

Privacy Policy

Effective Date: November 15, 2025

Last Updated: December 27, 2025

Introduction

Compass AI Data Services, LLC ("Compass AI", "we", "us", or "our") operates the Compass AI platform at compassaihq.com (the "Platform" or "Service"). We are committed to protecting your privacy and being transparent about how we collect, use, and share your information.

Beta Status (December 2025): The Platform is currently in Beta with coverage limited to approximately 78 popular stocks. Features and data collection practices may evolve as we expand coverage and improve the service.

This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our Platform. Please read this Privacy Policy carefully. By accessing or using the Platform, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy and our Terms of Service.

If you do not agree with the terms of this Privacy Policy, please do not access or use the Platform.

Information We Collect

Information You Provide to Us

Account Information: When you create an account, we collect:

- Email address
- Password (encrypted)
- Username or display name
- Profile information you choose to provide

Payment Information: When you subscribe to paid tiers, we collect payment information through our third-party payment processor (Stripe). We do not store your full credit card information on our servers.

Brokerage Account Information: (Currently unavailable) Third-party brokerage integration features are not currently active. This section is reserved for future integrations.

Communications: When you contact us or communicate with our support team, we collect the contents of your messages, including any attachments or information you provide.

User-Generated Content: We collect content you create or share through the Platform, including:

- Watchlists and portfolios you create
- Custom alerts and preferences
- Feedback and ratings you provide
- Any other information you choose to submit

Information Collected Automatically

Usage Data: When you access and use the Platform, we automatically collect:

- Device information (device type, operating system, browser type)
- IP address and general location information
- Pages visited, features used, and time spent on the Platform
- Referring URLs and exit pages
- Search queries entered on the Platform
- Interaction with AI features and chat history

Cookies and Tracking Technologies: We use cookies, web beacons, and similar tracking technologies. See the "Cookies and Similar Technologies" section below for detailed information about our cookie practices and how you can manage your preferences.

Analytics: We use third-party analytics services (such as Google Analytics) to help us understand how users interact with the Platform. These services may collect information about your use of the Platform and other websites over time.

Information from Third Parties

Market Data Providers: We collect real-time and historical market data from providers including TradingView, Polygon.io, and others. This data includes stock prices, trading volumes, and other market information that we aggregate and display on the Platform.

News and Social Media: We collect publicly available information from news sources, social media platforms (including Reddit, X/Twitter, and Discord), and other public sources to provide sentiment analysis and market intelligence features.

Third-Party Brokerage Integration: (Currently unavailable) Third-party brokerage account connection features are not currently active. This section is reserved for future integrations.

How We Use Your Information

We use the information we collect for the following purposes:

Platform Operation and Service Delivery

- Provide, maintain, and improve the Platform and its features
- Process transactions and manage your subscription
- Authenticate your account and verify your identity
- (Future) Enable brokerage account connections through third-party integrations
- Deliver personalized stock analysis and market insights
- Generate AI-powered analysis and recommendations
- Provide customer support and respond to your inquiries
- Send you service-related communications and notifications

Personalization and Enhancement

- Customize your experience based on your preferences and usage patterns
- Deliver relevant content, alerts, and insights based on your portfolio and watchlists
- Filter and organize information based on your holdings and interests
- Remember your settings and preferences across devices

Analytics and Improvement

- Analyze usage patterns to improve Platform performance and user experience
- Conduct research and development of new features
- Test new features and functionalities
- Identify and fix technical issues and bugs
- Monitor Platform security and prevent fraud

Legal and Compliance

- Comply with legal obligations and regulatory requirements
- Enforce our Terms of Service and other policies
- Protect our rights, privacy, safety, and property
- Resolve disputes and prevent prohibited or illegal activities

Marketing and Communications

- Send you newsletters, product updates, and promotional materials (with your consent)
- Conduct surveys and gather feedback
- Inform you about new features, services, or offerings

You can opt out of marketing communications at any time by following the unsubscribe instructions in our emails or by contacting us at support@compassaihq.com.

