

# WISDOMTREE PRIME PRIVACY POLICY

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WisdomTree Prime is a mobile app that offers a digital wallet, built on blockchain, that lets consumers save, spend and invest in digital assets like bitcoin, U.S. dollar tokens, gold tokens, and more (in this Privacy Policy, we refer to these features, collectively, as “services”). This Privacy Policy applies to the WisdomTree entities to the extent they are offering services through the app, including WisdomTree Digital Trust Company, LLC, WisdomTree Digital Movement, Inc., WisdomTree Securities, Inc., WisdomTree Transfers, Inc., WisdomTree Digital Management, Inc., and each series fund of the WisdomTree Digital Trust (collectively, “WisdomTree”).

This Privacy Policy and our [GLBA Consumer Privacy Notice](#) explain how WisdomTree Prime handles users’ personal information in connection with the services offered on our mobile app.

## INFORMATION WE COLLECT

### Information you provide to us:

- **Account and contact information.** When you create an account to use the services, we collect information about you such as your first and last name, email, and phone number.
- **Identification information.** We collect information about you to verify your identity such as your current mailing address, past addresses, date of birth, Social Security number, taxpayer identification number, citizenship status, and government-issued identification documents (e.g., driver’s license or passport).
- **Login credentials.** We collect information such as the username and password that you may use to establish an account with us through the app.
- **Financial information.** We collect information about your transactions on the app and the payment methods linked to your account (including payment card information, bank account information, billing details, account balances and transaction history, and information about the source of your funds). We allow you to connect your financial account to the services through our service providers, such as Plaid.
- **Your activity and connections.** We collect information about your activity while using our services, including the activity of other users or accounts you transact with, for example when you send or receive a digital asset.
- **Demographic data.** We collect demographic information about you such as your age.
- **Feedback or correspondence.** We collect information you provide when you contact us with questions, feedback, product reviews, or otherwise correspond with us online.
- **Marketing information.** We collect details about your preferences for receiving communications about our activities and publications, and details about how you engage with our communications.

### **Information we collect automatically when you interact with us:**

- **Activity information.** We collect information about your activity on our services, such as the pages you interact with, and your communications through our services.
- **Device data.** We collect information about how you access our services, including data about the device and network you use, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, device type (e.g., phone, tablet), mobile network, IP address, unique identifiers (including identifiers used for advertising purposes), language settings and general location information such as city, state or geographic area. We also collect information about your activity on our services, such as access times, pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, links clicked, and general location information such as city, state, or geographic area.

### **We use the following tools for automatic data collection:**

- **Local storage technologies,** like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data in connection with specific applications.
- **Web beacons,** also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

### **Information we collect from other sources:**

We obtain information from third-party sources, such as:

- **Market data reporting companies.** We may collect information about you from market data reporting companies.
- **Marketing partners.** We may collect information about you from marketing partners such as companies that have entered into joint marketing relationships with us.
- **Publicly available sources.** We may collect information about you from publicly available sources such as government databases.

## **HOW WE USE PERSONAL INFORMATION**

We may use personal information for the following purposes:

### **To operate our services, including to:**

- Provide, operate, and improve our services and our business;
- Verify your identity;
- Process, service, maintain, and monitor your investments in or accounts with the series funds;
- Process transactions initiated by you and send you notices about your transactions and account activity;

- Communicate with you about our services, including by sending announcements, updates, security alerts, and support and administrative messages;
- Understand your needs and interests to personalize your experience with our services; and
- Provide support, and respond to requests, questions, and feedback.

**For research and development.** We may use personal information to analyze and improve the services and to develop new products and services, including by studying use of our services and creating anonymous data from personal information by removing information that makes the data personally identifiable.

**For direct marketing.** We may send you direct marketing communications via email or text message as permitted by law, including, but not limited to notifying you of special promotions and offers. You may opt out of our marketing communications as described in the “[Opt out of marketing communications](#)” section below.

**To comply with law.** We may use personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

**For compliance, fraud prevention, and safety.** We may use personal information to: (a) protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern our services; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity, including but not limited to combatting money laundering and terrorist financing activities.

