# **Privacy Policy**

## Introduction

The Privacy Policy (this "Privacy Policy") of SignalPop LLC ("SignalPop" or the "Company") is intended to inform you of SignalPop's policies and practices regarding the collection, use, and disclosure of any information you submit to SignalPop through the Company's website or through the SignalPop Trading Studio Software Application ("Software"), or via the Tradier API functions called by the Software that you have granted the Software access to during each log in to Tradier from the Software. You agree that your use of the Software, services, tools, and any dispute over the Company's policies will be governed by this Privacy Policy.

SignalPop is committed to protecting your privacy online. The Company recognizes the need for appropriate protection and management of any information you share with the Company. As such, SignalPop respects your privacy, particularly regarding the storage, access, and use of personally identifiable data collected online. Federal law gives consumers the right to limit some, but not all, sharing. Federal law also requires SignalPop to tell you how the Company collects, shares, and protects your personal information. The Company will maintain your personal information in a secure format and, except, as described in this Privacy Policy, at no time will the Company permit anyone else to access your confidential information. Please read the following carefully to understand what SignalPop does with respect to your privacy.

## Why does SignalPop collect customer information?

There are several important reasons SignalPop collects customer information.

When you log into the SignalPop website, the PII that SignalPop collects about you includes, but is not limited to, your name, email, SignalPop website username and SignalPop website password, which are used to log you into the site. PII (personally identifiable information) is defined as information that identifies a specific customer by non-public information associated with that customer. When visiting our website we may also use Google Analytics or similar product to better understand how our website pages are used.

When you use the Software, SignalPop gathers PII about you via calls to API functions provided by Tradier. This PII includes, but is not limited to, your name, Tradier user ID, and Tradier account information, such as your account status, balances, orders, and positions. SignalPop gathers this information so it can be displayed to you. SignalPop uses this information in memory while running the Software. Your name and Tradier user ID are also stored securely and used to verify the type of product access level you have paid for, such as the BASIC mode or ADVANCED mode. SignalPop uses your name and user ID to coordinate with Tradier to determine which access level you purchased so that SignalPop can then deliver to you the features that you have purchased.

## When does SignalPop collect information?

As part of the process of creating a user account on the SignalPop website, you are required to enter your name, email, a username, and a password. Each time you log into the SignalPop website this information is used during the login process. When visiting our website we may analyze your actions using Google Analytics or the like.

Each time you log in to Tradier via the Software, as part of this process, the Software queries Tradier for your name, user ID, and associated account information. This information is periodically queried as you run the Software so that the Software can accurately display the status of your account(s), balances, orders, and positions.

#### How does SignalPop use your personal information?

Your SignalPop website username, email and password are used to log you in to the SignalPop website.

Your name and Tradier user ID are used by the Software to verify the mode BASIC or ADVANCED that you have paid for so that these features can be enabled when you run the Software. All other information is queried form Tradier periodically as you run the Software so that the Software can accurately display the status of your account(s), balances, orders, and positions.

#### What does SignalPop share with affiliated companies?

The purpose of the SignalPop Privacy Policy is to affirm that customer privacy is at the forefront of the Company's commitment to maintain a superior level of trust with its customers. Thus, the Company does not sell, license, lease or otherwise disclose your personal information to any third party for any reason other than the purposes described below:

- The Company may disclose personal information about you to third parties or to government entities as required by law or regulation, or in response to mandatory legal requests.
- The Company may disclose your personal information when necessary to protect your rights and property as a SignalPop customer, or that of SignalPop.
- The Company may share information with third parties that you have identified as having a commercial relationship with you.
- The Company may disclose your personal information to help the Company improve its services to you.
- The Company may disclose customer information from its database and admin systems to help the Company analyze and identify the needs of its customer base.
- The Company may disclose customer information to a purchaser of its capital stock, business or assets or to an affiliate-successor.
- The Company may disclose personal information should you decide to participate in certain promotions and special offers due to the fact that the promotion may require the Company to gather and share your personal information, such as supplying personal information to the promotion sponsor, which may be a third party or the Company's affiliate company. For example, it is common practice for a referral program to require that the Company provide your name as a reference to a prospective customer. You should understand that if at any time should you choose to purchase a product or service offered by another company, any personal information you share with that company would no longer be under the jurisdiction of this Privacy Policy.

