

PRIVACY PLEDGE

OptiMargin respects the sanctity of your trading data. We believe Surveillance Capitalism will fail just like it failed for East German Stasi. Our moto is NO CONTROL, NO CUSTODY, NO ACCESS

- ✓ NO CUSTODY OF USER POSITION DATA
- ✓ NO CONTROL OVER USER POSITION DATA
- ✓ NO INTERNAL ACCESS TO POSITION DATA
- ✓ User's Position Data will ALWAYS remain OFF LIMITS
- ✓ OptiMargin will always strive to plan and design its product in a way that provides maximum privacy of position data, in other words our design philosophy is to 'work blind' of POSITION DATA.
- ✓ OptiMargin will never have custody, unfettered access, store, or sell my position data
- ✓ Custody of Position Data will always be performed by the client, or a trusted third-party service provider with strict regulatory oversight, such as an FCM, or established cloud provider
- ✓ OptiMargin will never build a shadow file or personal profile for data monetization or reselling
- ✓ OptiMargin will always maintain a comprehensive security program to protect security, privacy, confidentiality and integrity of clients
- ✓ OptiMargin will not make material changes to its privacy pledge without first providing prominent notices to clients in writing, and allowing them choices before data is used in any manner inconsistent with earlier policies.
- ✓ OptiMargin will always advise clients which data is being collected, how it is being stored and treated
- ✓ OptiMargin disclose clearly in contracts and/or privacy policies, what types of information is collected if any and maintain strict controls around access and collection of data.

FREE Version Data Sharing

- ✓ FREE version customers, automatically share certain pieces of data that users on a PAID subscription can mask, neither plans will EVER include position data
- ✓ Monetization of FREE version is through EXECUTION business by forwarding the recommendation email to an executing broker APPROVED by the client
- ✓ Data is deleted within 30 days, in some cases it might be converted anonymously into an aggregator for development and improvements of future releases and updates
- ✓ OptiMargin provides the right to opt out of data collection by upgrading to a paid subscription
- ✓ OptiMargin will review data sharing and internal controls periodically to make sure there's no deviation from this Privacy Pledge

Commitment to Privacy Enhancing Technology

- ✓ OptiMargin is committed to research and development of privacy enhancing technologies (PET) among others, zero knowledge proofs, homomorphic encryption and other technologies increasing client data privacy.