# **Privacy Statement**

Effective 11/14/2014

Axiom Research & Trading, Inc. (Axiom) (aka OilTradingRoom.com, StockIndexTradingRoom.com, IndicatorSmart.com, EminiForecaster.com, MarketMapTrader.com and ManifestingYourFuture.guru), is committed to providing you with excellent service for all of our products and services. Because we respect your right to privacy, we have developed this Privacy Statement to inform you about our privacy practices for all Axiom sites. Axiom Research & Trading, Inc. services may be hosted on partner sites on behalf of Axiom, and if this Axiom Research & Trading, Inc. Privacy Statement is listed on that site, then it will also apply.

In keeping with our high standards in protecting your personal information with our Privacy Program, this Privacy Statement will inform you of:

- What personal information our site gathers about you
- How we use and with whom we share the personal information we gather
- Your ability to opt-out of future notifications
- What security procedures we have in place to protect your personal information from loss, misuse, or alteration
- How you can correct or update your personal information

Questions regarding this Privacy Statement should be directed to <u>AxiomRT@gmail.com.</u> Please specify "Privacy Statement" in the subject line of your e-mail.

#### Overview

Privacy is of great concern to most users of the Internet, and is a critical part of an enjoyable and satisfactory user experience. We at Axiom Research & Trading, Inc. are acutely aware of and sensitive to the privacy concerns of our subscribers and other visitors to our Web site. Whether you are a customer of our various products and services or a visitor to our site, we assure you that we do not collect personal information from you unless you provide it to us. You should be assured that we do not provide or sell personal information about our customers or site visitors to vendors that are not involved or affiliated with Axiom's products or services.

This Privacy Statement applies to Axiom sites. Many of our subsidiaries maintain their own privacy policies that may be viewed on their Web sites. Axiom Research & Trading, Inc. has a "network" of Affiliates That offer our services. We strive to provide our visitors and subscribers with the highest level of privacy possible, and therefore require that our Affiliates offer no less protection than that offered in this Privacy Statement. In addition, each of our Affiliates must meet the data protection requirements of their relevant national laws. Please note that our site contains links to other sites. Axiom Research & Trading, Inc. is not responsible for the privacy practices, privacy statements, or content regarding these other sites.

## **Privacy Policy Enforcement**

If you feel that we are violating this Privacy Statement, please contact us at <a href="mailto:AxiomRT@gmail.com">AxiomRT@gmail.com</a>. Please specify "Privacy Statement" in the subject line of your e-mail. We will respond as promptly as possible.

#### Information We Gather from You

#### **Personal Information**

There are two ways in which you may explicitly and intentionally provide us with and consent to our collection of certain personal information:

- **Site Registration** for our free products and services We use links throughout our site to provide you with the opportunity to contact us via e-mail to ask questions, request information and materials, register or sign up for news, reports, site access, guides or seminars, or provide comments and suggestions. You may also be offered the opportunity to have one of our representatives contact you personally to provide additional information about our products or services. To do so, we may request additional personal information from you, such as your name and telephone number, to help us satisfy your request.
- Purchase If you choose to enroll for one of our products or services, we will request certain information from you. Depending on the type of product or service that you request, you may be asked to provide different personal information. For certain products and services, we may require your name, address, telephone number, e-mail address, and credit card number. Other products and services may require different or supplemental information from you in order to apply. For a detailed listing of the type of personal information requested for our various products, please refer to the enrollment page for the particular product or service. Under no circumstances do we collect any personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, or sex life.

#### **Statistical Information About Your Visit**

When you visit our site, our computers may automatically collect statistics about your visit. This information does not identify you personally, but rather identifies information about a visit to our site. We may monitor statistics such as how many people visit our site, the user's IP address, which pages people visit, from which domains our visitors come and which browsers people use. We use these statistics about your visit for aggregation purposes only. These statistics are used to help us improve the performance of our Web site.

#### **Use of Cookies**

We only use "cookies" as described in this Section. A "cookie" is a piece of information that our Web site sends to your browser, which then stores this information on your system. If a cookie is used, our Web site will be able to "remember" information about you and your preferences either until you exit your current browser window (if the cookie is temporary) or until you disable or delete the cookie. Many users prefer to use cookies in order to help them navigate a Web site as seamlessly as possible. You should be aware that cookies contain no more information than you volunteer, and they are not able to "invade" your hard drive and return to the sender personal or other information from your computer.

Our uses of "cookies" are limited to the following specific situation. That situation is with respect to temporary cookies. There are two instances in which we use temporary cookies. First, if you are accessing our services through one of our online applications our Web server may automatically send your browser a temporary cookie, which is used to help your browser navigate our site. The only information contained in these temporary cookies is a direction value that lets our software determine which page to show when you hit the back button in your browser. This bit of information is erased when you close your current browser window. If you come to our site from one of our business partners, our Web server may also send your browser a temporary cookie that reflects an "origination code" for that business partner. We use this information for statistical and marketing purposes.

### How We Use and With Whom We Share the Personal Information We Gather

We assure you that the personal information we gather from you is used by us only as explained below.

