



US Privacy Policy

Last Updated: November 24, 2025

This Privacy Policy (“Policy”) is directed at U.S. residents and customers of Eclipse International Inc. (“Eclipse,” “we,” “us,” or “our”). As a U.S.-based commodity brokerage firm, we are subject to regulation by bodies such as the U.S. Commodity Futures Trading Commission (CFTC). This Policy explains how we collect, use, and handle personal information when:

- You are a customer of Eclipse’s brokerage or other services (collectively the “Services”);
 - You use our websites that link back to this Policy (collectively “Sites”); or
 - You otherwise engage with Eclipse, such as while working at a business partner, submitting an inquiry, or attending an Eclipse-sponsored event.
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1. Who is responsible for your personal information

This notice is provided on behalf of Eclipse International Inc., a commodity brokerage firm based in the United States.

2. Who we collect personal information about

We collect and process personal information about the following people:

- **Clients:** If you use our Services, we collect and process your personal information to supply services, and potentially market, to you.
- **Site visitors or people who contact us with inquiries:** If you are a visitor to our Sites, we may collect data in connection with your visit (e.g., IP address, device details). If you file an enquiry or complaint, or provide feedback, we collect and process your personal information to address your submission.
- **People who are affiliated with our clients and suppliers:** If you work for one of our clients or suppliers and have responsibility for administering your organization’s account or handling our Services, we process your personal information in connection with your organization’s relationship with us. Further, if you are a director or have a beneficial interest in one of our clients, we may collect data about you to fulfill our due diligence requirements.
- **Visitors to our physical offices:** If you visit one of our physical offices, we may process your personal information, such as collecting your photo identification and using CCTV footage for security purposes.
- **Event attendees:** If you attend one of our events, we may ask you to complete a registration or feedback form.

3. Information collected by Eclipse

We may collect and process the following categories of personal information depending on your relationship with Eclipse:

- **Contact information:** such as billing or residential address, email address, and telephone number.
 - **Identity data:** such as a national identification number (social security number or tax identification number), date of birth, gender, country of residence, nationality, or a copy of a government-issued ID.
 - **Reputation data:** such as adverse media, politically exposed person (PEP) status, and criminal record information.
 - **Financial data:** such as bank account details, payment card details, and account holdings.
 - **Transaction data:** such as details about payments made between us, services purchased from us, and trading history.
 - **Profile data:** such as your account username, password, contact preferences, and feedback or survey responses.
 - **Communication data:** such as the content of any messages, emails, or calls between us, including recordings of orders placed or confirmations of transactions.
 - **Device information:** such as internet protocol (IP) address, browser type and version, and time zone setting.
 - **Marketing data:** such as your marketing and communication preferences.
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4. How Eclipse collects personal information

We may collect personal information about you in the following ways:

- **Directly from your submissions:** We collect data directly from you when you register to become an Eclipse client, send us a message through our Sites, or otherwise correspond with us.
- **Through your use of our Sites or Services:** If you visit or use our Sites, information may be automatically collected from your devices, such as through cookies.
- **Your employer or an organization affiliated with you:** If you are an employee or are otherwise affiliated with an entity (i.e., a beneficial owner) that is or applies to be our customer, that organization may submit your personal information to us.
- **Third parties:** If you are our customer, we may collect transaction data from third parties such as exchanges, banks, or other financial institutions to record and facilitate your transaction. We may also collect personal information from third-party data brokers to fulfill our due diligence requirements.
- **Public sources:** We may collect personal information from publicly available sources such as media reports or published articles.

5. Why we process personal information

We process personal information to provide our Services to you or your organization and administer your Eclipse account. We specifically use your personal information to:

- Place orders, settle transactions, and generate statements;
- Verify the identity of account holders, beneficial owners, and persons authorized to trade;
- Protect our physical premises and digital assets;
- Monitor and assess compliance with our internal policies and standards;
- Fulfill your or our payment obligations;
- Comply with our legal and regulatory obligations, including detecting and preventing fraud and other market abuse behavior;
- Comply with legal orders and requests, and exercise and defend our rights; and
- Market our services and products.

6. To whom we disclose personal information

Eclipse only discloses personal information for everyday business purposes, such as to process transactions, maintain accounts, respond to court orders and legal investigations, or as otherwise permitted by law.

We do not share your personal information with third parties so that they can market their own products to you.

Specifically, Eclipse may disclose your personal information to the following groups:

- **Third-Party Service Providers/Vendors:** We use third-party service providers to process personal information on our behalf in accordance with our instructions. These vendors are subject to contractual requirements to maintain confidentiality and are only allowed to use personal information for the purposes we authorize.
 - **Third-Party Transaction Facilitators:** We may disclose personal information to third parties, such as exchanges, banks, futures commission merchants (FCMs), or counterparties, to process a service or transaction authorized by you.
 - **Compliance with Legal Obligations:** We may disclose personal information to third parties, such as courts, law enforcement authorities, auditors, regulators (like the CFTC), self-regulatory organizations, and attorneys, where it is reasonably necessary for compliance or the establishment, exercise, or defense of a legal claim.
 - **Corporate Transactions:** If we go through a corporate sale, merger, or similar event, your personal information may be part of the assets transferred or shared in connection with due diligence for such a transaction.
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7. SMS/Messaging Disclaimer

7.1. Privacy & Non-Sharing Statement

We value your privacy. Information obtained as part of the SMS consent process (including your mobile phone number) will **not** be shared with third parties for marketing purposes.

