

# Privacy Policy

*Last Updated: Feb 8, 2025*

TradeTBROS.ai (“**Company**,” “**we**,” “**us**,” or “**our**”) is committed to safeguarding the privacy and security of personal information we collect from users, clients, customers, and other individuals (“**you**,” “**your**”) who access or use our websites, financial tools, analytics platforms, course content, live stream content, and related services (collectively, the “**Services**”). This Privacy Policy explains how we collect, use, share, and protect your information, and it outlines your rights and choices regarding our data practices.

By using or accessing our Services, you agree to this Privacy Policy. If you do not agree, please discontinue use of the Services.

## 1. Scope and Applicability

### 1. Who We Are

- We may provide financial tools, market analytics, or information services for various clients, including but not limited to hedge funds, investment managers, private traders, and other institutional or retail clients.
- If we are registered or required to register with the Securities and Exchange Commission (“**SEC**”) or subject to the Federal Trade Commission (“**FTC**”) regulations, this Privacy Policy also addresses certain obligations under applicable federal laws, such as Regulation S-P and the Gramm-Leach-Bliley Act (“**GLBA**”), as well as relevant state privacy laws.

### 2. Coverage

- This Privacy Policy applies to personal information collected on our websites, subdomains, mobile applications, and any other online platforms we control.
- This Policy does not apply to third-party websites or services linked to or from our Services. We encourage you to review the privacy policies of any third parties before providing personal information.

## 2. Information We Collect

### 2.1 Information You Provide Directly

- **Account Registration:** When you register or open an account with us, subscribe to our services, or request information, we may collect your name, email address, phone number, postal address, job title, and company affiliation.

- **Financial and Billing:** If you pay for any subscriptions or services, we (or our third-party payment processors) collect billing details such as credit card numbers, bank account information, and billing addresses.
- **Investment/Transaction Data** (if applicable): If you use our investment or trading tools, you may provide brokerage account information, portfolio details, or transaction data so we can deliver analytics or advisory features.
- **Communications:** If you contact us (e.g., via email, support tickets, or phone), we collect and store your contact details and any information you choose to provide.

## 2.2 Information Collected Automatically

- **Log Data:** We automatically collect certain data when you access our Services, including IP address, browser type, device type, operating system, referring/exit pages, date/time stamps, and clickstream data.
- **Cookies and Similar Technologies:** We use cookies, web beacons, pixel tags, and other tracking technologies to recognize you, optimize performance, analyze usage, and personalize content. You can adjust your browser settings to manage cookies, but this may limit certain features of our Services.

## 2.3 Information from Third Parties

- **Social Media:** If you link or log in through a social media account, we may receive your profile information and other data that the platform provides.
- **Service Providers and Partners:** We may receive additional information from analytics providers, marketing partners, or others who have obtained your consent or have a legal basis to share it with us.
- **Regulatory/Compliance Checks:** We may obtain information from third-party services or government databases for Know Your Customer (“KYC”), Anti-Money Laundering (“AML”), or other legal compliance purposes.

# 3. How We Use Your Information

We use the personal information we collect for the following purposes:

1. **Service Delivery**
  - To provide, maintain, and improve our financial tools, analytics platforms, and other Services.
  - To facilitate transactions and process payments.
2. **Account and Client Management**
  - To authenticate users, manage accounts, and respond to user inquiries.
  - To send account-related or transactional communications (e.g., confirmations, technical notices).
3. **Regulatory and Legal Obligations**

- To comply with applicable laws, regulations, or orders from government or regulatory authorities (e.g., SEC, FTC).
  - To fulfill obligations under Regulation S-P and the GLBA if we are deemed a “financial institution,” including providing privacy notices to “customers” and safeguarding nonpublic personal information.
4. **Marketing and Communications**
- To send you newsletters, offers, or other marketing communications consistent with your preferences and applicable law.
  - You can opt out of marketing communications at any time by following the unsubscribe instructions in each email or by contacting us.
5. **Analytics and Personalization**
- To understand usage trends, monitor and analyze how you interact with our Services, and tailor content to your interests.
6. **Fraud Prevention and Security**
- To detect, investigate, and help prevent security incidents, fraud, or other malicious activity.
  - To enforce our terms of use, agreements, or policies, and protect our rights and the rights of others.
7. **Business Operations**
- For internal recordkeeping, auditing, invoicing, and compliance with record retention requirements (including SEC or other regulatory recordkeeping rules).
  - To evaluate or conduct mergers, divestitures, reorganizations, or other business transactions.

## 4. Legal Bases for Processing (EEA/UK)

Where required by law (e.g., the European Economic Area or United Kingdom), we rely on the following legal bases:

- **Consent:** When you have given consent for specific uses (e.g., marketing emails).
- **Contract:** Where processing is necessary to perform a contract with you or take steps at your request prior to entering into a contract.
- **Legal Obligation:** When processing is required to comply with a legal or regulatory obligation.
- **Legitimate Interests:** When processing is in our legitimate interests (e.g., improving our Services, ensuring the security of our platforms), and not overridden by your privacy interests.

