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## **WHO WE ARE**

TradeStation Group, Inc. (“TradeStation Group”) is a Florida corporation headquartered in Plantation, Florida, USA. TradeStation Group is a wholly-owned subsidiary of Monex Group, Inc. (“Monex”), headquartered in Tokyo, Japan, and listed on Section One of the Tokyo Stock Exchange. Monex, including its main subsidiary Monex, Inc., provides a variety of financial services to individual investors including securities, brokerage, M&A advisory, debt and equity underwriting, asset management, investment education, and other investment banking functions.

TradeStation Group is the parent company of wholly owned operating subsidiaries involved in the business of providing online investment analysis and trading products and services. TradeStation Group’s wholly-owned operating subsidiaries include, but are not limited to: (1) TradeStation Securities, Inc., a U.S. online securities and futures brokerage firm; (2) TradeStation Technologies, Inc., an investment software development and support company; (3) TradeStation International Ltd, an introducing broker based in London, England; (4) TradeStation Crypto, Inc., a virtual currency brokerage business; and (5) TradeStation Global Services, SA, a technology services company in San Jose, Costa Rica. TradeStation Group and its subsidiaries (collectively referred to herein as “TradeStation,” “our,” “us” or “we”) are committed to protecting the confidentiality and security of information we collect about consumers, our customers, and/or end-users (“you”).

## **PURPOSE OF THIS PRIVACY NOTICE**

### **BY USING OUR PRODUCTS AND SERVICES, YOU UNDERSTAND AND ACKNOWLEDGE THAT WE WILL COLLECT, USE AND TRANSFER YOUR PERSONAL DATA FOR PROCESSING AS DESCRIBED IN THIS PRIVACY NOTICE.**

This Privacy Notice is issued on behalf of TradeStation, which is the controller responsible for the processing of your Personal Data. Specifically, your Personal Data will be controlled by the TradeStation entity that is providing products, services or communications to you. This Privacy Notice aims to give you information on how TradeStation collects and processes your Personal Data through your use of TradeStation websites or through the TradeStation software platform or mobile application, including any data you may provide when you apply for an account or subscription or use and/or purchase a product or service. We will not share nonpublic information (“information”) about you with third parties outside of TradeStation’s order processing and clearing firm(s), if any, without your consent, except for the specific purposes described below. This Privacy Notice describes the information we may gather and the circumstances under which we may share it. TradeStation respects your privacy and is committed to protecting your Personal Data. This Privacy Notice will inform you of how we use your Personal Data, and tell you about your privacy rights and how the law protects you..

**Note to Residents of the European Union:** In order to comply with the requirements of the European Union (“EU”) General Data Protection Regulation (“GDPR”) for our EU consumers, customers, and/or end-users, this Privacy Notice outlines the legal basis on which we process your Personal Data and provides other information required by the GDPR.

Our products and services are not intended for children under the age of 18 and we do not knowingly collect data relating to children other than to the extent an adult establishes a custodial account on behalf of a child or if a child is designated as a beneficiary on a qualified account.

A Glossary has been provided to help you understand the meaning of some of the terms used in this Privacy Notice.

## **Third-party links**

Our websites may include links to unaffiliated third-party websites and applications. In addition, you may be able to communicate with us using chatbots that are hosted by third-party service providers and which may be offered as part of third-party software applications (such as social media platforms). Clicking on those links or enabling or using those connections and services may allow unaffiliated third parties to collect or share data about you. We do not

control these third-party websites or services and are not responsible for their privacy statements. We encourage you to read the Privacy Notice of every website or platform you visit or use and manage the privacy settings in your web browser or mobile device as you deem appropriate.

### **Changes to the Privacy Notice and your duty to inform us of changes**

This version of the Privacy Notice was last updated on December 20, 2018 and historic versions can be obtained by contacting us.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

### **THE DATA WE COLLECT ABOUT YOU**

For purposes of this Privacy Notice, Personal Data means any information about an individual from which that person can be identified. It does not include data that has been anonymized in accordance with applicable law (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you, which we have grouped together as follows:

- **Identity Data** includes first name, last name, government identification number, username or similar identifier, marital status, title, date of birth and professional affiliations.
- **Contact Data** includes physical address, mailing address, email address and telephone numbers.
- **Financial Data** includes financial account information, net worth, income, investments and investment experience and payment card details.
- **Transaction Data** includes details about payments to and from you, investments made (purchased and sold) by you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our products and services.
- **Profile Data** includes your username and password, your interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Geo-location Data** includes information about your geographic location based on internet protocol address.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and third parties and your communication preferences.
- **Background Information Data** includes information derived from third-party due diligence screening services using Personal Data provided by you with the intent of combating money laundering and fraud.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for business purposes that does not and cannot be used to identify you. Except as described below, Aggregated Data is not subject to this Privacy Notice as it does not personally identify you in any manner. As an example, we may aggregate your Usage Data for marketing purposes to calculate the percentage of users accessing a specific feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data, which will be used in accordance with this Privacy Notice.

