401kSignal, LLC

Privacy Policy & Privacy Notice

Effective Date: November 25, 2026 · Last Updated: November 25, 2026
New Jersey Registered Investment Adviser · CRD No. 340910
support@401ksignal.com · 401ksignal.com

This Privacy Policy & Privacy Notice (this "Notice") explains how 401kSignal, LLC ("401kSignal," the "Adviser," "we," "us," or "our") collects, uses, shares, and protects personal information. It applies to our clients and prospective clients, to people who join our waitlist, to visitors to 401ksignal.com, and to users of our web-based, non-discretionary advisory platform, marketed as the 401kSignal TrendEngine™ (together, the "Platform").

Our privacy commitments at a glance

- We do not sell your personal information, and we do not share it with anyone for their own marketing.
- We do not use advertising cookies or tracking pixels, and we do not engage in targeted advertising.
- Your mobile phone number and text-messaging consent are never shared with third parties or affiliates for marketing or promotional purposes.
- We never ask for, collect, or store the login credentials for your 401(k) recordkeeper or brokerage account, and we have no custody of or access to your retirement plan assets.
- Text messages are optional. Reply STOP at any time to opt out.

1. Why We Provide This Notice

401kSignal, LLC is an investment adviser registered with the New Jersey Bureau of Securities (CRD No. 340910). Registration does not imply a certain level of skill or training. As an investment adviser, 401kSignal is a "financial institution" under Title V of the federal Gramm-Leach-Bliley Act ("GLBA"). The GLBA and its implementing rules, including Regulation P (12 C.F.R. Part 1016) and the Federal Trade Commission's Standards for Safeguarding Customer Information (16 C.F.R. Part 314), require us to tell you what nonpublic personal information we collect, how we use and share it, how we protect it, and what choices you have. This Notice is also designed to meet the expectations of applicable state securities regulators and the wireless industry's requirements for text-messaging programs.

We provide this Notice to you when you become a client, make it available at all times on our website, and provide updated notices as required by law.

2. Information We Collect

Depending on how you interact with us, we may collect the following categories of information:

Category	Examples and purpose
Identity and contact information	Name and email address, along with account authentication and session data for the Platform (processed by our authentication provider, Clerk).

Category	Examples and purpose
Waitlist information	Your name and email address and, if you choose to share it, roughly how many years you are from retirement. We use them to tell you when 401kSignal is available and to understand who is joining.
Client Investment Profile	Information you provide in the Client Investment Profile questionnaire during onboarding: age, target retirement date or year, investment objective and risk preference (used to assign one of five risk profiles), and self-reported confidence in managing retirement investments.
State of residence and mailing address	Collected during onboarding to confirm that we are permitted to serve you as a client under state investment adviser registration and notice-filing requirements, and to pre-fill your billing address with our payment processor.
Employer and plan information	Your employer and employer-sponsored retirement plan (name and plan type), and the fund lineup available in your plan (for example, from an uploaded plan document or a manually entered fund list).
Self-reported financial information	Your self-reported 401(k) account balance, used to track your account over time; and, if you choose to answer, ranges for your annual income and your net worth (excluding your primary residence), collected to document your financial situation. Income and net worth are not inputs to our models.
Billing information	Subscription billing details are collected and processed directly by our payment processor, Stripe, Inc. We do not collect, process, or store your full payment card or bank account numbers. We receive limited billing records from Stripe, such as subscription status and payment confirmations.
Mobile phone number (optional)	Collected only if you choose to enable SMS alerts in the Platform, and verified with a one-time passcode sent through Amazon Web Services (AWS) End User Messaging. We also keep a record of your text-messaging consent and any opt-out.
Communications	The content of emails and support requests you send us, and records of our communications with you, which we are required to retain as an investment adviser.
Technical and usage information	Collected automatically when you use our website or Platform, such as IP address, browser and device type, pages viewed, and timestamps; aggregate usage data from our web analytics provider; and diagnostic data from our error-monitoring provider, Sentry (see Section 8).

How we collect it. We collect information directly from you (for example, when you join our waitlist, sign up, complete your Client Investment Profile, upload a plan document, or contact us), automatically through your use of the website and Platform, and from our service providers acting on our behalf (for example, payment confirmations from Stripe).

What we do not collect. We do not request, collect, or store the login credentials for your employer plan recordkeeper or brokerage account (for example, Fidelity NetBenefits, Vanguard, or Empower).

We do not have custody of, and cannot access or transact in, your retirement plan assets. We do not collect Social Security numbers, and we do not obtain consumer reports about you.

Uploaded plan documents. Plan documents are used only to identify the investment options in your plan, and our personnel review the extracted fund information before the Platform uses it. Because these documents sometimes contain personal details (such as your name or an employee ID), we encourage you to remove or black out personal details before uploading.

