

**Lumina Markets Inc.**

895 Broadway, 5th Floor, New York, NY 10003

**Privacy Policy**

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*This Privacy Policy describes how Lumina Markets Inc. collects, uses, shares, and protects information about visitors to its website and users of its mobile application. It supplements, and does not replace, the financial privacy notice provided to customers under the Gramm-Leach-Bliley Act and the privacy policy of Interactive Brokers LLC, which acts as Lumina Markets' clearing futures commission merchant. Information processed by Interactive Brokers in connection with your brokerage account is governed by the Interactive Brokers Group Privacy Policy, available at [interactivebrokers.com](https://www.interactivebrokers.com).*

**Table of Contents**

|                                                                            |           |
|----------------------------------------------------------------------------|-----------|
| <b>1. Introduction</b>                                                     | <b>3</b>  |
| <b>2. Scope of This Policy and Relationship to the IBKR Privacy Policy</b> | <b>3</b>  |
| <b>3. Information We Collect</b>                                           | <b>4</b>  |
| <b>4. How We Use Information</b>                                           | <b>6</b>  |
| <b>5. How We Share Information</b>                                         | <b>7</b>  |
| <b>6. Mobile Application Permissions</b>                                   | <b>8</b>  |
| <b>7. Cookies and Similar Technologies</b>                                 | <b>9</b>  |
| <b>8. Data Retention</b>                                                   | <b>9</b>  |
| <b>9. Information Security</b>                                             | <b>10</b> |
| <b>10. Your Choices and Account Deletion</b>                               | <b>10</b> |
| <b>11. Children's Privacy</b>                                              | <b>11</b> |
| <b>12. U.S. State Privacy Rights</b>                                       | <b>11</b> |
| <b>13. GLBA Financial Privacy Notice</b>                                   | <b>12</b> |
| <b>14. Third-Party Links and Services</b>                                  | <b>13</b> |
| <b>15. Changes to This Policy</b>                                          | <b>13</b> |
| <b>16. How to Contact Us</b>                                               | <b>13</b> |

## 1. Introduction

Lumina Markets Inc. ("**Lumina**," "**we**," "**our**," or "**us**") is a Delaware corporation registered with the U.S. Commodity Futures Trading Commission (the "**CFTC**") as an introducing broker (the "**IB**") and a member of the National Futures Association (the "**NFA**").

Lumina provides U.S. residents with access to event contracts and other commodity interest products listed on ForecastEx, LLC, a CFTC-designated contract market (the "**DCM**"), through our website at [luminamarkets.com](http://luminamarkets.com) (the "**Site**") and our mobile application (the "**App**," and together with the Site, the "**Services**"). Customer accounts introduced by Lumina are carried by Interactive Brokers LLC ("**Interactive Brokers**"), which acts as Lumina's clearing futures commission merchant (the "**Clearing FCM**").

We respect your privacy and are committed to protecting the personal information you provide to us. This Privacy Policy (the "**Policy**") explains the categories of information we collect, how we use and share that information, the choices and rights available to you, and how to contact us with questions. By accessing or using the Services, you acknowledge that you have read and understood this Policy.

## 2. Scope of This Policy and Relationship to the IBKR Privacy Policy

This Policy applies to information we collect: (i) when you visit, use, or interact with the Site or the App; (ii) when you create a Lumina account or transact through the Services; (iii) when you communicate with us by email, in-app messaging, telephone, or otherwise; and (iv) when we receive information about you from third parties as described in this Policy.

Because Lumina introduces customer accounts to Interactive Brokers, certain information about you is also collected and processed by Interactive Brokers in its capacity as the Clearing FCM. In particular, when you open a brokerage account through the Services, the customer identification, anti-money laundering, suitability, tax-reporting, and bank-account-verification processes are conducted by Interactive Brokers and its service providers, not by Lumina. Information collected and processed by Interactive Brokers in that context is governed by the **Interactive Brokers Group Privacy Policy**, available at [interactivebrokers.com](http://interactivebrokers.com), and is not the subject of this Policy. Lumina and Interactive Brokers are under common ultimate beneficial ownership; this relationship is described in our Conflict of Interest Disclosure.

This Policy also does not apply to: (a) the practices of ForecastEx, LLC as the DCM on which contracts are listed and executed; or (b) the practices of any third party whose website or service is linked from, or integrated with, the Services. Although we may share information with these parties as described in this Policy, their treatment of your information is governed by their own privacy policies.

