



## PRIVACY POLICY

Royal Treasure Securities LLC. believes in the privacy and protection of personal information provided by our clients and visitors. The purpose of this notice is to describe how Royal Treasure Securities, LLC. collects and shares data, including information provided by users, identity data, contact data, financial data, profile data, stored content, as well as data collected through tracking technologies.

### Information gathering

We gather information about you directly and indirectly when attempting to formulate a relationship with you, such as opening a new account with the firm and its clearing firm, Velox and/or other clearing firms. The firms use this information to verify your identity to meet regulatory requirements and transact business with you. We also use this information to improve our services, customize your browsing experience, and inform you about additional products, services, or promotions that may be of interest.

We may collect and store the following information:

From you	<ul style="list-style-type: none"><li>● Personally identifiable information including full name, date of birth, gender, marital status, national identification number (e.g., social security number, passport number), nationality/citizenship.</li><li>● Contact information such as email address, phone number, and residential address.</li><li>● Financial details such as employment detail, bank account information, suitability information, approximate liquid net worth, approximate worth, and credit reports.</li><li>● Content such as photos and contacts stored in your mobile device or email, collected with your consent.</li><li>● Profile information such as usernames, passwords, purchase or order history, knowledge assessments, interests, preferences, feedback, and survey responses.</li></ul>
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<p>Automatically collected through the Services</p>	<ul style="list-style-type: none"> <li>● Information about your usage patterns, including device identifiers, advertiser identifiers (e.g., IDFA), operating system and version, carrier and network type, IP addresses, browser type and language, referring and exit pages, URLs, date and time of access, duration of time spent on specific pages, and the features of the Services you use or visit, purchases, and similar information related to your use of the Services.</li> <li>● Geolocation data obtained from your mobile device, wireless carrier, or third-party service providers. You have control over the collection of precise geolocation data through the user settings on your device.</li> <li>● Activity data, such as purchases, sales, transaction amount, type of transaction, time and date, and similar activities conducted through the Services.</li> <li>● Tracking data gathered using first and third-party cookies, pixels, web server logs, web beacons, and similar technologies used for data collection and tracking. This may include information such as IP address, browser type, ISP, platform type, and device type.</li> </ul>
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### How do we use your personal information?

We use personal information only as needed to provide you with quality service and ensure there are proper security measures in place to safeguard the data. We may use the information collected from you to:

- verify your identity and contact information;
- establish and set up your trading account;
- issue an account number and password;
- maintain your portfolio;
- trading activity;
- contact you with account information;
- monitor, support, analyze and improve our services;
- customize your browsing experience;
- conduct marketing and advertising programs, provided that, where required under applicable law, we will obtain your prior opt-in consent to send electronic marketing communications;
- newsletters, product announcements, surveys;
- facilitate contests, sweepstakes, and promotions;
- protect the safety and security of our Services, business, and customers;
- fulfill legal and regulatory requirements;
- protect or exercise our legal rights;



- and as otherwise permitted by applicable law, or with your consent.

### **Parties to whom we disclose information.**

We may disclose your information to third parties in the following ways:

- Vendors and service providers: We may share your personal information with vendors and service providers, such as securities clearinghouses and identification verification providers, who assist us in delivering specific services. These third parties are obligated to maintain the confidentiality of your personal information and are only authorized to use it to provide the services we have requested.
- Business partners: We may collaborate with business partners to administer promotions, sweepstakes, surveys, and other programs, as well as deliver targeted advertising.
- Sale or transfer of business: In the event of a sale, merger, or other transfer of our business, your personal information may be shared as part of the transaction.
- Dealing with other parties: We may disclose your information to individuals or institutions with whom you currently or intend to have interactions, such as companies in which you purchase securities through our Services.
- Affiliates: We may share your information with our affiliates, including those located outside the United States, to enhance our ability to provide the Services to you effectively.
- Compliance with laws and legal processes: We may disclose your information as required by applicable laws or in response to legal processes.
- Reporting and investigations: We may disclose your information to report suspicious transactions or cooperate with law enforcement agencies during investigations.
- Protection of rights and safety: We may disclose your information to protect the rights, interests, safety, and security of Royal Treasure Securities, LLC., our customers, or the public.
- Authorized disclosures: If you request or authorize the disclosure, we may share your information with other third parties to facilitate or enforce a transaction.
- Aggregated or de-identified information: We may aggregate or de-identify your personal information so that it no longer identifies you specifically. This anonymized information may be shared with third parties.
- These disclosures are subject to applicable laws and regulations, as well as your consent when required.

