

SWIFTRADE LLC

PRIVACY NOTICE

Last Updated: April 12, 2026

This Privacy Notice explains how SwifTrade LLC, a Texas limited liability company (“SwifTrade,” “we,” “us,” or “our”), collects, uses, discloses, and protects personal information when you visit our websites, use our mobile applications, place orders through our business-to-business (“B2B”) e-commerce platform, contact us, or otherwise interact with us (collectively, the “Services”).

SwifTrade is a B2B wholesale and e-commerce company. Our Services are intended for use by businesses, sole proprietors, and other commercial entities, not by individual consumers purchasing for personal, family, or household use. By using the Services, you consent to the practices described in this Privacy Notice.

This Privacy Notice does not apply to websites, applications, or services operated by other companies that may be linked to or from our Services, or to any products or services provided by third parties. We will update this Privacy Notice from time to time to reflect changes in our Services, how we use personal information, or applicable law. The “Last Updated” date above indicates when this Privacy Notice was last revised.

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A. Personal Information We Collect

The personal information we collect depends on how you interact with us, the Services you use, and the choices you make. Not all categories of personal information will be collected about every individual or business.

1. Information You Provide Directly

- **Contact information such as** name, business name, job title, username, email address, business address, shipping address, billing address, and phone number.
- **Account and business-verification information such as** business legal name, entity type, federal Employer Identification Number (EIN) or other tax identification number, state sales-tax permit number, resale certificate, online account credentials, and any documentation you submit to verify your business status.
- **Commercial and payment information such as** payment-card information (processed by our third-party payment processors), bank account information for ACH or wire payments (where applicable), billing address, purchase orders, and other transaction details.
- **Order information such as** the products and quantities you order, special instructions, delivery preferences, and resale or end-use information you choose to provide.
- **Communications and feedback including** questions, support tickets, survey responses, product reviews, feedback, chat-session content, and other communications you direct to SwifTrade. When you use any chat or virtual-assistant feature on our Services, you consent to SwifTrade and its service providers collecting, monitoring, and processing the content of your chat.

2. Information We Collect Automatically

- **Transaction and purchase information including** the products you view, search for, add to cart, save, or purchase; quantities; pricing; payment method; transaction date and time; shipping address; and order status.
- **Usage and session information including** referring URL, pages you viewed, time spent on each page, click and scroll behavior, search terms, access times, and other details about your interaction with our Services.
- **Device information including** IP address and other unique device identifiers, device type, operating system and version, browser type, language, screen resolution, network information, and other software settings and configurations.
- **Location information including** approximate location derived from your IP address, and precise geolocation only if you choose to provide our Services with access to that information through your device permissions.
- **Call recordings and chat transcripts** when you contact our customer-support team or interact with our chat features, including for purposes of training, quality assurance, fraud prevention, and dispute resolution.

3. Information from Other Sources

- **Authorized users and account administrators may provide** name, contact information, signing authority, and purchasing history of authorized users on a business account, provided to us by the primary account holder or business administrator.
- **Verification, credit, and fraud-prevention providers** — third-party identity-verification, credit-reporting, fraud-prevention, business-data, and tax-validation services may provide information used to verify your business, assess credit risk, prevent fraud, and confirm tax-exemption status.
- **Carriers and shipping providers** — address-correction information, delivery confirmation, and tracking data from carriers and shipping providers.
- **Payment processors and financial institutions** — payment-confirmation, decline, and chargeback information from our payment processors and your card issuer or bank.

- **Advertising and analytics partners** — information from advertising networks, analytics providers, and marketing partners about your interaction with our advertisements or content on third-party websites.

4. Information We Generate

We generate information by analyzing data we collect to create inferences about your business's likely product preferences, ordering patterns, creditworthiness, and other commercial characteristics. For example, we may use information about your previous purchases to recommend products or services that may interest you.

5. Information About Minors

Our Services are intended for use by businesses, not individuals, and certainly not by minors. We do not knowingly collect personal information from individuals under the age of 18. If we become aware that we have inadvertently collected personal information from an individual under 18, we will take reasonable steps to delete such information.

B. Cookies and Similar Tracking Technologies

SwiftTrade and our service providers, suppliers, and advertising partners use cookies, pixels, web beacons, advertising identifiers, software development kits (SDKs), and similar tracking technologies (collectively, "Digital Trackers") on our Services. We use Digital Trackers to recognize your browser or device, remember your preferences, authenticate your account, secure our Services, analyze usage, deliver advertising, and measure the effectiveness of our marketing.