3. How We Use Information

We use the information described above to:

- create and maintain your account, verify your identity, and confirm your eligibility to be our client;
- assign your risk profile and produce investment recommendations ("Recommendations") through the 401kSignal TrendEngine™;
- deliver the alerts you have requested, including rebalance and allocation alerts by email or text message;
- process your subscription and respond to your questions and support requests;
- tell waitlist members when 401kSignal is available and understand who is joining our waitlist;
- operate, secure, troubleshoot, and improve the Platform, including detecting and preventing fraud, abuse, and security incidents;
- keep your Client Investment Profile on record and meet our other legal, regulatory, recordkeeping, and supervisory obligations as an investment adviser, and respond to requests from regulators and lawful legal process; and
- carry out any other purpose we describe to you when we collect the information, with your consent.

We do not use your information to send you marketing or promotional messages. Our communications with clients are limited to messages about your account and our services. If you join our waitlist, we will email you about 401kSignal's availability, and you can unsubscribe at any time.

4. How We Share Information

Financial companies choose how they share their customers' personal information. Federal law gives consumers the right to limit some, but not all, sharing. The table below shows the reasons financial companies can share personal information, whether 401kSignal shares for each reason, and whether you can limit that sharing.

Reasons we can share your personal information	Do we share?	Can you limit this sharing?
For our everyday business purposes — to process your subscription, maintain your account, operate the Platform, and respond to court orders, legal investigations, and regulatory requests	Yes	No

Reasons we can share your personal information	Do we share?	Can you limit this sharing?
For our marketing purposes — to offer our products and services 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	No — we have no affiliates	We don't share
For our affiliates to market to you	No — we have no affiliates	We don't share
For nonaffiliates to market to you	No	We don't share

Because we share only for everyday business purposes as permitted by law, there is no sharing for you to opt out of.

Service providers

We share limited information with the following service providers, each of which performs functions on our behalf, only as necessary to operate the Platform:

- **Stripe, Inc.** — payment processing for subscription billing. Stripe receives your billing details directly; we do not collect or store your full card or bank account numbers.
- **Amazon Web Services, Inc. (AWS)** — cloud hosting and infrastructure for the Platform, including AWS End User Messaging for delivering one-time verification codes and alert text messages to your verified phone number.
- **Vercel Inc.** — hosting for our website and waitlist sign-up page.
- **Neon** — database hosting for our waitlist, including the names, email addresses, and optional retirement-timeline answers of people who join it.
- **Clerk, Inc.** — authentication and account management (sign-up, sign-in, and session management). Clerk processes your name, email address, and authentication session data on our behalf.
- **Sentry (Functional Software, Inc.)** — error monitoring and diagnostics, including session replay as described in Section 8.
- **OpenAI, L.L.C. and Tavily** — when you upload a retirement plan document, these providers help us extract fund names, ticker symbols, and related plan data from the document. We do not send your account balance, income, net worth, risk profile, phone number, or billing information to these providers.
- **Web analytics provider** — helps us understand aggregate website and Platform usage so we can improve the service. We do not use advertising pixels or allow analytics data to be used for advertising.

Our service providers may use your information only to perform services for us and are not permitted to use it for their own marketing purposes.

Other disclosures permitted by law

We may also disclose information: to the New Jersey Bureau of Securities, other state securities regulators, the U.S. Securities and Exchange Commission, and other government authorities with jurisdiction over us; to comply with law, regulation, subpoena, or court order; to protect against fraud, unauthorized transactions, or security threats; to our attorneys, accountants, and auditors under duties of confidentiality; at your direction or with your consent, including to a legally authorized representative as described in your Investment Advisory Agreement; and, subject to this Notice and to your consent where the law requires it, to a successor entity in connection with a merger, acquisition, or sale of our business.

Text-messaging data is never shared

- No mobile information will be shared with third parties or affiliates for marketing or promotional purposes.
- All of the categories of sharing described in this Notice exclude text-messaging originator opt-in data and consent; this information will not be shared with any third parties, except the service providers that deliver our text messages (such as AWS and wireless carriers) solely to send messages you requested.

5. Text Messaging (SMS) Program

401kSignal offers an optional text-messaging program, **401kSignal Alerts**, for clients who choose to receive alerts on their mobile phone. Here is how it works:

Program name	401kSignal Alerts, operated by 401kSignal, LLC.
Messages you will receive	One-time verification codes to confirm your phone number, and account alerts about your 401kSignal Recommendations (such as rebalance and allocation alerts). We do not send marketing or promotional text messages.
How you opt in	You opt in by entering your mobile number in your Platform settings, checking an unchecked box agreeing to receive text messages from 401kSignal, and confirming the one-time passcode we send to that number.
Consent is optional	Consent to receive text messages is not a condition of becoming a client, subscribing, or using the Platform. You can receive the same alerts by email instead.
Message frequency	Message frequency varies based on your account activity and alert settings.
Cost	Message and data rates may apply, according to your wireless plan.
Opt out	Reply **STOP** to any message to stop receiving texts. We also honor QUIT, END, REVOKE, OPT OUT, CANCEL, and UNSUBSCRIBE, as well as opt-out requests made by turning off SMS alerts in your Platform settings or by emailing support@401ksignal.com. After you opt out, you will receive one final message confirming your opt-out, and no further texts unless you opt in again.
Help	Reply **HELP** to any message, or email support@401ksignal.com.

