

Privacy Policy

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1. Privacy Information Statement

11thestate Incorporated ("**Company**", "**we**", "**us**", or "**11thestate**", the "**Website**", the "**Platform**") are committed to protecting the privacy of individuals who visit Company's ("our") proprietary Website ("**Visitors**") or individuals who register to use the Service ("**Users**" or "**You**"). This Privacy Statement describes the Company's privacy practices in relation to the use of our Website and Service. Unless specifically defined, terms used throughout this statement have the same definitions as those given in the Company's Terms of Use, which is hereby incorporated into this Privacy Policy by this reference available at <https://www.11thestate.com/termsfuse.pdf>. Please read the entire Privacy Statement document carefully.

2. Platform Introduction and reference to Terms of Use

11thestate is a crowd-sourced content service Website for financial markets. The website is the property of 11thestate Incorporated and was developed exclusively and solely for information purposes. We provide an information-only Platform for collaboration and communication between legal professionals (i.e., Attorney Users) and those seeking assistance in securities litigation (i.e., Investor Users) and the functionality of an online marketplace for consumers of professional legal services and professional service providers on a global computer network. The Platform and 11thestate are not intended to, and do not, offer any advice, recommendations, referrals, provocations, or effect on other parties.

3. Collected Personal Information

When you visit our Website or register for our products and services, 11thestate collects personal information about you. We use this personal information for the business purpose of providing our products and services, as well as marketing our products and services to new and potential customers. This includes providing you with personalized recommendations and customized content on our Website. The categories of personal information we collect from users of and visitors to our Website are:

- **Identifiers**: This includes, for example, your name, nickname, username, email address, phone number, postal address (including ZIP code), Internet Protocol address, and cookies or other identifiers which we assigned to uniquely identify you or which others assigned to uniquely identify you. We obtain this information, when you provide it to us or otherwise, automatically in the course of your interactions with our products and services.
- **Demographic information** / Characteristics of protected classifications under California or federal law: This includes information such as age (including date of birth). We may obtain this information when you provide it to us, for identification purposes upon registering.
- **Commercial Information**: This includes securities in your investment portfolio, a list of Users you follow, broker information, and payment information including bank account details. We obtain this information directly from you or otherwise automatically in the course of your interactions with our products and services.
- **Internet or other electronic network activity information**: This includes but is not limited to device screen size, device type (unique device identifiers), browser information, your interactions with our Website, and preferred language used to display our Website. We obtain this information automatically in the course of your interactions with our products and services.
- **Location-based data**: this includes your country location (based on your IP address). We obtain this information, when you provide it to us or otherwise, automatically in the course of your interactions with our products and services.
- **Audio, Video, and other Electronic Data**: This includes audio, electronic, visual, or similar information such as chat and any interaction that you may have with us (such as for customer service purposes) as well as your profile photo. It also includes any information you submit in

forums, chat, or message boards, and feedback or testimonials you provide about our products and services. We obtain this information when you provide it to us or otherwise automatically in the course of your interactions with our products and services.

- Professional or employment-related information: This includes your job title, education information, experience, track record, firm details, and other biographical information including professional interests and areas of expertise. We obtain this information when you provide it to us upon registering.
- Profiles and Inferences: This includes inferences drawn from any of the information identified above to create a profile reflecting preferences, characteristics, predispositions, behavior, and attitudes. We obtain this information automatically during your interactions with our Services.
- Case Initiation and Join. To access the Service, Cases, or Content, Users may post certain information online. This information may include, among other things, a description of the Case and other key details. This posted Case will be viewed by those Users who have access to view posted Cases, and may be viewed by 11thstate employees to ensure quality control and provide technical support. Therefore, no Case or Content is confidential. Please do not share sensitive or confidential information via the Service.
- Your Personal Commercial/Trading Information. Trading, Investment, and Positions details provided within Case initiation or Join will only be visible to You and can be provided to Attorney Users directly in course of service provision to you by them. In some cases, you can be asked to provide financial information within the verification procedure on Platform or directly to Attorney.

The sources from which We collect personal information are:

- Directly from you: For example, when you create an account, make a purchase, initiate or join Case, etc.
- Directly and indirectly from activity on our Website and other services.
- Service providers who provide services on our behalf such as those used to fulfill orders, process your payments and requests, verify your information, monitor activity on our products and services, provide analysis and analytics, maintain databases, administer, and monitor emails and marketing, administer and send mobile messages, serve ads on this and other services, and provide consulting services.
- Third-party data providers.