## Sending you responses and updates

We generally respond to any e-mail questions, requests for product or service information, and other inquiries that we receive. We may also retain this correspondence to improve our products, services, and Web site, and for other disclosed purposes. Frequently we retain contact information so that we can send individuals updates or other important information about our services and products. Occasionally these updates or other important information may be sent out by third parties on our behalf. Please be assured that any third party who contacts you in this capacity has executed a confidentiality agreement with us that contains a provision ensuring the

privacy and security of any transferred information and limits the third party's use of the shared information to sending updates or providing services on our behalf. Our subsidiary companies may also send you information about their services and products. In situations where you have supplied your information in connection with a question or request for information about a product or service offered by a Axiom Research & Trading, Inc. business partner, we may also send the information you have supplied to the Axiom Research & Trading, Inc. business partners that offer such products or services. Please be assured that these Axiom Research & Trading, Inc. business partners have agreed to ensure the privacy and security of any transferred information and may only use the shared information to send you information about products or services about which you asked.

#### Facilitating the support, renewal, and purchase of our products and services

We may use the information you submit to contact you to discuss the support, renewal, and purchase of our products and services. We may provide our subsidiary companies with your information so that they may send you information about their services and products. We may also provide the information you have submitted to us to a Axiom Research & Trading, Inc. subsidiary, business partner, or independent reseller (either within or outside the United States) so that the subsidiary, business partner, or independent reseller can contact you and facilitate the support, renewal, and purchase of Axiom Research & Trading, Inc. products and services. You may receive a communication directly from one of our subsidiaries, business partners, or independent resellers. Please be assured that any subsidiary, business partner, or independent reseller who contacts you for one of these purposes has agreed to use the information we supply only in accordance with a confidentiality agreement. To find out the names and locations of the subsidiaries, business partners, and/or independent resellers to whom we have provided your information, please contact us at the address given at the end of this Privacy Statement.

### Disclosure by Law and Protection of Axiom Research & Trading, Inc. and Others

If we are required by law to disclose certain information to local, state, federal, national or international government or law enforcement authorities, we will do so (for example, we may disclose the identity of purchasers of certain software products to the U.S. Department of Commerce, Bureau of Export Administration, as required under the terms of our export licenses). We will also disclose information to third parties as necessary in order to comply with applicable laws and regulations. In addition, Axiom Research & Trading, Inc. may share information in order to investigate, prevent, or take action regarding illegal activities or suspected fraud, or enforce or apply Axiom's agreements.

#### **Business Transitions**

Circumstances may arise where, whether for strategic or other business reasons, Axiom Research & Trading, Inc. decides to sell, buy, merge or otherwise reorganize businesses or business units in some countries. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of it from sellers. It is Axiom's practice to seek appropriate protection for information in these types of transactions.

#### Surveys

From time-to-time we may request information from customers via surveys. Participation in these surveys is completely voluntary and the user therefore has a choice whether or not to disclose this information. Survey information will be used for purposes of monitoring or improving the use of and satisfaction with this Web site, and improving our customer service and product offerings.

#### **Your Ability to Opt-Out of Further Notifications**

From time-to-time, we notify our subscribers of new products, announcements, upgrades and updates. If you would like to opt-out of being notified please use the unsubscribe option in our ICANN compliant emails, or please contact us at the address given at the end of this Privacy Statement.

If you receive a marketing communication from our subsidiaries, business partners or independent resellers, you should opt-out with that entity directly.

#### **Our Security Procedures**

We consider the protection of all personal information we receive from our Web site visitors and subscribers as critical to our corporate mission. Please be assured that we have security measures in place to protect against the loss, misuse, and alteration of any personal information we receive from you. As with any transmission over the Internet, however, there is always some element of risk involved in sending personal information. In order to try to minimize this risk, we encrypt all information that you submit in ordering one of our products or services using the Secure Sockets Layer (SSL) protocol.

## **How You Can Update or Correct Your Personal Information**

If you would like to update or correct any personal information in our records you may email us at AxiomRT@gmail.com

#### **Changes to this Privacy Statement**

If a material change is made to this Privacy Statement and/or the way we use our customers' personally identifiable information then, we will post prominent notice of the nature of such change on the first page of this Privacy Statement and also on our home page.

#### **GDPR** (**Updated May 25, 2018**)

The aim of the GDPR is to protect natural persons (EU/EEA Citizens) in relation to the processing of their personal data. The regulation applies to those within the EU/EEA which may hold such data, but also to those outside the EU/EEA which may offer goods or services to natural persons within that area, or send personal data to organization's within the EU/EEA, or send personal data to recipients within the EU/EEA. Axiom Research & Tracing, Inc. (Axiom), a US Based company, may offer good or services to natural persons of the EU/EEA from time to time via its websites as it is possible for these natural persons to find and visit our websites, therefore certain principles and rights exist for these natural persons that AXIOM takes into consideration. As Defined in Article 4 (6), AXIOM is to be considered a Data Controller. A Data Controller has certain obligations to natural persons (EU/EEA Citizens) when processing and storing your Personal data.

