

# Privacy Policy (Connect API)

**Last Updated: August 26, 2025**

**Effective Date: August 26, 2025**

## 1. Introduction

Castle Capital LLC (“Castle Capital”, “we”, “us”, or “our”) operates the Castle Capital trade-recommendation platform (the “Service”). This Privacy Policy describes how we collect, use, disclose, and protect personal information when you use our Service, including our websites, applications, and related offerings. This version of the policy applies specifically to users who link an existing brokerage account through our integration with **broker connect APIs** (for example, the Alpaca Connect API). Through these broker-provided APIs, users link their accounts via OAuth and Castle Capital provides trade suggestions and portfolio analytics. Castle Capital does **not** open brokerage accounts, collect know-your-customer (KYC) data, or execute trades on your behalf in this context. We do **not** provide a public connect API for third parties; instead, we use the broker’s connect API to obtain your account information with your authorization.

We take your privacy and security seriously. As a technology platform that connects to your brokerage account only with your authorization, we adhere to strict data protection standards and comply with applicable privacy laws and securities regulations.

## 2. Information We Collect

### 2.1 Information You Provide

- **Account Information:** When you register for a Castle Capital account, we collect identifiers such as your name, email address, phone number, username, and password.
- **Profile Information:** You may choose to provide information about your investment objectives, risk tolerance, trading preferences, and other financial profile information to customize trade suggestions and analytics.
- **Payment Information:** When you subscribe to paid services, we collect billing address and payment method details. This information is processed by our payment processor; we do not store your full payment card numbers.
- **Communications:** When you contact support or provide feedback, we collect your communications and any attachments.

We **do not** collect Social Security numbers, full government identifiers, or detailed KYC information through this integration. Your brokerage has already collected this information, and Castle Capital does not need or store it.

## 2.2 Information from Brokerage Integrations

When you link your existing brokerage account using OAuth (via our integration partner or directly through your broker), you authorize us to access certain account information:

- **Account Data:** Account numbers or identifiers, account type (e.g., individual or joint), and account status.
- **Financial Data:** Portfolio holdings, cash balances, fractional share holdings, buying power, margin information, and other relevant data.
- **Trading Data:** Order history, transaction details, positions, performance metrics, and tax documents.

We access this information through secure OAuth tokens provided by your broker or an aggregator using the broker's connect API. We do not receive your brokerage login credentials, and we do not store your brokerage passwords. We do **not** execute trades in your brokerage account through this integration; all trade execution remains with your broker.

## 2.3 Information from Aggregator Services

We may integrate with third-party data aggregators that allow you to connect accounts at multiple brokers. When you connect accounts via such services, we receive account information (balances, positions, transaction history) and other data made available by those services. Use of aggregators is subject to their privacy policies and terms.

## 2.4 Automatically Collected Information

- **Device and Usage Data:** We automatically collect information about your device (IP address, browser type, operating system, device identifiers) and how you interact with the Service (features used, click paths, time spent, pages viewed, recommendation selections).
- **Log Information:** We record log data such as access times, error reports, system alerts, and platform usage logs.
- **Cookies and Tracking Technologies:** We use cookies and similar technologies to provide, secure, and improve the Service. Cookies may be essential (required to operate the Service), analytics-related (to understand usage patterns), or preferences-based. You may adjust your browser settings to refuse non-essential cookies; however, some functionality may be affected.

## 3. How We Use Your Information

### 3.1 Primary Uses

We use personal information to:

- Provide and operate the Service, including generating trade suggestions, providing portfolio analytics, and backtesting strategies.
- Authenticate you, secure the Service, process subscriptions, and provide customer support.

- Communicate with you about important Service updates, security alerts, account notifications, and marketing messages (with your consent).
- Analyze usage patterns, develop and test new features, conduct research, and improve the Service.
- Comply with legal obligations and respond to lawful requests.

### 3.2 Trade Recommendations and Analytics

Castle Capital offers tools to analyze your portfolio and suggest potential trades. We use your account and market data to:

- Identify trends and generate hypothetical trade ideas
- Run backtests and model portfolios
- Calculate performance metrics and risk analytics
- Present you with non-binding trade suggestions you may choose to act on at your broker

We do **not** automatically execute trades through the connect API. Any trades you place based on our suggestions are executed solely by your broker and subject to your broker's terms and conditions.

