

Personal Information and Data Protection Notice

Document Type	Privacy Policy — Personal Information and Data Protection Notice
Effective Date	April 1, 2025
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Data Controller	GenOne Futures LLC, Miami, Florida
Applicable Laws	CCPA/CPRA, GLBA (where applicable), and applicable U.S. law

NOTICE TO ALL PARTICIPANTS

GenOne Futures LLC is committed to protecting the privacy and security of your personal information. This Privacy Policy describes how we collect, use, retain, share, and safeguard information when you use the GenOne simulated futures evaluation platform and related services. By using the Platform or enrolling in any Evaluation Program, you consent to the data practices described herein.

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SECTION 1

Who We Are

GenOne Futures LLC ("GenOne," "we," "our," or "us") is a technology company organized under the laws of the State of Florida, with its principal place of business in Miami, Florida. GenOne operates a simulated futures trading evaluation platform and, where applicable, a funded account program through which qualified participants may trade GenOne's proprietary capital.

GenOne Futures LLC is the data controller responsible for personal information collected through the Platform. Questions regarding this Privacy Policy may be directed to the contact information provided in Section 15.

SECTION 2

Information We Collect

We collect personal information from three primary sources: (i) information you provide directly to us; (ii) information collected automatically when you use the Platform; and (iii) information obtained from third-party sources where permitted by applicable law.

A. Information You Provide Directly. This includes information submitted during registration, enrollment in Evaluation Programs, and in the course of using Platform features:

- (a) **Account Registration:** Full legal name, email address, telephone number, username, and password
- (b) **Identity Verification:** Government-issued photo identification, date of birth, country of residence, and such other documentation as may be required to verify your identity and eligibility to participate in the Program
- (c) **Payment Information:** Credit or debit card details, billing address, and transaction history in connection with Evaluation Fee payments

- (d) **Evaluation and Trading Data:** Simulated trading activity, order history, position records, performance metrics, and account statistics generated during your participation in the Evaluation Program
- (e) **Funded Account Application Data:** Additional information you provide in connection with a Funded Account application, which may include trading experience, background, and financial information
- (f) **Communications:** Information submitted through customer support requests, inquiries, or correspondence with GenOne

B. Information Collected Automatically. When you access and use the Platform, we automatically collect certain technical and usage information:

- (a) **Device and Technical Information:** IP address, device type and model, operating system, browser type and version, and unique device identifiers
- (b) **Usage and Activity Data:** Pages visited, features accessed, session timestamps and duration, click-stream data, and referral URL information
- (c) **Platform Interaction Data:** Simulated trading inputs, interface interactions, and feature usage patterns
- (d) **Log Data:** Server-side logs recording Platform activity, error reports, and diagnostic information
- (e) **Cookie and Tracking Data:** Information collected through cookies and similar tracking technologies, as described in Section 10

SECTION 3

How We Use Your Information

We use the personal information we collect for the following purposes:

- (a) **Account and Program Administration:** Creating and managing your Account, processing Evaluation Fee payments, administering Evaluation Programs, and (if applicable) managing Funded Account arrangements
- (b) **Identity Verification:** Verifying your identity and eligibility to participate in the Program, and preventing the creation of fraudulent or duplicate Accounts
- (c) **Evaluation Assessment:** Analyzing your simulated trading performance to assess compliance with Evaluation Program objectives and rules, and making funding determinations
- (d) **Security and Fraud Prevention:** Detecting and preventing unauthorized Account access, multiple Account abuse, gaming of the evaluation environment, and other fraudulent or prohibited activity
- (e) **Customer Support:** Responding to inquiries, resolving disputes, and providing technical assistance
- (f) **Communications:** Sending service-related notices, Evaluation Program updates, results notifications, and (where consented) marketing communications about GenOne's products and programs
- (g) **Platform Improvement:** Analyzing usage patterns and evaluation data to improve Platform functionality, evaluation fairness, and user experience
- (h) **Legal Compliance:** Complying with applicable legal obligations and responding to lawful requests from regulatory or law enforcement authorities
- (i) **Funded Account Program:** Where applicable, using your identity, evaluation performance, and financial information to administer Funded Account arrangements and process profit share distributions

SECTION 4

Legal Basis for Processing

Where applicable, our processing of personal information is based on one or more of the following legal grounds:

- (a) **Performance of a Contract:** Processing necessary to administer your participation in the Evaluation Program and any Funded Account arrangement
- (b) **Legal Obligation:** Processing required to comply with applicable laws and regulations
- (c) **Legitimate Interests:** Processing for fraud prevention, platform security, evaluation integrity, and product improvement, balanced against your privacy rights
- (d) **Consent:** Where you have provided explicit consent, such as for marketing communications; consent may be withdrawn at any time without affecting the lawfulness of prior processing

SECTION 5

How We Share Your Information

GenOne Futures LLC does not sell your personal information. We may share personal information only in the following limited circumstances:

- (a) **Service Providers:** We engage third-party vendors for cloud hosting, payment processing, identity verification, customer support, and analytics, each of whom is contractually required to process your data only as directed by GenOne
- (b) **Funding Partners and Brokers:** If you are offered a Funded Account, we may share relevant identity, evaluation, and trading information with any broker, prime broker, or technology provider engaged to facilitate live funded trading on your behalf
- (c) **Legal and Regulatory Compliance:** We may disclose personal information to governmental authorities, regulators, or courts as required by applicable law or legal process
- (d) **Business Transfers:** In connection with a merger, acquisition, or sale of assets, your information may be transferred to a successor entity subject to equivalent privacy protections
- (e) **Safety and Security:** Where reasonably necessary to prevent fraud, enforce our agreements, or protect the safety of GenOne, its participants, or the public
- (f) **With Your Consent:** Where you have provided explicit prior consent to such disclosure

SECTION 6

Data Retention

We retain personal information for as long as necessary to fulfill the purposes described in this Policy, maintain our relationship with you, and comply with applicable legal obligations.

