

Just2Trade, Inc.
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NOTICE OF JUST2TRADE, INC. PRIVACY POLICY

Our commitment to Your Privacy: Just2Trade, Inc. has a longstanding policy of protecting the confidentiality and security of information we collect about customers. We will not share nonpublic information about you (“Information”) without your consent, except for specific purposes described below. This notice describes the Information we may gather and the circumstances under which we may share it.

Why do we gather information? We collect information required to open an account, to transact business effectively and to safeguard your assets or your privacy. But we also continually strive to improve our services and provide you opportunities to use additional products and services you may find of interest. To do this, we gather information to help us assess your needs and preferences.

What information do we collect? 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 fax number, gender, education, occupation employer name and address. And to identify who you are, including birth date and Social Security number. Additionally, as required by law, to assess your experience in margin use and trading, we may also collect your approximate annual income, approximate net worth, approximate worth, and credit reports to assess your financial position.

When do we obtain information? You directly provide to us the majority of information we collect. You do this by completing the account application and related documentation, placing a trade, sending us an e-mail for questions or comment.

How do we use your personal information? Again, the trust of our clients is our most valued asset. Therefore, we use personal information only as appropriate to provide you quality service and security.

For example, Just2Trade, Inc. 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 portfolio and trading 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.

Just2Trade, Inc. may also use demographic information provided by others on our clients so that we can develop products and services for our clients.

Should you close your account with us, Just2Trade, Inc. will retain your information as needed to comply with regulatory requirements.

What information does Just2Trade, Inc. share with affiliates, alliances and partners? Just2Trade, Inc. 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. Just2Trade, Inc. also forges 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, Just2Trade, Inc. may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. We may also compare our client lists with those of our partners and affiliates to ensure that they are not sending messages to

you if you've elected not to be so notified. In our strategic relationships, we will require that it be identified that an offer is being extended because of the relationship with us. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

An affiliate is a company that we own or control or with which there is common ownership with us and our parent company. We may share with our affiliates information about our transactions and experiences with you such as name, e-mail address, mailing address, date of birth, employment status, general account and demographic information. This information may be used for internal reporting, anticipating margin calls, development strategies, to improve customer service and/or to provide products and services that may be of interest to you. We do not share information other than the types of transaction and experience information described above with our affiliates.

PLAID- Third Party Service

When you use Plaid for your money transfer needs as a client, Plaid will gather and store your name, email address, phone number, billing address, and any other relevant information that you provide directly to us. Plaid will also store the relevant data required to complete your transaction, including but not limited to your financial information, bank account numbers, routing numbers, billing address and company name. Plaid may also rely on a third-party payment processor to complete transactions, and all data shared with them falls under their own privacy policies. Further, Plaid will collect and associate all relevant end-user data with your client account, including but limited to end-user names, email addresses, billing addresses and financial information. Plaid may additionally collect information on the IP addresses, devices, and locations used to access Plaid, which may be linked to your account for fraud detection and prevention purposes. Finally, Plaid may collect additional data for identity verification on an as-needed basis determined at our own sole discretion.

For reference please review Plaid's privacy policy at plaid.com/legal

Do we share the information collected with any other third parties? The cornerstone of our Privacy Statement is the commitment to keep our clients' personal information confidential. Just2Trade, Inc. does not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as noted earlier and as described below:

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, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a party with client information from our database to help us to analyze 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 which we share personal information are required to protect personal information in a manner similar to the way we protect personal information. Examples of information shared are identifying information such as name, mailing address, e-mail address, telephone number, and information on account activity. 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.

Just2Trade, Inc. also reserves the right to disclose your personal information to third parties where permitted by law or where required by law to regulatory, law enforcement or other government authorities. We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property.

Protecting Your Information

Just2Trade, Inc. protects your nonpublic information from access by third parties by maintaining physical, electronic and procedural safeguards. We limit access to your information to those employees who are trained in the proper handling of nonpublic client information and who need access to the information to perform their job functions. Information may be shared with J2T affiliates for marketing purposes.

Privacy Choices Form – Opt Out

If you prefer that we limit disclosures of personal information about you, you may notify us via email at compliance@just2trade.com by calling (646) 346-1000, or via Postal Service, that you elect to opt out of our privacy policy procedures. Please send correspondence along with your account number(s) to: JUST2TRADE INC Compliance Dept. 1 Penn Plaza 16th Floor New York, NY 10119

Our account records will then indicate the following preferences:

- Limit disclosure of personal information about me to non-affiliated third parties
- Limit the personal information about me that you share with J2T affiliates
- Remove my name from your marketing lists shared with affiliates in non-commodity lines of business.

Please allow approximately 30 days from our receipt of your request for your instructions to become effective. You do not need to notify us, if you have previously instructed J2T not to share information about you.

Does our Privacy Statement apply to the sites to which we link? No. 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 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.

What about "cookies" and other tracking devices? Cookies are small text files sent from the Web server to your computer. Just2Trade, Inc. may maintain a website that contains cookies. Cookies also may be placed by third parties when you access their sites through linking from a Web site. We do not have access to these cookies or any information that these cookies may contain.

Please contact the third-party site for more information on these cookies. Although we encourage third parties to adhere to appropriate privacy policies and standards, we are not responsible for the actions or policies of such parties.

To administer and improve the Just2Trade, Inc. Web site, we may use a third party to track and analyze usage and volume statistical information, including page requests, form requests, and click paths. All data collected for this purpose is owned and used by Just2Trade, Inc. The third party may use cookies to track behavior and may set cookies on behalf of Just2Trade, Inc. These cookies do not contain any personally identifiable information.

Will I be able to review, change or correct my information? Yes. Personal identifying information may be reviewed, changed or corrected at any time. You are responsible for maintaining the accuracy and completeness of your personal and other information. At least once every 36 months we will send you a letter asking you to confirm the information we have on file. If you would like to review your personal information or if you believe that any of your information is incorrect, or if you have any questions regarding your personal information, or if you have any other questions or concerns regarding this privacy policy, simply contact our office.

How will I know if there are any changes to this Privacy Statement? Just2Trade, Inc. will provide a copy of the Privacy Statement when new material changes occur. Should you have any additional questions concerning our privacy policy, you may submit a written request for additional information to our Customer Service Department located at 1 Penn Plaza, 16th Floor, New York, NY 10119.