## 5. How We Share Your Information

We do not sell or rent your personal information. However, we may share your information under the following circumstances:

1. **Affiliates and Subsidiaries**
  - We may share information with our corporate affiliates for operational, administrative, or compliance purposes.
2. **Service Providers**
  - We engage third-party vendors (e.g., cloud hosting providers, payment processors, analytics tools) to perform functions on our behalf. These service providers are bound by contractual obligations to protect your information and only use it as directed by us.
3. **Regulatory or Legal Requirements**
  - We may disclose information to government authorities or regulators (such as the SEC) if we are compelled by law, regulation, subpoena, court order, or other legal process.
  - We also may share information to assert or defend our legal rights, protect the safety of our users or others, investigate fraud, or respond to a government request.
4. **Business Transfers**
  - In the event of a merger, acquisition, financing, reorganization, bankruptcy, or sale of all or a portion of our assets, your information may be transferred to a successor or affiliated entity as part of that transaction.
5. **Consent or Direction**
  - We may share your information when you specifically request or authorize us to do so.
6. **Opt-Out Rights (GLBA/Regulation S-P)**
  - If we collect nonpublic personal information (“NPI”) subject to the GLBA or Regulation S-P, and we share it with nonaffiliated third parties other than as permitted by law, we will provide you with notice and an opportunity to opt out of such sharing.

## 6. Security Measures

We maintain a comprehensive written information security program designed to protect the confidentiality and integrity of personal and financial information, in compliance with applicable laws, including the GLBA Safeguards Rule. Our measures include:

- **Administrative Safeguards:** Limiting access to personal information to employees who need it to perform their job duties, regular training on privacy/security, and vendor oversight.
- **Technical Safeguards:** Using encryption, secure servers, firewalls, and routine security testing.
- **Physical Safeguards:** Restricting access to facilities and secure storage of physical documents.

While we strive to protect your personal information, no security system is impenetrable, and we cannot guarantee the absolute security of our systems or databases.

## 7. Data Retention

We retain your personal information for as long as is necessary to:

- Provide you with the Services;
- Comply with our legal and regulatory obligations, including applicable SEC recordkeeping rules (for example, under the Investment Advisers Act of 1940 or the Securities Exchange Act of 1934);
- Enforce this Privacy Policy and our Terms of Use;
- Resolve disputes and protect our legal rights; and
- Conduct audits and fulfill legitimate business needs.

Once retention is no longer necessary, we securely dispose of or anonymize your information.

## 8. Your Rights and Choices

### 8.1 Account-Related Choices

- **Access, Correction, and Deletion:** You may have the right to access, update, or delete certain personal information in our possession, subject to legal or contractual restrictions. Please contact us at [support @ tradetbros.ai](mailto:support@tradetbros.ai) if you need assistance.
- **Marketing Preferences:** You can unsubscribe from marketing communications by clicking the “unsubscribe” link in our emails or contacting us.

### 8.2 Additional Rights for Certain Jurisdictions

- **California Residents:** If you are a California resident, you may have additional rights under the California Consumer Privacy Act (“CCPA”) or the California Privacy Rights Act (“CPRA”). These include the right to know, delete, correct, opt out of the “sale” or “sharing” of personal information, and limit the use of sensitive personal information. Please contact us if you have any concerns regarding the CCPA for more details.
- **Other State Laws:** Laws in certain U.S. states (e.g., Colorado, Connecticut, Utah, Virginia) may provide additional privacy rights. Where applicable, we will honor such rights in accordance with the relevant state laws.
- **EEA/UK Residents:** You have rights under GDPR/UK GDPR to request access, rectification, erasure, restriction of processing, or objection to processing of your personal data. You also have the right to lodge a complaint with a supervisory authority if you believe our data practices violate applicable law.

## 9. International Data Transfers

We are headquartered in the United States, and the information we collect may be transferred to and processed in the U.S. or other jurisdictions that may not have equivalent data protection

laws as in your country of residence. Where required by law (e.g., GDPR), we use appropriate safeguards (such as Standard Contractual Clauses) to protect any transferred personal data.

## **10. Children’s Privacy**

Our Services are not directed to individuals under the age of 18. We do not knowingly collect personal information from minors without parental or guardian consent. If you believe that we have collected personal information from someone under the age of 18 without proper consent, please contact us at [support @ tradetbros.ai](mailto:support@tradetbros.ai), and we will promptly take steps to delete such information.

## **11. No Investment Advice**

We do not provide investment, financial, legal, or tax advice through the Services. All Services, tools, analytics, and data are for informational purposes only and should not be construed as a recommendation to buy, sell, or hold any security. Past performance is not indicative of future results. See our Terms and Conditions policy for more details. Consult a qualified professional for personalized advice.

## **12. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our data practices, operations, or legal requirements. When we do, we will revise the “Last Updated” date at the top. Your continued use of the Services after any changes indicates your acceptance of the revised Privacy Policy. If any modifications materially affect your rights, we will endeavor to provide additional notice (e.g., by email or prominent notice on our website).

## **13. Contact Us**

If you have questions or concerns about this Privacy Policy, our data practices, or need to exercise any applicable rights, please contact us at:

**Email:** [support @ tradetbros.ai](mailto:support@tradetbros.ai)