### 3. Information We Collect

We collect a deliberately limited set of information through the Services. The categories below describe what Lumina itself collects and processes. Information that you submit during account opening for purposes of customer identification, suitability, or bank-account verification is collected and processed by Interactive Brokers and is governed by the Interactive Brokers Group Privacy Policy.

#### Information You Provide to Us

- **Account credentials**, including the username and password you use to access your Lumina account, as well as authentication factors such as one-time codes or biometric prompts.
- **Contact and profile information**, including your name, email address, telephone number, and similar identifiers used to register and communicate with you.
- **Communications**, including the content of emails, in-app messages, support tickets, chat transcripts, and recorded telephone calls (when applicable), as well as your contact preferences. As a regulated introducing broker, Lumina is required to record, retain, and review business communications with customers and prospective customers for compliance, supervision, and recordkeeping purposes.
- **Marketing information**, including your subscription preferences and any responses you provide to surveys or research requests.

#### Information We Collect Automatically

- **Device and connection data**, including your IP address, device type, operating system, mobile network information, browser type and version, time zone, and similar technical attributes. On our mobile App, we and our advertising and measurement partners may access mobile advertising identifiers (such as the Apple Identifier for Advertisers (IDFA) and the Android Advertising ID) and use software development kits (SDKs) to attribute app installs and measure advertising, subject to your permission.
- **Usage data, including the screens you view, the features you use, the actions you take, and the dates and times of your visits. We and the product-analytics and error-monitoring providers that act on our behalf collect this information through Cookies and software development kits in order to understand how the Services are used and to diagnose problems.**
- **Approximate and precise location.** We collect approximate location derived from your IP address. We may also collect precise location from your device, with your permission where required, for the limited purposes of confirming that you are located in a U.S. jurisdiction in which our Services are available, enforcing state-by-state restrictions applicable to event contracts, and detecting anomalous account activity. Precise location is collected at account access and at order-submission checkpoints, rather than continuously, and is not retained as a location history.
- **Cookies and similar technologies**, as described in Section 7.

- **Log data and crash reports**, including diagnostic information collected when an error occurs in the Services.

### Information We Receive from Third Parties

We receive limited information about you from third parties, including:

- **Interactive Brokers**, from which we receive operational information about the status of your brokerage account and the transactions effected through the Clearing FCM.
- **ForecastEx**, from which we receive information necessary to operate the Services and process your orders.
- **Service providers** that support the Services, such as analytics, error-monitoring, and customer-support providers.
- **Referral sources**, when another individual provides us with your contact information through a referral or invitation feature.
- **Advertising and measurement partners**, from which we receive campaign, attribution, and measurement information about how our advertising performs.

### Information We Do Not Collect or Retain

Customer identification documents (such as passports, driver's licenses, and government identifiers), Social Security numbers, financial-suitability information, and bank-account numbers used for funding are collected and processed by Interactive Brokers as part of the brokerage account-opening process. Lumina does not independently retain these materials. We also do not collect microphone audio, contacts, calendar entries, health data, SMS messages, or call logs from your device.

## 4. How We Use Information

We use the information described in Section 3 for the following purposes:

- **To provide and operate the Services**, including authenticating your access, supporting your interactions with the App and Site, providing customer support, and communicating with you about the Services.
- **To comply with our legal and regulatory obligations**, including obligations under the Commodity Exchange Act, the rules of the CFTC and NFA, the rules of ForecastEx, federal and state anti-money laundering laws, applicable tax-reporting requirements, and the books-and-records and recording-of-communications obligations applicable to introducing brokers.
- **To verify eligibility and prevent fraud**, including confirming that you are accessing the Services from a U.S. jurisdiction in which they are available, detecting unauthorized access, and detecting market manipulation or other prohibited activity.

- **To improve the Services, by analyzing usage patterns, debugging, and developing new features, including through third-party product-analytics and error-monitoring tools that process this information on our behalf and under contract.**
- **To measure and deliver advertising**, including measuring the performance of our marketing campaigns, attributing app installs and account sign-ups to the campaigns that brought you to the Services, and delivering and optimizing advertising for the Services on third-party platforms.
- **To send you communications** about your account, transactions, regulatory disclosures, and (where permitted and subject to your preferences) marketing messages.
- **To enforce our agreements** and to comply with subpoenas, legal process, and lawful requests from regulators, self-regulatory organizations, and law enforcement.
- **In aggregated or de-identified form**, for analytical, research, and business-reporting purposes. We maintain and use de-identified information in de-identified form and do not attempt to re-identify it except as permitted by law.

