Webull Securities (Thailand) Company Limited
Webull Privacy Notice
Last Updated: 28 December 2023

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

This Notice describes how Webull Securities (Thailand) Company Limited and its affiliates (collectively "Webull," "we," "us," or "our") process the information we collect about you through our websites, mobile apps, services, and when you otherwise interact with us (the "Services"), starting when you take steps to apply for a Webull account ("Account"). We have the utmost respect for your data privacy, so this Notice also explains steps you can take to control and protect your personal information on our Services. You agree to this Notice by accessing or using our Services. If you do not agree, you may not access or use the Services. The websites and mobile apps that you use to interact with us are owned and operated by our affiliates, and their use may have additional privacy guidelines. We will follow those additional guidelines as well as this Notice in protecting your privacy. If you have any questions about this Notice, please contact us (see HOW TO CONTACT US below).

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

This Notice will help you understand the following:

1. THE INFORMATION WE COLLECT

2. HOW WE USE AND SHARE YOUR INFORMATION

3. COOKIES

4. ANALYTICS, TRACKING AND ONLINE ADVERTISING

5. HOW WE PROTECT YOUR INFORMATION

6. MANAGING YOUR INFORMATION

7. TRANSFER OF YOUR INFORMATION

8. THIRD PARTY SITES

9. CHANGE TO THIS NOTICE

10. HOW TO CONTACT US

1. THE INFORMATION WE COLLECT

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

Data Source	Types of Data
From you	• Identity data such as full name, date of birth, nationality identification number (e.g., social security number, passport number), nationality/citizenship. • Biometric data such as photograph, voice and video recordings of you, including our conversations with you. • Contact data such as email, phone number, mailing/home address information. • Financial data such as bank account and payment card details, suitability information, personal income, account balance, credit scores and tax information. • Content such as photos and contacts in your mobile device or email (collected with your consent). • Profile data such as username and password, purchases or orders, knowledge assessments, interests, preferences feedback, survey responses, and inferences regarding characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

Data Source	Types of Data
	• Other information such as information submitted via focus groups, contests, sweepstakes, job applications, customer support and/or other interactions with us.
Automatically collected through the Services	• Usage information such as device identifiers, the identifier for advertisers ("IDFA"), operating system and version, carrier and network type, internet protocol addresses ("IP address"), browser type and language, referring and exit pages and uniform resource locators (date and time, amount of time spent on particular pages), what features of the Services you use or visit, purchases, and similar information regarding your use of the Services. • Geolocation data from your mobile device, wireless carrier, or third-party service providers; you may control the collection of precise geolocation data through the user settings on your device. • Activity data, such as purchases/sales, amount, type of transaction, time and data, and similar activity through the Services. • Tracking data collected using first and third-party cookies, pixels, web server logs, web beacons, and similar data collection and tracking technologies, such as IP address, browser, type, internet service provider ("ISP"), platform type, device type.
Other sources	• Service providers and partners, such as fraud risk assessments and protection, identify verification, credit records, payment processing information, ad campaign information (e.g., the ads you click on), and data from other users (e.g., you appear in a contact list provided to us). • Social media and connected services, such as information from your interactions with our social media platforms, the Webull Community, and from services that you connect with Webull, such as when you

Data Source	Types of Data
	link, connect, or log into your Account through social media, Google, or Apple. • Third-party analytics services, such as demographic data, mobile and internet usage, analyses of performance metrics, reports regarding your activity and use of the Services. • Publicly available data, such as contact information, public records, and information you have designated as publicly available on other sites.

2. HOW WE USE AND SHARE YOUR INFORMATION

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

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

- protect the safety and security of our Services, business, and customers;
- fulfill legal and regulatory requirements;
- protect or exercise our legal rights; and
- as otherwise permitted by applicable law, or with your consent.

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

We may share your information with third parties as described below:

- vendors and service providers, such as securities clearinghouses, identification verification providers, that provide services at our direction, and are instructed to keep your personal information confidential and use it only to provide the services that we have specified;
- business partners to administer our promotions, sweepstakes, surveys, and other programs, and deliver targeted advertising;
- as part of the sale or other transfer of our business;
- any person or institution with which you have or propose to have dealings, such as companies whose securities you purchase using the Services;
- our affiliates, including those in jurisdictions other than Singapore and Thailand when doing so will allow us to more effectively provide the Services to you;
- as required by applicable law or legal process;
- report suspicious transactions or assist law enforcement with an investigation;
- protect the rights interest, safety, and security of Webull, our customers, or the public;
- other third parties, provided that you request or authorize the disclosure, such as implementing, administering, or enforcing a transaction; and
- as otherwise permitted by applicable law, or with your consent.

