

Eagle Trading Ventures LLC

Privacy Policy

Effective Date: May 7, 2026

Last Updated: May 7, 2026

Eagle Trading Ventures LLC ("Company," "we," "us," or "our") is committed to protecting the privacy and confidentiality of information provided by clients and users of the Global Strategy Architect service ("Service"). This Privacy Policy describes how we collect, use, store, protect, and disclose information in connection with our Service, and your rights with respect to that information.

This Privacy Policy applies to all users of the Service, including clients located in California and throughout the United States. California residents have additional rights described in Section 10 of this Policy.

1. INFORMATION WE COLLECT

1.1 Account and Registration Information

When you register for or subscribe to the Service, we collect:

- Name and contact information including email address
- Organization name and business information
- Billing information processed through our payment processor Stripe (we do not store full payment card numbers)
- Subscription tier and authorized user information
- Communication preferences

1.2 Service Usage Data

When you use the Service, we collect:

- Session data including queries submitted to the Global Strategy Architect
- Advisory outputs generated in response to your queries
- Documents, data, and information you upload or submit to the Service
- Usage patterns, feature engagement, token consumption, and session duration
- Technical data including IP address, browser type, device information, and access timestamps
- PDF documents generated through the Service

1.3 Performance and Analytics Data

We collect aggregated and anonymized performance data to monitor Service quality, identify technical issues, and improve Service reliability. This data does not identify individual users and is used solely for operational purposes.

1.4 Communications

We collect and retain communications you send to us including support requests, billing inquiries, and correspondence with the Lead Architect.

2. HOW WE USE YOUR INFORMATION

We use the information we collect for the following purposes:

- To provide, operate, and maintain the Service
- To process your subscription and billing through Stripe and to issue invoices through our accounting system
- To monitor token usage and calculate overage charges where applicable
- To personalize your Service experience and improve diagnostic accuracy
- To monitor Service performance and identify technical issues
- To communicate with you regarding your account, subscription, token usage, and Service updates
- To respond to your inquiries and support requests
- To enforce these Terms of Service and our acceptable use policies
- To comply with applicable legal obligations
- To protect the security and integrity of the Service

3. WHAT WE DO NOT DO WITH YOUR DATA

Eagle Trading Ventures LLC makes the following firm commitments regarding your data:

- We will NOT use your data to train, fine-tune, or improve AI models or large language models of any kind
- We will NOT sell your personal information or Client Data to third parties
- We will NOT share your Client Data with third parties for marketing purposes
- We will NOT use your strategic advisory sessions or submitted data to create competing products or services
- We will NOT share your data with other clients of the Service

4. HOW WE SHARE YOUR INFORMATION

4.1 Service Providers

We share information with trusted third-party service providers who assist us in operating the Service, subject to confidentiality obligations:

- Stripe: Payment processing and subscription management
- Accounting software providers: Invoice generation and financial record keeping
- Cloud infrastructure providers: Service hosting and data storage
- AI model providers: Processing of queries submitted to the Service

4.2 Law Enforcement and Legal Requests

Eagle Trading Ventures LLC operates as a service provider to its clients. Client Data submitted to the Service belongs to and is the responsibility of the client organization, not Eagle Trading Ventures LLC. Consistent with this principle, our policy regarding law enforcement and government requests for Client Data is as follows:

- When Eagle Trading Ventures LLC receives a request, demand, subpoena, court order, warrant, or other legal process from any law enforcement agency, government authority, or third party seeking access to Client Data, our default response is to redirect that request directly to the client whose data is being sought
- Eagle Trading Ventures LLC will inform the requesting authority that Client Data is owned and controlled by the client and direct the requesting authority to contact the client directly through appropriate legal channels
- Eagle Trading Ventures LLC will promptly notify the affected client of any law enforcement or legal request received concerning their data, to the extent permitted by applicable law
- Eagle Trading Ventures LLC will not voluntarily produce Client Data to law enforcement or government authorities without a valid legal order specifically directed to Eagle Trading Ventures LLC that we are legally compelled to comply with and that we have been unable to redirect to the client
- Where Eagle Trading Ventures LLC is legally compelled to produce Client Data despite redirection efforts, we will produce only the minimum information required by the applicable legal order and will notify the client to the extent permitted by law
- Eagle Trading Ventures LLC will maintain records of all legal requests received and our responses thereto

IMPORTANT NOTICE REGARDING DATA DELETION AND LEGAL HOLDS: If you submit a data deletion request and a law enforcement request, legal hold, subpoena, court order, or warrant is in effect or has been received concerning your data, your deletion request cannot be honored until the legal obligation is fully resolved. We will notify you of any legal hold affecting your deletion request to the extent permitted by law.