We do not use automated decision-making, including profiling, to make decisions that produce legal or similarly significant effects concerning you without meaningful human involvement. Where automated systems assist with fraud prevention or risk monitoring, the results are subject to human review where they affect your access to the Services, and you may contact us to request additional information or human review where required by applicable law.

## 5. How We Share Information

We share information only as described in this Policy, and only where permitted by applicable law. We do not sell your personal information for money. We do share a limited set of information for advertising and measurement, as described under "Advertising and Measurement Partners" below. Depending on where you live, some of that activity may be treated as a "sale," a "share," or "targeted advertising" under state privacy law. You may opt out at any time, as described in Sections 10 and 12.

### Interactive Brokers as Clearing FCM

Because customer accounts introduced by Lumina are carried by Interactive Brokers, we transmit to Interactive Brokers information necessary to open and maintain your brokerage account, process orders, and comply with applicable law. Interactive Brokers also conducts customer identification, anti-money laundering screening, and bank-account verification on its own infrastructure and through its own service providers. Information processed by Interactive Brokers is governed by the Interactive Brokers Group Privacy Policy.

### ForecastEx and Other Designated Contract Markets

Information necessary to route and execute your orders, and to comply with exchange rules, is transmitted to ForecastEx, LLC and any other DCM on which the products you transact are listed.

**Service Providers**

We share information with third-party service providers that perform services on our behalf and under contractual obligations of confidentiality and limited use. The categories of service providers we use include cloud hosting and infrastructure, communications archiving and surveillance vendors required to maintain books and records, analytics and error-monitoring providers, customer-support and helpdesk providers, marketing-automation and email-delivery providers, and professional advisers (auditors, accountants, and outside legal counsel).

**Advertising and Measurement Partners**

We advertise the Services on third-party platforms and work with measurement partners to understand which campaigns bring people to Lumina. For these purposes we and these partners use cookies, software development kits, advertising identifiers, IP address, and advertising click identifiers, and we transmit a limited set of information about your interactions with our advertising and with the Services. Where that information includes contact identifiers such as your email address or telephone number, we transmit them only in hashed form, and we do not transmit your account number for any advertising purpose. If you opt out as described in Section 10, we instruct these platforms to use any information they receive for measurement purposes only, and not to build audiences or deliver advertising to you on the basis of it.

**Affiliates**

We share information with affiliates that support technical operations, customer service, and related functions on our behalf, subject to the same confidentiality and security standards that apply to Lumina personnel.

**Regulators, Self-Regulatory Organizations, and Law Enforcement**

We share information with the CFTC, NFA, ForecastEx and other exchanges, the Financial Crimes Enforcement Network, and other governmental and self-regulatory bodies, in response to subpoenas, examinations, regulatory reporting obligations, suspicious-activity reports, and other lawful requests. We may also share information with law enforcement and other parties as required by law or to protect the rights, property, or safety of Lumina, our customers, or others.

**Corporate Transactions**

If Lumina is involved in a merger, acquisition, financing, reorganization, sale of assets, or similar transaction, information about you may be transferred to the counterparty or successor entity, subject to confidentiality protections.

**With Your Direction or Consent**

We share information with other parties when you direct us to do so or when you otherwise consent to the sharing.

**6. Mobile Application Permissions**

When you use the App, the App may request permission to access certain features of your device. You may grant or decline these permissions in your device settings, and you may change

your selections at any time. The permissions we request, and the purposes for which we use them, include:

- **Camera**, if you choose to upload a photograph in support of a customer-support inquiry. Camera-based identity verification, where required, is conducted by Interactive Brokers and not by Lumina.
- **Photo library**, to allow you to upload images you choose to share with us.
- **Location**, to confirm that you are located in a U.S. jurisdiction in which the Services are available and to enforce state-level eligibility restrictions applicable to event contracts.
- **Notifications**, to deliver account, transaction, security, and (where you have opted in) marketing notifications.
- **Biometrics** (Face ID, Touch ID, fingerprint, or comparable system features), as a convenience method to authenticate access to the App. Biometric data is processed locally by your device and is not transmitted to or stored by Lumina.
- **Network state**, to manage data usage and to optimize the App's performance under different connection conditions.
- **App Tracking Transparency (Apple devices)**, through which we ask your permission to access your device's advertising identifier for advertising attribution and measurement.

Declining a permission may limit your ability to use certain features of the App.

