PRIVACY POLICY

PredictCraft Mkt Inc. d/b/a DimeTrades

Effective: August 17, 2026
Last Updated: August 17, 2026

This Privacy Policy describes how PredictCraft Mkt Inc., doing business as DimeTrades, together with its parents, subsidiaries, and affiliates (collectively, "DimeTrades," "the Exchange," "we," "us," or "our"), collects, uses, discloses, and protects personal information. This Policy applies to personal information we collect about individual traders who access or use our markets, and about the beneficial owners, principals, officers, employees, and other representatives of market makers and other institutional participants (collectively, "Representatives"), who connect through our websites, mobile applications, trading platform, application programming interfaces, and related services (collectively, the "Services").

DimeTrades operates a designated contract market registered with the U.S. Commodity Futures Trading Commission (the "CFTC"). Much of the personal information we collect, and much of what we do with it, is required or shaped by the Commodity Exchange Act, CFTC regulations, and the rules of the Exchange. Where this Policy and those legal obligations conflict, we follow the law.

"Personal information" means information that identifies you, relates to you, or from which you can reasonably be identified, whether directly or indirectly. It includes information such as your name, email address, telephone number, Social Security number or taxpayer identification number, financial account information, trading activity, and certain online identifiers.

By accessing or using the Services, you acknowledge that you have read this Policy and consent to the collection, use, and disclosure of your personal information as described here. If you do not agree with the practices described in this Policy, please do not use the Services. This Policy does not apply to any website, application, or service that does not link to it, or that displays a different privacy notice.

If you are a California resident, please also see Section J, "Notice to California Residents." If you are a resident of another state with a comprehensive consumer privacy law, please see Section I, "Your State Privacy Rights."

A. Information We Collect Directly From You

We collect the following categories of personal information directly from you when you register for an account, complete our onboarding and identity verification processes, fund or withdraw from your account, trade on the Exchange, or otherwise interact with us:

- **Identity Data.** Full legal name, date of birth, Social Security number or taxpayer identification number, government-issued identification numbers, and images or copies of identification documents. For Representatives, we also collect information establishing your role, authority, and beneficial ownership in relation to the entity you represent.
- **Contact Data.** Email address, mailing and residential address, and telephone numbers.

- **Financial Data.** For traders (whom we also refer to as "participants" or "users"), this includes bank and payment account details, funding and withdrawal history, account balances, transaction history, tax information, and information relevant to determining your eligibility and suitability to use the Services, including information bearing on your financial resources. For Representatives, this includes bank statements, audited or unaudited financial statements, capital and net worth information, and other financial records of the entity you represent.

- **Trading and Profile Data.** Orders, quotes, executions, positions, settlement activity, account preferences and settings, and information you provide in surveys, feedback, promotions, or contests.

- **Communications Data.** Information you provide through customer support channels, focus groups, or any other communication with us, including email, chat, text messages, and telephone calls. Consistent with our regulatory recordkeeping obligations, communications with us may be recorded, monitored, and retained by us and by our service providers.

- **Compliance Data.** Information generated or collected in connection with our anti-money laundering, know-your-customer, sanctions screening, market surveillance, and disciplinary programs, including the results of screening and any related investigations.

B. Information We Collect Automatically

Like most digital platforms, we collect certain information automatically when you visit or use the Services:

- **Location Data.** We collect your IP address and coarse location data in order to provide and improve the Services, to determine and verify your eligibility to access particular markets, to comply with jurisdictional restrictions and our legal and regulatory obligations, and to protect our legal rights and the integrity of the Exchange.

- **Usage and Device Data.** We and our service providers may automatically collect information about your device and how you use the Services, including IP address, browser type and version, internet service provider, platform and device type, operating system, referring and exit pages, date and time stamps, session activity, pages and screens viewed, and unique identifiers that allow us to recognize your browser, device, or account. We collect this information through cookies, pixels, embedded scripts, log files, software development kits, and similar technologies (collectively, "Tracking Technologies").

We use Tracking Technologies to operate and secure the Services, to authenticate sessions and detect fraudulent or unauthorized access, to remember your preferences, to understand how the Services are used, and to measure the performance of our own marketing. We do not use Tracking Technologies to build cross-context behavioral advertising profiles, and we do not permit third-party advertising networks to collect information about your activity on the Services for their own targeting purposes.

