LLP
1200 Waterfront Centre
200 Burrard Street
PO Box 48600
Vancouver, BC V7X1T2
Attention: Michael Waters

Quebec

Borden Ladner Gervais LLP
1000 De La Gauchetriere Street West
Suite 900
Montreal, QC, Canada H3B 5H4
Attention: Christian Faribault

Ontario

Borden Ladner Gervais LLP
Bay Adelaide Centre, East Tower
22 Adelaide St W
Toronto, ON Canada M5H 4E3
Attention: Matthew Williams

Business Continuity Plan Summary

Clear Street has developed a Business Continuity Plan regarding how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us

If after a significant business disruption you cannot contact us as you usually do at ops@clearstreet.io or [+1 646-813-2535](tel:+16468132535), you should call our alternate number at [646-845-0036](tel:6468450036). If possible, we publish information about a business outage on our public website: www.clearstreet.io.

Our Business Continuity Plan

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our clients and investors to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our Business Continuity Plan Addresses

Data back-up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

We replicate data from our office to the cloud. All critical data is replicated across multiple database servers and backed up daily cloud based WORM format backup archives. Backup archives are maintained for five years or the regulatory required retention period, whichever is longer. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, our objective is to restore our own operations and be able to restore all existing data in one business day. Your communications with us may be disrupted until such time as our data is restored.

Varying Disruptions

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 4 business hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 1 business day. In either situation, we plan to continue in business, transfer operations to our alternative if necessary, and notify you through our website or through any other means available. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our client's prompt access to their records on file with us at the time of the disruption.

A copy of our plan can also be found on our website: www.clearstreet.io. For more information, or if you have questions about our business continuity planning, you can contact us via email at ops@clearstreet.io or call 646.813.2535.