

Palmarium Privacy Policy

Last modified: October 9, 2025

Palmarium AI LLC, a Delaware limited liability company and its affiliates (“**Palmarium**,” “**we**,” “**our**,” or “**us**”) respects your privacy and is committed to protecting it through our compliance with this policy. This Privacy Policy explains how we collect, use, disclose, and protect information in connection with our website, online services, and software-as-a-service platform (collectively, the “**Services**”).

This policy describes the types of information we may collect from you or that you may provide when you visit the website <https://palmarium.ai/> (our “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

Palmarium provides tools and information that allow investment professionals, entities, and other users to view and receive market data, information on financial trends, and related insights. **Palmarium does not provide any financial advice, investment recommendations, or individualized guidance. Please refer to our Terms of Service ([LINK TERMS OF USE](#)) for more detailed information in this regard.**

This Privacy Policy covers data, data collection and processing where Palmarium acts as the controller of data as described by the European Union’s General Data Protection Regulation (“**GDPR**”), the California Consumer Protection Act (“**CCPA**”) or any other data protection law (known collectively with GDPR and CCPA as “**Data Protection Laws**”).

If you are a client of our customer (a “**Client**”), this Privacy Policy does not apply. If you are a Client, please contact the controller of your data (most likely your financial representative or their parent company) directly for detailed privacy information. We will process your data only as directed by our customer, who is the controller of your data.

This Privacy Policy is directed to anyone using the Services. The subset of users that are subscribers, or those for whom we support account creation, are referred to within as “**Customers**”. By accessing or using our Services, you agree to the terms of this Privacy Policy. If you do not agree, you should not use our Services.

1. Data Ownership

Your data belongs to you. You are not transferring the ownership of data about you or your clients by storing it in Palmarium.

2. Information We Collect

We may collect the following categories of information:

(i) Account Information: name, email address, organization, role, password, and account preferences.

(ii) Payment Information: billing address, payment card details, and related information if you subscribe to paid Services.

(iii) Usage Information: information about how you use the Services, including log data, clickstream, searches, and activity history.

(iv) Technical Information: IP address, device identifiers, browser type, operating system, referring URLs, and cookies or similar technologies.

(v) Communications: information you provide when contacting us or participating in surveys, feedback, or support requests.

(vi) Professional/Business Contact Data: if you interact with us on behalf of an organization, we may collect your business contact information.

(vii) We may also collect information from third parties (such as analytics providers or payment processors) in connection with your use of the Services.

3. How We Use Information

We use the information we collect for purposes including:

- (i) Providing, operating, maintaining, and improving the Services.
- (ii) Processing transactions and managing accounts.
- (iii) Personalizing your experience.
- (iv) Communicating with you, including responding to inquiries and sending updates.
- (v) Conducting research and analytics, including aggregated and anonymized analysis of usage trends.
- (vi) Marketing our Services, consistent with your preferences.
- (vii) Protecting the security, integrity, and availability of the Services.
- (viii) Complying with legal obligations and enforcing our agreements and policies.

4. Disclosure of Information

We may disclose aggregated information about our Customers, and information that does not identify any individual or person, without restriction. By way of example, we may disclose such aggregate or anonymous data to prospective partners or other outside parties for their use.

We may disclose personal information that we collect or you provide as described in this privacy policy only:

- (i) To our subsidiaries and affiliates.
- (ii) To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- (iii) To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Palmarium's assets, whether as a

going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Palmarium about our Website users is among the assets transferred.

(iv) To fulfill the purpose for which you provide it. For example, if you give us an email address to use the “invite a friend” feature of our products, we will transmit the contents of that email and your email address to the recipients.

(v) For any other purpose disclosed by us when you provide the information.

(vi) With your consent.

We do not sell personal information.

5. Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

(i) Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.

(ii) Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may only be statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

(iii) Estimate our audience size and usage patterns.

(iv) Store information about your preferences, allowing us to customize our Website according to your individual interests.

(v) Speed up your searches.

(vi) Recognize you when you return to our Website.

(a) The technologies we use for this automatic data collection may include:

(vii) Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website. When you visit our Platforms, we send one or more cookies to your computer or other device. We use cookies to improve the quality of the Services, store user preferences, and track user trends and advertise to potential customers. The table below details the categories of cookies used by Palmarium, the purpose and uses of those cookies and how to opt-in or out where applicable.

(viii) Web Beacons. Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie non-personal information collected automatically to personal information about you that we collect from other sources or that you provide to us.

6. Data Retention

We retain personal information for as long as reasonably necessary to provide the Services, comply with our legal obligations, resolve disputes, enforce our agreements, or for other legitimate business purposes.

Some features of the Services include generative artificial intelligence or machine learning outputs (“**AI Outputs**”). AI Outputs are automatically generated, may resemble expert commentary, and may include errors or inaccuracies. Palmarium does not control or direct these outputs, and they do not constitute financial advice, investment recommendations, or any other regulated activity. Customer is solely responsible for use of any AI Outputs, and Palmarium disclaims all liability in connection therewith.

