

NOTICE CONCERNING YOUR PRIVACY & ONLINE SERVICES

At Phillip Capital, Inc. and its affiliates (collectively, "PCI"), maintaining client trust and confidence is a high priority. We understand that you are concerned with how we treat nonpublic personal information ("Client Information") that we obtain from you or from other sources about you in the course of providing you with our products and services. For this reason, we want you to understand how we work to protect your privacy when we collect and use information about you, and the steps we take to safeguard that information.

USA PATRIOT ACT NOTICE TO CUSTOMERS:

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying document.

INFORMATION WE COLLECT:

In providing you with financial products and services, PCI may collect the following types of Client Information:

- Information we receive from your Introducing Broker or from you on account applications, whether written or electronic, or on other forms. This information would include your name, address, phone number, email address, electronic signature, date of birth, driver's license number, tax ID, passport number, Social Security number, income, bank information and investment experience.
- Information about your transactions with us, our affiliates, or others. This information could include your trading through us, our affiliates, and others, your history of meeting margin calls, and your use of the various products and services that we and our affiliates provide.
- Information about your creditworthiness, credit history, and other information about you that we receive from consumer reporting agencies, our affiliates, your Introducing Broker, or providers of other demographic information, such as your purchasing or investment preferences.
- Information collected automatically may include usage details, IP addresses, and information collected through cookies.
- Information about you obtained in connection with our efforts to protect against fraud or unauthorized use of your account(s) with us.

You have the right, at any time, to request and receive a copy of the information you have provided. Your data is retained by PCI based on current U.S. financial regulatory requirements.

HOW WE USE YOUR PERSONAL INFORMATION:

PCI does not disclose non-public personal information about its clients or potential clients to non-affiliated third parties, except as permitted by law. For example, we may share non-public information with the following:

- Financial service providers, such as Introducing Brokers, broker-dealers, futures commission merchants, investment companies, investment advisors, commodity trading advisors, and commodity pool operators.
- Other non-affiliated third parties as permitted or required by law, such as in response to a subpoena or legal process or in order to complete a transaction that you initiated and authorized.
- If you register for our online products or services, we retain your user ID and password and other information about your use of the website to recognize you as a registered user. We may obtain your email address from you or from another source. We may send you email offers for our and our affiliates' products and services. We may also send you emails for third-party products and services we think may be of interest to you. All email offers we send to you include an opportunity to opt out of future email offers.
- Information collected may be used for information about your equipment, browsing actions, and patterns, including: Details of your visits to our Website, including traffic data, location data, logs, information about your computer, including your IP address, operating system, and browser type.
- If you opt out of receiving email offers, we may still send (via email or otherwise) important information about your account(s) with us and our products and services.

INTERNAL SECURITY PROCEDURES:

PCI restricts access to Client Information about you to:

- Those of our employees and affiliates who need to know that information in order to provide the products and services you receive from us.

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- Those unaffiliated brokers who have introduced you to us (“Introducing Brokers”).
- Those unaffiliated third parties whose access to such information is permitted or required by law and who need to know that information in order to assist us in providing you with the products and services you receive from us.

To protect the security of Client Information, we maintain physical, electronic, and procedural safeguards that comply with federal standards for guarding the information we collect about you.

DATA SECURITY:

Security and confidentiality of your personal information is very important to us. We have the necessary technology and organizational measures such as access control, encryption, intrusion detection and incident management to assist in protecting your data. These measures are regularly reviewed to ensure they remain appropriate. Despite PCI’s commitment and efforts, no data security measure is completely impenetrable.

We take our responsibility to protect your information seriously. We use reasonable and appropriate physical, technical, and organizational safeguards designed to promote the security of our systems and protect the confidentiality, integrity, availability, and resilience of personal information.

INTERNATIONAL DATA TRANSFER:

We may share your personal data within the Phillip Capital Group for data processing purposes. This may involve transferring your data to other group companies outside the European Economic Area (EEA). This may include countries that are not required to provide the same level of protection as the laws of your home country. We will take the appropriate steps to ensure the security of your data in these instances. We also ensure that our external processors utilize similar data protection mechanisms.

COOKIE POLICY:

To better serve you, our products and services are described and, in many cases, available through our websites, www.phillipcapital.com, Portal.phillipcapital.com and openaccount.phillipusa.com.

A cookie is a small text file that is stored on a computer for record-keeping purposes. We use cookies on this Site. We do not add the information we store in cookies to Personal Information you submit through this Site. We use both session ID cookies and persistent cookies. You can choose to accept or decline cookies. Most browsers automatically accept cookies, but you can change the settings to your preference.

YOUR RIGHTS:

- You are entitled to request information regarding the processing of your personal information.
- You may request that we correct your personal information
- You may request that we delete your personal information. Please note that we may be required by US regulation to retain your data regardless.
- You have the right to request that we stop the processing of your personal information unless there are legal reasons for us to continue.
- You have the right to withdraw your consent to processing your personal data unless there are regulatory obligations to continue.

Changes to this Privacy Policy:

Phillip Capital Inc. reserves the right, at any time, to modify, alter, and/or update this Privacy Policy, and any such modifications, alterations, or updates will be effective upon our posting of the revised Privacy Policy. We will use reasonable efforts to notify you in the event material changes are made to this Privacy Policy, such as by posting a notice on www.PhillipCapital.com. Your continued use of PCI services following our posting of any revised Privacy Policy will constitute your acknowledgment of the amended Privacy Policy.

HOW TO CONTACT US:

If you have questions, requests or complaints please email us at privacy@phillipcapital.com or call or write directly.

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