

PRIVACY POLICY

Top Gun Investors

A service operated by Ithaka Holdings, LLC

Last Updated: February 28, 2026

1. Introduction

Ithaka Holdings, LLC ("Company," "we," "us," or "our") operates the Top Gun Investors platform, including all associated websites, mobile applications, and related services (collectively, the "Service"). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you access or use the Service.

By accessing or using the Service, you acknowledge that you have read, understood, and agree to the practices described in this Privacy Policy. If you do not agree, please do not access or use the Service.

This Privacy Policy should be read together with our Terms and Conditions of Use, which govern your use of the Service.

2. Information We Collect

2.1 Account Information

When you register for an account or participate in contests, we may collect:

- Full legal name
- Email address
- Username or callsign
- State of residence
- Age or date of birth (to verify eligibility)
- Password (stored in encrypted form)

2.2 Contest and Simulation Data

When you participate in contests through the Service, we collect:

- Stock picks and portfolio selections
- Squad membership and team affiliations
- Simulated portfolio performance and rankings
- Contest entry timestamps and trading activity
- Leaderboard standings and historical performance

2.3 Usage and Device Information

We automatically collect certain information when you access or use the Service:

- IP address
- Device type, operating system, and browser type
- Referring URLs and pages visited
- Clickstream data and interaction logs
- Date and time of access
- Session duration and feature usage patterns

2.4 Location Information

We may collect approximate location information derived from your IP address. We use this to verify eligibility (certain states may be restricted from contest participation) and to comply with applicable laws.

2.5 Communications

We collect information when you communicate with us, including:

- Chat messages sent through the Hangar (in-app community chat)
- Support requests and feedback
- Email correspondence
- SMS messaging (if you opt in to SMS notifications)

2.6 Payment Information

If you purchase Premium Features in the future, billing and payment information may be collected and processed by our third-party payment processors. We do not store full payment card numbers on our servers.

3. How We Use Your Information

We use the information we collect for the following purposes:

3.1 Providing and Operating the Service

- Creating and managing your account
- Administering contests, leaderboards, and rankings
- Displaying your performance on leaderboards and within squads
- Processing contest entries and verifying eligibility
- Delivering notifications about contest updates, results, and deadlines

3.2 Communicating with You

- Sending contest-related updates and reminders
- Responding to support requests and inquiries
- Notifying you of changes to the Service or these policies

- Delivering SMS messages (if you have opted in)

3.3 Improving the Service

- Analyzing usage trends and user behavior to improve features
- Conducting research and analytics using aggregated, anonymized data
- Debugging errors and improving platform performance
- Developing new features and educational content

3.4 Safety and Compliance

- Detecting and preventing fraud, cheating, manipulation, or abuse
- Enforcing our Terms and Conditions of Use and Contest Rules
- Complying with applicable laws, regulations, and legal obligations
- Protecting the rights, property, and safety of our users and the public

4. How We Share Your Information

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

4.1 Public Information

Certain information is visible to other users of the Service by design, including your callsign, squad affiliation, contest rankings, portfolio performance, and chat messages posted in the Hangar. Do not share sensitive personal information through these public features.

4.2 Service Providers

We may share your information with third-party service providers who perform services on our behalf, including hosting and infrastructure (e.g., AWS), analytics, email delivery, SMS messaging, and payment processing. These providers are contractually obligated to use your information only for the purposes of providing services to us.

4.3 Legal Requirements

We may disclose your information when required to do so by law, in response to a subpoena, court order, or other lawful request from governmental authorities, or when we believe disclosure is necessary to protect our rights, your safety, or the safety of others.

4.4 Business Transfers

In connection with a merger, acquisition, reorganization, or sale of assets, your information may be transferred to the acquiring entity. We will provide notice before your information becomes subject to a different privacy policy.

4.5 With Your Consent

We may share your information for other purposes with your explicit consent.

