

Privacy Policy

Last updated: February 08, 2024

This privacy notice for New Age Trading LLC (“we,” “us,” or “our”), describes how and why we might collect, store, use, and/or share (“process”) your information when you use our services (“Services”), such as when you:

- Visit our website at <https://www.newagemastermind.com/>, or any website of ours that links to this privacy notice.
- Engage with us in other related ways, including any sales, marketing, or events.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at PB@newagetradingmastermind.com.

Summary of Key Points

This summary provides key points from our privacy notice. You can find out more details about any of these topics by reviewing the corresponding sections below.

- **What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.
- **Do we process any sensitive personal information?** We do not process sensitive personal information.
- **Do we receive any information from third parties?** We do not receive any information from third parties.
- **How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information

for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

- **In what situations and with which parties do we share personal information?** We may share information in specific situations and with specific third parties.
 - **How do we keep your information safe?** We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure.
 - **What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.
 - **How do you exercise your rights?** The easiest way to exercise your rights is by submitting a data subject access request, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.
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1. What Information Do We Collect?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses
- Mailing addresses

- Contact preferences
- Contact or authentication data
- Billing addresses
- Debit/credit card numbers

Sensitive Information. We do not process sensitive information.

Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is stored by Whop. You may find their privacy notice link(s) here: <https://whop.com/privacy.pdf>.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

2. How Do We Process Your Information?

In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfill and manage your orders.** We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.

- **To enable user-to-user communications.** We may process your information if you choose to use any of our offerings that allow for communication with another user.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time.
- **To deliver targeted advertising to you.** We may process your information to develop and display personalized content and advertising tailored to your interests, location, and more.
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

3. What Legal Bases Do We Rely On To Process Your Information?

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.

If you are located in the EU or UK

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Send users information about special offers and discounts on our products and services.
 - Develop and display personalized and relevant advertising content for our users.
 - Analyze how our Services are used so we can improve them to engage and retain users.
 - Support our marketing activities.
 - Diagnose problems and/or prevent fraudulent activities.
 - Understand how our users use our products and services so we can improve user experience.
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

If you are located in Canada

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- For investigations and fraud detection and prevention.
- For business transactions provided certain conditions are met.
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim.
- For identifying injured, ill, or deceased persons and communicating with next of kin.
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse.
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province.
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records.
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced.
- If the collection is solely for journalistic, artistic, or literary purposes.
- If the information is publicly available and is specified by the regulations.

4. When and With Whom Do We Share Your Personal Information?

In Short: We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

5. How Long Do We Keep Your Information?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. How Do We Keep Your Information Safe?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

7. Do We Collect Information From Minors?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at PB@newagemastermind.com.

8. What Are Your Privacy Rights?

In Short: In some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain

circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, replying “STOP” or “UNSUBSCRIBE” to the SMS messages that we send, or by contacting us.

9. Controls for Do-Not-Track Features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

10. Do United States Residents Have Specific Privacy Rights?

In Short: If you are a resident of California, Colorado, Connecticut, Utah or Virginia, you are granted specific rights regarding access to your personal information.

We have collected the following categories of personal information in the past twelve (12) months:

- **Identifiers** (Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name) - **YES**
- **Personal information as defined in the California Customer Records statute** (Name, contact information, education, employment, employment history, and financial information) - **YES**
- Other categories (Protected classification characteristics, Commercial information, Biometric information, Internet or other similar network activity, Geolocation data, Audio/electronic/visual information, Professional or employment-related information, Education Information, Inferences drawn from collected personal information, Sensitive personal Information) - **NO**

We will use and retain the collected personal information as needed to provide the Services or for as long as the user has an account with us.

California Residents

California Civil Code Section 1798.83, also known as the “Shine The Light” law permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year.

CCPA Privacy Notice: Under the California Consumer Privacy Act (CCPA), you have the right to request deletion of your data, the right to be informed, the right to non-discrimination, and the right to limit the use and disclosure of sensitive personal information.

Colorado, Connecticut, Utah, and Virginia Residents

Residents of these states have rights including the right to be informed, right to access, right to correct inaccuracies, right to request deletion, right to obtain a copy of personal data, and right to opt out of processing for targeted advertising or sale of personal data.

11. Do We Make Updates to This Notice?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible.

12. How Can You Contact Us About This Notice?

If you have questions or comments about this notice, you may email us at PB@newagemastermind.com or contact us by post at:

New Age Trading LLC

United States

13. How Can You Review, Update, or Delete the Data We Collect From You?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please submit a data subject access request.