You can manage your cookie preferences through the "Cookie Settings" control on our Services where available, or through your browser settings. Most browsers allow you to refuse, delete, or limit cookies. If you disable certain cookies, some features of our Services (such as your shopping cart, account login, or checkout) may not function properly. Our Services are designed to honor Global Privacy Control (GPC) signals where supported by your browser.

C. How We Use Personal Information

We use personal information for the following purposes:

- **Account creation and verification** — To verify your business identity, register your account, authenticate your access, and confirm your eligibility to purchase from SwiftTrade.
- **Order processing and fulfillment** — To process orders, take and confirm purchases, process payments, arrange shipping and delivery, fulfill returns, issue refunds and credits, and communicate with you about your orders, account, and the Services.
- **Customer service and support** — To respond to your inquiries, provide technical support, resolve disputes, address complaints, and send service-related notifications.
- **Business operations and improvement** — To operate, maintain, secure, troubleshoot, optimize, and improve our Services, including monitoring performance, testing new features, diagnosing technology problems, and analyzing usage patterns.
- **Marketing, personalization, and advertising** — To recommend products, deliver personalized content and advertising, conduct market research, send promotional emails and direct-marketing communications, and measure the effectiveness of our marketing campaigns.

- **Fraud prevention, security, and risk management** — To detect, prevent, investigate, and respond to fraud, payment chargebacks, account-takeover attempts, prohibited resale activities (including diversion and grey-market sales), security incidents, and other unlawful or harmful activity.
- **Legal, compliance, and safety purposes** — To comply with applicable laws, regulations, court orders, subpoenas, and lawful requests from government authorities; to enforce our Terms and Conditions and other agreements; to protect our rights, property, and interests and those of our customers, employees, suppliers, and the public; and to defend against legal claims.
- **Collections and credit assessment** — To collect amounts owed to SwifTrade and to evaluate creditworthiness for net-terms or credit-account requests.

We may aggregate or de-identify personal information so that it no longer identifies you or your business, and use such aggregated or de-identified information for any lawful purpose. Where we maintain de-identified information, we will not attempt to re-identify it except as necessary to evaluate the effectiveness of our de-identification practices.

D. How We Disclose Personal Information

SwifTrade does not sell personal information for monetary consideration. We disclose personal information only as described below:

- **Account holders, administrators, and authorized users** — If you are an authorized user on a business account controlled by another person or entity, we may disclose your contact information, role, and purchase activity to the primary account holder, account administrator, or your employer.
- **Service providers and contractors** — We disclose personal information to vendors, contractors, and service providers that perform services on our behalf, including payment processors, fraud-prevention providers, hosting and cloud-infrastructure providers, e-commerce-platform providers, customer-support and call-center providers, marketing and email-delivery providers, analytics providers, identity-verification and tax-validation providers, accounting and tax-preparation providers, legal advisors, and shipping carriers. These service providers are contractually restricted from using personal information for any purpose unrelated to the services they perform for SwifTrade.
- **Carriers and shipping providers** — We disclose shipping addresses, recipient names, contact information, and order details to carriers and logistics providers (such as UPS, FedEx, USPS, and freight carriers) for purposes of delivering your orders.
- **Payment processors and financial institutions** — We disclose payment-card information, ACH details, billing address, and related transaction information to payment processors, banks, and card networks for purposes of processing payments, preventing fraud, and managing chargebacks.
- **Advertising and analytics partners** — We disclose information to advertising and analytics partners (such as Google, Meta, and similar providers) for purposes of measuring our marketing effectiveness and delivering relevant advertising. Where required by law, you have the right to opt out of such disclosures.
- **Affiliates** — We disclose personal information to our subsidiaries, affiliates, and entities under common control with SwifTrade for the purposes described in this Privacy Notice.

- **Corporate transactions** — We may disclose personal information as part of a corporate transaction such as a merger, acquisition, financing, asset sale, reorganization, bankruptcy, or other business combination, in which case personal information will remain subject to the promises made in this Privacy Notice unless you are notified otherwise.
- **Legal, safety, and compliance disclosures** — We will access, transfer, disclose, and preserve personal information when we believe it is necessary to: (i) comply with applicable law or respond to valid legal process, including subpoenas, court orders, and requests from law enforcement or other government agencies; (ii) demonstrate our compliance with laws and regulatory requirements; (iii) protect the rights, property, or safety of SwifTrade, our customers, employees, suppliers, or the public, including to detect, prevent, or report fraud, security incidents, or violations of our Terms and Conditions; (iv) enforce our agreements, terms, and policies; or (v) defend against legal claims.