Your cookie choices. Most browsers allow you to accept cookies, reject cookies, or receive a notification each time a cookie is set. You may reject or delete cookies through your browser settings, but doing so will limit the functionality available to you, and certain cookies are strictly necessary for the Services to

operate securely. Because these settings differ between browsers and may not apply to all technologies, we recommend reviewing the documentation provided by your browser developer.

Email tracking. You may configure your email client to prevent the automatic downloading of images, some of which allow us to determine whether you have opened an email from us or interacted with it.

Do Not Track. Some browsers offer a "Do Not Track" or "DNT" setting that transmits a signal expressing a preference not to be tracked. Because there is no common industry or legal standard for interpreting these signals, we do not currently respond to DNT headers. We do honor recognized opt-out preference signals to the extent required by applicable state law, as described in Sections I and J.

C. Information We Obtain From Other Sources

We obtain personal information from sources other than you, and we often combine it with information we collect directly or automatically. These sources include:

- **Identity verification and screening providers.** We receive information from vendors that verify identity documents, confirm identity attributes, perform sanctions and politically-exposed-person screening, and assess fraud risk.
- **Financial institutions and payment providers.** We receive information from banks, payment processors, and clearing and settlement providers in connection with funding, withdrawals, and settlement of your account.
- **Regulators, self-regulatory organizations, and other markets.** We may receive information in connection with regulatory inquiries, surveillance, information-sharing arrangements, and investigations.
- **Entities you represent.** If you are a Representative, we receive information about you from the market maker or other institutional participant on whose behalf you act.
- **Publicly available and commercial sources.** We and our vendors may collect contact, business, and other information from public records, public databases, and commercial data providers, and may combine it with information we hold about you.

D. How We Use Your Information

We use personal information for the purposes described in this Policy, for purposes disclosed to you at the point of collection, and as otherwise permitted or required by law. Specifically, we use your information to:

- **Establish and operate your account and provide the Services** — including registering you as a participant, verifying your identity, determining your eligibility to trade, processing orders and executions, handling funding, withdrawals, settlement, and billing, and performing related administrative functions;
- **Meet our legal and regulatory obligations** — including those applicable to us as a CFTC designated contract market, such as participant eligibility, recordkeeping and reporting, large trader

and position reporting, market surveillance, trade practice and market conduct oversight, disciplinary proceedings, anti-money laundering and countering the financing of terrorism, sanctions compliance, and responding to requests from the CFTC and other authorities (including without limitation the National Futures Association, defined herein as "NFA";

- **Maintain the integrity of our markets** — including monitoring for manipulation, wash trading, money passing, position limit violations, abusive trading practices, and other conduct prohibited by the Commodity Exchange Act or Exchange rules, and conducting investigations and enforcement actions;
- **Send you transactional and operational communications** — including trade confirmations, account statements, technical notices, security alerts, service announcements, changes to Exchange rules or this Policy, and administrative and support messages;
- **Communicate with you** — including responding to your questions and requests, providing customer support, notifying you about market events or product launches, conducting surveys, and contacting you about amounts owed;
- **Conduct research and analytics** — to understand how the Services are used, to evaluate and improve our markets, contract designs, fee structures, and user experience, and to produce internal reporting;
- **Market our own Services to you** — including sending newsletters, promotional messages, and information about products and features that may interest you, subject to your communication preferences;
- **Protect the safety and security of the Services and our participants** — including authenticating users, securing accounts, and detecting, investigating, preventing, and reporting fraud, unauthorized access, and other harmful or unlawful activity;
- **Perform audits and exercise or defend legal rights** — including performing and enforcing contracts and other obligations, responding to claims, managing rule enforcement reviews and conducting internal and external audits; and
- **Comply with applicable law** — including without limitation regulatory, tax, financial, and other reporting requirements.

We may create aggregated, de-identified, or anonymized data (including indices) from personal information and use it for any lawful purpose. We will maintain and use such data in de-identified form and will not attempt to re-identify it except as permitted by law.

E. How We Disclose Personal Information

We disclose personal information as described below.

Service providers and vendors. We disclose personal information to third parties that perform services on our behalf and under contractual obligations restricting their use of that information to our instructions. These include providers of identity verification and know-your-customer services, cloud hosting and

infrastructure, trading and clearing technology, market surveillance, payment processing and banking, customer support tooling, communications and email delivery, analytics, security monitoring, and fraud detection.

Clearing organization and settlement providers. We disclose personal information as necessary to the derivatives clearing organization, settlement bank, and custodian supporting the Exchange, in order to clear, settle, and safeguard positions and funds.