How We Share Your Information

We do not sell your personal information to third parties. We may share your information in the following circumstances:

Service Providers

We share information with third-party service providers who perform services on our behalf, including:

- **Payment Processors:** Stripe processes payment information for subscription services
- **Data Providers:** TradingView, Polygon.io, and other market data providers
- **Brokerage Integration:** (Currently unavailable) Third-party brokerage integrations (reserved for future use)
- **AI Model Providers:** Third-party AI services that power our analysis features
- **Cloud Hosting:** AWS and other infrastructure providers host our Platform
- **Analytics Services:** Google Analytics and similar services analyze Platform usage
- **Customer Support:** Tools and services that help us provide customer support

These service providers are contractually obligated to protect your information and may only use it to provide services to us.

Business Transfers

If we are involved in a merger, acquisition, financing, reorganization, bankruptcy, or sale of assets, your information may be transferred as part of that transaction. We will provide notice before your information is transferred and becomes subject to a different privacy policy.

Legal Requirements

We may disclose your information if required to do so by law or in response to:

- Valid legal processes (subpoenas, court orders, search warrants)
- Requests from law enforcement or government agencies
- Situations involving potential threats to safety or illegal activities
- Protection of our rights, property, or safety

With Your Consent

We may share your information with third parties when you provide explicit consent or direct us to do so.

Aggregated and De-identified Data

We may share aggregated, anonymized, or de-identified information that cannot reasonably be used to identify you. This may include market trends, usage statistics, and platform analytics.

Data Retention

We retain your information for as long as necessary to provide the Platform and fulfill the purposes described in this Privacy Policy, unless a longer retention period is required or permitted by law.

Account Information: We retain your account information for as long as your account is active. If you close your account, we will delete or anonymize your information within 90 days, except as required for legal compliance, dispute resolution, or fraud prevention.

Usage Data: We retain personally identifiable usage data for up to 24 months, or less if no longer needed for our legitimate business purposes. Data may be deleted upon user request at any time. We

retain aggregated and anonymized usage data indefinitely to improve the Platform and understand usage patterns.

Communications: We retain customer support communications (including emails sent to or from support@compassaihq.com and related support aliases such as info@compassaihq.com, help@compassaihq.com, and contact@compassaihq.com) for 3 years from the date of the message, or longer where required by law or to establish, exercise, or defend legal claims. After the retention period expires, we delete or irreversibly anonymize these communications in the ordinary course of business.

These communications are stored in Microsoft 365 and are subject to our Microsoft Purview retention policy, which may preserve emails for the full retention period even if a user deletes them from their mailbox. You may request deletion of specific communications at any time by contacting support@compassaihq.com, and we will honor these requests where they are not overridden by legal or compliance retention requirements.

Brokerage Data: (Currently unavailable) Third-party brokerage data retention policies will apply if brokerage integration features are activated in the future.

Data Security

We implement reasonable technical, administrative, and physical security measures to protect your information from unauthorized access, disclosure, alteration, or destruction. These measures include:

- Encryption of data in transit using TLS/SSL
- Encryption of sensitive data at rest
- Regular security assessments and penetration testing
- Access controls and authentication mechanisms
- Employee training on data security and privacy
- Secure data centers and cloud infrastructure

However, no method of transmission over the Internet or electronic storage is 100% secure. While we strive to protect your information, we cannot guarantee absolute security. You are responsible for maintaining the confidentiality of your account credentials.

Cookies and Similar Technologies

What Are Cookies?

Cookies are small text files that are stored on your device when you visit our website. They help us recognize you, remember your preferences, and improve your experience on the Platform. We also use similar technologies such as web beacons, pixels, and local storage.

Types of Cookies We Use

We use the following categories of cookies:

Essential Cookies (Always Active)

These cookies are strictly necessary for the Platform to function and cannot be disabled in our systems. They are usually only set in response to actions you take, such as setting your privacy preferences, logging in, or filling in forms.