## If you fail to provide Personal Data

Where we need to collect Personal Data by law, in order to take steps at your request prior to entering into a contract with you, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform under the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to suspend or discontinue providing services to you but we will notify you if this is the case at the time.

## **HOW YOUR PERSONAL DATA IS COLLECTED**

We obtain most Personal Data directly from you, when you apply for, access and use financial (and related) products and services offered by TradeStation and certain third parties – whether in person, by postal mail, by phone or electronically. We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Personal Data (including Identity Data, Contact Data, Financial Data, Profile Data, Transaction Data, and Marketing and Communications Data) by filling in forms or by corresponding with us by post, telephone, electronically or otherwise. This includes, but is not necessarily limited to, Personal Data you provide when you apply for our products or services; create an account; subscribe to our service or publications; request marketing to be sent to you; enter a competition, promotion or survey; contact us with questions or requests; or give us feedback.
- **Automated technologies or interactions.** As you interact with our products and services, we may automatically collect Technical Data, Usage Data, and Geo-location Data about your equipment, device, software, browsing actions and traffic patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. These analytical tools are used by us and our analytics and information technology service providers for internal purposes only and are not used to collect or disseminate Personal Data to any third party. We may receive Technical Data about you if you visit other websites that employ or interact with our cookies.
- **Third parties or publicly available sources.** We may receive Personal Data about you from various third parties (including from your interactions with us and our pages on social media platforms and from third parties with whom we have business relationships) to help us provide and/or improve products and services as well as for marketing. We may verify information provided by you or obtain additional information from consumer or investigative reporting agencies or public sources. For example, we may use your Identity Data and Background Information Data in order to confirm that you are not included on any blocked persons lists in order to comply with Know Your Customer (“KYC”), economic sanctions, anti-terrorist financing and anti-money laundering laws. We use third-party due diligence screening services for such confirmations, which screen Identity Data against publicly available sources and process Background Information Data. We may combine your Personal Data with data we obtain from our services, other users or third parties to enhance your experience and improve the services. These sources may include analytical providers, advertising networks and search information providers.

## **HOW WE USE YOUR PERSONAL DATA**

We will only collect and/or use your Personal Data as allowed by law.<sup>1</sup> Most commonly, we will use your Personal Data under the following circumstances:

- Where we need to perform under the contract we are about to enter into or have entered into with you or where we seek to deliver and improve service to you.
- Where it is necessary for our Legitimate Interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

- Where you have given your consent to processing.

We have set out below, in a table format, a description of ways we use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our Legitimate Interests are where appropriate.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing includes, but is not necessarily limited to</b>
To onboard you as a new customer	(a) Identity Data (b) Contact Data (c) Financial Data (d) Background Information Data	(a) Performance of a contract with you (b) Necessary to comply with a regulatory or legal obligation (c) Necessary for our Legitimate Interests (such as whether to approve you as a customer and to carry out diligence, KYC, and anti-fraud measures)
To process and deliver your order, including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Marketing and Communications Data (f) Geo-location Data	(a) Performance of a contract with you (b) Necessary for our Legitimate Interests (to create records of financial transactions and to recover debts due to us)
To manage our relationship with you, which will include: (a) Notifying you about changes to our terms or Privacy Notice (b) Asking you to leave a review or take a survey (c) Responding to questions and comments from you	(a) Identity Data (b) Contact Data (c) Profile Data (d) Financial Data (e) Transaction Data (f) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary to comply with a regulatory or legal obligation (c) Necessary for our Legitimate Interests (to keep our records updated, to study how customers use our products/ services and to provide customer service)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity Data (b) Contact Data (c) Profile Data (d) Usage Data (e) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our Legitimate Interests (to study how customers use our products/ services and to develop them and grow our business and for marketing of products and services)

Purpose/Activity	Type of data	Lawful basis for processing includes, but is not necessarily limited to
To administer and protect our business, our websites, the TradeStation software platform and the TradeStation mobile application (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data (e) Geo-location Data	(a) Necessary for our Legitimate Interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a regulatory and legal obligation
To deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity Data (b) Contact Data (c) Profile Data (d) Usage Data (e) Marketing and Communications Data (f) Technical Data	Necessary for our Legitimate Interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our products/services, marketing, customer relationships and experiences	(a) Technical Data (b) Usage Data (c) Geo-location Data	Necessary for our Legitimate Interests (to define types of customers for our products and services, to keep our website updated and relevant, for marketing of products and services, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data (e) Profile Data	Necessary for our Legitimate Interests (to develop our products/services and grow our business)