Regulators and self-regulatory organizations. We disclose personal information to the CFTC and to other regulators, self-regulatory organizations, and law enforcement or governmental authorities where required by law, Exchange rules, or an information-sharing arrangement, or where we are otherwise permitted to do so. This includes disclosures in connection with examinations, investigations, surveillance, and reporting obligations.

Corporate affiliates. We may disclose personal information to our parents, subsidiaries, joint venturers, and other entities under common control, in which case we will require those affiliates to handle the information consistently with this Policy.

Professional advisers. We may disclose personal information to lawyers, auditors, accountants, bankers, insurers, and consultants in order to obtain professional advice or services. These advisers are bound by legal or contractual duties of confidentiality.

Corporate transactions. We may disclose personal information in connection with, or during negotiation of, any merger, financing, acquisition, reorganization, divestiture, dissolution, or sale or transfer of all or a portion of our business or assets. In the event of insolvency, bankruptcy, or receivership, personal information may be transferred as a business asset. Any such transfer will remain subject to applicable law and, where required, to CFTC approval.

Legal and safety disclosures. We may disclose personal information where we believe in good faith that disclosure is necessary to comply with applicable law or legal process, including subpoenas, warrants, court orders, and discovery requests; in connection with any legal or regulatory investigation; to protect or defend the rights, property, or safety of the Exchange, our participants, or others; to investigate or prevent a violation of law, this Policy, our Rulebook, or our terms of service; or in an emergency involving a risk of death or serious injury.

With your consent. We may disclose personal information for any other purpose with your consent or at your direction.

F. Third-Party Links

The Services may contain links to websites, applications, or content operated by third parties that we do not control. We are not responsible for the privacy practices or content of those third parties, and this Policy does not apply to them. We encourage you to review the privacy policies and terms of use of any third-party service before providing it with your information.

G. Analytics

We use analytics providers to understand how visitors and participants use the Services and to improve them. These providers may set cookies or use similar technologies and may receive information such as your IP address, device and browser characteristics, and pages or screens viewed. We configure these tools to limit the collection and retention of personal information where practicable, and we contractually restrict our analytics providers from using the data for their own independent purposes.

H. Your Choices and Control Over Your Information

Account information. You may review and update certain account profile information by logging into your account. Some information cannot be changed without re-verification, because we are required to maintain accurate identity records for regulatory purposes.

Device permissions. You may control the permissions granted to our mobile applications, including access to location and notifications, through your device settings. Disabling certain permissions may limit functionality.

Marketing communications. You may opt out of promotional emails at any time by using the unsubscribe link in the message or by contacting us at support@dimetrades.com. You may not opt out of service-related or non-promotional communications, including messages regarding identity verification, account and settlement activity, Exchange rule changes, technical and security notices, or customer support.

Limits on deletion. Because we are subject to CFTC recordkeeping requirements and other legal obligations, we generally cannot delete records of your identity, account activity, trading, communications, or compliance screening for the periods prescribed by law, even if you close your account or make a deletion request. See Section N.

I. Your State Privacy Rights

A number of states have enacted comprehensive consumer privacy laws granting residents rights with respect to their personal information. Whether these rights are available to you depends on your state of residence, not on where DimeTrades is incorporated or maintains offices. Subject to the exemptions described below, residents of these states may have the right to: confirm whether we process their personal information and access that information; obtain a copy of their personal information in a portable format; correct inaccuracies in their personal information; request deletion of their personal information; opt out of the sale of personal information, targeted advertising, and certain profiling; and not be discriminated against for exercising these rights.

As described in this Policy, we do not sell personal information, do not process it for targeted advertising, and do not engage in profiling that produces legal or similarly significant effects for purposes of these laws.

Important exemptions. Much of the personal information we collect is nonpublic personal information collected by a financial institution and is subject to the Gramm-Leach-Bliley Act, the Commodity Exchange Act, and CFTC financial privacy regulations. Most state comprehensive privacy laws exempt such information, and some exempt regulated financial institutions entirely. As a result, many of the rights described above do not apply to a substantial portion of the information we hold about you. In addition,

where information is retained under a legal or regulatory recordkeeping obligation, we will decline deletion requests as to that information and will explain the basis for doing so.