From time to time, we may also receive personal information about you from third-party sources but only where these third parties have confirmed to us that they either have your consent or are otherwise legally permitted or required to disclose your personal information to us. We use this information to maintain and improve the accuracy of the records we hold about you and to send you personalized content, such as showing you articles and news about the stocks of your preference, or articles by the User you follow.

4. Use of Personal Information

We use personal information collected through our products and services, both individually and combined, for purposes described in this Privacy Policy or disclosed to you in connection with our products and services. We may use your information to:

- Create your account;
- Provide and deliver products and services you request;
- Send you service-related information updates, alerts, and support and administrative messages;
- Send you marketing communications and personalized content such as showing you articles and news about your preferred stocks, or articles by Users you follow;
- Respond to your inquiries;
- Enable you to send and receive messages to other registered Users, and post comments;
- Carry out analytics and improve the quality and relevance of our Website;
- Survey your opinions through surveys or questionnaires;
- Serve and measure the effectiveness of advertising;

- Protect the integrity of our products and services and enforce our Terms of Use and other applicable terms, including to detect and prevent fraud and unauthorized activities, to secure our systems and the services, and prevent activities that may violate our policies or be illegal;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.

We may use the personal information we collect from or about you to create aggregated or de-identified data that does not specifically identify you.

5. Disclosure of Personal Information

We may share personal information with affiliated companies who help us to provide you with products and services.

We share personal information with other users of the Website. For example, if you use our Website to publish content, Case, post comments, or send private notes, certain information about you will be visible to others, such as your name, photo, bio, other account information you may provide, and information about your activities on our Platform (e.g., your followers and who you follow, recent posts, claps, highlights, and responses).

We also share personal information with third parties for the business purposes of providing our products and services and marketing our products and services to existing and potential customers. The categories of these third parties with whom we share personal information are:

- Hosting and infrastructure providers;
- IT services;
- Email service providers;
- Advertising partners;
- Payment processors;
- Attorney Users. If you choose to upload a document by using our documents feature, only Platform Attorney Users may review such documents. You may choose to make the document open to all Attorney Users who use the Service or provide access by request only. You may also provide different levels of control, including "View Only," "View and Download," and "Full Control" to such Attorney Users;
- Employees, affiliates, and third parties. Platform discloses User Personal Information only to those of our employees, third-party contractors (e.g., our email service providers and payment processors), and affiliated organizations that need to know this information to process it on our behalf or to provide or improve our Service. In addition, our employees and other affiliates have agreed not to disclose this information to others, following terms and conditions at least as restrictive as this Privacy Statement. Some of our employees, contractors, and affiliated organizations may be located outside of your home country; by using Platform's Service, you consent to the transfer of such information to them. Please see Section 5, "Gathering and protecting the information we collect," for more details;
- General non-person-aggregated information. Platform may disclose aggregated User Non-Personally Identifiable Information about how our Users, collectively, use our Service, so that we may share general information about our Service, such as statistics about the average cost of legal services.

We share all of the categories of personal information with these third parties when we need to do so to provide you with 11thestate products and services.

We may also share personal information with:

- Competent law enforcement bodies, regulators, government agencies, courts, or other third parties where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- Actual or potential buyers (and their agents and advisers) in connection with any actual or proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy;
- Other persons where you have given your consent.

6. Cookies and other tracking technologies

Most web browsers are set to accept cookies by default. If you prefer, you can usually adjust your browser settings to remove or reject browser cookies. Please note that removing or rejecting cookies could affect the availability and functionality of our Website.

Cookies, generally: Platform uses cookies to make interactions with our Website easy and meaningful and to serve you more relevant advertisements or promotional offers. A cookie is a small piece of text that our web server stores on your computer or mobile device, which we can then retrieve as needed. Cookies do not necessarily identify you if you are merely visiting the Website; however, a cookie may store a unique identifier for each logged-in User.

Temporary cookies: Platform uses temporary, or “session-based,” cookies, which are removed when you close your web browser or reboot your computer or device. We use session-based cookies to provide Services to you while you navigate our Website; remember that you are logged in during your visit; keep track of your progress as you post or bid on a Case, and increase Website security.