E. Retention of Personal Information

We retain personal information for as long as necessary to provide our Services, fulfill the purposes described in this Privacy Notice, comply with our legal and regulatory obligations (including tax, accounting, anti-fraud, and recordkeeping requirements), enforce our agreements, defend against potential legal claims, and protect the rights, property, and safety of SwifTrade and others.

The length of time that any particular type of personal information is retained varies based on: (a) the business purpose for which the information is used; (b) any legal or contractual requirement to retain the information; (c) the privacy impact of ongoing retention; and (d) whether the information is stored in combination with other data subject to a different retention period. After the applicable retention period, we will delete, de-identify, or anonymize the personal information, except where retention is required by law.

F. Your Privacy Choices

1. Direct Marketing Communications

You may opt out of receiving promotional emails from SwifTrade at any time by clicking the “unsubscribe” link in any marketing email you receive from us, by adjusting your email preferences in your account settings, or by contacting us using the contact information at the end of this Privacy Notice. Even if you opt out of marketing communications, we may continue to send you transactional and account-related communications (such as order confirmations, shipping notifications, invoices, and account-security alerts).

2. SMS, Text, and Push Notifications

If you have consented to receive SMS or text messages from SwifTrade, you may opt out at any time by replying “STOP” to any such message. Standard message and data rates may apply. You may disable mobile push notifications by changing the notification settings on your device.

3. Targeted Advertising and Analytics

You may opt out of certain types of targeted advertising by adjusting your cookie preferences through our “Cookie Settings” control where available, by enabling Global Privacy Control (GPC) on a supported browser, or by visiting industry opt-out tools such as the Digital Advertising

Alliance's YourAdChoices (www.aboutads.info) or the Network Advertising Initiative's opt-out page (www.networkadvertising.org/choices). Opt-out preferences are specific to the device and browser you use, and you may need to repeat the process if you clear your cookies, switch devices, or use a different browser.

4. Precise Location Information

Our Services may request access to your device's precise location. You may decline or revoke this access at any time through your device settings. If you decline, certain location-based features may not function.

5. Account Information

You may access, update, or correct your account information at any time by logging into your account on the Services or by contacting us using the contact information at the end of this Privacy Notice.

G. State-Specific Privacy Rights

Depending on the state in which you reside, you may have additional privacy rights under applicable state law. SwifTrade currently recognizes the following state privacy rights for residents of states with comprehensive consumer-privacy laws, including (without limitation) California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, Nevada, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, Virginia, and Washington.

1. Rights You May Have

- **Right to Know / Access** — the right to request access to and a portable copy of the personal information we have collected about you;
- **Right to Correct** — the right to request correction of inaccurate personal information;
- **Right to Delete** — the right to request deletion of personal information we have collected about you, subject to certain exceptions (including retention required by law, fraud prevention, completion of pending transactions, and defense of legal claims);
- **Right to Opt Out of Sale, Sharing, or Targeted Advertising** — the right to opt out of the "sale" or "sharing" of your personal information for cross-context behavioral advertising;
- **Right to Limit Use of Sensitive Personal Information** — the right to limit the processing of sensitive personal information to certain permitted purposes;
- **Right to Non-Discrimination** — the right not to receive discriminatory treatment for exercising your privacy rights.

2. How to Submit a Request

You or your authorized agent may submit a privacy-rights request by emailing us at the address listed in Section M of this Privacy Notice with the subject line "Privacy Rights Request," or by writing to us at our mailing address. We will need to verify your identity (and, if applicable, your authorized agent's authority) before responding to your request, and we may request additional information for that purpose. Information you provide for verification will be used solely to verify identity and process the request.

If we deny your request, you may appeal our decision by replying to our denial within sixty (60) days. We will respond to your appeal within the timeframe required by applicable law.

3. Texas Residents

If you are a Texas resident, you have the rights described above under the Texas Data Privacy and Security Act (TDPSA). To exercise your rights, please contact us as described in Section M.

4. Automated Decision-Making

SwiftTrade does not engage in automated decision-making that produces legal or similarly significant effects on individuals without human involvement. We do use automated tools for fraud detection, credit assessment, and personalized marketing, but final decisions involving meaningful consequences are subject to human review. For that reason, we do not currently accept opt-out requests for automated decision-making.

H. California Privacy Rights

If you are a California resident, you have rights under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, the “CCPA”). This section provides additional disclosures required by the CCPA.

