

PRIVACY POLICY

1. PRIVACY STATEMENT

- 1.1. Protecting the privacy and safeguarding the personal and financial information of our clients and Web site visitors is one of our highest priorities. The following Privacy Statement explains how we collect and protect your information. By opening an account or by using our Web site, you give your consent to the collection and use of personal information by us as explained in this privacy statement.

2. COLLECTION OF PERSONAL INFORMATION

- 2.1. We collect information required to open an account, to transact business effectively and to safeguard your assets and your privacy. To do this, we gather information to help us assess your needs and preferences.
- 2.2. The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address and to identify who you are. We also collect demographic information when you open an account, including, birth date, education, occupation, etc. and information about your transactions with us. We also assess your trading experience, your approximate annual income and approximate net worth to assess your financial position.

3. USAGE OF PERSONAL INFORMATION

We use personal information only as appropriate to provide you quality service and security. For example, we may use the information collected from you to verify your identity and contact information. We may also use this information to establish and set up your trading account, issue an account number and a secure password, maintain your account activity, and contact you with account information. This information helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

4. OUR AFFILIATES AND PARTNERS

We may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer. We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. The use of your

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personal information is limited to the purposes identified in our relationship with the partner or affiliate.

5. NON-AFFILIATED THIRD PARTIES

- 5.1. We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below.
- 5.2. We reserve the right to disclose your personal information to third parties where required by law to regulatory, law enforcement or other government authorities or when necessary to protect our rights or property.
- 5.3. To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, order fulfilment, client service, client satisfaction surveys or other support services or data collection activities relevant to our business. We may also provide a party with client information from our database to help us to analyse and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task we request and for no other purpose. All third parties with whom we share personal information are required to protect personal information in a manner similar to the way we protect personal information.

6. SECURITY

- 6.1. All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Web site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 6.2. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Web site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7. RESTRICTION OF RESPONSIBILITY

If at any time you choose to purchase a product or service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Statement. We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by you or

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collected by those sites. Whenever you elect to link to a co-branded Web site or to a linked Web site, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party and you should familiarize yourself with the privacy policy provided by that third party.

8. MARKETING

- 8.1. We may use your data to provide you with information about our goods and services which may be of interest to you and we or our agents may contact you about these by post and telephone.
- 8.2. If you are an existing customer, we will only contact you by electronic means (such as email, voicemail or SMS) with information about our goods and services similar to those which were the subject of a previous sale to you.
- 8.3. If you do not want us to use your data in this way please tick the relevant boxes when we collect your marketing preferences. You may change your preferences at any time by contacting a Client Services representative. An opt out election made by one account owner of a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account you hold with us.

9. USE OF "COOKIES"

- 9.1. We use cookies to assist us in securing your trading activities and to enhance the performance of our Web site. (Cookies are small text files sent from the Web server to your computer.) Cookies used by us do not contain any personal information nor do they contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on.
- 9.2. We may share Web site usage information about visitors to the Web site with reputable advertising companies for targeting our Internet banner advertisements on this site and other sites. For this purpose, pixel tags (also called clear gifs or web beacons) may be used to note the pages you have visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.

10. CHANGES TO THIS PRIVACY STATEMENT

From time to time, we may update this Privacy Statement. In the event we change this Privacy Statement, the revised Privacy Statement will promptly be posted to the Web sites and we will post a notice on our Web sites informing you of such changes. You agree to accept posting of a revised Privacy Statement electronically on the Web site as actual notice

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to you. Any dispute over our Privacy Statement is subject to this notice and our Customer Agreement. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. If you have any questions that this statement does not address, please contact a Client Services representative.