

PRIVACY POLICY

Our Commitment to Privacy

At Bulltick4U Advisor, LLC (“B4U”) our most important asset is our relationship with you. We want you to know that we will always make every attempt to recognize and respect our client’s and visitor’s right to on-line privacy.

We are required by law to ask for certain information in order to perform our services for you, but we are committed to protecting your personal and financial information. This Privacy Policy answers some questions about what information we collect, what we do with it, and how we protect it. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

Please read this policy carefully. This policy does not cover any interactions you may have with B4U by telephone, postal mail, or other forms of off-line communications.

Our Policy

Welcome to the web site www.bulltick4u.com (the “Site” or “Mobile Application”) owned by Bulltick4U, Inc. and operated by Bulltick4U Advisor, LLC (Henceforward “B4U”, “Adviser”, “we,” “us,” and/or “our”). This Site has been created to provide information about our company and its web-based portfolio management services (the “Services”) to all users of the Site or Service who in any way use the Site or Mobile Application provided by B4U (in each case, a “User”). This Privacy Policy sets forth B4U’s policy with respect to information, including personally identifiable data (“Personal Data”), and other information that is collected from Site visitors and users of the Services.

Information We Collect

When you interact with us through the Site or the Services, we may collect Personal Data and other information from you, as further described below:

Personal Data That You Provide Through the Site: We collect Personal Data from you when you voluntarily provide such information such as when you register for access to the Services (for example, contact information such as your name, email address, and mailing address; and when you wish to use certain Services (for example financial information such as bank account numbers, your Date of Birth and your social security number).

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Data, you acknowledge and agree that such Personal Data may be transferred from your current location to authorized third parties referred to herein located in the United States.

Non-Identifiable or Aggregated Data: When you interact with B4U through the Site or Services, we receive and store certain non-identifiable information about you. Such information, which may be collected passively using various technologies or through other means, cannot be used to specifically identify you.

As is true of most web sites, we gather certain information automatically and store it in log

files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. B4U may store such information itself or such information may be included in databases owned and maintained by B4U affiliates, agents, or service providers. This Site may use such information and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, the domain names of our visitors' Internet service providers, and how our users use and interact with the Services. Also, in an ongoing effort to better understand and serve the users of the Services, B4U often conducts research on its customer demographics, interests and behavior based on the Personal Data and other information provided to B4U by Issuers and Users.

This research may be compiled and analyzed on an aggregate basis. B4U may share this non-identifiable and aggregate data with its affiliates, agents, and business partners, but this type of non-identifiable and aggregate information does not identify you personally. B4U may also disclose aggregated user statistics in order to describe our Services to current and prospective business partners and to other third parties for other lawful purposes.

In operating this Site, we may also use a technology called "cookies." A cookie is a piece of information that the computer that hosts our Site gives to your browser when you access the Site. Our cookies help provide additional functionality to the Site and help us analyze Site usage more accurately. For instance, our Site may set a cookie on your browser that allows you to access the Site without needing to remember and then enter a password more than once during a visit to the Site. In all cases in which we use cookies, we will not collect Personal Data except with your permission. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Site's features.

This Site uses Google Analytics to track viewing trends and help analyze how visitors use the Site. This information will help us to improve the B4U Site and the overall user experience. Google Analytics uses cookies to collect standard internet log information and visitor behavior information in an anonymous form. None of the information gathered is personally identifiable in nature without your expressed permission.

Our Use of Your Personal Data and Other Information

B4U uses the Personal Data you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by email, we will use the Personal Data you provide to answer your question or resolve your problem. Also, if you provide Personal Data in order to obtain access to the Services, we will use your Personal Data to provide you with access to such services and to monitor your use of such services. B4U may obtain information about you from third party sources to verify your identity so we can properly process your requests and prevent fraud. By accessing our Site and using our Services, you hereby explicitly consent that we may use your submitted and obtained Personal Information for such purposes.

B4U and its affiliates (the "Related Companies") may also use your Personal Data and other personally non-identifiable information collected through the Site to help us improve

the content and functionality of the Site, to better understand our users and to improve the Services. B4U and its Related Companies may use this information to communicate with you regarding the Services or to tell you about services we believe will be of interest to you. If at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact us as indicated below. Note however that as a user of the Service we will send you administrative communications that are reasonably necessary to the Service, such as billing, brokerage, or service notifications. If B4U intends on using any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Data is collected.

Our Disclosure of Your Personal Data and Other Information

We will share personal and other information with third parties only in the ways that are described in this Privacy Policy. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your Personal Data and other information with certain third parties without further notice to you, as set forth below:

Business Transfers: As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets and you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

Related Companies: We may also share your Personal Data with our Related Companies for purposes consistent with this Privacy Policy. Our Related Companies are those companies who, directly or indirectly hold common ownership with B4U.

Your Advisers and Service Providers: We may share information with your agents, advisers, and service providers in connection with their administration and servicing of your accounts, which may include insurance agents, brokers, investment advisors, and other professionals.