4.3 Business Transfers

In the event of a merger, acquisition, reorganization, or sale of all or substantially all of our assets, your information may be transferred as part of that transaction. We will provide notice of any such transfer and the privacy choices available to you.

5. DATA RETENTION

We retain your information for as long as necessary to provide the Service, fulfill the purposes described in this Policy, comply with legal obligations, resolve disputes, and enforce our agreements. Specifically:

- Account and subscription information is retained for the duration of your subscription and for seven (7) years thereafter for legal and accounting compliance
- Session data and advisory outputs are retained for the duration of your subscription and for two (2) years thereafter unless you request earlier deletion
- Billing records are retained for seven (7) years in accordance with applicable tax and accounting requirements
- Legal hold data is retained for as long as required by the applicable legal process

6. DATA SECURITY

We implement commercially reasonable technical, administrative, and physical safeguards designed to protect your information from unauthorized access, disclosure, alteration, and destruction. These measures include:

- Encryption of data in transit using industry-standard protocols
- Access controls limiting data access to authorized personnel on a need-to-know basis
- Regular monitoring of systems for potential vulnerabilities and security incidents
- Secure payment processing through Stripe which maintains PCI DSS compliance

No method of transmission over the Internet or electronic storage is 100% secure. While we strive to protect your information, we cannot guarantee absolute security.

7. COOKIES AND TRACKING

The Service uses cookies and similar tracking technologies to maintain session state, authenticate users, and enable certain Service features including PDF generation. Disabling cookies or using private browsing modes may limit the functionality of certain Service features, including the ability to download generated PDF documents. By using the Service, you consent to our use of cookies as described in this Policy.

8. THIRD-PARTY SERVICES

The Service integrates with third-party services including search and data analysis tools. Your use of these integrated features is subject to the privacy policies of the respective third-party providers. We are not responsible for the privacy practices of third-party services.

9. YOUR DATA RIGHTS AND DELETION REQUESTS

9.1 Right to Access

You may request a copy of the personal information we hold about you by contacting us through our official communication channels. We will respond to access requests within thirty (30) days.

9.2 Right to Deletion

You may request deletion of your personal information and Client Data by submitting a written deletion request to Eagle Trading Ventures LLC through our official communication channels. We require a minimum of thirty (30) days advance notice for data deletion requests to allow us to process your request properly and to verify the absence of any applicable legal holds.

Deletion requests will be honored subject to the following limitations:

- Data subject to a valid legal hold, subpoena, court order, or law enforcement warrant cannot be deleted until the legal obligation is fully resolved
- Data required for legal and accounting compliance will be retained for the legally required period
- Aggregated and anonymized data that does not identify you may be retained
- Backup copies will be deleted in the ordinary course of our backup rotation schedule

9.3 Right to Correction

You may request correction of inaccurate personal information we hold about you by contacting us through our official communication channels.

9.4 Right to Portability

Upon request, we will provide you with a copy of your Client Data in a commonly used, machine-readable format to the extent technically feasible.

10. CALIFORNIA PRIVACY RIGHTS (CCPA/CPRA)

California residents have specific rights under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA). In addition to the rights described above, California residents have the right to:

- Know what personal information is collected, used, shared, or sold
- Delete personal information held by businesses, subject to certain exceptions
- Opt-out of the sale or sharing of personal information (Eagle Trading Ventures LLC does not sell personal information)
- Non-discrimination for exercising privacy rights
- Correct inaccurate personal information
- Limit the use and disclosure of sensitive personal information

Categories of personal information we collect are described in Section 1 of this Policy. We do not sell personal information. To exercise your California privacy rights, contact us through our official communication channels. We will respond to verifiable consumer requests within forty-five (45) days.

11. CHILDREN'S PRIVACY

The Service is intended for business use by adults and organizations. We do not knowingly collect personal information from individuals under the age of 18. If we become aware that we have collected personal information from a minor, we will take steps to delete such information promptly.

12. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. Material changes will be communicated to you via email to the address associated with your account at least fifteen (15) days prior to the effective date of the change. Your continued use of the Service after the effective date of the updated Policy constitutes acceptance of the changes.

13. CONTACT US

For questions, concerns, or requests regarding this Privacy Policy or your personal information, please contact:

Eagle Trading Ventures LLC

California, United States

Privacy and Data Requests: Contact us through the official Eagle Trading Ventures LLC communication channels.

jamesk@eagletradingventures.com

925-217-0028

This Privacy Policy is effective as of the date listed above and applies to all information collected by Eagle Trading Ventures LLC in connection with the Global Strategy Architect service.