Persistent cookies: Platform uses permanent, or “persistent,” cookies, which remain stored on your computer or device until deleted, or until they reach a specified date of expiration. We use persistent cookies to enable us to remember you each time you visit our Website; keep track of your preferences in relation to your use of our Website; allow you to log in without re-entering your password every time you visit, and serve you more relevant advertisements or promotional offers.

The cookies Platform sets are essential for the operation of the Website, are used for performance or functionality; or serve you more relevant advertisements or promotional offers. By using our Website, you agree that we can place these types of cookies on your computer.

Google Analytics: Platform uses Google Analytics to help improve our Users’ experience. Google Analytics uses both session-based and permanent cookies to collect information about how our Website performs and how our Users use the Website and Service. The Google Analytics tool helps us evaluate and monitor Users’ use of our Website, compile statistical reports on activity on the Service, and improve our content. Google Analytics may collect more information than Platform collects. Google Analytics stores the information these cookies generate. Platform will not, nor will we seek to allow any third party to, use the Google Analytics tool to (i) track our Users, (ii) collect any User Personal Information other than IP address, or (iii) correlate a User’s IP address with his or her identity. Google Analytics provides further information about its privacy practices and allows the ability to opt-out of Google Analytics tracking here (<https://www.google.com/intl/en/policies/privacy/>). You may disable your browser or device’s ability to accept cookies, but if you do, you may not be able to use Platform’s Services.

7. Children’s Privacy

In accordance with our Terms of Use, the Website is not designed for use by individuals under the age of 18. Accordingly, we do not intend to or knowingly collect personal information from anyone we know to be under 18 years of age. If you believe we have collected personal data from anyone under 18, please contact us at the email address listed below in article 12.

8. Security

Industry standards in data security: The Company takes all measures reasonably necessary to protect User Personal Information from unauthorized access, alteration, or destruction; maintain data accuracy, and help ensure the appropriate use of User Personal Information. We follow generally accepted industry standards to protect the User Personal Information submitted to us, both during transmission and once we receive it. No method of transmission, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

No responsibility for third-party service providers’ security: In addition, while we take measures reasonably necessary to ensure that our third-party service providers, such as our payment processing and data tracking, re-targeting, or data analysis services, keep your information secure, these organizations’ practices are ultimately beyond our control. By using our Service, you acknowledge that you understand and agree to assume these risks.

OAuth, in general: The Company makes use of the industry standard OAuth authentication protocol. OAuth is a simple, secure process that allows you to grant Platform access to your accounts on third-party networks without sharing the passwords to those accounts. Using OAuth, the data you choose to share is securely transferred without revealing your login information. OAuth also allows you to verify that an application acting on your behalf is doing so only with the permissions you have granted it. Most social networks, such as LinkedIn, Twitter, Facebook, and Google, allow applications to access user accounts via the OAuth process. OAuth functions using authentication tokens, which will expire after a period and may be revoked.

Documents, in general: The Company uses third-party service providers to transmit, store, encrypt, process and display uploaded documents on our behalf. The Company has taken measures reasonably necessary to ensure that these services keep uploaded documents private and secure, but these organizations' practices are ultimately beyond our control. By using the documents feature, you acknowledge that you understand and agree to assume the risks.

International data transfer: Information that we collect may be stored and processed in and transferred between any of the countries in which we operate to enable us to use the information in accordance with this privacy policy. We and our service providers may transfer your personal information to, or store or access it in, jurisdictions that may not provide levels of data protection that are equivalent to those of your home jurisdiction. By using the Website, you agree that we can store, process, and transfer your information in this manner.

Attorney Users and other legal service providers using the Platform, in all their communication (which include but are not limited to receiving, sending, storing use, reproduction, modification, displaying distribution, and other disclosure to third parties any such material for any purpose receiving, sending, storing and using information) with the Company, the Platform, Scout Users and Investor Users, must comply with the rules set out in American Bar Association (ABA) [Rule 1.6: Confidentiality of Information](#), as well as ABA Ethics Opinions [Securing Communication of Protected Client Information](#) and [Lawyers Obligations After an Electronic Data Breach or Cyberattack](#)

9. California Privacy Information

If you are a California resident, the following information also applies to you and supplements the information contained in this Privacy Policy.

Information We Collect and Sources of Information

We are obliged to collect the information described in the section "Collected Personal Information " above for 12 months preceding the current date, which also includes categories of sources from which we have collected that personal information.

How we use and share information

We collect and use personal information for business and commercial purposes as described in the section "Use of Personal Information" above. 11thestate does not share your personal information except as approved by you or as otherwise described in this Privacy Policy.