Explicitly: SMS opt-in or phone numbers for the purpose of SMS are not being shared with any third party and affiliate company for marketing purposes.

7.2. Opt-In Methods

You may opt-in to receive SMS messages from Eclipse International Inc. in the following ways:

- By submitting an online contact or registration form and checking the SMS consent box.
- By verbally consenting to your broker or account representative to receive text communications regarding your account.
- By initiating a text message conversation with an Eclipse International Inc. representative.

7.3. Types of SMS Communications

If you have consented to receive text messages from Eclipse International Inc., you may receive messages related to the following:

- Market updates and alerts
- Trade confirmations and status updates
- Margin calls or billing inquiries
- Appointment reminders
- Follow-up messages regarding client inquiries

7.4. Message Frequency

Message frequency may vary depending on the type of communication and your specific trading activity.

- **General updates:** You may receive up to 2 SMS messages per week regarding general appointments or account status.
- **Active Trading:** Clients actively trading may receive daily messages regarding market movements or specific trade confirmations.

7.5. Potential Fees

Please note that **Standard Message and Data Rates may apply**, depending on your mobile carrier's pricing plan. These fees may vary if the message is sent domestically or internationally. Please check with your mobile carrier if you are unsure about your plan's rates.

7.6. Opt-Out Method

You can opt out of receiving SMS messages from us at any time.

- Simply reply "**STOP**" to any SMS message you receive.
- Alternatively, contact us directly at **(212) 822-7111** or **info@eclipsecommodities.com** to request removal from our messaging list.

7.7. Help & Support

If you are experiencing any issues or require assistance:

- Reply with the keyword **HELP** to any message you receive.
- Or get help directly from us by emailing **info@eclipsecommodities.com**.

7.8. Additional Options

If you do not wish to receive SMS messages, you can choose not to check the SMS consent box on our online forms, or inform your broker that you prefer email or telephone communication only.

8. Retention of personal information

We retain your personal information for as long as we have a legitimate business need to do so (for example, to provide you with Services or to comply with applicable legal, regulatory, or accounting requirements).

The criteria used to determine appropriate retention periods include:

- Whether we have an ongoing business relationship with you;
- The amount, nature, and sensitivity of the data we process; and
- Whether we have a legal obligation to retain the data. For example, **commodities laws require our business to keep certain records for a set period, such as five years after account closure.**

When we no longer need to process your personal information, we will delete or anonymize it.

9. Security of your personal information

To protect your personal information from unauthorized access and use, we use appropriate technical and organizational measures that comply with federal law, including computer safeguards, access controls, encryption, and secured files and buildings. Only authorized Eclipse employees, agents, or service providers have access to your personal information.

10. Your data subject rights

Depending on where you are located and how you interact with Eclipse, you may have certain legal rights over the personal information we hold about you. To exercise your rights, please submit your request using the contact information in Section 11.

11. Jurisdiction-Specific Disclosures

11.1. California

If you are a California resident, you have certain rights under the California Consumer Privacy Act (CCPA). However, data collected and processed pursuant to your consumer or customer relationship with Eclipse is subject to the **Gramm-Leach-Bliley Act (GLBA)** and relevant regulations. Under the CCPA, GLBA-data is exempt. Therefore, this Section 10.1 only applies to personal information that is not subject to GLBA.

- **Categories of Personal Information Collected:**
 - **Identifiers:** such as real name, IP address, email address, or social security number.
 - **Personal information described in subdivision (e) of Section 1798.80:** such as name, signature, social security number, or telephone number.
 - **Internet or other electronic network activity information:** such as information regarding your use of our Sites.
 - **Audio:** such as recordings of orders placed.
 - **Professional or employment-related information:** such as employer and job title.
 - **Sensitive personal information:** such as social security number, driver's license, or state identification card number.
- **Business Purposes for Collection:** To view why we collect personal information, please see Section 5, "Why we process personal information."
- **Categories of Personal Information Disclosed and Categories of Recipients:** To view the categories of parties to whom we disclose information, please see Section 6, "To whom we disclose personal information." **We do not sell or share data as those terms are defined by the CCPA.**
- **Your Rights Under the CCPA:**
 - **Right to Know and Access:** You have the right to request access to the categories and specific pieces of personal information we have collected about you, the sources of collection, the business purpose, and the categories of third parties to whom we disclose information.
 - **Right to Correct:** You have the right to request correction of inaccurate personal information maintained about you.
 - **Right to Delete:** You have the right to request the deletion of your personal information.

- **How to Exercise Your Rights:** If you or an authorized agent wish to exercise your CCPA rights, please contact us using one of the following methods:
 - **Email:** compliance@eclipsecommodities.com
 - **Phone Number:** (212) 822-7111

We will not discriminate against you if you choose to exercise your CCPA rights. We will verify your identity using commercially reasonable methods commensurate with the sensitivity of the data at issue in the request.

12. Contact details and complaints

If you want to exercise your data subject rights or have concerns about the use of your personal information, please contact us at:

Email: compliance@eclipsecommodities.com **Phone:** (212) 822-7111

12. Updates to this Policy

We reserve the right to update this Policy to reflect any changes to how we process personal information or legal requirements. In the event of any such changes, we will post the updated Policy on the Sites. The revised Policy will take effect when it is published.