

Last Revised: December 27, 2019

Nothing in this Privacy Statement may be construed to create any obligation for the Company beyond what is required by applicable law.

[California residents click here to access our California Consumer Protection Act \(CCPA\) Notice.](#)

This Privacy Statement (“Privacy Statement” or “Statement”) describes the practices of Black Clover Trading LLC (BCT, “Company,” “we” or “us”) with respect to information, including Personal Data (which means any information relating to an identified or identifiable natural person), we obtain from and about individuals interacting with us and our websites, mobile applications, products and services (collectively, our “Services”). This Statement does not apply to job applicants or Company employees.

This Privacy Statement only applies to the data processing activities of Black Clover Trading LLC. This Privacy Statement does not apply to services, websites or mobile apps offered by third parties, even if this site links to those services or third parties. We encourage you to read the privacy statements of every third party website that collects your Personal Data.

Please read the information below to learn about the information, including Personal Data, collected about you and how it is used. Please note that there is a separate Terms of Service found at the hyperlink located at the bottom of our site.

If we make any material changes to this Statement we will notify you by means of a prominent notice on our site prior to the change becoming effective. The most current version of the Statement may be reviewed by clicking on the “Privacy Statement” link located at the bottom of our site.

1. INFORMATION WE COLLECT

The type of information, including Personal Data, we collect depends on how you use our Services or interact with us.

Sources of Personal Data

Information, including Personal Data, is collected directly from you when you:

- Register for an account;
- Communicate with us, such as to provide feedback, request support, or ask for additional information;
- Subscribe to newsletters, register for seminars or training, or purchase goods or services;
- Use interactive or social networking features of our Services, including setting up a public profile, submitting content (such as comments, articles, links, or other items), or using our chat feature; or
- Otherwise interact with or use our Services.

Black Clover Trading LLC also collects information, including Personal Data, from our affiliated entities. For example, you may sign up for newsletters with one of our affiliates and in so doing choose to receive information from us as well.

In addition, Black Clover Trading LLC receives information, including Personal Data, from third parties who provide services to us. This information may include information about your use of our Services, your use of other websites as well as your interests and preferences. For example, we may collect information about your browsing and usage history on this site. We may combine the information we obtain from third parties with information that we or our affiliates have collected about you.

Categories of Personal Data

The Personal Data collected (electronically, in writing, or by phone) includes:

- Contact information (such as name, email address, mailing address and phone numbers);

- Payment information (including credit card information, billing address and bank account information);
- Purchase or product/service use history;
- Account log-in credentials;
- Your interests;
- Demographic information (such as number in household, information on your income and assets, age, etc.);
- Photographs, images, video and other user-generated content such as materials that you may submit for contests or sweepstakes; and
- Data gathered by technology when you visit our site.

CALIFORNIA DO NOT TRACK DISCLOSURES (AUTOMATICALLY COLLECTED INFORMATION)

Like most website operators, we collect information of the sort that web browsers and servers typically make available, such as your IP address, your browser type, information regarding your internet service provider or the type of device you used to access this website, language preference, pages visited, and the date and time of each page request. Some of this information may be considered Personal Data under applicable laws. Some of this data may also be sent to third-party content providers (for example: advertisers, website analytic companies, etc.) that provide content on our Services. Such sharing may allow the website and/or content providers to track you over time and across multiple websites. At this time, our site does not respond to Do Not Track beacons sent by browser plugins as there is not yet a common agreement about how to interpret Do Not Track signals from browsers. Additionally, if you navigated from or navigate to other websites from our site, we may collect the address of those websites.

We may collect information about your activities on this site through the use of cookies, clear gifs or web beacons, local shared objects or Flash cookies, or through other identifiers or technologies, including similar technologies as they may evolve over time. We refer to these technologies collectively as Data Technologies. We use Data Technologies to help us identify and track visitors, their usage of our Services, and their website access preferences.

We may allow third parties to use Data Technologies on our site. The information collected from these Data Technologies may be shared with and used by us, by

others acting on our behalf, or by third parties. Information collected by Data Technologies may be used on this website or on other websites, services, or online applications, including websites that may not be operated by us. For example, we may partner with third party ad networks to either display advertising on our website or to manage our advertising on other sites. These ad-network partners use Data Technologies to collect information about your activities on this and other websites to provide you targeted advertising based upon your interests. These websites and third-party ad networks are not controlled by us.

You may be able to restrict our use of certain Data Technologies, such as cookies, by modifying your browser settings. For example, your web browser may enable you to refuse cookies. By restricting our use of Data Technologies, certain features of our Services may not function properly.

