



CF Global Trading, L.L.C. and its Affiliates (collectively “CF Global” or “we”) understand that our clients’ privacy is important and we are committed to maintaining their confidentiality. The following disclosure explains our policy regarding non-public information and the process we have in place to protect our clients’ privacy and the confidential information we receive from our clients.

We collect non-public information about clients and counterparties from various sources (“Personal Data”), which include the following:

- Information we receive on applications and other forms (such as name, address, e-mail address, telephone number, Social Security Number, assets and income);
- Information about our clients’ financial transactions with us or others; and
- Information that we received from non-affiliated third parties (such as credit rating agencies) or other entities who may service our clients’ accounts from time to time.

We may use our clients’ information in order to operate our business in a prudent manner in accordance with industry standards and applicable law, which may include servicing and maintaining accounts and transactions, offering a broad range of services and products, verifying income and assets, responding to inquiries and requests, preventing fraud, monitoring and archiving communications and verifying our clients’ identity in accordance with the USA PATRIOT Act.

We do not disclose any non-public information to any non-affiliated third parties other than as permitted by law. We may disclose or share non-public information about our clients to our affiliates or third parties involved in servicing our clients’ accounts. We do not otherwise provide information about our clients to outside firms, organizations or individuals except to our attorneys, accountants and auditors and as permitted by law. We will, however, release information about our client if directed to do so by such client or if compelled or required to do so by law or self-regulatory organization (“SRO”) regulations.

We restrict access to our clients’ information to those employees who need to know such information to provide products or services to our clients. We maintain physical, electronic and procedural safeguards to guard and protect all clients’ information from unauthorized access, accidental or intentional manipulation, loss and destruction. Employees who violate these policies are subject to disciplinary action, including termination. Our clients’ information is secure and is not shared with a third party unless such third party is involved in servicing our clients’ relationship with CF Global or as required, in limited situations, by law or SRO regulations.

CHOICES AND ACCESS

If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt-out by contacting your client relationship manager, primary point of contact or email: CFGTCCompliance@cfglobal.com. Please note we will still send you important administrative and service or transaction-related messages, which you cannot opt out of.

How individuals can access, change or suppress their Personal Data: If you would like to request a review, correct, update, suppress, restrict or delete Personal Data that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact CFGTCCompliance@cfglobal.com. We will respond to your request consistent with applicable law. For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that we may need to retain certain information for recordkeeping and regulatory purposes. Additional Information for the EEA: You also retain the right to complain to a supervisory authority in the EEA competent for your relevant country or region.



RETENTION PERIOD: We will retain Personal Data for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with our client and service their account(s); (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of applicable statutes of limitations, or regulatory investigations.

JURISDICTION AND CROSS-BORDER TRANSFER: Personal Data may be stored and processed in any country where we engage service providers to provide services to our client's account(s). In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access Personal Data. Transfer may also be made pursuant to contracts in your interest or at your request. **Additional Information for the EEA:** Where personal data is sent to third parties or service providers in countries outside the EEA, we ensure they have adequate level of data protection according to EEA standards.

SENSITIVE INFORMATION: We do not typically collect sensitive Personal Data in connection with the Services. Please do not send us any Personal Data which would be categorized as special data under GDPR (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership).