

## **PRIVACY POLICY**

First Terrace Systems, LLC (“FTS”) values its users’ privacy. This Privacy Policy (“Privacy Policy” or “Policy”) will help you understand how we collect and use personal information from those who visit our website (“Website”) or make use of our online facilities and services, including those who purchase a subscription for use of our services, and what we will and will not do with the information we collect. Our Policy has been designed and created to ensure those affiliated with FTS of our commitment and realization of our obligation not only to meet, but to exceed, most existing privacy standards.

We reserve the right to make changes to this Policy at any given time. If you want to make sure that you are up-to-date with the latest changes, we advise you to frequently visit this page. If at any point in time FTS decides to make use of any personally identifiable information on file, in a manner vastly different from that which was stated when this information was initially collected, the user or users shall be promptly notified by email. Users at that time shall have the option as to whether to permit the use of their information in this separate manner.

This Policy applies to FTS, and it governs any and all data collection and usage by us. Through the use of [www.firstterraceystems.com](http://www.firstterraceystems.com), you are therefore consenting to the data collection procedures expressed in this Policy.

This Policy does not govern the collection and use of information by companies that FTS does not control, nor by individuals not employed or managed by us. If you visit a website that we mention or link to, be sure to review its privacy policy before providing the site with information. It is highly recommended and suggested that you review the privacy policies and statements of any website you choose to use or frequent to better understand the way in which websites garner, make use of, and share the information collected.

This Policy will inform you of the following:

1. What personally identifiable information is collected from you through our Website;
2. How we collect your data;
3. Why we collect personally identifiable information and the legal basis for such collection;
4. How we use the collected information and with whom it may be shared;
5. What choices are available to you regarding the use of your data; and
6. The security procedures in place to protect the misuse of your information.

## **INFORMATION WE COLLECT**

It is always up to you whether to disclose personally identifiable information to us, although if you elect not to do so, we reserve the right not to register you as a user or provide you with any products or services. This Website collects various types of information, which may include, but is not limited to:

- Voluntarily provided information, which includes your name, address (e.g., state, zip code, city), email address, phone number, billing and/or credit card information, which may be used when you purchase our subscription service, and/or products and/or other services and to deliver the services you have requested.
- Information automatically collected when visiting our Website, which includes cookies, location, and server logs.

In addition, FTS may collect nonpersonal anonymous demographic information, such as the type of browser you are using, IP address, or type of operating system you are using, which will assist us in providing and maintaining superior quality service.

Please rest assured that this site will only collect personal information that you knowingly and willingly provide to us by way of surveys, completed membership forms, and emails. It is the intent of this site to use personal information only for the purpose for which it was requested, and any additional uses specifically provided for on this Policy.

When you subscribe to our services for the first time and/or renew your subscription, you will be prompted to enter payment information to process the subscription order. This information will be processed by a third-party processor and you will need to separately agree to the privacy policy and terms and conditions of that third-party processor.

- *Log Data*

Like many website operators, we collect information that your browser sends whenever you visit our Website (“Log Data”). This Log Data may include information such as your computer’s Internet Protocol (“IP”) address, browser type, browser version, the pages of our Website that you visit, the time and date of your visit, the time spent on those pages, and other statistics. We may use such Log Data to improve our Website.

- *Cookies*

Like many sites, we use “Cookies” to store certain information to manage sessions on our Website. We also use “Cookies” to collect information about your activities on our Website in order to improve your experience on our Website. You can instruct your browser to refuse all Cookies or to provide you with an indication when a Cookie is being sent. However, if you do not accept Cookies, you may not be able to use some portions of our Website.

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer’s hard drive. Cookies can include “Session” or “Persistent” Cookies.

Session Cookies are deleted as soon as you close your web browser, while Persistent Cookies remain on your personal computer when you go offline. We may use both Session and Persistent Cookies. Session Cookies include necessary Cookies. These Cookies are essential to provide you with services available through the Website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have asked for cannot be provided, and we only use these Cookies to provide you with those services.

Persistent Cookies include “Functionality Cookies.” Functionality Cookies allow us to remember choices you make when you use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid your having to re-enter your preferences every time you use the Website.

## **HOW WE COLLECT YOUR DATA**

You directly provide FTS with most of the data we collect. We collect data and process data when you:

- Register for a subscription service to use our Website, as well as place an order for any of our products or services.

- Request market data and/or information about financial markets, including, without limitation, stock ticker, time, date, price, and size.
- Voluntarily complete a customer survey or provide feedback or via email.
- Use or view our Website via your browser's Cookies.

## **WHY WE COLLECT INFORMATION AND FOR HOW LONG**

We are collecting your data for several reasons:

- To better understand your needs and provide you with the services you have requested.
- To fulfill our legitimate interest in improving our services and products.
- To send you promotional emails containing information we think you may like when we have your consent to do so.
- To manage your requests, including attending to and managing any requests that you may have.
- To contact you to fill out surveys or participate in other types of market research when we have your consent to do so.
- To customize our Website according to your online behavior and personal preferences.
- To authenticate your identity: We may use information you provide to verify and/or authenticate your information or identity.
- To allow payment service providers to conduct monetary transactions: We may use information you provide to us to a third-party payment partner who will handle any monetary transactions between you and FTS.
- For business transfers: We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about users of our Website and our business more generally is among the assets transferred.

The data we collect from you will be stored for no longer than necessary, and at least as long as you maintain a subscription to use our services. The length of time we retain said information will be determined based upon the following criteria: the length of time your personal information remains relevant; the length of time it is reasonable to keep records to demonstrate that we have fulfilled our duties and obligations; any limitation periods within which claims might be made; any retention periods prescribed by law or recommended by regulators, professional bodies, or associations; the type of contract we have with you, the existence of your consent, and our legitimate interest in keeping such information as stated in this Policy.

## **USE OF INFORMATION COLLECTED**

In the preceding twelve (12) months, FTS has not sold any of its customer lists and/or names and/or personal information of its customers to any third parties. Our policy is that we do not and will not sell your personal information, unless you give us your consent or direct us to do so.

FTS may collect and may make use of personal information to assist in the operation of our Website and to ensure delivery of the services you need and request. At times, we may find it necessary to use personally identifiable information as a means to keep you informed of other possible products and/or

services that may be available to you from [www.firstterrace.com](http://www.firstterrace.com). For example, we may send you newsletters, promotional materials, and customer service for our products.

FTS may also be in contact with you with regard to completing surveys and/or research questionnaires related to your opinion of current or potential future services that may be offered.

FTS may feel it necessary, from time to time, to contact you on behalf of our other external business partners with regard to a potential new offer that may be of interest to you. If you consent or show interest in presented offers, then, at that time, specific identifiable information, such as name, email address, and/or telephone number, may be shared with the third party.

FTS may find it beneficial to all our customers to share specific data with our trusted partners in an effort to conduct statistical analysis, provide you with email and/or postal mail, deliver support and/or arrange for deliveries to be made. Those third parties shall be strictly prohibited from making use of your personal information, other than to deliver those services that you requested, and as such they are required, in accordance with this Privacy Policy, to maintain the strictest of confidentiality with regard to all your information.

FTS uses various third-party social media features, including, but not limited to, Facebook, Instagram, X, YouTube, LinkedIn and other interactive programs. These may collect your IP address and require Cookies to work properly. These services are governed by the privacy policies of the providers and are not within FTS's control.

## **DISCLOSURE OF INFORMATION**

FTS does not use or disclose the information provided by you except that we may disclose the information under the following circumstances:

- as necessary to provide services or products you have ordered;
- in other ways described in this Policy or to which you have otherwise consented;
- in the aggregate with other information in such a way so that your identity cannot reasonably be determined;
- as required by law, or in response to valid requests made by public authorities (including a court or a government agency), including, without limitation, a subpoena or search warrant;
- to outside auditors who have agreed to keep the information confidential, as necessary to enforce the Terms of Service;
- protect against legal liability or comply with a legal obligation;
- protect the personal safety of users of the Website or the public; and
- as necessary, to maintain, safeguard, and preserve all the rights and property of FTS.

Notwithstanding the foregoing, in the event we consider or proceed with a merger, sale, or other transfer of our Site, assets, or operations, we may disclose or transfer your Personal Information as a part of such a transaction, subject to standard confidentiality agreements.

## **NONMARKETING PURPOSES**

FTS greatly respects your privacy. We do maintain and reserve the right to contact you if needed for non-marketing purposes (such as bug alerts, security breaches, account issues, and/or changes in FTS products and services). In certain circumstances, we may use our Website, newspapers, or other public means to post a notice.

## **MINORS**

Our Website is not intended for use by minors. Anyone under the age of 18 must seek and obtain parent or guardian permission to use this Website. By agreeing to the Terms of Use, you agree that you are not under the age of 18.

The Website is not directed to, and does not knowingly collect personal identifiable information from children under the age of 13. If it is determined that such information has been inadvertently collected on anyone under the age of 13, we shall immediately take the necessary steps to ensure that such information is deleted from our system's database, or, in the alternative, that verifiable parental consent is obtained for the use and storage of such information.

## **UNSUBSCRIBE OR OPT-OUT**

All users and visitors to our Website have the option to discontinue receiving communications from us by way of email or newsletters. To discontinue or unsubscribe from our Website, please send an email that you wish to unsubscribe to [contact@firstterracesystems.com](mailto:contact@firstterracesystems.com). If you wish to unsubscribe or opt-out from any third-party websites, you must go to that specific website to unsubscribe or opt-out. FTS will continue to adhere to this Policy with respect to any personal information previously collected. While we will honor all unsubscribe requests as timely as possible, it may take up to fifteen (15) business days, if not more, to become effective. Further, an opt-out will not remove you from messages that we are required to send under relevant laws or regulations.

## **LINKS TO OTHER WEBSITES**

Our Website does contain links to affiliate and other websites. FTS does not claim or accept responsibility for any privacy policies, practices, and/or procedures of other such websites. Therefore, we encourage all users and visitors to be aware when they leave our Website and to read the privacy statements of every website that collects personally identifiable information. This Privacy Policy applies only and solely to the information collected by our Website.

## **NOTICE TO EUROPEAN UNION USERS**

FTS's operations are located primarily in the United States. If you provide information to us, the information will be transferred out of the European Union ("EU") and sent to the United States. By providing personal information to us, you are consenting to its storage and use as described in this Policy.

## **YOUR RIGHTS AS A DATA SUBJECT**

You have certain rights as a Data Subject (i.e., someone who can be identified through direct or indirect means, including, without limitation, a name, an ID number, location data, or other attributes that may be linked to your identity). These rights are as follows:

- The right to be informed: this means we must inform you of how we intend to use your personal data and we do this through the terms of this Policy.
- The right of access: this means you have the right to request access to the data we hold about you and we must respond to those requests within one (1) month. You can do this by sending an email to [contact@firstterracesystems.com](mailto:contact@firstterracesystems.com).
- The right to rectification: this means that if you believe some of the data, we hold is incorrect, you have the right to have it corrected. You can do this by logging into your account with us or by sending us an email with your request.

- The right to deletion: this means you can request that the information we hold be deleted, and we will comply unless we have a compelling reason not to, in which case you will be informed of same. You can do this by sending an email to [contact@firstterracesystems.com](mailto:contact@firstterracesystems.com).
- The right to restrict processing: this means you can change your communication preferences or opt-out of certain communications. You can do this by sending an email to [contact@firstterracesystems.com](mailto:contact@firstterracesystems.com).
- The right of data portability: this means you can obtain and use the data we hold for your own purposes without explanation. If you wish to request a copy of your information, contact us at [contact@firstterracesystems.com](mailto:contact@firstterracesystems.com).
- The right to object: this means you can file a formal objection with us regarding our use of your information with regard to third parties, or its processing where our legal basis is our legitimate interest in it. To do this, please send an email to [contact@firstterracesystems.com](mailto:contact@firstterracesystems.com).

In addition to the rights above, please rest assured that we will always aim to encrypt and anonymize your personal information whenever possible. We also have protocols in place in the unlikely event that we suffer a data breach and we will contact you if your personal information is ever at risk. For more details regarding our security protections see the section below.

## **SECURITY**

FTS takes precautions to protect your information. When you submit sensitive information via the Website, your information is protected both online and offline. We use Secure Sockets Layer (“SSL”) technology to keep your personal information secure. This technology is used to protect your Personal Information from unauthorized access, destruction, use, modification, and/or disclosure. Wherever we collect sensitive information (e.g., credit card information), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for “https” at the beginning of the address of the webpage.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers and servers in which we store personally identifiable information are kept in a secure environment. This is all done to prevent any loss, misuse, unauthorized access, disclosure, or modification of the user’s personal information under our control.

We recommend that you take appropriate measures to ensure the security of your account, including the creation of a strong password and keeping your account information private and inaccessible to others. You are responsible for maintaining the confidentiality of your account password and for any access to, or use of, the Website by you or another person or entity through your account, whether or not such access or use has been authorized by, or on behalf of, you.

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

ACCORDINGLY, WE DISCLAIM ANY LIABILITY FOR ANY THEFT OR LOSS OF, UNAUTHORIZED ACCESS OR DAMAGE TO, OR INTERCEPTION OF ANY DATA OR COMMUNICATIONS. BY USING THE WEBSITE, YOU ACKNOWLEDGE THAT YOU UNDERSTAND AND AGREE TO ASSUME THESE RISKS.

### **ACCEPTANCE OF TERMS**

This Privacy Policy will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

By using this Website, you are hereby accepting the terms and conditions stipulated within the Privacy Policy. If you are not in agreement with our terms and conditions, then you should refrain from further use of our Website.

### **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of our Website after we post any modifications to the Privacy Policy on this page or changes to our terms and conditions constitutes your acknowledgment of the modifications and your acceptance of such modifications, including your consent to abide and be bound by the modified Privacy Policy.

This Privacy Policy was last updated: December 04 , 2024

### **HOW TO CONTACT US**

If you have any questions or concerns regarding the Privacy Policy, please feel free to contact us at:

First Terrace Systems LLC

Attn: Privacy Officer

Email: [contact@firstterraceystems.com](mailto:contact@firstterraceystems.com)

Via this Link: [www.firstterraceystems.com/contact/](http://www.firstterraceystems.com/contact/)

(Privacy Policy - Version 1)