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

3. COOKIES

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

4. ANALYTICS, TRACKING AND ONLINE ADVERTISING

Webull uses third-party advertising and analytics services (e.g., Google Analytics) to better understand your online activity and to provide you with content that is relevant to your interests and preferences. These services collect information about your use of our Services and other websites and online services over time through cookies and other tracking technologies. The data collected may include your IP address, web browser, mobile network, pages viewed, time spent, links clicked, and conversion information. We and our third-party partners use this information to, among other things, analyze and track data, determine the popularity of content, and deliver targeted advertisements on our Services and other platforms. Analytics companies may also provide advertising-related services to us such as reporting, attribution, analytics, and market research. By accessing and using the Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Notice. For more information on Google Analytics, including

how to opt out from certain data collection, please visit https://support.google.com/analytics/answer/6004245. For more information about interest-based ads, including to learn about options for opting out of having your web browsing information used for targeted advertising purposes, please visit www.aboutads.info/choices. You should also review your mobile device settings and controls for features that allow you to opt out or opt in to having certain information collected for behavioral advertising purposes. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Services. Webull does not advertise on behalf of specific securities or investment options on our Services.

5. HOW WE PROTECT YOUR INFORMATION

Webull uses reasonable, industry standard security measures to protect information under our control from loss, misuse, unauthorized access, disclosure, alteration, and destruction. We maintain appropriate physical, electronic and procedural safeguards, including restricting access to personal information on a need-to-know basis, and limiting the amount and type of information available for downloading or transmittal. We also regularly conduct audits to ensure the effectiveness of our system. Please understand, however, that no security system is impenetrable. We cannot guarantee that our security measures will prevent hackers from illegally obtaining this information, or that our database and/or systems will not be subject to a cyber-attack. Webull retains your personal information for as long as necessary to accomplish the purpose for which it was collected, to meet our legal and regulatory obligations including compliance with our records retention practices, and as permitted to meet our legitimate interests, but such retention shall not exceed 10 years after you stop using our Services.

6. MANAGING YOUR INFORMATION

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

- **Access and change your information.** If you have an Account, you may access, review, delete and make changes to your information by using our Services. You may also request that we rectify any inaccuracies or incomplete information in your personal data. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely

remove or modify information in our subscription databases. In such case, we will provide you the reason why the modification or removal was not possible.

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

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

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

- **Manage communications preferences.** You can stop receiving promotional emails from us by clicking the "unsubscribe" link in those emails. We may still send you service-related or other non-promotional communications, such as Account notifications, receipts, security notices and other transactional or relationship messages.

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

- **Disabling certain data sharing.** You can limit how we share your data with our marketing partners to more effectively market our Services to you across sites and apps

by contacting us. When disabled, we will no longer share personal information with these partners for these purposes.

- **Posting information.** Posting personal information in the Webull Community or other public areas will make it publicly available. The personal information you post or share with others may in turn be shared by them with still other users and it may also show up when someone uses a public search engine (even if that person is not a user of our Services). Do not post personal information in public areas of our Services that you want to keep private.
- **Access and obtain the personal data.** You have the right to access and receive a copy of the personal data we hold about you, as well as to verify that we are lawfully collecting, using, processing, and disclosing it.
- **Portability.** You can request us to transfer your personal data in machine-readable formats to another party.
- **Objection.** You have the right to object to the collection, use, processing, and disclosure of your personal data.
- **Restrict Processing.** You have the right to request us to suspend the use of your personal data.
- **Lodge a complaint.** You may file a complaint with a relevant government authority, including but not limited to the Thailand Personal Data Protection Committee.

7. TRANSFER OF YOUR INFORMATION

Our Services are hosted in Singapore, and your personal information is stored in Singapore in the cloud. If you are located outside Singapore, by using our Services you agree to have your data transferred to and processed in Singapore and other countries where Webull conducts business. In providing our Services, your personal information may be accessed by our affiliates in jurisdictions other than Singapore. Where personal information is transferred to any of our affiliates and/or third parties to Singapore or outside of Singapore, Webull will ensure that such entities provide a standard of protection to personal information so transferred that is comparable to the protection under the Personal Data Protection Act 2012 of Singapore and the Personal Data Protection B.E. 2562 (2019) of Thailand. Webull will not transfer any personal data relating to a natural person located in the European Economic Area, the United Kingdom, or any other jurisdiction that restricts outbound data transfer, from the

country of origin without appropriate safeguards as required by applicable law and regulations. You may receive a copy of those safeguards by contacting us (see, HOW TO CONTACT US below).

8. THIRD PARTY SITES

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

9. CHANGES TO THIS NOTICE

We may update or revise this Notice at any time, and we will notify you of significant changes we make under Personal Data Protection B.E. 2562 (2019) of Thailand. However, if we make any substantial changes, we will take reasonable steps to inform you and obtain your consent as required by applicable law. We will post the latest version of this Notice on our website.

10. HOW TO CONTACT US

If you have any questions, comments, or suggestions about this Notice or your personal information, please contact us at:

Contacting Address: 496,498,500,502 Amarin Tower Building, Ploen Chit Road, Lumpini, Pathumwan, Bangkok 10500
Tel: 02-0265222
Website: www.webull.co.th
Customer Services
Email: clientservices@webull.co.th or Tel: 02-0265222
Data Protection Officer (DPO)
Email: dpo@webull.co.th or Tel: 02-0265222
We will normally reply to you within fifteen (15) business days.