All third parties with whom SignalPop shares personal information have their own privacy policies, and while they are expected to protect personal information in a manner that aligns respectively with the protocols described in SignalPop's Privacy Policy, you should visit their website(s) to view their respective privacy policies.

If SignalPop proposes to share customer information in a manner not covered in this Privacy Policy, it is the Company's responsibility to notify you of this change by making an updated Privacy Polity available to you on the SignalPop website, as well as notifying you in an updated Terms and Conditions agreement for the Software.

# Can you opt out of sharing personal information with non-affiliated third parties for marketing purposes?

The Company does not share information with non-affiliated third parties for marketing purposes unless the Company has record of your prior consent. Therefore, there is no need to opt-out. You may decline to share your information if and when there is a time that the Company requests your consent before disclosing any information to a non-affiliated third party.

#### Can you opt-out of receiving marketing information?

Yes. If you opt-opt of marketing emails regarding news about new products and services, SignalPop will always honor your request. However, from time to time, SignalPop may need to send you certain notifications that contain important information about your account and, due to the important and sometimes time-sensitive nature of these notifications, we cannot prevent their delivery via an opt-out feature.

#### Does this Privacy Policy apply to links out to other websites?

SignalPop is not responsible for the privacy policies or content of websites the Company links out to. The Company has no control over the use or protection of information provided by you when visiting those websites, nor any control over the information collected by those websites. If you elect to link to a co-branded website or to a linked website, you may be asked to provide registration or other information. The information you provide to that website is not under the jurisdiction of the SignalPop Privacy Policy; therefore, you should read that website's privacy policy.

#### How does SignalPop protect personal information?

SignalPop takes the safety of its customer data very seriously and employs industry standard measures to ensure data is protected from being accessed by any unauthorized persons. The Company utilizes the security and encryption technology provided by a world class cloud vendor to protect personal information collected. The Software also relies on the personal information protections provided by Tradier. These protections, while not subject to this Privacy Policy, are described in Tradier's Privacy Policy, which can be found on Tradier's website at <a href="https://brokerage.tradier.com">https://brokerage.tradier.com</a>.

All communication with the Tradier website is encrypted with Transport Layer Security and sent over a secure channel.

## How does SignalPop use information collected from Cookies and/or other tracking techniques?

Other than as described above, SignalPop does not collect PII related to cookies or other tracking techniques.

## Can customers update their information via SignalPop?

PII associated with your SignalPop account, including your name, email, SignalPop website username and SignalPop website password, can be updated via SignalPop. However, since your PII at Tradier is directly maintained by Tradier, it cannot be udated by or via SignalPop. For information on updating your PII at Tradier, please see Tradier's website at <a href="https://brokerage.tradier.com">https://brokerage.tradier.com</a>.

#### What if there are changes to this Privacy Policy?

The Company reserves the right to modify this Privacy Policy at any time. Therefore, SignalPop encourages you to review it frequently. If SignalPop makes material changes to this Privacy Policy, the Company will post the updated Privacy Policy to the SignalPop website (<u>www.signalpop.com</u>) and place an updated notification in the Terms and Conditions agreement displayed after running a new installation of the Software. The Company will note the date of the most recent Privacy Policy in the document footer.

#### How can I contact SignalPop with questions regarding this Privacy Policy?

If you have any questions, complaints, or comments, please email SignalPop directly at info@signalpop.com or address the SignalPop LLC at PO Box 2522, White Salmon, WA 98672