How to exercise your rights. To submit a request, email us at support@dimetrades.com. We will verify your request by asking for information that matches what we already maintain about you; we may decline a request we cannot reasonably verify. You may designate an authorized agent to act on your behalf, but we will require proof of authorization and may also ask you to verify your identity directly. We will respond within the period required by applicable law. If we deny your request, you may appeal by replying to our response, and we will inform you of the outcome and of any further recourse available to you under your state's law.

J. Notice to California Residents

This section supplements the rest of this Policy and applies to California residents under the California Consumer Privacy Act, as amended (the "CCPA").

The CCPA does not apply to nonpublic personal information collected, processed, sold, or disclosed subject to the Gramm-Leach-Bliley Act and its implementing regulations, which includes CFTC financial privacy rules. Because DimeTrades is a financial institution for these purposes, most of the personal information we collect falls within this exemption and is instead governed by those financial privacy laws.

With respect to personal information that is subject to the CCPA because it is not collected in our capacity as a financial institution, we have collected the following categories in the preceding twelve months:

identifiers, including email address and IP address; internet or other electronic network activity information, including browsing and usage data; coarse geolocation information; and commercial information relating to inquiries about our Services.

We collect these categories from the sources described in Sections A through C, use them for the purposes described in Section D, and disclose them to the categories of recipients described in Section E. We retain them for the periods described in Section N. We have not sold or shared personal information in the preceding twelve months, and we do not knowingly sell or share the personal information of consumers under sixteen years of age.

California residents may request access to, correction of, or deletion of personal information subject to the CCPA, may request disclosure of the categories and specific pieces of personal information we have collected, and may not be discriminated against for exercising these rights. To submit a request, email support@dimetrades.com. Verification and authorized agent requirements are described in Section I.

K. Transfers of Personal Information

The Services are intended for use only in jurisdictions where we are authorized to offer them. Personal information we collect may be stored and processed in the United States or in any other country where we, our affiliates, or our service providers maintain facilities. If you access the Services from a jurisdiction with data protection laws that differ from those of the United States, you acknowledge that

your personal information may be transferred to and processed in a jurisdiction that does not provide the same level of protection as your own.

L. Age Restrictions

The Services are available only to individuals who are at least eighteen (18) years of age. We do not knowingly collect or solicit personal information from anyone under eighteen (18), and we do not permit such individuals to open an account or trade on the Exchange. If we learn that we have collected personal information from a person under eighteen (18), we will take reasonable steps to close the account and delete the information, subject to any recordkeeping obligation that requires us to retain it. If you believe we may hold information about a person under eighteen (18), please contact us at support@dimetrades.com.

M. Security

We maintain administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, use, alteration, disclosure, and loss. These safeguards include encryption of data in transit and at rest, access controls and least-privilege provisioning, multi-factor authentication, network monitoring and logging, vulnerability management, personnel training, vendor due diligence, and an incident response program, consistent with our obligations as a designated contract market.

No system is completely secure, and we cannot guarantee the security of information transmitted to or from the Services. You are responsible for maintaining the confidentiality of your account credentials and for enabling the security features we make available. Please notify us immediately at support@dimetrades.com if you believe your account has been compromised.

N. Retention

We retain personal information for as long as necessary to fulfill the purposes described in this Policy, and for longer where required by law. As a designated contract market, we are subject to recordkeeping requirements under the Commodity Exchange Act, CFTC regulations and NFA requirements, including additional requirements to retain records of participants, orders, trades, communications, and compliance activity for prescribed periods. Retention periods also reflect applicable tax, anti-money laundering, and accounting requirements, the need to resolve disputes and complaints, and the need to preserve records for litigation, investigations, and regulatory matters. Specific retention periods depend on the nature of the information, the purposes for which it was collected, and the applicable legal or regulatory requirement.

O. Changes to This Policy

We may revise this Policy from time to time. Changes take effect when the revised Policy is posted to our website and applications, and we will update the “Last Updated” date accordingly. Where a change is material, we will provide additional notice as required by applicable law. You are responsible for reviewing this Policy periodically. Your continued use of the Services after a change takes effect constitutes your acknowledgment of and consent to the revised Policy, which applies to all personal information we hold about you, including personal information collected before the change.

P. How to Contact Us

Questions, comments, or requests regarding your personal information or our privacy practices, and reports of suspected or confirmed security violations, fraud, or other harmful or unlawful activity, should be directed to:

PredictCraft Mkt Inc. d/b/a DimeTrades

861 6th Avenue, Suite 627
San Diego, CA 92101

Email: support@dimetrades.com