Purpose:

- Authentication and account access
- Security and fraud prevention
- Session management
- Remembering your cookie consent preferences
- Load balancing and platform performance

Legal Basis: These cookies are necessary for the performance of our contract with you and to provide the services you have requested.

Analytics Cookies (Optional)

These cookies help us understand how visitors interact with our Platform by collecting and reporting information anonymously. We use this data to improve the Platform's functionality and user experience.

Purpose:

- Track page views and user navigation patterns
- Measure Platform performance and load times
- Identify technical issues and bugs

- Understand which features are most used
- Analyze user engagement and behavior

Third-Party Services:

- Google Analytics (anonymized IP tracking)
- Custom analytics tools for usage patterns

Legal Basis: We use these cookies based on your consent. You can withdraw consent at any time through our cookie preference center.

Marketing Cookies (Optional)

These cookies track your online activity to help us deliver more relevant advertising and measure the effectiveness of marketing campaigns. They may be set by us or by third-party advertising partners.

Purpose:

- Deliver targeted advertisements
- Measure ad campaign performance
- Frequency capping (limiting how often you see an ad)
- Cross-device tracking for consistent experience
- Remarketing to visitors who have shown interest

Third-Party Services:

- Social media pixels (Facebook, LinkedIn, Twitter)
- Advertising networks and platforms
- Marketing automation tools

Legal Basis: We use these cookies based on your consent. You can withdraw consent at any time through our cookie preference center.

Cookie Duration

Cookies may be session-based (deleted when you close your browser) or persistent (stored on your device for a set period):

- **Session Cookies:** Deleted when you close your browser
- **Persistent Cookies:** Remain on your device for a specified period or until manually deleted

Typical Duration:

- Essential cookies: Session to 1 year
- Analytics cookies: 13-26 months
- Marketing cookies: 3-12 months

Managing Your Cookie Preferences

You have control over which cookies you allow:

Our Cookie Preference Center

When you first visit our website, you'll see a cookie consent banner. You can:

- **Accept All:** Enable all cookies for the full Platform experience
- **Reject All:** Disable non-essential cookies (analytics and marketing)
- **Customize:** Choose specific cookie categories to enable

You can change your preferences at any time by accessing the cookie settings available on our website or by clearing your browser cookies and revisiting our site.

Browser Settings

You can also control cookies through your browser settings:

- **Chrome:** Settings > Privacy and Security > Cookies and other site data
- **Firefox:** Options > Privacy & Security > Cookies and Site Data
- **Safari:** Preferences > Privacy > Manage Website Data
- **Edge:** Settings > Cookies and site permissions

Note: Disabling essential cookies will prevent you from using certain features of the Platform, including account access and personalized settings. Disabling analytics or marketing cookies will not affect Platform functionality but may limit your experience.

Mobile Devices

On mobile devices, you can manage cookies through your device settings or by using the in-app cookie preference center.

Third-Party Cookies

Some cookies are placed by third-party services that appear on our pages. We do not control these third-party cookies, and their use is governed by the privacy policies of the third-party providers.

Common Third-Party Cookie Providers:

- Google Analytics (analytics)
- Stripe (payment processing)
- Social media platforms (sharing and login features)

We recommend reviewing the privacy policies of these third-party providers to understand their cookie practices:

- Google Privacy Policy: <https://policies.google.com/privacy>
- Stripe Privacy Policy: <https://stripe.com/privacy>

Do Not Track Signals

Some browsers offer a "Do Not Track" (DNT) signal that requests websites not to track your browsing activity. Currently, there is no industry standard for how to respond to DNT signals. We do not currently respond to DNT signals, but we provide you with the ability to manage your cookie preferences through our cookie consent banner.

Updates to Our Cookie Practices

We may update our cookie practices from time to time to reflect changes in technology, legal requirements, or Platform features. When we make significant changes, we will notify you through the Platform or by email and ask you to review your cookie preferences.

Contact Us About Cookies

If you have questions about our use of cookies or other tracking technologies, please contact us at support@compassaihq.com.