## 7. Cookies and Similar Technologies

We and our service providers use cookies, software development kits, and similar technologies (collectively, "**Cookies**") to operate and improve the Services. Cookies allow us to recognize you across sessions, maintain your preferences, secure your account, and conduct first-party analytics. We and our advertising partners also use Cookies to measure and deliver advertising for the Services on third-party platforms, including based on your activity within the Services. Where required by applicable law, we present cookie choices through a banner or preference center; you may in any event opt out of this use at any time, as described in Section 10. You can control Cookies through your browser settings and your mobile device's privacy settings. If you disable strictly necessary Cookies, parts of the Services may not function correctly.

## 8. Data Retention

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, including to provide the Services, comply with our legal and regulatory obligations, resolve disputes, and enforce our agreements. As an introducing broker, Lumina is subject to recordkeeping obligations under CFTC and NFA rules, including a minimum five-year retention period for many books and records, and longer periods for certain categories. Recordings of business communications are retained in accordance with CFTC Regulation 1.35 and NFA

rules. When we no longer have a business or legal need to retain personal information, we will delete or de-identify it.

## **9. Information Security**

Lumina maintains an information systems security program designed to protect the confidentiality, integrity, and availability of personal information. The program includes administrative, technical, and physical safeguards, including encryption of data in transit and at rest where appropriate, access controls based on the principle of least privilege, multi-factor authentication, vulnerability management, security monitoring, employee training, and incident-response procedures. No method of transmission or electronic storage is completely secure, and we cannot guarantee that information about you will not be accessed by unauthorized persons despite our efforts. If you believe your account has been compromised, please contact us immediately at [security@luminamarkets.com](mailto:security@luminamarkets.com).

## **10. Your Choices and Account Deletion**

### **Marketing Communications**

You may opt out of marketing communications by following the unsubscribe instructions in the communication, by adjusting your preferences in the App, or by emailing [privacy@luminamarkets.com](mailto:privacy@luminamarkets.com). Even if you opt out of marketing communications, we will continue to send you communications relating to your account, regulatory disclosures, and other transactional or relationship matters.

### **Advertising and Tracking Choices**

You may control Cookies through your browser settings and your mobile device's privacy settings. You may opt out of the use of your information for advertising at any time through the "Your Privacy Choices" link in the footer of the Site and in your App settings. You may also opt out of interest-based advertising from participating companies through the Digital Advertising Alliance at [optout.aboutads.info](http://optout.aboutads.info), and you may limit interest-based advertising in your mobile device settings. On Apple mobile devices, you may decline tracking at the App Tracking Transparency prompt or in your device settings. Where the App presents the App Tracking Transparency prompt and you decline, information collected in the App is not linked with other companies' data for advertising, including hashed-identifier matching from App activity; your choices for the Site and your account are managed through the "Your Privacy Choices" link. Where required by applicable law, we treat browser-based opt-out preference signals, such as the Global Privacy Control, as a request to opt out of advertising-related sharing for the browser that sends the signal.

### **Account and Data Deletion**

You may request that we delete your Lumina account and the personal information associated with it by selecting "Delete My Account" within the App, or by emailing [privacy@luminamarkets.com](mailto:privacy@luminamarkets.com). We are required to retain certain information to comply with our legal and regulatory obligations, including the books-and-records and anti-money-laundering retention requirements applicable to introducing brokers. Information held by Interactive Brokers

in connection with your brokerage account is retained by Interactive Brokers in accordance with its own policies and applicable law; a deletion request submitted to Lumina does not extend to information held by Interactive Brokers, and you may submit a separate request to Interactive Brokers in accordance with the Interactive Brokers Group Privacy Policy.

### **Access and Correction**

You may access and update most of your account information by logging into the App. To request access to or correction of other information, please contact [privacy@luminamarkets.com](mailto:privacy@luminamarkets.com).

## **11. Children's Privacy**

The Services are intended for individuals who are at least 21 years of age and otherwise eligible to open a brokerage account and transact in event contracts and other commodity interests. The Services are not directed to children under 13 within the meaning of the Children's Online Privacy Protection Act ("**COPPA**"), and we do not knowingly collect personal information from anyone under 18. If we learn that we have collected personal information from a person under 18, we will delete that information promptly. If you believe a child has provided personal information to us, please contact [privacy@luminamarkets.com](mailto:privacy@luminamarkets.com).