### 3.3 Legal Basis for Processing

We process your information on the following legal bases:

- **Performance of contract:** To provide the Service and carry out your requests.
- **Consent:** When you opt in to marketing communications or optional features.
- **Legitimate interests:** To maintain security, monitor the Service for misuse, improve our offerings, and develop analytics, provided these interests do not override your rights.
- **Legal obligations:** To comply with applicable laws and regulations, including securities laws and consumer protection laws.

## 4. Information Sharing and Disclosure

### 4.1 What We Do NOT Do

We do not sell your personal information or your trading data. We do not share your credentials with advertisers. We do not allow unauthorized access to your financial information.

### 4.2 Service Providers

We may share personal information with trusted service providers who help us operate the Service, such as:

- Cloud hosting providers
- Payment processors

- Analytics services (in anonymized or pseudonymized form)
- Customer support platforms
- Email/SMS providers for notifications
- Compliance and fraud detection tools

These providers are contractually required to use your information only to provide services to us and to implement appropriate security measures.

#### 4.3 Brokerage and Aggregator Partners

When you connect your brokerage account using OAuth through a broker-provided **Connect API** (for example, Alpaca's Connect API), we share certain information with your broker or the aggregator to authenticate your connection and maintain secure sessions. We do not share your Castle Capital login credentials with brokers. All trades are executed through your broker subject to their terms; Castle Capital does not custody your assets or place trades on your behalf.

#### 4.4 Legal Requirements

We may disclose information if required to do so by law or regulatory authorities, including to:

- Comply with subpoenas, court orders, or other legal processes
- Cooperate with law enforcement or government agencies
- Meet our obligations under applicable securities laws or consumer protection regulations
- Report suspicious activity as required by law

#### 4.5 Business Transfers

If Castle Capital is involved in a merger, acquisition, financing, or sale of assets, we may transfer personal information in connection with that transaction. We will notify you via email and a prominent notice on our Service at least 30 days before any such transfer affects your data rights.

### 5. Data Security

#### 5.1 Security Measures

We employ administrative, technical, and physical measures designed to protect personal information against loss, theft, misuse, and unauthorized access. These measures include:

- **Encryption:** TLS/SSL encryption for data in transit and encryption for data at rest
- **Access Controls:** Role-based access, multi-factor authentication, least-privilege principles, and strong password requirements
- **Infrastructure:** Secure cloud infrastructure, regular penetration testing, code reviews, and security audits

- **Monitoring:** Continuous monitoring, intrusion detection systems, and anomaly detection
- **Incident Response:** Dedicated security team and incident response procedures

## 5.2 Data Breach Notification

In the event of a data breach that compromises your personal information:

- We will notify affected users within 72 hours of discovery
- We will provide information about the nature of the breach, data affected, and steps we're taking
- We will cooperate with regulatory authorities as required

## 5.3 Your Responsibilities

You are responsible for:

- Maintaining the confidentiality of your login credentials
- Using a unique, strong password and enabling two-factor authentication
- Restricting access to your devices
- Reporting any suspicious activity promptly to [support@castlecapital-llc.com](mailto:support@castlecapital-llc.com)

## 6. Data Retention

- **Account and Usage Data:** We retain account and usage information for the duration of your account and for up to three years after account closure for audit and compliance purposes.
- **Trading Data and Logs:** We retain records of trade suggestions and related analytics for at least five years to meet regulatory obligations.
- **Communications:** We retain support communications for three years after your last interaction.
- **Analytics and System Logs:** We retain system logs for one year and aggregated analytics data for up to two years.
- **Marketing Data:** We retain marketing preferences and email engagement data for three years after last interaction.

You may request deletion of your personal data subject to legal or regulatory retention requirements. We will anonymize or delete data when no longer necessary.

## 7. Your Rights and Choices

Depending on your jurisdiction, you may have rights regarding your personal information:

- **Access:** Request copies of your personal data in a portable format.
- **Correction:** Update inaccurate or incomplete information through your account settings or by contacting support.