## HOW WE DISCLOSE PERSONAL INFORMATION

We may disclose personal information in the following circumstances or as otherwise described in this policy:

- **Affiliates.** We disclose personal information between and among WisdomTree and our current and future parents, affiliates, and subsidiaries and other companies under common control and ownership. Our affiliates may use the personal information we disclose to them in a manner consistent with this Privacy Policy.
- **Service providers.** We disclose personal information to vendors, service providers, and consultants that need access to personal information in order to perform services for us, such as companies and individuals that assist us with web hosting, information technology, customer support, email delivery and website analytics services, marketing, and the preparation and mailing of prospectuses, shareholder reports, account statements, fund distribution, identity verification, and payment processing. Examples of service providers we use include:
  - **Socure.** We use Socure Inc. (“Socure”) to (i) verify your identity using, for example, your government-issued identification documents and (ii) help prevent and detect fraud. Socure will process, store, retain and delete your personal information in accordance with Socure’s privacy policy, available [here](#).
  - **Plaid.** We use Plaid, Inc. (“Plaid”) to connect your WisdomTree Prime account with your bank account. We will disclose personal and financial information to Plaid if you

connect a bank account to your WisdomTree Prime account. The personal and financial information we disclose to Plaid will be treated in accordance with Plaid's privacy policy, available [here](#).

- **Professional advisors.** We may disclose personal information to our professional advisors, such as lawyers, auditors, bankers and insurers, where necessary to obtain advice or otherwise protect and manage our business interests.
- **Authorities and others.** We may disclose personal information if we believe that disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements.
- **Corporate transaction.** We may disclose personal information in connection with, or during negotiations concerning, any corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, financing or equity interests in all or a portion of our business by another company (including, in connection with a bankruptcy or similar proceedings).
- **Advertising partners.** We may disclose personal information to third party advertising companies, including for interest-based advertising purposes described herein.
- **For compliance, fraud prevention and safety.** We may disclose personal information for the compliance, fraud prevention, and safety purposes described above.
- **As instructed by you.** We disclose personal information with your consent or at your direction.

## YOUR CHOICES

**Access, update, or delete account information.** If you have a WisdomTree Prime account, you can review and update certain account information by logging into your account. You may also contact us at [privacy@wisdomtree.com](mailto:privacy@wisdomtree.com) or through our customer support portal within the app to request deletion of your account and certain personal information. We may request information from you to help us confirm your identity and process your request. Applicable law may require or permit us to limit or decline access and deletion requests, for example, where we need to retain certain information as required by law or for our legitimate business purposes.

**Opt out of marketing communications.** You may opt out of marketing-related emails and other communications by following the opt-out or unsubscribe instructions in the communications you receive from us. If you opt out, we may continue communicating with you about our services, your account, and other non-marketing emails.

**Opt out of push notifications.** If you opt in to receive push notifications within the app, we may send push notifications or alerts to your mobile device from time to time. You can deactivate push notifications and alerts at any time by changing your device settings, changing the push notification settings within the app, or deleting the app.

**Blocking advertising ID use in your mobile settings.** Your mobile device settings can provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

## **THIRD-PARTY SITES AND SERVICES**

Our services may contain links to third-party websites and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control such websites or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the applicable privacy policies and terms and conditions of such services or websites.

## **CHILDREN’S PRIVACY**

Our services are designed for a general audience and are not directed to children. In connection with the services, we do not knowingly solicit or collect personal information from children under the age of 13 without parental consent. If you believe that a child under age 13 may have provided us with personal information without parental consent, please contact us as specified in the “Contact Us” section of this Privacy Policy.

## **DO NOT TRACK**

Some Internet browsers may be configured to send “Do Not Track” signals to the online websites that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit [www.allaboutdnt.com](http://www.allaboutdnt.com).

## **DATA RETENTION**

The personal information we collect about you will be retained for the time required to fulfill the purposes for which it was collected and processed, including for the purpose of satisfying legal, business, professional, contractual, regulatory, accounting, or reporting obligations.

## **SECURITY PRACTICES**

We use reasonable organizational, technical, and administrative measures designed to protect against unauthorized access, misuse, loss, disclosure, alteration, and destruction of personal information. Unfortunately, data transmission over the Internet cannot be guaranteed as completely secure. Therefore, while we strive to protect your personal information, we cannot guarantee the security of personal information.

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the app.

## **CONTACT US**

If you have any questions about this Privacy Policy, please contact us at [privacy@wisdomtree.com](mailto:privacy@wisdomtree.com) or directly through the app.