

IncomeClub Privacy Policy

IncomeClub is SEC registered internet advisor that provides investment advice and investment management through its website. The Privacy Policy describes what kind of personal information we collect about you when you use our services and how IncomeClub treats it. The IncomeClub Privacy Policy effective date is April 6, 2015.

Types of personal Information:

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this Policy carefully to understand what we do.

The types of personal information we collect and share depends on the product or service you have with us. This information can include:

- Tax Identification Number, Date of Birth, Telephone Number and Address
- Annual Income, Tax Bracket, Account Balances and Transaction History
- Net Worth, Assets and Employment History
- Other regulatory disclosures that may be necessary
- Your investment objectives and risk tolerance
- Your photograph, if you are agreed to provide it
- Information about your use of IncomeClub website (browsing activity, data displayed, clicked on UI elements, links, ads, etc.)
- Information about your computer(browser type, IP address, referral URL, cookie ID, data and time of access)
- Information about your activities on the IncomeClub website provided by third party tracking technology, such Google Analytics.

IncomeClub collects some information during account opening process according to requirements of regulatory bodies, such as Security Exchange Commission (SEC) and Financial Industry Regulatory Authority (FINRA), and our needs to provide individually tailored service to you. Other information can be collected when you use our website or interact with us via e-mails. We can also collect your personal information from other sources, such as credit bureaus, affiliates, or other companies.

IncomeClub does not provide services to anyone under the age of 18. If parents or guardians become aware that their dependent under the age of 18 has provided IncomeClub with personal information without their consent, they should contact IncomeClub at support@incomeclub.co . Information will be removed from our records. If IncomeClub discovers that a person under the age of 18 has provided us with personal information, such information will be removed from our records.

Information tracking technology

Cookies are small pieces of data that are stored on your computer, mobile phone or other device. Pixels are small code blocks on a website that allow for another server to measure viewing of a webpage and often are used in connection with cookies.

IncomeClub uses these technologies in order to improve your experience with the site. Cookies store anonymous information, such as whether you viewed the website from your mobile device or computer. Some personal information may be stored in a cookie and/or pixel, such as the website that you visited immediately prior to visiting IncomeClub website and relevant information that allows us to improve your user experience and for marketing purposes. Additionally, IncomeClub may use a cookie and/or that only stores anonymous information to track visitors across websites in order to better customize our marketing and advertising campaigns.

We use analytics tools such as called “Google Analytics” to collect information about your usage of this website. These analytics services collect information such as how often you visit this website, what pages you visit, and what other websites you visit prior to coming to the IncomeClub website.

These Analytics Services only collect the IP address assigned to you on the date you visit this site, not your name or other identifying information. IncomeClub does not combine these type of information with personally identifiable information.

Personal information use

All financial companies need to share clients’ personal information to run their everyday business. IncomeClub collects and use your personal information for various purposes, including but not limited to, creating of individually tailored Recommended Listings, delivering related content, process your transactions, maintain your account (s), calculating your investment performance and other purposes related to the IncomeClub services.

IncomeClub does not share your personal information with any third parties except as permitted or required by law such as respond to court order, legal investigations , report to credit bureaus, or to take actions regarding illegal activities, suspect fraud , front running and scalping, or breach our Terms of Use agreement.

We do not share your personal information with any affiliates, however we share your personal information required to open account(s) with our brokerage/custodian partner solely for the purpose of account(s) opening and brokerage service providing.

IncomeClub and you have mutually understood and agreed, that any personal information that you provide through the IncomeClub website for purpose of public use, may be publicly available at our discretion, and that other people can reproduce such information in various manners. We do not control how other people can use your voluntarily provided information.

IncomeClub can deliver you the information about our services, news, articles published at our blog or your account(s) transactions by e-mails. If you make a decision that you are no longer wish to receive this information, you can unsubscribe from our email delivery at any time by using “Unsubscribe” instructions provided in e-mails.

When you are no longer our customer, we continue to use and share your information as described in this Policy. Due to US regulatory requirements, we do not delete residual copies of outdated information and must preserve all customer data for a minimum of three years.

Personal Information Protection

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computers, servers, networks and procedural safeguards, secured files and buildings.

Limitation of personal information use

Federal law gives you the right to limit only

- Sharing information for affiliates' everyday business purposes-information about your creditworthiness
- Sharing information for affiliates to market to you
- Sharing information for non-affiliates to market to you

You can decline to provide your personal information to IncomeClub, however you will not be able to be our Client and we will not be able to provide you with qualified investment advice and investment management services.

Miscellaneous

By using the IncomeClub service, or otherwise providing us with personal information (such as an email address) you agree to the terms and conditions of this Privacy Policy.

IncomeClub's Privacy Policy may change from time to time. Your right under this policy will not be reduced without your consent. We will post an updated version of the Privacy Policy promptly on our website. If changes reduce your right, we will send you an e-mail notification about Privacy Policy changes at least one month before the new Privacy Policy takes in effect.

If you have questions about this Privacy Policy, please e-mail us at support@incomeclub.co or contact us by phone at 650-83-9094 or visit www.incomeclub.co and submit a request form.