

Pathfinder Investments Group — Privacy Policy

Date Last Updated: September 29, 2026

Who we are: Pathfinder Investments Group, LLC, a North Carolina limited liability company (Wendell, North Carolina). Contact: Michael@pathfinderinvestments.io.

This privacy policy (the “Policy”) is intended to inform you of the types of information Pathfinder collects, as well as our policies and practices regarding the collection, use, and disclosure of that information through our website at pathfinderinvestments.io (the “Site”) and the Pathfinder Platform (defined below). Please read this Policy carefully, because by using the Site and/or Platform, you are acknowledging that you understand and agree to the terms of this Policy, and consent to the types of information and the manner in which we may collect, use and disclose such information. If you do not agree to the terms of this Policy, please do not use the Site or the Platform.

1. The short version

Pathfinder is a calibrated stock-scanning and member-education platform (the “Platform”). We collect the minimum information needed to run it. We do not sell your information. We do not share it with anyone for marketing. We use no advertising trackers, no analytics scripts, and no third-party cookies on our website. We never hold your money, your securities, or your brokerage login credentials. Our business model is a flat membership fee — we have no financial incentive tied to your data or your trading activity.

2. What we collect

Personal Information You Provide to Us: When you register for and access or use the Platform, we may collect (i) personal information, including name and email address, and (ii) any other information that you may provide while accessing or using the Platform. This is all collectively referred to as “Personal Information.”

Information Collected by Automated Means. Our website sets no cookies and runs no analytics or tracking scripts. The member Platform sets a single strictly necessary session cookie that keeps you signed in; it is not used for tracking or analytics, and no third-party cookies or tracking technologies are used on the Site or the Platform. Whenever you use the Site, we and/or our service providers may use a variety of technologies that automatically collect information about how the Site is accessed and used (“Usage Information”). Usage Information includes standard, short-lived server logs documenting (IP address, request time, page requested) for security and operations. These logs are retained for four weeks and then deleted automatically.

Waitlist. If you join the waitlist, we collect information such as your **name, email address, and the time you signed up**, stored in a database on a server we control.

Beta members. For invited beta participants we additionally collect:

- Contact and agreement records — your name, email, and executed agreements (NDA, Beta Test License Agreement).
- Platform access records — account identifiers and, during the paper-trading beta, the paper-trading API credentials used to connect your simulated account. Paper accounts contain no real money.
- Your activity on the Platform — the scan results you view, positions you track, and the questions you ask APEX (our AI mentor), with APEX's answers. We keep these records because provenance is a design principle of the Platform: what you were shown, and when, is part of the record.
- Feedback you give us.

What we deliberately do not collect. We do not collect Social Security numbers, government IDs, bank or brokerage account numbers, or payment card information. The beta is free, so we process no payments. APEX is not given your financial situation, outside holdings, income, or net worth, and the platform is designed so that it does not ask.

3. How we use information

- To operate the platform and provide the membership you signed up for.
- To communicate with you about the Platform, your membership, and the waitlist.
- To improve the Platform (in the beta, this is the point of the beta) and the Site.
- To meet legal, regulatory, and record-keeping obligations.

We do not use your information for advertising. We do not build profiles of you for third parties. We do not train third-party AI models on your data — Anthropic's Commercial Terms of Service expressly provide that Anthropic "may not train models on Customer Content from Services".

4. Who we share it with

We share information only with the service providers required to run the Platform, only to the extent required, and never for their own marketing:

Provider	Role	What they process
Anthropic	AI processing for APEX	Your APEX conversations, under commercial terms
Brokerage and market-data provider	Brokerage rails and market data	Paper-account identifiers (your direct relationship with your brokerage is governed by its own privacy policy)
Hosting provider (Hostinger)	Website and waitlist hosting	Waitlist entries, server logs
Microsoft 365	Email and business operations	Email correspondence with you

We may also share data:

- To comply with our legal obligations, regulations, or contracts, or to respond to a court order, administrative or judicial process, such as a subpoena, government audit, or search warrant.

- To seek legal advice from external lawyers and advice from other professional advisers.
- Where necessary to protect Pathfinder, your security, or the security of another person.
- In connection with the sale, assignment or other transfer of all or part of our business (such as a potential purchaser and its legal/professional advisers).

We do not sell personal information, and we have not sold it in the past.

5. Security

Pathfinder is strongly committed to protecting the security of your personal information. When you submit personal information on the Site or Platform, we will take reasonable efforts to protect such personal information. We use certain security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure once it is received. We maintain a written information security program with additional details regarding the administrative, technical, and physical safeguards we use in accordance with applicable law. Details live in our Information Security Policy, which is available at pathfinderinvestments.io/security.

6. If something goes wrong

If a security breach affects your personal information, we will notify you without unreasonable delay, and in the manner and with the content required by applicable law. Where a breach involves 500 or more people, we are also required to report it to the Federal Trade Commission within 30 days (16 C.F.R. § 314.4(j)). Our internal target for notifying affected individuals is within 30 days of determining sensitive information was accessed — the stricter standard SEC-registered advisers must meet — which we have voluntarily adopted as our own bar even though it does not yet legally apply to us.

7. Retention and disposal

We keep personal information only as long as needed for the purposes above, plus any period required by law or regulation (including books-and-records requirements that will apply upon investment-adviser registration). When records are no longer needed, we destroy them under our written disposal procedures: paper is shredded; electronic media are erased or destroyed so the information cannot practicably be read or reconstructed (

8. Your choices and rights

The Site and/or Platform provides you with the opportunity to choose to receive updates about Pathfinder and any information we may want you to know about. You may be added to our mailing lists and signed up for certain notifications from Pathfinder when you submit your contact information through the Site. If you would like to be removed from this list and/or opt out of these notifications, please unsubscribe using the instructions in the email, or contact us using the “Contact Information” provided below.

You have additional choices and rights regarding the use of your personal information. You have the right to: request access to, details regarding, and a copy of the personal information we have collected about you and/or shared with third parties; (ii) request deletion of the personal information that we have collected about you; and (iii) correct any personal information of yours we

have collected. Additionally, you may ask us to remove you from the waitlist at any time. To exercise these rights, please contact us using the “Contact Information” provided below. We may need to verify your identity to carry out your request. We will consider and act upon your request in accordance with applicable law, and we will not discriminate against you for exercising any these rights.

We honor these requests for everyone regardless of state of residence.

9. Children

The Platform and Site are not directed to anyone under 18, and we do not knowingly collect information from anyone under 18. No information should be submitted to or posted to the Site or Platform by any person under the age of 18. If we determine that contact information has been submitted by a person under the age of 18, such information will be promptly deleted. By submitting your contact information through the Site or Platform, you represent that you are age 18 or over.

10. Changes

We will post any changes here with a new effective date, and for material changes we will email members before they take effect. Version history is retained. Your continued use of the Site and/or Platform constitutes your agreement to this Policy, as amended from time to time.

11. Contact Information

Pathfinder welcomes your comments regarding this Policy. If you have questions about this Policy, or wish to exercise your choices and rights under this Policy and applicable law, please contact us by email at Michael@pathfinderinvestments.io, or by phone at (919) 205-9222.
