

Phoenix Financial Services — Cookie Policy

Document	Cookie Policy
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1. Purpose and Scope

1.1

This Cookie Policy explains the cookies and similar technologies we use on our websites, and the equivalent storage and identifiers used in our mobile applications — what they are for, who sets them, and how you control them.

1.2

It covers our website at **www.phoenixinc.com**, the **Phoenix Investor Portal**, our **broker portal**, and our **mobile applications for iOS and Android** (together, the “Services”).

2. Who This Policy Covers

2.1

This Policy is issued by **Phoenix Financial Services**, a broker-dealer registered with the U.S. Securities and Exchange Commission (“SEC”) and a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”), CRD number 144403.

2.2

Phoenix Financial Services and PHX Financial, Inc. are the same company. The names “Phoenix Financial Services,” “PHX Financial, Inc.,” “Phoenix Financial,” and “PHX” all refer to that one registered broker-dealer. In this Policy, “PHX,” “we,” “us,” and “our” mean that company together with its affiliate **Kese Technologies LLC**.

3. Websites and the Mobile App Are Different

3.1

Our websites use cookies. Our mobile app does not.

3.2

The Phoenix mobile app is a native application, not a web page in a browser, so browser cookies do not apply to it. It uses **on-device storage** and **software development kit (“SDK”) identifiers** instead. These serve similar purposes — keeping you signed in, remembering your settings, delivering notifications, and helping us detect faults — but they work differently and you control them differently.

3.3

Section 4 covers the websites. Section 5 covers the mobile app. Section 8 explains your choices for each.

4. Cookies on Our Websites

4.1

A **cookie** is a small text file placed on your device by a website you visit. **Session cookies** are erased when you close your browser; **persistent cookies** remain until they expire or you delete them. Related technologies — including web beacons, clear GIFs, pixel tags, and local storage — work similarly, and this Policy covers them all.

4.2

We use the following categories on our websites:

Category	What it does	Can you disable it?
Strictly necessary	Signs you in, keeps your session active, secures the connection, balances load, and protects against fraud and unauthorised access. The site cannot function without these.	No — disabling them prevents sign-in and secure use of the site
Functional	Remembers your settings and preferences, such as display options, so you do not have to set them each visit.	Yes, through your browser
Performance and analytics	Tells us how the site is used in aggregate — which pages are visited, where errors occur, how the site performs — so we can fix problems and improve it.	Yes, through your browser

4.3

We do not use advertising cookies, and we do not permit third parties to place advertising cookies through our websites.

5. Storage and Identifiers in Our Mobile App

5.1

The Phoenix mobile app stores the following on your device and uses the following identifiers:

What	Why	Where it is stored
Sign-in credentials and session tokens	To sign you in and keep you signed in without re-entering credentials each time	The platform's secure keychain or keystore, encrypted by the operating system
App settings and preferences	To remember your choices between sessions	Ordinary app storage on your device
Device and app information	Device model, operating system version, and app version, used to diagnose faults and to deliver a build that works on your device	Read from the device; not stored persistently by us on it

What	Why	Where it is stored
Push notification token	An identifier issued by the platform's notification service so we can deliver notifications you have enabled	Held by the notification service and by us
Diagnostic and usage telemetry	Crash reports, error diagnostics, performance measurements, and IP address, used to keep the app working and secure	Transmitted to our telemetry service; not stored persistently on your device

5.2

Deleting the app removes what is stored on your device, including your saved credentials, session tokens, and settings. It does not delete records we are required to retain — see our **Privacy Policy** and the retention obligations described there.

6. Who Sets Them

6.1

Some of these are set by us. Others are set by service providers acting on our behalf:

Provider	What it supports
Microsoft Azure , including Microsoft Entra External ID	Sign-in, authentication, and session security
Microsoft Azure Application Insights	Diagnostic, error, and performance telemetry, including IP address
Google Firebase Cloud Messaging	Delivery of push notifications
Twilio	Phone number verification

6.2

These providers act on our instructions and are not permitted to use the information for their own purposes. How we handle the information involved is described in our **Privacy Policy**.

7. We Do Not Use Any of This for Advertising

7.1

We do not use cookies, on-device storage, or device identifiers for advertising. Specifically:

- we do not serve targeted or behavioural advertising;
- we do not track you across other companies' apps or websites;
- we do not collect the platform advertising identifier — Apple's IDFA or the Android Advertising ID — and our app contains no advertising software;
- we do not sell or share personal information for cross-context behavioural advertising; and
- we do not share this information with data brokers.

7.2

Because we do not track across other companies' apps and websites, the Phoenix app does not present Apple's App Tracking Transparency prompt.

8. Your Choices

8.1

On our websites, your browser controls cookies. You can set it to accept or reject cookies, to delete cookies already stored, or to notify you when one is offered. Each browser handles this differently; the instructions are in your browser's settings or help.

If you block strictly necessary cookies you will not be able to sign in, and parts of the site will not work.

8.2

In the mobile app, you control the following through your device settings:

- **Notifications** — turn push notifications off for the Phoenix app at any time, in iOS Settings or Android Settings. You may still receive service messages by other means, such as email.
- **Location** — grant or revoke the app's location permission at any time in your device settings. See our Privacy Policy for what location is used for.
- **Everything stored on the device** — delete the app to remove locally stored credentials, session tokens, and settings.

8.3

You cannot disable the storage that keeps you signed in while continuing to use your account, for the same reason you cannot disable strictly necessary cookies on the website: it is what makes authenticated access work.

9. Changes to This Policy

9.1

We may update this Policy to reflect changes in the technologies we use or in applicable law. Updates are published within the Services, and the document set version and effective date at the top of this Policy identify the current version.

10. Related Documents

Read this Policy together with:

- **Privacy Policy** — what personal information we collect, why, and your rights over it
- **Terms and Conditions**
- **Data Disclaimer**
- **Disclosures**

Where this Policy conflicts with the Terms and Conditions, the **Terms and Conditions govern**.

11. Contact Us

Phoenix Financial Services 100 Wall Street, 10th Floor New York, NY 10005

Telephone: (212) 776-4187 Email: contact@phoenixinc.com Website: www.phoenixinc.com Legal documents: www.phoenixinc.app/legal Account disclosures: <https://phoenixinc.com/account-disclosures/>

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100 Wall Street, 10th Floor, New York, NY 10005

Telephone (212) 776-4187 · contact@phoenixinc.com · www.phoenixinc.com

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