

Robinhood Non-Custodial Privacy Policy



This Privacy Policy outlines how Robinhood Non-Custodial Ltd. (“Robinhood NC,” “we,” “our,” or “us”) processes the information we collect about you through our mobile app and other online services (collectively, the “Services”) and when you otherwise interact with us, such as through our customer service channels. To review the privacy practices for any of our other Robinhood-owned products or services, please see our general Robinhood Privacy Policy.

1. INFORMATION WE COLLECT AND HOW WE COLLECT IT

Information You Provide

We collect information you provide when you use our Services or otherwise engage or communicate with us as described below.

- **Identity Data**, such as a device token generated by your phone manufacturer (if you decide to enable push notifications) and a Robinhood generated device ID;
- **Contact Data**, such as your email address for customer support and research;
- **Financial Data**, such as your Self-custodial wallet address, portfolio data, and transaction data; and
- **Additional Data You Provide**, such as via survey responses and customer support.

Information We Collect Automatically

We also collect certain information about you automatically when you use our Services, as described below.

- **Usage Information.** We collect anonymized information about user activity on our Services, which includes pages or features accessed, time and date of access, and other similar usage information.
- **Transactional Information.** When you receive, submit, or complete a transaction via the Services, we collect information about the transaction, such as the transaction amount, type and nature of the transaction, and time and date of the transaction.
- **Location Data.** We may approximate your geolocation by your IP address to restrict access from sanctioned countries or as needed for tax purposes.
- **Information Collected Through Tracking Technologies.** We and our service providers also use technologies to automatically collect certain types of usage and device information when you use our Services or interact with our emails. The information collected through these technologies may include your IP address, date and time stamp, and usage information.

Information We Collect from Other Sources

We also obtain information about you from other sources as described below.



- **Business Partners.** We collect information about your wallet based on the public wallet address from companies that we do business with such as your balance and blockchain transaction data. We may also receive transaction information from connected apps for you to review and sign.
- **Robinhood Affiliates.** We may obtain transaction information from our Affiliates when you make a transfer from a Robinhood Crypto account to your Robinhood Self-custodial wallet, so that we may offer our Affiliates' Services to you.
- **Publicly Available Data.** This includes on chain spend behavior, your interactions with our social media platforms, and other information from publicly available sources, such as public websites.

2. HOW WE USE YOUR INFORMATION

We use the information we collect for purposes described below or as otherwise described to you at the point of collection:

- **Maintain and provide the Services,** including to repair our Services, support, and handle account management;
- **Send you transactional or relationship information,** including waitlist communications, transaction confirmations, technical notices, customer support responses, software updates, security alerts, support and administrative messages, and information about your transactions;
- **Communicate with you about offers and other things we think you will be interested in,** such as product announcements, offerings, or surveys;
- **Monitor and improve our Services,** including analyzing usage, research and development;
- **Help protect the safety and security of our Services, business, and users,** such as to investigate and help prevent fraud or other unlawful activity;
- **Protect or exercise our legal rights or defend against legal claims,** including to enforce and carry out contracts and agreements; and
- **Comply with applicable laws and legal obligations,** such as compliance obligations associated with relevant regulations.

3. DISCLOSURES OF INFORMATION

We share information about you in the instances described below.

- **Authorized third-party vendors and service providers.** We share information about you with third-party vendors and service providers who perform services for us, such as fraud prevention, mailing services, accounting services, web hosting, and analytics services.



- **Robinhood affiliates.** Where appropriate, we share information about you with other companies owned or controlled by Robinhood. For example, we may share data with other Robinhood entities for security purposes.
- **Public blockchain.** Transactions made using the RH Self-custodial wallet are recorded on the blockchain and are publicly available. Others can only identify your transactions on block explorers (such as Polyscan) if they know your public address.
- **Substantial corporate transactions.** We may share information about you in connection with a substantial corporate transaction, a merger, consolidation, reorganization, financing, change in control or acquisition of all or a portion of our business by a third party, or in the unlikely event of a bankruptcy or similar proceeding.
- **Legal purposes.** We disclose information about you if we believe that disclosure is in accordance with, or required by, any applicable law or legal process or to protect and defend the rights, interests, safety, and security of Robinhood NC, our users, or the public.
- **With your consent.** We share information about you for any other purposes disclosed to you with your consent.

We share information with others in an aggregated or otherwise de-identified form that does not reasonably identify you.

4. MARKETING

We may use third parties to serve non-targeted ads across other platforms. On an aggregated basis, we may also use third parties to measure the success of our ad campaigns presented across other platforms so that we may measure popularity of content.

5. CHILDREN

We do not knowingly collect or solicit any information from anyone under the age of 13 on these Services. In the event we learn that we have inadvertently collected personal information from a child under age 13, we will take reasonable steps to delete that information. If you believe that we might have any information from a child under 13, please contact us at privacy@robinhood.com.

6. CHANGES TO THIS POLICY

This Privacy Policy will evolve with time, and when we update it, we will revise the "Effective Date" above and post the new Policy and, in some cases, we may provide additional notice. To stay informed of our privacy practices, we recommend you review the Policy on a regular basis as you continue to use our Services.



7. HOW TO CONTACT US

If you have any questions about this Privacy Policy, please contact us at privacy@robinhood.com.