Bull Gains — Privacy Policy

Last updated: October 1, 2026 — Effective date: October 1, 2026

1. Introduction

This Privacy Policy describes how Bull Gains LLC ("Bull Gains," "Company," "we," "us," or "our") collects, uses, discloses, and protects information in connection with our website, the Bull Gains automated trading software, and related services (collectively, the "Service").

By accessing or using the Service, you agree to the collection and use of information as described in this Policy. If you do not agree, please do not use the Service.

2. Information We Collect

Information you provide directly. When you contact us, book a strategy call, create an account, or make a purchase, we collect information such as your name, email address, phone number, billing address, and any other information you choose to provide in communications with us.

Payment information. When you make a purchase, payment is processed through our third-party payment processor and billing system. Bull Gains does not directly collect, store, or have access to your full credit card number or wire transfer credentials. Our payment processor handles this information subject to its own security standards and privacy practices.

Usage and configuration information. We may collect information related to your use of the Service, including account setup and configuration details, support communications, license status, payment history, and general usage patterns, for the purposes described in Section 4.

Website and device information. When you visit our website, we may automatically collect standard technical information such as your IP address, browser type, device type, referring pages, and general usage activity, for security, analytics, and website-improvement purposes.

Brokerage credentials and account access. You configure your brokerage credentials, API keys, and login information directly on your own server, which you control. As described in the Terms of Service, Bull Gains provides that server with blank fields for this information, and the only information Bull Gains sends to your server is an encrypted activation file containing a designated on/off switch for the automation — that file does not contain, transmit, or request your brokerage credentials. As a result, Bull Gains does not collect, receive, store, view, or otherwise have access to your brokerage credentials, API keys, or login information, through the Service or through any other channel, at any time. This means that no process operated by Bull Gains ever puts those credentials within Bull Gains' reach, not merely that Bull Gains chooses not to use information it otherwise could obtain.

3. How We Use Information

We use the information we collect to:

- Provide, operate, and maintain the Service, including setup, configuration, billing, and support;

- Process payments and manage installment or subscription billing;
- Communicate with you regarding your account, purchases, support requests, and updates to the Service;
- Improve, secure, and troubleshoot the Service and our website;
- Enforce our Terms of Service, protect against fraud, and comply with applicable law;
- Send you information about Bull Gains products, features, or offers, where permitted, and subject to your ability to opt out at any time.

We do not use your information to make investment decisions on your behalf. We do not access your brokerage account or trading activity, because — as described in Section 2 — we do not collect or possess your brokerage credentials or API keys in the first place. Bull Gains does retain the limited technical ability to remotely turn the automation itself on or off, as described in the Terms of Service; this ability is separate from, and does not involve any access to, your brokerage account, credentials, funds, or securities.

4. How We Share Information

We do not sell your personal information.

We may share information with:

- **Service providers** who perform functions on our behalf, such as payment processing, billing, hosting, customer communication, and analytics, and who are bound to use such information only to provide those services to us;
- **Legal and compliance purposes**, where disclosure is required to comply with applicable law, regulation, legal process, or governmental request, or to protect the rights, property, or safety of Bull Gains, our users, or others;
- **Business transfers**, where information may be transferred in connection with a merger, acquisition, financing, reorganization, or sale of some or all of our assets, subject to the terms of this Policy;
- **With your consent**, for any other purpose disclosed to you at the time of collection.

We do not share, sell, or otherwise disclose brokerage credentials or API keys, because we do not collect or possess them in the first place.

Nothing in this Policy, or in any agreement with Bull Gains, restricts your right to communicate directly with the SEC, FINRA, any other regulator, or law enforcement, or to leave an honest review of the Service.

5. Cookies and Similar Technologies

Our website may use cookies and similar technologies to operate core functionality, remember preferences, and understand general usage of the site. You can control cookies through your browser settings; disabling cookies may affect certain website functionality.

6. Data Security

We maintain reasonable administrative, technical, and organizational safeguards designed to protect the information we collect from unauthorized access, disclosure, alteration, or destruction. No method of transmission or storage is completely secure, and we cannot guarantee absolute security of any information.

Because Bull Gains does not collect or store your brokerage credentials or API keys, those credentials are never exposed to risk through our systems — their security is governed by your own environment and your brokerage provider's own security practices.

7. Data Retention

We retain the information we collect for as long as necessary to provide the Service, comply with our legal obligations, resolve disputes, enforce our agreements, and for other legitimate business purposes. When information is no longer needed for these purposes, we take reasonable steps to delete or de-identify it.

8. Your Choices and Rights

You may request access to, correction of, or deletion of the personal information we hold about you by contacting us at the email address below. We will respond to verified requests in accordance with applicable law. Please note that certain information may be retained where required for legal, billing, security, or legitimate business purposes even after a deletion request.

You may opt out of promotional communications from Bull Gains at any time by using the unsubscribe mechanism in those communications or by contacting us directly. You will continue to receive transactional and service-related communications necessary for the operation of your account.

9. Third-Party Services

The Service is designed to operate in connection with your own third-party brokerage account (currently Alpaca) and infrastructure that you control. Your use of any third-party brokerage, hosting provider, or other service is governed by that provider's own terms and privacy practices, which are independent of Bull Gains and outside our control. We encourage you to review the privacy practices of any third-party service you use in connection with the Service.

10. Children's Privacy

The Service is not directed to, and is not intended for use by, anyone under the age of 18. We do not knowingly collect personal information from anyone under 18. If we become aware that we have inadvertently collected such information, we will take steps to delete it.

11. Changes to This Policy

We may update this Privacy Policy from time to time. Material changes will be communicated by posting the updated Policy on our website and updating the "Last updated" date above. Continued use of the Service after changes take effect constitutes acceptance of the revised Policy.

12. Contact

Questions about this Privacy Policy may be directed to: info@bullgains.com