We may generate and use aggregated, anonymized, or de-identified data derived from Customer Data and Service usage (“**Aggregated Data**”). Aggregated Data does not identify you or any individual. As between you and Palmarium, Palmarium exclusively owns all rights, title, and interest in Aggregated Data and may use it for any lawful business purpose, including product improvement, research, marketing, benchmarking, or publication.

7. Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

8. Your Rights and Choices

Depending on your location, you may have rights regarding your personal information, including to request access, correction, deletion, or restriction. To exercise these rights, please contact us at the email address below. We may require verification of your identity before fulfilling requests and may deny requests where permitted by law.

You may also opt out of receiving promotional communications from us by following the unsubscribe instructions in those messages.

9. Accessing and Correcting Your Information

You can review and change your personal information by logging into the Website and visiting your account profile page.

You may also send us an email at our email below to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

10. Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information.

California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights to:

Confirm whether we process their personal information.

- (i) Access and delete certain personal information.
- (ii) Correct inaccuracies in their personal information, taking into account the information's nature processing purpose (excluding Iowa and Utah)
- (iii) Data portability.
- (iv) Opt-out of personal data processing for:
- (v) targeted advertising (excluding Iowa);
- (vi) sales; or
- (vii) profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- (viii) Either limit (opt-out of) or require consent to process sensitive personal data.

The exact scope of these rights may vary by state.

11. Additional Information for California Residents

If you are a California resident, you have certain rights regarding your personal information under the CCPA. You also have the right to designate an agent to exercise these rights on your behalf. This section supplements the information in this Privacy Policy and applies solely to California residents.

(a) Sources of Personal Information. We collect personal information about you from the following categories of sources:

- (i) Directly from you or your representatives (including information you provide through your use of the Services).
- (ii) Automatically from your activity on our websites and Services.
- (iii) From our affiliates and subsidiaries.
- (iv) From service providers, business partners, and other third parties.

(b) Categories of Personal Information Collected. In the last 12 months, we may have collected the following categories of personal information:

Category	Examples	Business Purpose for Collection
Identifiers	Name, email address, address, phone number, date of birth, payment card or billing information	To provide and personalize the Services, process transactions, prevent fraud, maintain security, comply with law, and communicate with you (including marketing with your consent).
Commercial Information	Records of products or services purchased or considered, usage history	To provide and improve the Services, maintain accounts, process payments, and for internal analytics.
Internet or Network Activity	Browsing history, search history, interactions with our websites and Services, cookie data	To operate, secure, and improve the Services, debug errors, and analyze usage trends.
Inferences	Preferences, characteristics, financial goals, or risk tolerance (if provided by you)	To personalize the Services, improve product functionality, and develop new features.

We may also collect professional or business contact information if you interact with us on behalf of an organization.

(c) Your Rights Under the CCPA. Subject to certain limitations and exceptions, California residents have the following rights:

- (i) Right to Know/Access. You may request that we disclose the categories and specific pieces of personal information we have collected, used, disclosed, or sold about you.
- (ii) Right to Delete. You may request that we delete personal information we have collected from you. We may retain certain information as permitted by law, such as to provide Services, detect security incidents, comply with legal obligations, or for legitimate internal purposes.

(iii) Right to Correct. You may request that we correct inaccurate personal information we maintain about you.

(iv) Right to Opt-Out of Sale/Sharing. Palmarium does not “sell” personal information as defined under the CCPA, and we have not done so in the past 12 months. We also do not share personal information for cross-context behavioral advertising.

(v) Right to Non-Discrimination. You have the right not to receive discriminatory treatment for exercising any of your CCPA rights.

If you would like further information regarding your legal rights under applicable law or would like to exercise any of them, please contact us either through our email at contact@palmarium.ai or call us at +1 (302)574-2710.

12. International Users

If you access the Services from outside the United States, please note that your information may be transferred to, stored, and processed in the United States or other jurisdictions that may not provide the same level of data protection as your home country.

13. Children’s Privacy

Our Services are not directed to children under 18, and we do not knowingly collect personal information from them. If we become aware that we have collected such information, we will delete it. No one under age 18 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Website or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at our email below

14. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. When we do, we will revise the “Last modified” above. Any changes will be effective when posted unless otherwise required by law. Your continued use of the Services after changes become effective constitutes your acceptance of the revised Privacy Policy.

If we make material changes to how we treat our users’ personal information, we will notify you by email to the email address specified in your account or through a notice on the Website home page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes

15. Contact Us

If you have any questions about this Privacy Policy or our practices, please contact us at contact@palmarium.ai or call us at +1 (302)574-2710. We may need to verify your identity before processing any request, which may require additional information.