Agents, Consultants and Related Third Parties: B4U, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include website hosting, mailing information, maintaining databases, ID verification, processing applications, processing payments and completing transactions. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function. These companies are authorized to use your personal information *only as necessary to provide* these services to us.

Legal Requirements: B4U may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of B4U, (iii) act in urgent circumstances to protect the personal safety of users of the Site or the public against fraud or other harm, or (iv) protect against legal liability.

Your Choices

Other than those disclosures required by law, you may direct us not to disclose Personal Data

about you to: our Related Companies and non-affiliated third parties to make a marketing solicitation. If you wish to do so, you may visit the **opt out page** to opt out of receiving the marketing solicitations **within thirty (30) days after you receive this Privacy Policy**. If you are a new client, we can begin sharing your information after 30 days from the date we send this Privacy Policy. When you are no longer our client, we continue to share your information as described in this Privacy Policy. However, you may contact us anytime via email at hola@bulltick4u.com to limit our sharing. Your opt out direction is effective even after termination of your client relationship unless you revoke it in writing or electronically.

Please be aware, you cannot opt out and completely stop the flow of all of your Personal Data. The law permits us to share certain information about you without giving you a right to opt out. Federal law gives you the right to limit only:

- Sharing for Related Companies everyday business purposes-information about your creditworthiness
- Related Companies from using your information to market to you
- Sharing for non-affiliate third parties to market to you

State laws may give you additional rights to limit sharing.

If your personal information changes, or if you no longer desire our Services, you may correct, update, amend, delete, or request deletion via our Site (www.bulltick4u.com) or App. or by emailing our Customer Support at compliance@bulltick.com or by contacting us at the contact information listed below. We will respond to your request to access within 30 days.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If you decide to close your account, our Privacy Policy will continue to apply to you. We treat nonpublic personal information about former clients in the same manner, and with the same care, that we do our current clients.

When you sign up for our Services or newsletter(s), we will send periodic emails to you regarding the Services or to tell you about services we believe will be of interest to you. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, or you can contact us at compliance@bulltick.com.

Security

The security of your personal information is important to us. When you enter sensitive information (such as bank account information) on our website, we encrypt the transmission of that information using secure socket layer technology (SSL). We and our custodian also use third party ID verification to ensure our users' true identities are validated.

We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Web site, you can consult our

“Aprender” section on the web page (www.bulltick4u.com/aprender) or contact us at hola@bulltick4u.com.

Exclusions

This Privacy Policy does not apply to any Personal Data collected by B4U other than Personal Data collected through the Site or Services. This Privacy Policy shall not apply to any unsolicited information you provide to B4U through this Site or through any other means. This includes, but is not limited to, information posted to any public areas of the Site (collectively, “Public Areas”), any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, “Unsolicited Information”). All Unsolicited Information shall be deemed to be non-confidential and B4U shall be free to reproduce, use, disclose, distribute, and exploit such Unsolicited Information without limitation or attribution.

Testimonials

We do not display personal testimonials of satisfied customers on our site.

Suspicious Email

We do not email you or send you other electronic communications to request non-public information or account information (such as username and password). If you receive an unsolicited email or other electronic communication that appears to be from B4U but you suspect it may be from some other source or fraudulent, please email us at hola@bulltick4u.com.

Children

Our service is not directed towards anyone under the age of 18. If a parent or guardian becomes aware that his or her child under the age of 18 has created an account with B4U and/or provided us with personally identifiable information, please contact us at hola@bulltick4u.com. Additionally, if we become aware at any point that a child under the age of 18 is using our service, we will terminate his or her account. For more information on the Children’s Online Privacy Protection Act (COPPA), please visit the Federal Trade Commission website at www.fts.gov.

Links to Other Web Sites

This Privacy Policy applies only to the Site. This Site may contain links to other web sites not operated or controlled by B4U (the “Third Party Sites”). The policies and procedures we described here do not apply to the Third Party Sites. The links from this Site do not imply that B4U endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

Other Terms and Conditions

Your access to and use of this Site is subject to the Terms of Use.

Changes to B4U's Privacy Policy

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Contacting Bulltick4U Advisor, LLC

Please feel free to contact us if you have any questions about B4U's Privacy Policy or the information practices of this Site:

Bulltick4U Advisor, LLC
333 SE 2nd Avenue, Suite 3950
Miami, FL 33131

Opt Out Form

If you would like to limit the personal information that we disclose about you, please check the appropriate box or boxes below and submit this form:

- Do not disclose my personal information to any of your affiliates.
- Do not disclose my personal information to companies that perform marketing services on B4U's behalf.
- Do not share my personal information with nonaffiliates to market their products and services to me.

*Name: _____

* Account #: _____

*Street Address: _____

*City: _____ *State: _____

*This information is required so that we may properly process your opt out form.

Alternatively, you may email us at hola@bulltick4u.com with your opt out preferences or mail this form to:

Bulltick4U Advisor, LLC
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Miami, FL 33131