

## **Privacy policy for MCarloRisk and MCarloRisk3D -- October 2018:**

### **Identify what data, if any, the app/service collects, how it collects that data, and all uses of that data.**

App collects the asset symbols that users enter for analysis. These symbols are used to query our data providers for time history data of stocks, ETFs, and cryptocurrencies.

A unique but changeable identifier is stored to associate your data with your device, as various data download requests are made through our server. This identifier is cleared and erased if you uninstall the app and re-install it, it is not locked to your device permanently.

There is no personally identifiable information stored.

We do not store your portfolio share counts on our servers, this is stored in-app only. Such information is deleted if you delete the app.

### **Confirm that any third party with whom an app shares user data (in compliance with these Guidelines) – such as analytics tools, advertising networks and third party SDKs, as well as any parent, subsidiary or other related entities that will have access to user data – will provide the same or equal protection of user data as stated in the app’s privacy policy and required by these Guidelines.**

The only items we share with our data providers is the stock symbols you request. We do not send the changeable device identifier to our market data providers. Direct connections from your device are made to the data providers iextrading.com and cryptocompare.com to pull time history data in the case of single stock portfolios through normal HTTPS protocol. When you have a more than one stock in your portfolio, data connections to the data providers are routed through our server, and the connections to the data providers are made through our server, not from your device directly.

Our data providers policies are as follows:

IEX stock exchange: <https://iextrading.com/privacy/>

CryptoCompare: <https://www.cryptocompare.com/privacy-policy/>

Since connections to the data providers are provided through Apple standard HTTPS, information that is transmitted from your device to the services via this standard HTTPS protocol, such as internet address and device type, may be collected by the above services. However, we only use standard minimal HTTPS connection protocols, we do not add additional data from your device to the HTTPS request. We send only the minimum HTTPS request that enables accessing the market data.

**Explain its data retention/deletion policies and describe how a user can revoke consent and/or request deletion of the user's data.**

Market time history data that you have requested by typing symbol information is stored on our servers in temporary files. If you delete and re-install the app, a new set of temporary files is created on our server, and no connection is maintained to your old data requests. These temporary files may be deleted at any time by our server management system.