2. CHILDREN'S PRIVACY AND USE OF THE SERVICES BY MINORS

This website and our Services are not directed to minors under the age of 18. You should not use this website or our Services or send any Personal Data about yourself to us if you are under the age of 18.

Furthermore, if you believe that a child under the age of 13 may have provided his or her Personal Data to us, please contact us using the contact information at the end of this Statement. In the event that we become aware that we have collected Personal Data from a child under the age of 13, we will dispose of that Personal Data immediately.

3. HOW WE USE THE INFORMATION WE COLLECT OR RECEIVE

We and others acting on our behalf may process information that we collect or receive about you, including Personal Data, to operate our business, including our Services. We process your information to:

- Deliver, administer, and improve the services, products and features that we provide to you and others – this is necessary for the performance of a contract with you or for our legitimate interest to do so;
- Comply with applicable laws or our policies – this is necessary for our compliance with legal obligations or our legitimate interests to defend our interests and claims;
- Resolve disputes, prevent fraud, theft, or injury to you, us, or others, and to enforce our agreements with you, including our Services Terms of Service – this is necessary for our legitimate interests to defend our interests and claims;
- Contact you to respond to you, including through telephone, fax, text, or chat –this is necessary for our legitimate interests as set out herein or based on your consent (in which case we would ask you separately to provide your consent to a particular processing activity);
- Send you administrative notices to inform you about important changes in our contractual relationship – this is necessary for the performance of a contract with you or for our legitimate interest to do so;
- Provide you with a more efficient and customized educational and shopping experience, provide you with customized marketing and promotional services and inform you about our products, services, special offers and upcoming events that may be of interest to you, statistically analyze site use (for more information in this respect, see our separate Cookie Policy), improve our product and service offerings, and enhance our Services' content, layout, and services – this is necessary for our legitimate interests as set out herein or based on your consent (in which case we would ask you separately to provide your consent to a particular processing activity).

4. HOW WE SHARE INFORMATION

We may share data with select third parties, such as our advertisers, for purposes of serving you with customized promotions. If you would like to learn more about the sharing of data for purposes of providing customized advertisements or promotions, please visit <http://www.aboutads.info/consumers/>. We may also use or share your information in an anonymized or aggregate manner.

Your Personal Data may be shared with other Black Clover Trading LLC companies and affiliates (i.e. intra-group) for all the purposes described in Section 2. We may also provide some of our services through contractual arrangements with other

service providers who process the Personal Data on our behalf, in particular for IT support, hosting and maintenance services and mailing or delivery/transport services.

We need to share your Personal Data with other third parties in order to deliver the requested products or services. In particular, we must release your credit card information to the card-issuing bank or a payment provider to confirm payment for products and services you purchase from us. We also share your Personal Data with accounting and consulting firms and external counsel.

Occasionally we may be required by law enforcement or other public authorities as well as judicial authorities, courts or tribunals to share Personal Data with them or other parties. We will disclose Personal Data upon receipt of a court order, subpoena, warrant, or other legal process to the extent necessary to meet legal, national security, public interest, or law enforcement obligations or defend our interests in legal, administrative or other proceedings, which may require us to share Personal Data with other parties to the proceedings and their external counsel. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.

In addition, we may share information we have collected from you, including Personal Data, in connection with the sale or merger of our business or the transfer of our assets, however, your Personal Data will continue to be protected by any pre-existing Privacy Statement of Black Clover Trading LLC, unless you agree otherwise.

You should also be aware that when you voluntarily disclose your Personal Data in any public areas of our Services, that Personal Data, along with any information disclosed in your communication, can be collected and used by third parties and may result in unsolicited messages from third parties. Such activities are beyond our control. If you do not want your comments to be viewed by third parties, you are advised not to make any public submissions. In some cases, we may publicly display information about you, or display your information to other users or visitors of our Services. For example, if you publicly post to our forum with a support issue, we reserve the right to publish it in order to help us clarify or respond to your

request or to help us support other users. In addition, we may post, publish, or otherwise publicly display or use content you post in our chat rooms or through our other social networking features, including for our own promotional or marketing purposes. If you create a profile in order to access our social networking features, your profile information may be displayed and made publicly available, including to other users or visitors. We may also aggregate information about you and combine it with information on other visitors or users of our Services. We may display this information publicly or provide it to others.

5. YOUR CALIFORNIA PRIVACY RIGHTS

If you are a California resident you have the right to request information from us regarding the manner in which we share certain categories of your personal information with third parties for the third parties' direct marketing purposes. California law provides that you have the right to submit a request to us at our designated address and receive the following information:

- the categories of information we disclosed to third parties for the third parties' direct marketing purposes during the preceding calendar year; and
- the names and addresses of third parties that received such information, or if the nature of their business cannot be determined from the name, then examples of the products or services marketed.