During the 12 months preceding any current date, we have disclosed the following categories of personal information described above for the business purposes described in this Privacy Policy:

- Identifiers such as those set forth above;
- Internet or other electronic network activity information;
- Demographic information / Protected Classification Characteristics;
- Commercial Information;
- Geo-location data;
- Audio, Video, and other Electronic Data
- Professional or employment-related information; and
- Profiles and Inferences.

Under the California Consumer Privacy Act (CCPA), "sale" is defined very broadly and includes a wide array of data sharing. As the term is defined by the CCPA, we "sell" the following categories of personal

information in the 12 months preceding any current date: identifiers/contact information, Internet or other electronic network activity information, and inferences drawn from the above. We “sold” such information to advertising networks, data analytics providers, and social networks. The business or commercial purpose of “selling” personal information is for third-party companies to perform services on our behalfs, such as marketing, advertising, and audience measurement. We do not have any actual knowledge that we “sell” the personal information of consumers under 16 years of age.

Most modern web browsers give you the option to send a Do Not Track signal to the Websites you visit, indicating that you do not wish to be tracked. However, there is no accepted standard for how a Website should respond to this signal, and we do not take any action in response to this signal.

California Privacy Rights

If you are a California resident, you have the following consumer privacy rights:

- Right to Know: You have the right to request that we disclose to you the personal information we have collected, used, disclosed, and sold over the 12 months preceding any current date, and information about our data practices.
- Right to request deletion: You can request that we delete personal information about you. Although you may request deletion, we are allowed, under California law, to keep certain personal information. You can submit a request to delete by sending your request to info@11thestate.com.
- Right to Opt-Out of "Sale" of personal information: You can opt-out of the "sale" of your personal information to "third parties" by sending your request to info@11thestate.com.
- Right to be Notified of Financial Incentives: You have the right to be notified of any financial incentives offers and their material terms, the right to opt-out of such incentives at any time, and may not be included in such incentives without your prior informed opt-in consent. We do not offer any such incentives at this time.
- Right to Non-Discrimination: We will not discriminate against you for exercising any of these rights.

California law also permits you to request certain information regarding the disclosure of your personal information by us and our related companies to third parties for the third parties’ direct marketing purposes. We do not disclose your personal information to third parties for their own direct marketing purposes.

In addition to the specific forms listed above, you can exercise any of these rights by contacting us at info@11thestate.com and providing us with your name, email address, and address (including zip code) or by submitting a request to us through your Platform account. We may verify your identity by asking you to submit a request through your password-protected Platform account and by providing us with your California zip code or other proof of California residency.

You can also authorize an agent to submit a request on your behalf. An authorized agent must have your signed permission to submit a request on your behalf or provide proof that they have power of attorney in accordance with California probate law. Authorized agents that are business entities must be registered with the California Secretary of State to conduct business in California. Where you use an agent, we will ask for verification of your authorization, namely a copy of your written authorization for the agent to submit the request on your behalf.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We do not discriminate against any consumer for exercising their consumer rights.

10. Access and control of Collected Personal Information

Access to User Information: As a Platform User, you may access, update, alter, or delete your basic User profile information by editing your user profile or settings.

Data retention: Subject to the conditions outlined in the next paragraph entitled ‘Deletion of User Information, the Company will retain User Personal Information for as long as your account is active or as needed to provide you Services.

Deletion of User Information: If you wish to cancel your account, delete your User Personal Information, or request that we no longer use your User Personal Information to provide you Services, please do it through settings. We will retain and use your User Personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements, but barring legal requirements, we will seek to delete your full profile within 30 days.

Control of communications from us: The Company may occasionally send Users an email to tell you about new features, solicit feedback, notify you of important changes, including notifications of changes to this Privacy Policy or just keep you up to date with what's going on with Platform and our products. You may manage your notifications options in the profile or "Settings" panel. Please note that if you do opt-out of promotional mailings, we may still send you important administrative emails, such as notices that affect your rights.

11. Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, technical, or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Policy was last updated by checking the "Last updated" date displayed at the top of this Privacy Policy.

We encourage Visitors and Users to frequently check this page for any changes to our Privacy Policy. Your continued use of the Service constitutes your acceptance of our Privacy Policy terms.

12. Contact

Questions regarding the Company's Privacy Statement or information practices should be directed to info@11thestate.com