1. Categories of Personal Information Collected

In the preceding twelve (12) months, SwiftTrade has collected the following categories of personal information about California residents (using the categories defined in California Civil Code § 1798.140):

- **Identifiers** — such as name, business name, email address, postal address, phone number, IP address, online identifiers, and account identifiers.
- **Customer-records information** (Cal. Civ. Code § 1798.80(e)) such as name, signature, address, telephone number, business tax identification number, bank account number, credit card number, and other financial information.
- **Commercial information** — such as transaction and order history, products purchased, products considered or browsed, returns, payment records, and feedback.
- **Internet or other electronic network activity information** — such as device identifiers, browser type, operating system, cookies and tracking-pixel information, browsing and search history on our Services, page-view and click data, and chat transcripts.
- **Geolocation data** — approximate location derived from IP address, and precise geolocation only if you affirmatively grant device permission.
- **Audio, electronic, and visual information** — call recordings, chat transcripts, and customer-support correspondence.
- **Professional or employment-related information** — current employer, business affiliation, and job title.
- **Inferences** — derived from your purchase history, browsing behavior, and other interactions to predict your business preferences and needs.
- **Sensitive personal information** — government-issued identifiers (such as driver’s license number for business verification), payment-card and financial-account information, and precise geolocation. SwiftTrade does not collect racial or ethnic origin,

religious beliefs, union membership, genetic data, biometric data, or health information except where you voluntarily provide such information in correspondence with us.

2. Sources, Purposes, and Disclosure

The sources from which we collect each category, the purposes for which we use each category, and the categories of third parties to whom we disclose each category are described in Sections A, C, and D of this Privacy Notice.

3. Sale or Sharing of Personal Information

SwifTrade does not sell personal information for monetary consideration. However, our use of advertising and analytics cookies on our Services may constitute “sharing” of personal information for cross-context behavioral advertising under the CCPA. The categories of personal information that may be “shared” in this manner include identifiers, internet or other electronic network activity information, and inferences. SwifTrade does not knowingly sell or share the personal information of consumers under 16 years of age.

You may opt out of such sharing by adjusting your cookie preferences through our “Cookie Settings” control, by enabling Global Privacy Control (GPC) on a supported browser, or by submitting a request as described in Section G.2.

4. Right to Limit Use of Sensitive Personal Information

SwifTrade uses sensitive personal information (such as government-issued identifiers and payment information) only for purposes permitted by the CCPA without separate consent, including providing the Services you request, verifying your identity, processing payments, preventing fraud, and complying with law. Because we do not use sensitive personal information for purposes that would trigger the right to limit, we do not currently offer a separate opt-out mechanism for sensitive-information use.

5. Retention

Each category of personal information is retained as described in Section E. Information associated with your account is generally retained for the duration of your account plus a reasonable period thereafter for legal, tax, and recordkeeping purposes.

6. Shine the Light

California Civil Code § 1798.83 (the “Shine the Light” law) permits California residents who have an established business relationship with SwifTrade to request information about our disclosures of personal information to third parties for those third parties’ direct marketing purposes during the immediately preceding calendar year. To make such a request, please contact us as described in Section M.

I. Children’s Privacy

Our Services are intended for businesses and are not directed to children. We do not knowingly collect personal information from children under the age of 18. If you are under 18, please do not provide any personal information to us. If we become aware that we have collected personal information from a child under 18 without verified parental consent, we will take reasonable steps to delete that information.

J. Security of Personal Information

SwifTrade implements administrative, technical, physical, and procedural safeguards designed to protect personal information from unauthorized access, use, alteration, disclosure, and destruction. These safeguards include encryption of data in transit and at rest, access controls, network and application security, logging and monitoring, employee training, and compliance with the Payment Card Industry Data Security Standard (PCI DSS) for handling payment-card information through our payment processors.

Despite these measures, no method of transmission over the internet, no method of electronic storage, and no security system is completely secure. We cannot guarantee the absolute security of personal information. You are responsible for maintaining the confidentiality of your account credentials, restricting access to your devices, and notifying us promptly of any suspected unauthorized access to your account.

K. International Users

SwifTrade is based in the United States, and our Services are intended for use by businesses operating in the United States. If you access or use our Services from outside the United States, you understand that personal information you provide will be transferred to, stored in, and processed in the United States, where data-protection laws may differ from those in your country of residence. By using our Services, you consent to such transfer, storage, and processing.

L. Changes to This Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our Services, our information practices, or applicable law. When we make changes, we will revise the “Last Updated” date at the top of this Privacy Notice. If we make material changes, we will provide additional notice as required by applicable law (for example, by email or by a prominent notice on our Services). Your continued use of the Services after any such update constitutes your acceptance of the revised Privacy Notice.

M. How to Contact Us

If you have a privacy concern, complaint, question, or request, please contact us at:

SwifTrade LLC

940 N Belt Line Rd, Suite 135

Irving, Texas 75061

Email: admin@swiftradellc.com

— END OF PRIVACY NOTICE —