### **How we protect your information**

We have security measures to protect information under our control from loss, misuse, unauthorized access, disclosure, alteration, and destruction. We maintain appropriate physical, electronic and procedural safeguards, including restricting access to personal information on a need-to-know basis, and limiting the amount and type of information available for downloading or transmittal. We also regularly conduct audits to ensure the effectiveness of our system. No security system is impenetrable, Royal Treasury Securities, LLC. cannot guarantee that our security measures will prevent hackers from illegally obtaining this information, or that our database and/or systems will not be subject to a cyber-attack. We have established a data breach management plan. If there is a data breach involving the personal information of our users, we will activate the data breach management plan to contain the data breach to prevent data from



being further compromised and take appropriate measures to inform you, including in the form of push notifications, public announcements, or other appropriate means. You understand that there are no guaranteed security measures that are completely effective. We strongly suggest that you perform all actions in a secure internet environment and use a strong password for your account. Please contact us at [help@royaltsec.com](mailto:help@royaltsec.com) if you have reason to believe your account security has in any way been compromised. Royal Treasury Securities, LLC. retains your personal information for as long as necessary to accomplish the purpose for which it was collected, to meet our legal and regulatory obligations including compliance with our records retention practices, or as required or permitted by applicable laws and as permitted to meet our legitimate interests.

### **What information does Royal Treasury Securities, LLC. share with affiliates and partners?**

We may share information with our affiliates if the information is required to provide the product or service you have requested or to provide you with the opportunity to participate in the products or services our affiliates offer. Affiliates are defined as companies related by common ownership or control. They can be financial and non-financial companies. Non-affiliated companies are not related by common ownership or control. They can be financial and non-financial companies. Joint marketing is a formal agreement between non-affiliated financial companies that together market financial products or services to you. We build partnerships, which may include joint marketing agreements, with other companies that offer products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with our partners and/or affiliates. This allows us and the partners and/or affiliates to better understand the offers that are most relevant and useful. We may also compare our client lists with those of our partners and affiliates to ensure they are not sending messages to you if you've elected not to be notified previously. In our strategic partnerships, we will require that it be identified that an offer is being extended because of the relationship with us. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

### **Third-party links**

Some information on our website or services we offer may contain links to content maintained by third parties that we have no control over. We are not responsible for the privacy practices of these third parties or the content of third-party services or third-party service providers. The information practices of these third parties are not covered by this privacy policy. Please review the privacy policies of these third-party services. We urge you to read their privacy policies as well as terms and conditions of use to understand how they collect, use, and share your information.

### **Child privacy**

It is not our intention to collect or use personal information from anyone under the age of majority. We don't knowingly collect or solicit any information from minors. In the event that we learn that we have collected personal information of minors, we'll take reasonable steps to delete that information as quickly as possible. If we are also made aware that we have collected any personal information from minors and are asked to delete such information from our databases,



we will do so promptly. If you believe that we might have any information from a minor, please contact us at [help@royaltsec.com](mailto:help@royaltsec.com)

### **California residents**

This section provides details applicable to California residents under the California Consumer Privacy Act ("CCPA") regarding the personal information we collect about California residents and the rights afforded to them. Subject to certain limitations and exceptions, the CCPA provides California residents the right to opt out of the sale of personal information (please note we do not sell personal information), the ability to request the details of the personal information we collect, and the option to control and delete personal information.

In accordance with the CCPA, California residents may exercise their rights under the CCPA by sending an email to [help@royaltsec.com](mailto:help@royaltsec.com).