You are entitled to receive a copy of this information in a standardized format and the information will not be specific to you individually. You may make such a request by emailing support@clovertrading.io

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6. RETENTION OF PERSONAL DATA

We will only keep your information, including Personal Data, as reasonably necessary to fulfill the purposes for which Personal Data is collected as stated herein; for as long as is necessary for the performance of the contract between you

and us, if any; and to comply with legal and statutory obligations, such as in tax, trade and corporate laws. For example, we do not store credit card numbers or credit card security codes after that payment card information is used to process a credit card transaction.

When we no longer need your Personal Data for our purposes, we will destroy, delete or erase that Personal Data or convert it into an anonymous form.

7. SECURITY OF DATA

Black Clover Trading LLC will take reasonable steps to protect your information, including Personal Data, in our possession from loss, misuse, unauthorized access, disclosure, alteration, and destruction. For example, we use security measures including safeguarding and monitoring our network and controlling access to our files, equipment, and buildings.

8. YOUR CHOICES

If you do not wish to receive information regarding our products, services, special offers and upcoming events, please click on the “Unsubscribe” link shown on our emails and electronic newsletters to you or contact us at the address or telephone number listed below and we will remove your name from our mailing lists.

You may access your Personal Data and correct, amend, or delete any of the Personal Data you have provided to us on this site by emailing us at support@clovertrading.io. Please include your name, address, and/or email address when you contact us.

It is possible that you may be denied access to your Personal Data. For instance, access can be denied when: giving one person access would compromise another privacy rights; disclosure is likely to interfere with the safeguarding of national security, defense, or public security; and disclosure could interfere with law enforcement or legal actions. These are only examples, and access may be denied

in other situations in compliance with applicable laws. For additional information about EU rights, please see Section 9 below.

9. YOUR EU PRIVACY RIGHTS

If you are using our Services from the EU or where applicable EU data protection laws so provide, you may exercise the following rights regarding your Personal Data:

ACCESS

You have the right to obtain from us confirmation if your Personal Data is being processed and certain information in this regard.

RECTIFICATION

You have the right to request the rectification of inaccurate Personal Data and to have incomplete data completed.

OBJECTION

You have the right, when we process Personal Data on the grounds of legitimate interests, to object to the processing of your Personal Data for compelling and legitimate reasons relating to your particular situation, except in cases where legal provisions expressly provide for that processing. In addition, you have the right to object at any time where your Personal Data is processed for direct marketing purposes.

PORTABILITY

You may receive your Personal Data that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit them to other data controllers without hindrance. This right only exists if the processing is based on your consent or a contract and the processing is carried out by automated means.

RESTRICTION

You may request to restrict processing of your Personal Data if (i) you contest the accuracy of it – for a period we need to verify your request; (ii) the processing is unlawful and you oppose the erasure of it and request restriction instead; (iii) we no longer need it, but you tell us you need it to establish, exercise or defend a legal claim; or (iv) you object to processing based on public or legitimate interest – for a period we need to verify your request.

ERASURE

You may request to erase your Personal Data if it is no longer necessary for the purposes for which we have collected it, you have withdrawn your consent and no other legal ground for the processing exists, you objected and no overriding legitimate grounds for the processing exist, the processing is unlawful, or erasure is required to comply with a legal obligation.

RIGHT TO LODGE A COMPLAINT

You also have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your residence, or the location where the issue that is the subject of the complaint occurred.

RIGHT TO REFUSE OR WITHDRAW CONSENT

Please note that in case we ask for your consent to certain processing, you are free to refuse to give consent and you can withdraw your consent at any time without any adverse negative consequences. The lawfulness of any processing of your Personal Data that occurred prior to the withdrawal of your consent will not be affected.

If you have questions about exercising any of those rights or their applicability to any of our particular processing activities or have questions about any data transfer mechanism or want a copy thereof, you may contact us at support@clovertrading.io or at the address provided in Section 10 below.

10. HOW TO CONTACT US

Unless otherwise stated, Black Clover Trading LLC is a data controller under applicable law for Personal Data processed subject to this Statement. If you have any questions about this Statement or if you believe that your Personal Data has been processed or disclosed in violation of this Statement, please contact us: support@clovertrading.io

or

You may also contact us by email at support@clovertrading.io.

We will investigate and attempt to resolve any complaints and disputes regarding the processing of your Personal Data.