5. Data Retention

We retain your personal information for as long as your account is active or as needed to provide you with the Service. Following account termination or deactivation:

- We may retain your data for 90 to 180 days for backup, archival, audit, or legal purposes.
- We may retain data longer where required by legal, regulatory, tax, or accounting obligations.
- Aggregated, anonymized, or de-identified data that does not identify you may be retained indefinitely for research and analytics.

You may request deletion of your personal data at any time by contacting us at hello@topguninvestors.com. We will process such requests in accordance with applicable law.

6. Cookies and Tracking Technologies

We may use cookies, web beacons, pixels, and similar tracking technologies to collect usage data and improve your experience. These may include:

- Essential cookies: Required for the Service to function (authentication, session management).
- Analytics cookies: Help us understand how users interact with the Service (e.g., page views, feature usage).
- Third-party cookies: Set by service providers such as analytics platforms.

Most web browsers allow you to control cookies through settings. Disabling cookies may affect certain features of the Service.

7. Data Security

We implement reasonable technical and organizational measures to protect your personal information, including encryption of data in transit and at rest, secure authentication mechanisms, and access controls.

However, no method of transmission over the internet or electronic storage is 100% secure. We cannot guarantee absolute security. In the event of a data breach affecting your personal data, we will take appropriate steps consistent with applicable law, which may include notifying you and relevant authorities.

8. Children's Privacy

The Service is not intended for use by individuals under the age of 18. We do not knowingly collect personal information from children under 18. If we become aware that we have collected personal information from a child under 18, we will take steps to delete such information promptly.

If you are a parent or guardian and believe your child has provided us with personal information, please contact us at hello@topguninvestors.com.

9. Your Privacy Rights

9.1 General Rights

Depending on your jurisdiction, you may have the following rights regarding your personal data:

- Right to access: Request a copy of the personal data we hold about you.
- Right to correction: Request that we correct inaccurate or incomplete data.
- Right to deletion: Request that we delete your personal data, subject to legal retention obligations.
- Right to restrict processing: Request that we limit how we use your data.
- Right to data portability: Request a copy of your data in a structured, machine-readable format.
- Right to object: Object to certain types of processing, including direct marketing.
- Right to withdraw consent: Where processing is based on consent, you may withdraw it at any time.

9.2 California Residents (CCPA/CPRA)

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

- Right to know: You may request that we disclose the categories and specific pieces of personal information we have collected about you, the sources of that information, our business purposes for collecting it, and the categories of third parties with whom we share it.
- Right to delete: You may request deletion of your personal information, subject to certain exceptions.
- Right to opt out of sale: We do not sell your personal information. If this changes, we will provide a clear opt-out mechanism.
- Right to non-discrimination: We will not discriminate against you for exercising your privacy rights.

To exercise these rights, contact us at hello@topguninvestors.com. We will verify your identity before processing your request and respond within 45 days as required by law.

9.3 SMS Messaging

If you have opted in to receive SMS messages from us:

- You can opt out at any time by replying STOP to any of our messages.
 - Standard message and data rates from your mobile carrier may apply.
 - We will not share your phone number with third parties for their marketing purposes.
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10. International Data Transfers

Your information may be transferred to, stored, and processed in the United States or other jurisdictions where our service providers operate. These jurisdictions may have different data protection laws than your own. We implement appropriate safeguards to protect your information when transferred across borders.

11. Third-Party Services and Links

The Service may contain links to third-party websites, applications, or services that are not owned or controlled by us. We are not responsible for the privacy practices of these third parties. We encourage you to review their privacy policies before providing any personal information.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will post the updated policy on the Service and update the "Last Updated" date at the top. Material changes may also be communicated via email or in-app notification. Your continued use of the Service after any changes constitutes your acceptance of the revised policy.

13. Contact Us

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

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d/b/a Top Gun Investors

Dover, DE 19904

United States

Email: hello@topguninvestors.com

Website: www.topguninvestors.com

Phone: +1 646 638 2838

This Privacy Policy is governed by the laws of the State of Delaware, United States.