Account registration information and Evaluation Program records are retained for a minimum of five (5) years following account closure. Identity verification documentation is retained for up to seven (7) years as required under applicable laws. Simulated trading performance data may be retained for program analysis and evaluation integrity purposes.

Funded Account records, profit share documentation, and associated financial records are retained for the period required under applicable financial and tax record-keeping laws. Upon expiry of applicable retention periods, personal information is securely destroyed or anonymized.

SECTION 7

Security of Your Information

We maintain commercially reasonable technical, administrative, and physical safeguards to protect your personal information from unauthorized access, use, disclosure, and destruction:

- (a) Encryption of personal data in transit via TLS/SSL protocols and encryption of sensitive data at rest
- (b) Multi-factor authentication (MFA) options for Account access
- (c) Role-based access controls restricting internal access on a need-to-know basis
- (d) Regular security assessments and penetration testing of Platform infrastructure
- (e) Contractual data security requirements imposed on all third-party vendors
- (f) Documented incident response and notification procedures

No security system is impenetrable. While we take commercially reasonable steps to protect your information, we cannot guarantee absolute security. You are responsible for maintaining the confidentiality of your Account credentials and notifying GenOne promptly of any suspected unauthorized Account access.

SECTION 8

Your Privacy Rights

Subject to applicable law, you may have the following rights with respect to your personal information held by GenOne:

- (a) **Right of Access:** Request a copy of the personal information we hold about you
- (b) **Right to Rectification:** Request correction of inaccurate or incomplete personal information
- (c) **Right to Erasure:** Request deletion of your personal information, subject to applicable legal retention obligations
- (d) **Right to Restrict Processing:** Request limitation on the manner in which we process your information in specified circumstances
- (e) **Right to Data Portability:** Request your personal information in a structured, machine-readable format
- (f) **Right to Object:** Object to processing based on legitimate interests or for direct marketing purposes
- (g) **Right to Withdraw Consent:** Withdraw consent at any time where processing is consent-based

To exercise any of the foregoing rights, please submit a written request to GenOne using the contact information in Section 15. We will respond within thirty (30) days. Identity verification may be required prior to processing your request.

SECTION 9

California Residents — CCPA and CPRA Rights

If you are a California resident, you have specific rights under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), in addition to Section 8 rights:

- (a) **Right to Know:** The categories and specific pieces of personal information collected, sources, purposes, and third-party sharing
- (b) **Right to Delete:** Deletion of collected personal information, subject to statutory exceptions

- (c) **Right to Correct:** Correction of inaccurate personal information
- (d) **Right to Opt Out of Sale or Sharing:** GenOne does not sell personal information or share it for cross-context behavioral advertising without consent
- (e) **Right to Limit Use of Sensitive Personal Information:** Limit use to purposes necessary for service delivery
- (f) **Right to Non-Discrimination:** You will not be discriminated against for exercising CCPA/CPRA rights

California residents may submit CCPA/CPRA requests to privacy@genonefutures.com. We will respond within forty-five (45) days, with a possible extension of up to an additional forty-five (45) days upon notice.

SECTION 10

Cookies and Tracking Technologies

We use cookies and similar technologies to support Platform functionality, security, and analytics. Cookies are small text files placed on your device when you access the Platform.

- (a) **Strictly Necessary Cookies:** Essential to core Platform operation; cannot be disabled without impairing functionality
- (b) **Performance and Analytics Cookies:** Used to understand how Participants interact with the Platform and to improve its performance and fairness
- (c) **Functional Cookies:** Retain user preferences to provide a more consistent Platform experience
- (d) **Security Cookies:** Used to detect and prevent fraudulent activity and unauthorized Account access

You may manage cookie preferences through your browser settings. Disabling certain cookies may impair Platform functionality. GenOne does not currently respond to browser "Do Not Track" signals.

SECTION 11

Third-Party Links and Services

The Platform may contain links to third-party websites or services. This Privacy Policy does not apply to any third-party site. GenOne is not responsible for the privacy practices of third-party services and encourages you to review their respective privacy policies.

SECTION 12

Children's Privacy

The GenOne Platform is not directed to individuals under the age of eighteen (18). GenOne does not knowingly collect personal information from minors. If we become aware of such collection, we will promptly delete the information. Please contact us if you believe a minor has provided information to the Platform.

SECTION 13

International Data Transfers

GenOne is headquartered in the United States. Your personal information may be processed and stored in the U.S. or in jurisdictions where our service providers maintain facilities. Where we transfer personal information from the EEA, UK, or other restricted jurisdictions, we implement appropriate safeguards such as Standard Contractual Clauses or other lawful transfer

mechanisms.

SECTION 14

Changes to This Policy

GenOne may update this Privacy Policy at any time. Material changes will be communicated by updating the Effective Date and, where reasonably practicable, notifying registered users via email or in-Platform notice. Continued use of the Platform after the effective date of changes constitutes acceptance of the updated Policy.

SECTION 15

Contact Information

For questions, concerns, or requests regarding this Privacy Policy or GenOne's data practices, please contact our Privacy Team:

Company	GenOne Futures LLC
Principal Office	Miami, Florida, United States
Privacy Inquiries	privacy@genonefutures.com
Legal Notices	legal@genonefutures.com
Response Period	Within thirty (30) days of receipt of a verifiable request

END OF PRIVACY POLICY — GENONE FUTURES LLC

This Privacy Policy is provided in compliance with applicable U.S. federal and state privacy laws. It does not constitute legal advice.