



Last Updated: June 2026

1. Introduction

Robinhood Assets (Jersey) Limited ("we", "us", or "our") respects your privacy and is committed to protecting your personal data. We are incorporated in Jersey and act as the data controller for the processing of personal data: (a) collected through this website; and (b) relating to directors, officers, employees, and Ultimate Beneficial Owners (UBOs) of our institutional partners who interact with Robinhood Assets (Jersey) Limited.

This Privacy Notice explains how we collect, use, and share personal data in compliance with the EU General Data Protection Regulation (GDPR) and the Data Protection (Jersey) Law 2018 (DPJL).

Note: This notice does not apply to retail customers using the Robinhood app or trading platforms. It applies solely to visitors to this issuer website and representatives of our institutional counterparty.

2. The Data We Collect

If you are a website visitor, we collect and process the following categories of personal data:

- Website Visitor Data: IP addresses, browser types and versions, time zone settings, operating systems, and information about your interactions with our website collected via cookies. Please see section 4 for more information on cookies.

If you are a representative of an institutional partner:

- Contact data: names, email address, address, address for service of documents, position, date of birth, place of birth, date of appointment, date of resignation, nationality.
- KYB and compliance data: passport, national identity documents, selfie, proof of address, source of funds, financial histories relating to directors, officers, and Ultimate Beneficial Owners (UBOs).

3. How We Collect Your Data

We collect personal data through the following methods:

- Directly from you: when you visit our website, contact us via email, or interact with our institutional systems.
- Indirectly from third parties (Article 14 GDPR): we may receive personal data relating to you from a third party performing ID verification checks for us.

4. Cookies and Similar Technologies

When you use our website, we use the following cookies:



<u>Name</u>	<u>Category</u>	<u>Purpose</u>
Usercentrics	Strictly Necessary	Consent management platform. Serves the consent banner / gate, not a tracker itself.
Google Analytics 4	Analytics	This cookie helps us understand how you use our website, allowing us to improve its performance. Only operates subject to your consent.
Sentry	Strictly Necessary	This cookie is used for error monitoring on the website.

5. Purposes and Legal Basis for Processing

We process your personal data for the following purposes and legal bases:

- To comply with a legal obligation: to fulfill our statutory AML, Know Your Business (KYB), sanctions screening, and regulatory reporting requirements.
- To perform a contract: to manage our institutional relationships and execute tokenized note issuances.
- For our legitimate interests: to ensure the security of our website, manage corporate risk, maintain our IT infrastructure, and monitor the integrity of our digital asset issuances, provided your fundamental rights do not override these interests.

6. Data Sharing and Disclosures

We may share your personal data with:

- Corporate affiliates: other entities within the Robinhood corporate group for operational and compliance support.
- Service providers: third-party vendors providing IT hosting, legal, audit, and compliance screening services.
- Institutional partners: counterparties involved in the tokenized note issuance flow (where strictly necessary).
- Regulators and authorities: The Jersey Financial Services Commission (JFSC) or other law enforcement or regulatory bodies when legally compelled.

7. International Data Transfers



As a US headquartered company, most of our IT systems are hosted in the United States (including on third party systems). We also share personal data with our group companies in the US. As a result, we will transfer your personal data to this jurisdiction, including to our staff members who are located there.

We transfer your personal data on the basis of the EU and UK standard contractual clauses, EU or UK adequacy decisions, or as otherwise permitted by law.

To the extent required or permitted by data protection law, we may rely on other applicable legal mechanisms, such as an appropriate Data Privacy Framework Certification, a vendor's binding corporate rules and/or a derogation under EU/UK data protection laws. More information can be obtained by using the contact details below.

8. Data Retention

We will only retain your personal data in line with our retention policy and for as long as reasonably necessary to fulfill the purposes we collected it for, including satisfying any legal, regulatory, tax, accounting, or reporting requirements.

9. Your Legal Rights

Under the GDPR and DPJL, you have rights regarding your personal data, including the right to:

- Request access to your personal data.
- Request correction of inaccurate data.
- Request erasure of your personal data.
- Object to or restrict the processing of your data.
- Request the transfer of your data to another party.

If you wish to exercise any of these rights, please contact us.

10. Contact Us

If you have any questions about this Privacy Notice, or how we protect your information, please contact us at:

- Email: dataprotection@robinhood.com
- Postal Address: First Floor, La Chasse Chambers, Ten La Chasse, St. Helier, JE2 4UE, Jersey