### Automated decision-making

We may use automated decision-making as part of our account opening process and for certain marketing communications. As part of our account approval process, we may automate the evaluation of your suitability to open an account or certain types of accounts. We also perform automated screening as required by KYC, economic sanctions, anti-terrorist financing, and anti-money laundering laws. For marketing purposes, we may automate decisions on who is included in distribution lists based on criteria such as Identity Data, Contact Data, Technical Data, Usage Data and/or Profile Data (although please note that you will have the opportunity to opt out of direct marketing communications as required by applicable law).

## **Promotional (sometimes referred to as “Marketing”) offers from us**

You may receive marketing communications from us. We may use your Identity Data, Contact Data, Technical Data, Usage Data, Geo-location Data, and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

## **Opting out**

You can ask us to stop sending you marketing materials at any time by contacting [Client Services](#) for assistance and further instructions or by unsubscribing via the links provided in marketing emails.

Where you opt out of receiving these marketing communications, this will not apply to other types of communications necessary to provide services, required for business purposes, or pursuant to regulatory requirements (such as transaction confirmation communications, notices of updates to this Privacy Notice, etc.).

## **Cookies**

Cookies are blocks of textual information that are sent electronically from a web server to your browser and are stored on your computer or mobile device. We may use cookies to facilitate the use of analytics tools that measure and identify traffic patterns and to track the performance of features and advertisements. By increasing our understanding of how you and our other customers and visitors use our services, cookies enable us to continually improve the form and functionality of our services and to convey to you the most relevant information and current offers. Information gathered through the placement and tracking of cookies may be shared with TradeStation employees, agents and affiliates, but we do not sell such information to unaffiliated third parties.

TradeStation may allow other companies or third-party advertising services to place cookies onto your computer or mobile device while browsing a TradeStation website or mobile application. In such cases, these companies generally use these cookies in a manner consistent with our use, and are typically doing so in support of TradeStation-sponsored campaigns.

You may optionally refuse or delete cookies. Most web browsers and mobile devices offer settings that permit the user to manage cookies. You can set your browser or mobile device to refuse all or some browser cookies, or to alert you when websites or mobile applications set or access cookies. Please note that if you should elect to refuse or delete cookies provided by a TradeStation website or service you may experience some inconvenience in your use of TradeStation products and services. For example, you may be asked for additional verification while signing in to access your account, or we may not be able to recognize your device or your previously established online preferences.

Consult our [Cookies Policy](#) for more information about the specific cookies we use and place, as well as methods for opting out of certain tracking technologies.

## **Change of purpose**

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact [Client Services](#).

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with this Privacy Notice, where this is required or permitted by law.

## **DISCLOSURES OF YOUR PERSONAL DATA**

We do not disclose any Personal Data about applicants, our customers or former customers to anyone, except as required or permitted by law. We may disclose Personal Data to or as directed by TradeStation's order processing or clearing firm(s), if any, or when we believe it necessary for the conduct of our business. Personal Data may be disclosed for audit or research purposes to attorneys or other professionals, or to law enforcement and regulatory and self-regulatory agencies, for example, to help us prevent fraud. We may also disclose Personal Data in connection with a proposed or actual corporate transaction, including a reorganization or sale of some or all of TradeStation's assets. In addition, we may disclose Personal Data to affiliated and non-affiliated third-party service providers:

- (i)** to enable them to provide business services for us or TradeStation's order processing or clearing firm(s), if any, such as performing computer-related or data maintenance or processing services,
- (ii)** to facilitate the processing of transactions requested by you,
- (iii)** (iii) to assist us in offering products and services to you or to assist TradeStation's order processing or clearing firm(s), if any, in offering products and services to you, or
- (iv)** for credit or other background review and reporting purposes.

Except in those specific, limited situations, without your consent we will not make any disclosures of Personal Data to other companies that may want to sell their products or services to you. For example, we do not sell customer lists and we will not sell your name to a catalogue company. It is TradeStation's policy to require all third parties that are to receive any information to agree in writing to confidentiality and non-disclosure obligations.

Furthermore, we make all reasonable efforts to require that all third parties who process your Personal Data respect the security of your Personal Data, treat it in accordance with the law and not use your Personal Data for their own purposes or contrary to our instructions.