Your Privacy Rights

Depending on your location, you may have certain rights regarding your personal information:

Access and Portability

You have the right to access your personal information and request a copy in a portable format. You can download your data through your account settings or by contacting us at support@compassaihq.com.

Correction and Update

You have the right to correct inaccurate information or update incomplete information. You can update most information through your account settings.

Deletion

You have the right to request deletion of your personal information, subject to certain exceptions for legal compliance, fraud prevention, and security purposes. You can delete your account through account settings or by contacting us.

Objection and Restriction

You have the right to object to or restrict certain processing of your information, including for marketing purposes.

Withdraw Consent

Where we process your information based on consent, you have the right to withdraw that consent at any time.

Do Not Track

Some browsers have "Do Not Track" features that signal websites you visit that you do not want your online activity tracked. The Platform does not currently respond to Do Not Track signals.

Exercising Your Rights

To exercise any of these rights, please contact us at support@compassaihq.com. We will respond to your request within 30 days. We may require verification of your identity before processing your request.

California Privacy Rights

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA):

Right to Know: You have the right to request information about the personal information we collect, use, disclose, and sell about you.

Right to Delete: You have the right to request deletion of your personal information, subject to certain exceptions.

Right to Opt-Out: We do not sell personal information. If our practices change, we will provide you with the right to opt out.

Right to Non-Discrimination: We will not discriminate against you for exercising your privacy rights.

To exercise these rights, contact us at support@compassaihq.com or call us at the number provided on our website.

Children's Privacy

The Platform is not intended for children under the age of 18. We do not knowingly collect personal information from children under 18. If you are under 18, please do not use the Platform or provide any information to us.

If we learn that we have collected personal information from a child under 18, we will delete that information promptly. If you believe we have collected information from a child under 18, please contact us at support@compassaihq.com.

Third-Party Links

The Platform may contain links to third-party websites, services, or resources that are not owned or controlled by us. This Privacy Policy does not apply to those third-party services. We are not responsible for the privacy practices of third parties. We encourage you to review the privacy policies of any third-party services before providing them with your information.

International Data Transfers

Your information may be transferred to, stored, and processed in the United States or other countries where we or our service providers operate. These countries may have data protection laws that differ from your country of residence.

By using the Platform, you consent to the transfer of your information to the United States and other countries. We take steps to ensure that your information receives an adequate level of protection in the jurisdictions in which we process it.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. When we make changes, we will update the "Last Updated" date at the top of this Privacy Policy.

If we make material changes, we will provide notice through the Platform or by sending you an email to the address associated with your account. Your continued use of the Platform after we make changes constitutes your acceptance of the revised Privacy Policy.

We encourage you to review this Privacy Policy periodically to stay informed about how we protect your information.

Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact us:

Compass AI Data Services, LLC

Email: support@compassaihq.com

Website: compassaihq.com

We will respond to your inquiry within a reasonable timeframe, typically within 30 days.

Additional Disclosures

AI Features and Data Processing

Our Platform uses artificial intelligence to analyze market data, news, and social media content. When you interact with AI features:

- Your queries and interactions may be processed by third-party AI model providers
- Chat history and usage patterns may be used to improve AI performance
- AI-generated content may contain errors or inaccuracies (see our AI Disclaimer at <https://compassaihq.com/agreement/CompassAI-Disclaimer.pdf>)

Brokerage Account Connections

Currently Unavailable: Third-party brokerage account connection features are not currently active. If brokerage integration features are activated in the future, appropriate privacy disclosures will be provided at that time.

Market Data Usage

Market data displayed on the Platform is sourced from third-party providers and may be delayed or subject to usage restrictions. Your use of market data is subject to the terms and conditions of our data providers.

By using the Platform, you acknowledge that you have read, understood, and agree to this Privacy Policy.

For our complete Terms of Service, please visit: <https://compassaihq.com/agreement/Terms-of-Service.pdf>

For information about AI features and disclaimers, please visit: <https://compassaihq.com/agreement/CompassAI-Disclaimer.pdf>