

Privacy Notice — CFTC Part 160

Model Program Advisors, LLC (proposed) · a multi-program commodity trading advisor · mpacient.com
Template for counsel review · October 28, 2026 · Principal: Austin Putt · BRACKETED TEMPLATE — nothing herein is used unless and until the Advisor is registered with the CFTC as a CTA and is a Member of NFA with an NFA-accepted Disclosure Document

FACTS — What does Model Program Advisors, LLC do with your personal information?

Why? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What? The types of personal information we collect and share depend on the program you have with us. This information can include: identity and contact details received from your connected brand's sign-on; income, net worth, occupation, and trading-experience answers you give us; your program elections, limits, and the identifier (never the secret) of the trading-only access key you link; your venue account equity, positions, and trade records as needed to run the program and compute fees; and fee invoices and payment status.

How? All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons Model Program Advisors, LLC chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does the Advisor share?	Can you limit this sharing?
For our everyday business purposes — to run the program, maintain your account, respond to court orders and legal investigations, and report to CFTC, NFA, and your venue	Yes	No
For our marketing purposes — to offer our programs to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes — transactions and experiences	No — the Advisor has no affiliates	We don't share
For our affiliates' everyday business purposes — creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions? Call [PHONE] or write to [EMAIL] · [ADDRESS].

Who we are

Who is providing this notice? Model Program Advisors, LLC, a commodity trading advisor registered with the CFTC and a Member of NFA (NFA ID []). This notice is the Advisor's own. Your connected brand (for example,

AI Trade Pros, operated by WEB PROS MARKETING, LLC) and the software company whose platform the Advisor licenses (ABC Software Technologies) each have their own privacy policies, which govern what they collect from you as their customer.

What we do

How does the Advisor protect my personal information? With security measures that comply with federal law and NFA Interpretive Notice 9070: access controls, encryption in transit and at rest, logging, and the Advisor's written Information Systems Security Program. Access-key secrets are stored by the platform's replication service under the Advisor's license and are never displayed to Advisor staff.

How does the Advisor collect my personal information? From your brand's verified sign-on when you open the doorway; from the answers you give in enrollment; from your venue, through the trading-only key you link, as needed to run the program; and from your fee-payment records.

Why can't I limit all sharing? Federal law gives you the right to limit only sharing for affiliates' everyday business purposes (creditworthiness), affiliates marketing to you, and nonaffiliates marketing to you. The Advisor does none of these.

Definitions

Affiliates: companies related by common ownership or control. The Advisor has none; its connected brands and its software licensor are not affiliates. **Nonaffiliates:** companies not related by common ownership or control. The Advisor shares with nonaffiliates only as needed to run the program: your venue, the platform operator whose replication service executes your elected program under license, its email and e-signature vendors, its accountants and auditors, and regulators. **Joint marketing:** a formal agreement between nonaffiliated financial companies that together market financial products to you. The Advisor does not jointly market.

Other important information

The Advisor delivers this notice at enrollment and annually thereafter, and whenever its practices change. State-law rights (including California residents' rights) are honored where they apply.

[Counsel: conform to 17 CFR Part 160 and the model form in Appendix A; confirm the annual-notice exception under §160.5(e) does not apply because the Advisor shares with service providers; confirm state privacy overlays.]

Template prepared for counsel and the Advisor's principal. Not legal advice. Counsel must complete, conform to current CFTC regulations and NFA rules, and approve before any use.