## **INTERNATIONAL TRANSFERS**

If you are located outside of the United States, please be aware that Personal Data we collect will be processed and stored in the United States. By using our products and services and submitting your Personal Data, you acknowledge that we will transfer, store and process your Personal Data in the United States. In addition, third-party service providers that process your Personal Data on our behalf (as described above) may be based outside the EU or may use cloud service providers to process and store your Personal Data outside the EU.

### **Note to Residents of the European Union:**

Whenever we transfer your Personal Data out of the EU we ensure your Personal Data is protected in accordance with GDPR requirements by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Data to countries (or using mechanisms) that have been deemed to provide an adequate level of protection for Personal Data by the European Commission;
- Where we use certain third-party service providers, we may use specific contracts approved by the European Commission which give Personal Data the same protection it has in the EU; or
- Where we use certain third-party service providers based in the U.S., we may transfer data to them if they are part of the Privacy Shield, which requires them to provide similar protection to Personal Data shared between the EU and the U.S., or pursuant to the above approved contracts.

Please contact [Client Services](#) if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EU.



## **DATA SECURITY**

We have put in place physical, administrative, and technical security measures designed to protect the confidentiality, integrity, availability, and resilience of Personal Data, and designed to prevent the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality. If an employee were to violate the terms in this Privacy Notice, he or she would be subject to a disciplinary process.

We use industry standard security technologies and procedures to help protect your Personal Data from unauthorized access, use or disclosure. TradeStation uses secure servers with strong password protection. Industry standard Transport Layer Security (TLS) and HTTPS protocols are used to pseudonymize and protect your Personal Data. We also use firewalls and other security technology to help protect our network and systems from external attack, and take industry standard steps to back up and protect your Personal Data.

In addition to our efforts to protect information, you can also help to protect your identity. When using the Internet: keep your security software current and turned on; protect your password information; shred personal documents; and check your credit report regularly. If you have reason to believe that you have been the victim of identity theft, contact [Client Services](#) immediately.

We have put in place procedures to deal with any suspected incidents involving Personal Data and will notify you and any applicable regulators or self-regulatory organizations of an incident that has resulted in a breach of Personal Data where we are legally required to do so.

## **DATA RETENTION**

We will only retain your Personal Data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount or quantity, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data, and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law, TradeStation is required to keep certain information about its customers (including Contact Data, Identity Data, Financial Data and Transaction Data) for legally mandated periods following termination of your relationship.

**Note to Residents of the European Union:** In some circumstances you can ask us to delete your data: see *Request to erasure* below for further information.

## **EUROPEAN UNION RESIDENTS: ENUMERATED RIGHTS**

TradeStation takes measures to keep your Personal Data accurate and up to date. If you reside in the EU or are a citizen of the EU, under certain circumstances, you have rights under data protection laws in relation to your Personal Data. To exercise your rights to your Personal Data, please contact [Client Services](#). You have the following rights:

- **Right to request access** to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and certain information about the processing.
- **Right to request correction** of your Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If we do not agree, you may submit a short statement of dispute, which we will include in future disclosures of the disputed information. Information collected in connection with, or in anticipation of, any claim

or legal proceeding will not be made available.

- **Right to request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be communicated to you, if applicable, at the time of your request.
- **Right to request restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to data portability or request the transfer** of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen (where technically feasible), your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to Personal Data which you initially provided consent for us to use or where we used Personal Data to perform a contract with you, and in both cases was processed by automated means.
- **Right to object to processing** of your Personal Data where we are relying on a Legitimate Interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your Personal Data, which override your rights and freedoms.
- **Right to withdraw consent at any time** where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. If we process your Personal Data based on one or more lawful grounds in addition to consent, then we may continue processing your Personal Data even though you have withdrawn consent.

In addition to the enumerated rights above, you have the **Right to lodge a complaint** with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of Personal Data relating to you infringes upon your right to data protection and privacy.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

We would, however, appreciate the chance to deal with your concerns before you approach a supervisory authority, so please contact [Client Services](#) in the first instance. You also may contact our designated Data Protection Officer ("DPO") with regard to all issues related to our processing of Personal Data and to exercise your rights under the GDPR.

### **No fee usually required**

You will usually not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request under these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex, you have made a number of requests or additional information is needed from you to process your request. In this case, we will notify you and keep you updated.

### **UNITED STATES RESIDENTS:**

**State Considerations:** The practices described above meet the minimum requirements of United States federal law. You may have other protections under applicable state laws, such as those in Nevada and California. To the extent these state laws apply, we will comply with them if we share your information.