Delivery	Carriers are not liable for delayed or undelivered messages.
Your number	Your phone number is used only to deliver the messages described above. Please update your number in your settings if it changes.

The text-messaging program is also governed by the SMS Terms in our Terms of Service, available at 401ksignal.com.

6. Cookies, Analytics, and Diagnostics

We use a limited set of cookies and similar technologies:

- **Essential cookies** that keep you signed in and secure your session (Clerk), and that support secure payment processing and fraud prevention (Stripe). The Platform cannot function without them.
- **Analytics** that measure aggregate usage of our website and Platform so we can improve them.
- **Diagnostics** from Sentry, described in Section 8.

We do not use advertising cookies or tracking pixels, we do not sell or “share” personal information for cross-context behavioral or targeted advertising, and we do not allow third parties to track you across websites through our Platform. We treat Global Privacy Control signals as a request to opt out of any sale or targeted advertising, although we engage in neither. You can block or delete cookies through your browser settings, but blocking essential cookies will prevent you from signing in.

7. How We Protect Information

We maintain administrative, technical, and physical safeguards reasonably designed to protect the security, confidentiality, and integrity of your personal and financial information, consistent with our written information security program. These include encryption of data in transit, access limited to personnel who need it to serve you, and reliance on established infrastructure providers. Certain administrative actions affecting the Platform’s algorithmic parameters and configuration, such as changes to risk-tier settings, signal overrides, and state-registration configuration, are recorded in immutable, tamper-evident logs.

No method of transmission or storage is completely secure. If we learn of a security incident involving your personal information, we will notify you and the appropriate regulators as required by applicable law.

8. Error Monitoring and Session Replay

To find and fix bugs, we use Sentry’s error monitoring, which includes session replay. Session replay can capture a reconstruction of on-screen interactions around an error, such as clicks, page navigation, and page layout. Our session replay is configured to mask all on-screen text and form inputs, so the content you see and type, including your financial details, is not captured in replays. Replay data is used only for debugging and is not used for analytics or advertising.

9. How Long We Keep Information

We keep personal information for as long as your account is active and afterward for as long as needed to meet our legal, regulatory, and recordkeeping obligations as an investment adviser (including books-and-records requirements under applicable securities laws), to resolve disputes, and to enforce our agreements. We keep records of your text-messaging consent and opt-out for as long as needed to document our compliance. If you unsubscribe from our waitlist, we delete your waitlist information. When information is no longer needed, we securely delete it or de-identify it.

10. Your Choices and Rights

- **Access and correction.** You can review and update much of your information, including your Client Investment Profile, in your Platform settings, or ask us to access or correct your information by emailing support@401ksignal.com.
- **Text messages.** You can opt out at any time as described in Section 5.
- **Waitlist emails.** You can unsubscribe at any time using the link in any waitlist email.
- **Closing your account.** You may close your account at any time. We will delete or de-identify your information except where we must retain it under Section 9.
- **Sharing.** Because we do not share your information for any purpose you can limit under federal law, no opt-out is needed.

State privacy laws

Nonpublic personal information covered by the GLBA is generally exempt from comprehensive state consumer privacy laws, such as the New Jersey Data Privacy Act and the California Consumer Privacy Act (as amended by the California Privacy Rights Act). To the extent any information we hold about you is not covered by such an exemption, for example certain information about website visitors, you may have the right under applicable state law to request access to, correction of, deletion of, or a portable copy of that information, and to opt out of certain processing. To make a request, email support@401ksignal.com with the subject line “Privacy Request.” We will verify your identity before responding, will respond within the time required by law, and will not discriminate against you for exercising your rights. If we deny your request, you may appeal by replying to our decision.

11. Children’s Privacy

The Platform is intended for adults and is not directed to anyone under 18. We do not knowingly collect personal information from anyone under 18. If you believe a minor has provided us with personal information, please contact us and we will delete it.

12. Former Clients

If you stop being our client, we will continue to treat your information as described in this Notice.

13. Changes to This Notice

We may update this Notice from time to time. The “Last Updated” date at the top shows when it was last revised. If we make a material change to how we collect, use, or share your information, we will provide you with a revised notice by email or through the Platform before the change takes effect, and we will obtain any consent required by law.

14. Contact Us

If you have questions about this Notice or our privacy practices, or want to make a privacy request, please contact our Chief Compliance Officer:

401kSignal, LLC (CRD No. 340910) · Attn: Chief Compliance Officer
Email: support@401ksignal.com · Website: 401ksignal.com