#### **Privacy Notice**

Data Controller obligations:

- Data must be available to the data subject.
- Describe what data will be collected and for what purposes.
- Detail any recipients who will receive the data, including if will be transferred outside EEA, and how data will be protected with onward transfer.
- If any legitimate interests exist in collecting and/or processing the data.
- Describe data retention and/or storage periods, or the criteria used to determine retention periods.
- Describe data subject rights, and how a data subject can exercise his/her rights.
- Details around any uses of automated decision-making.

#### **Personal Data Collection**

Processing of your EU/EEA personal data may only apply under certain conditions, such as receiving your express consent or where processing is a necessary consequence of the establishment, exercise or defense of legal claims, or wherever courts are acting in their judicial capacity. AXIOM has updated its privacy policies to notify EU/EEA citizens of their rights and also to be transparent where applicable of what information AXIOM collects and how we process data of EU/EEA citizen's personal data.

AXIOM **DOES NOT** collect what is to be considered sensitive personal data as some of the examples of such data include: race, ethnic background, religious/political affiliations and health and medical information about a data subject.

AXIOM **DOES** collect certain personal data in order for AXIOM to provide its products and services to EU/EEA citizens upon receiving express consent. This personal data may include one or more of the following data attributes, dependent upon the submission form and data attributes filled out by the EU/EEA citizen:

- First Name
- Last Name
- Email Address
- Address
- Phone Number

In addition, before receiving express consent, there will be transparent and plain language that states AXIOM may use this information for marketing purposes. Marketing is defined as sending internal and 3<sup>rd</sup> party offers that may be of interest to the EU/EEA citizen. Methods of communicating these offers include email, text, and phone. EU/EEA citizens have the right to opt out at any time by following the opt out instructions included in the marketing materials or by contacting us at <a href="mailto:axiomrt@gmail.com">axiomrt@gmail.com</a>. Please see the section Right of the EU/EEA Data Subject for more information below.

#### AXIOM DOES collect the following data upon visiting our website(s) which Include

- IP Address
- Metadata (browser version, device name, etc.)
- Cookie Data (expiring no more than 30 days)

The purpose of this data is to enhance user experience, and allows us to view visitors geo location, time on site, what device the user used to access our site, what browser version so we can better format and properly display pages to enhance viewing. Cookies may be used to remember settings or preferences from visitors or to not display the same advertisement or tailor or track advertisements. EU/EEA citizens will have the right to request cookie deletion and AXIOM will work on those requests to the best of our ability. All requests can be sent to axiomrt@gmail.com.

## Rights of the EU/EEA Data Subject

EU/EEA citizens have rights to transparency, access, updating, restrict processing and which may also include to be forgotten.

Below is a summary of the rights which the data subject has, including the right to request information. Under the GDPR what does this mean to you? As owners of your data, you are granted rights and data controllers who process and/or store your information, are required under GDPR to comply with your data requests. AXIOM will respond to all requests in a reasonable time frame and in a courteous manner. AXIOM will also store data no longer than necessarily needed as part of its data minimization practices:

- **Right to Access** (Article 15): You have the right to request a copy of your personal data that AXIOM has collected on you. Please send requests to <a href="mailto:axiomrt@gmail.com">axiomrt@gmail.com</a>. We will comply with this request in a timely manner to not be more than 30 days.
- **Right to Rectification** (Article 16): You have the right to change inaccurate information of the data we have on you. For example, if you have a different email address or there is a typo or misspelling in your name you can send AXIOM a request to update this information. Please send all update requests to <a href="mailto:axiomrt@gmail.com">axiomrt@gmail.com</a>. We will comply with this request in a timely manner to not be more than 30 days.
- **Right to Erasure** (Article 17): You have the right to request to delete your data. You may request for AXIOM to delete all existing personal data. You may also with to withdraw consent to not receive any future communications from AXIOM. We will honor these requests in a timely manner not to exceed more than 30 days. Please send Right to Erasure requests to <a href="mailto:axiomrt@gmail.com">axiomrt@gmail.com</a>

- **Right to Restriction of Processing** (Article 18) You may request that AXIOM stops using tracking data. Examples of tracking or behavior based tracking may include impressions, site visits, website clicks, and what pages you have visited and the time and duration on those pages. Please send Rights to Restrictions requests
- **Right to Data Portability** (Article 20): In some cases, you may have the right to request that we move your data or transfer your data to another provider. Please send Right to Data Portability requests to <a href="mailto:axiomrt@gmail.com">axiomrt@gmail.com</a>

## **Data Security**

• AXIOM takes data security and the protection of a data subject's information very seriously. Please see our <u>Data Protection Policies</u> for more information.

# **Data Breach of Data Subject**

- In case of a data Breach AXIOM will inform such a breach occurred to a supervisory authority within 72 hours of the breach, if high risk impact is likely to data subjects.
- If appropriate AXIOM will give notice to the Data Subject

#### **Contact Us:**

#### By Address:

Axiom Research & Trading, Inc 6631 Fiona Place Carlsbad, CA 92011