## **12. U.S. State Privacy Rights**

Lumina is a financial institution subject to the Gramm-Leach-Bliley Act ("**GLBA**") and the privacy provisions of CFTC Regulation 160. Personal information that we collect, process, or disclose pursuant to GLBA is generally exempt from the substantive provisions of the California Consumer Privacy Act, as amended by the California Privacy Rights Act ("**CCPA**"), and from the substantive provisions of comparable consumer privacy laws in Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, Virginia, and other states with comparable laws as they take effect. The use and disclosure of nonpublic personal information collected to provide brokerage services is instead governed by the Lumina GLBA Financial Privacy Notice described in Section 13.

To the extent we collect information that is not subject to the GLBA exemption — such as information from passive visitors to the Site, prospective customers who do not open an account, and recipients of marketing communications — residents of the states listed above may have certain rights under the applicable state law, including the right to know what information we have collected, the right to request access to or a copy of that information, the right to request correction or deletion, and the right to opt out of any sale or sharing of personal information. We do not sell personal information for monetary consideration. In the preceding twelve months, we have disclosed identifiers and internet or other electronic network activity information to advertising and measurement partners. As described in Section 5, we do share a limited set of information with advertising platforms to measure and deliver advertising; for personal information that is not exempt under GLBA — such as information about site visitors, prospective customers who do not open an account, and marketing recipients — this may constitute a "sale," a "share," or "targeted advertising" as those terms are defined under applicable state privacy law. Where a state privacy

law applies to us and to that activity, you have the right to opt out, and we will honor your request. We will not discriminate against you for exercising your rights.

To exercise these rights, please email [privacy@luminamarkets.com](mailto:privacy@luminamarkets.com). We will verify your identity before responding and may require you to provide additional information for verification purposes. We will respond within the timeframes required by applicable law (typically 45 days, with one extension permitted in certain circumstances). You may designate an authorized agent to make a request on your behalf, in which case the agent will be required to provide proof of authorization. If we deny your request, we will provide instructions for submitting an appeal in our response, where appeal rights apply under your state's law.

To opt out of advertising-related sharing, you may use the "Your Privacy Choices" link in the footer of the Site or in your App settings, or contact us at [privacy@luminamarkets.com](mailto:privacy@luminamarkets.com). Where required by applicable law, we treat browser-based opt-out preference signals, including the Global Privacy Control, as a valid request to opt out of the sale or sharing of personal information for the applicable browser or device. To the extent a state privacy law's thresholds for applicability to Lumina are met, we will provide the additional disclosures and opt-out mechanisms that the law requires.

Lumina does not collect "consumer health data" within the meaning of the Washington My Health My Data Act, the Nevada Consumer Health Data Privacy Law, or comparable laws.

### 13. GLBA Financial Privacy Notice

Lumina is a "financial institution" under GLBA and is subject to the privacy provisions of CFTC Regulation 160. We provide our customers with a separate financial privacy notice (the "**GLBA Notice**") describing the categories of nonpublic personal information we collect and disclose, the parties to whom we disclose, and the safeguards we maintain. The GLBA Notice is delivered electronically (with your consent under the federal Electronic Signatures in Global and National Commerce Act) at the time the customer relationship is established, where required. The current GLBA Notice is available at [luminamarkets.com/legal/glba](https://luminamarkets.com/legal/glba). In summary, Lumina discloses nonpublic personal information about its customers and former customers to nonaffiliated third parties only as permitted under CFTC Regulation 160, including to process your transactions, service your account, comply with legal and regulatory obligations, and, subject to the notice and opt out described in the GLBA Notice, for our own marketing.

### 14. Third-Party Links and Services

The Services may contain links to, or integrations with, third-party websites and applications, including those operated by Interactive Brokers, ForecastEx, regulators, news sources, and other parties. This Policy does not apply to those third-party services, and we are not responsible for their privacy practices. We encourage you to review the privacy policies of any third-party service before providing your information.

## 15. Changes to This Policy

We may update this Policy from time to time. If we make material changes, we will notify you by posting an updated version of this Policy on the Site and the App, by email, or through other reasonable means, and we will update the "Effective" date at the top of this Policy. We will provide reasonable advance notice of material changes where required by applicable law. Your continued use of the Services after the effective date of an updated Policy will constitute your acknowledgment of the updated Policy.

## 16. How to Contact Us

If you have questions, comments, or complaints about this Policy or our information practices, please contact us:

**Lumina Markets Inc.**

895 Broadway, 5th Floor

New York, NY 10003

Email: [privacy@luminamarkets.com](mailto:privacy@luminamarkets.com)

Website: [luminamarkets.com/privacy](https://luminamarkets.com/privacy)

If you need this Policy in an alternative format for accessibility purposes, please contact [privacy@luminamarkets.com](mailto:privacy@luminamarkets.com).