### **Residents of Nevada:**

At any time, you may request to be placed on TradeStation's internal do-not-call list. Nevada law also requires that we provide you with the following contact information:

- **Bureau of Consumer Protection**  
Office of the Nevada Attorney General  
555 E. Washington Street, Suite 3900  
Las Vegas, Nevada 89101
- **Consumers and Former Customers:** Even if you never became, or are no longer, a customer, the terms in this Privacy Notice will continue to apply to you where applicable to your jurisdiction.
- **To Whom This Policy Applies:** This Privacy Notice applies to products or services provided by TradeStation to its customers.
- **Access to and Correction of Information:** If you wish to review any file we may maintain for your Personal Data, please contact [Client Services](#). If you notify us that any information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which we will include in future disclosures of the disputed information. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available.
- **Further Information:** We reserve the right to change this Privacy Notice. The examples contained within this Privacy Notice are illustrations and they are not intended to be exclusive. This notice complies with federal law and SEC and industry self-regulatory rules and regulations regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.

### **Residents of California - Your Privacy Rights:**

California Civil Code Section 1798.83 permits California residents to request and obtain from us a list of what Personal Data (if any) we disclosed to third parties for that third party's direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge. Under Section 1798.83, if we were to share your Personal Data with third parties for their marketing purposes, you may opt-out of this disclosure at any time by submitting a request in writing to [Client Services](#).

Please note that this opt-out option does not extend to disclosures made for non-marketing purposes or our own marketing purposes. It is only limited to the third party's direct marketing purposes. Making requests for removal

does not ensure complete and/or comprehensive removal of your Personal Data. Personal Data may be retained pursuant to our internal recordkeeping requirements and/or applicable law.

### **DO NOT TRACK**

We do not currently process or comply with any web browser's "do not track" signal or similar mechanisms.

Note, however, that you may find information about how to opt out of certain online tracking technologies in the "Cookies" section above, and in our [Cookies Policy](#).

### **HOW TO CONTACT US**

If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact [Client Services](#) using the details set out below. You also may contact our designated Data Protection Officer (DPO) with regard to all issues related to our processing of Personal Data and to exercise your rights under the GDPR.

**TradeStation Group Inc.**  
**8050 SW 10th Street, Suite 4000**  
**Plantation, Florida 33324**  
**Email: [ClientService@tradestation.com](mailto:ClientService@tradestation.com)**  
**1-800-822-0512 or 954-652-7900**

**Data Protection Officer**  
**Focal Point Data Risk on behalf of TradeStation**  
**201 E. Kennedy Blvd.**  
**Suite 1750**  
**Tampa, FL 33602**  
**Email: [DPO@tradestation.com](mailto:DPO@tradestation.com)**

### **GLOSSARY**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our Legitimate Interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our Legitimate Interests against any potential impact on you in respect of specific activities by contacting [Client Services](#).

**Performance of contract** (or similar terminology) means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** (or similar terminology) means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Non-Affiliate** (or similar terminology) means an entity that is not related by direct ownership or control to TradeStation Group and its subsidiaries. Such companies can engage in financial services or other areas of business. Current law allows you to limit the sharing of information with nonaffiliated third parties under certain circumstances. Since we do not currently share your information with nonaffiliated third parties, other than as described in this policy, there is no need for you to opt out. Non-affiliates may include service providers who provide IT system and administrative, Anti-Money Laundering, Fraud Prevention and Compliance services. Non-affiliates also include professional advisers that may act as processors or joint controllers including lawyers, bankers, auditors and insurers who provide

consultancy, banking, legal, insurance and accounting services. Additionally, non-affiliates include regulators and other authorities who require reporting of processing activities in certain circumstances.

**Affiliate** (or similar terminology) means an entity that is directly related by ownership or control to TradeStation Group and its subsidiaries. Such companies can engage in financial services or other areas of business. Current law allows you to limit the sharing of certain information among our affiliates, including creditworthiness information and, under some circumstances, information for marketing products and services to you. Sometimes we do share your information between and among our affiliates for marketing offers that relate to products and services we believe could enhance or improve your experience as our customer. You may ask us not to share your information, for marketing purposes, with any TradeStation affiliate with whom you do not do business by following the opt-out procedure described in this Privacy Notice.

*<sup>1</sup>Pursuant to the GDPR, processing is lawful under any of the following conditions: (a) you have given consent to the processing of your Personal Data for one or more specific purposes; (b) processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract; (c) processing is necessary for compliance with a legal obligation to which TradeStation is subject; (d) processing is necessary in order to protect the vital interests of your rights or the rights of another natural person; (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; or (f) processing is necessary for the purposes of the Legitimate Interests pursued by TradeStation or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of Personal Data.*