- **Deletion:** Request deletion of personal information (subject to legal retention periods).
- **Portability:** Receive data in CSV or JSON format for transfer to another service.
- **Objection or Restriction:** Object to or restrict certain processing activities.
- **Opt-out of marketing:** Use unsubscribe links in marketing emails or adjust notification preferences in your account settings.
- **Cookie controls:** Adjust your browser settings to manage cookies (disabling essential cookies may affect functionality).
- **Do Not Track:** We currently do not respond to Do Not Track signals.

To exercise these rights, contact [support@castlecapital-llc.com](mailto:support@castlecapital-llc.com) with your request.

## 8. California Privacy Rights

If you are a California resident, you have rights under the California Consumer Privacy Act (CCPA), including:

- The right to know what personal information we collect, use, and share
- The right to request deletion of your personal information
- The right to opt out of the sale of personal information (we do not sell your data)
- The right to non-discrimination for exercising your privacy rights

California residents may make requests by emailing [support@castlecapital-llc.com](mailto:support@castlecapital-llc.com).

## 9. International Data Transfers

Our servers are located in the United States. If you use the Service from outside the United States:

- Your data will be transferred to and stored in the U.S.
- We use appropriate safeguards for international transfers, including Standard Contractual Clauses where required by law.
- By using our Service, you consent to the transfer of your data to the United States.
- You may request information about our transfer safeguards by contacting us.

## 10. Children's Privacy

The Service is intended for users aged 18 and older. We do not knowingly collect personal information from anyone under 18. If we learn that we have inadvertently collected information from a minor, we will delete it immediately and terminate the associated account.

## 11. Third-Party Services

The Service may contain links to third-party websites and services, including brokerage platforms, educational resources, and market data providers. We are not responsible for

the privacy practices or content of those third-party sites. When you leave our Service, we encourage you to read the privacy policies of those sites.

## 12. Cookies and Tracking Technologies

We use the following types of cookies:

- **Essential Cookies:** Required for authentication and core functionality
- **Analytics Cookies:** To understand usage patterns and improve the Service
- **Preference Cookies:** To remember your settings and preferences
- **Security Cookies:** To detect and prevent fraudulent activity

You may adjust your browser settings to refuse non-essential cookies. For more control, you can use browser extensions that block tracking technologies.

## 13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. If we make material changes:

- We will notify you by email at least 30 days before the changes take effect
- We will post a prominent notice on our Service
- We will update the “Last Updated” date
- Your continued use of the Service after the update constitutes acceptance

## 14. Data Protection and Privacy Contact

For questions about this Privacy Policy or our privacy practices, contact:

**Email:** support@castlecapital-llc.com

**Phone:** (612) 442-8959

**Mail:** Castle Capital LLC

635 Newman Trail

Stillwater, MN 55082

## 15. Regulatory Compliance

Castle Capital operates as a technology platform in partnership with registered broker-dealers. We comply with:

- The Gramm-Leach-Bliley Act (GLBA)
- Regulation S-P privacy rules
- The California Consumer Privacy Act (CCPA)
- Other applicable federal and state privacy laws

Our broker-dealer partners are registered with the SEC and are members of FINRA and SIPC. Castle Capital itself is not a registered broker-dealer or investment adviser. We do not collect KYC information through this connect integration; we use the broker’s Connect API solely to access your existing account information with your authorization.

## Money Transmitter Status

Castle Capital does **not** hold or transmit customer funds. All customer assets and settlement activities are managed directly by your brokerage firm and its clearing partners. Because we do not handle money movement, Castle Capital is **not** licensed as a money transmitter and operates under the regulatory exemptions available to software providers. If future changes require us to obtain a money transmitter or similar license, we will update this policy accordingly and notify users.

## 16. Additional Information for Specific States

### Nevada Residents

Nevada residents may opt out of the sale of covered information by emailing [support@castlecapital-llc.com](mailto:support@castlecapital-llc.com).

### European Economic Area Residents

If you are located in the EEA, you have additional rights under the GDPR, including the right to lodge a complaint with your local supervisory authority.

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By using the Castle Capital Service, you acknowledge that you have read and understand this Privacy Policy and agree to our collection, use, and disclosure of your information as described herein.