Please note that:

- The CCPA does not apply to nonpublic personal information collected by financial institutions such as Royal Treasury Securities, LLC
- We may deny your deletion request if retaining the information is necessary for us or our service providers to provide our services to you.
- We may verify the request as well as your identity by asking you to provide information that matches information we have on file and/or your authorized agent if you designated one to act on your behalf.

In accordance with California law, Royal Treasury Securities, LLC. will not share information we collect about you with non-affiliates, except as allowed by law. Please refer to this privacy policy document about who we share your information with and how it is used.

### **Nevada residents**

We do not sell consumer covered information for monetary consideration (as defined in Chapter 603A of the Nevada Revised Statutes). However, if you are a Nevada resident, you have the right to submit a request directing us not to sell your personal information. To submit such a request, please contact us at [help@royaltsec.com](mailto:help@royaltsec.com)

### **European and United Kingdom residents**

If you are a resident of Europe and the United Kingdom, you have the following rights regarding your personal data: If you wish to access, correct, update or request deletion, restrict processing, object to processing, or request porting of your personal information, you can do so at any time by contacting us. You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" link in the marketing emails we send you. You can manage your account settings and email marketing preferences as set forth in the policy above. Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time by contacting us. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance



on lawful processing grounds other than consent. Please note that if you opt-out of having your data shared with advertisers, you will still see ads, they just will not be tailored to your interests. You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Notwithstanding the foregoing, we reserve the right to keep any information in our archives that we deem necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

### **Indirect information gathering**

The information we collect indirectly from you includes your Internet protocol (IP) address, browser type, operating system, Internet service provider (ISP), time stamps, transaction history, and location data. We may collect location data about you through your Internet Protocol (IP) address, GPS, Wi-Fi, or other methods. Should you close your account with us, we will retain your information, but only use it to comply with regulatory requirements and periodically contact you to offer you the opportunity to fund your account, reopen your account, or participate in other offers.

### **Cookies**

We use cookies and other tracking technologies to improve your experience and understand your preferences. Cookies are small text files sent from web servers that may be stored on your computer. Cookies enable us to capture how you arrive at our site, when you return, which pages on our site you visit, and to recognize that you are already logged on when we receive a page request from your browser. We collect cookies using our website. We may link the information we store in cookies to personally identifiable information you submit while on our site. We will never share this information with any non-affiliated companies. Cookies do not contain any personal information or account/password information. You can adjust your browser settings to block cookies, but please note that some functions may not work properly if you choose to do so.

### **Privacy choices form**

If you prefer that we limit disclosures of personal information about you, you may notify us via email at [help@royaltsec.com](mailto:help@royaltsec.com) that you elect to opt out of our privacy policy procedures. Please send correspondence along with your account number(s) to: [help@royaltsec.com](mailto:help@royaltsec.com)  
Please indicate the following preferences:

- Limit disclosure of personal information about me to non-affiliated third parties.
- Limit the personal information about me that you share with our affiliates.
- Remove my name from your marketing lists shared with affiliates in related lines of business.

Please allow approximately 30 days from our receipt of your request for your instructions to become effective. You do not need to notify us if you have previously instructed the firm not to share information about you.



### **Security of your personal information**

We employ physical, electronic, and procedural safeguards to guard your nonpublic personal information. When you open an account with us, you are issued a unique account number, user ID, and password. It is important to maintain the secrecy of your account number, user ID, and password. We recommend not disclosing this information to anyone. We also recommend periodically changing your password.

### **Reviewing or changing personal information**

Personal identifying information may be reviewed, changed, or corrected at any time. You are responsible for maintaining the accuracy and completeness of your personal information stored at the firm.

In the event the firm materially changes this Privacy Statement, the revised Privacy Statement will promptly be posted to our website. By opening an account with us, you are deemed to agree to accept the posting of a revised Privacy Statement electronically on our website as actual notice to you.

Should you have any additional questions concerning our privacy policy, you may submit a written request for additional information to our Customer Service Team at [help@royaltsec.com](mailto:help@royaltsec.com).

**Effective: Apr 2024**