

## **Notice of TradeStation's Privacy Policy**

TradeStation Group Inc. and its subsidiary companies (collectively referred to herein as "TradeStation", "our", "us" or "we") are committed to protecting the confidentiality and security of information we collect about consumers and our customers. We will not share nonpublic information about you ("information") with third parties outside of our securities affiliate's clearing firm(s) without your consent, except for the specific purposes described below. This notice describes the information we may gather and the circumstances under which we may share it. Our securities affiliate's clearing firm(s) should have an additional separate privacy policy, which explains their privacy practices.

### **How We Use Your Information**

We limit the collection and use of information to the minimum we require to deliver and improve service to you. Such service includes processing transactions requested by you, providing you with trading software analysis tools (and related educational, training and support), and administering our business.

### **How We Collect Customer Information**

We obtain most information directly from you, when you apply for, access and use financial (and related) products and services offered by TradeStation through its affiliated companies and its business partners – whether in person, by telephone or electronically. We may verify this information or obtain additional information from consumer or investigative reporting agencies or public sources. This information may relate to your finances, employment, avocations or other personal characteristics, as well as transactions and interactions between or among our affiliated companies or others. The personal information we collect may include your name, address, telephone number, email address, Social Security number and date of birth, as well as details about your professional affiliations, net worth, income, investments and investment experience. In addition, analytical tools are used on our website to help us monitor traffic patterns and to see how users navigate through our site(s). These analytical tools are used by us and our affiliates for internal purposes only and are not used to collect or disseminate personal information to any third party.

### **How We Protect Customer Information**

We maintain physical, electronic and procedural safeguards that are designed to comply with industry rules and regulations to guard your information. Our employees are required to protect the confidentiality of information and to comply with our established policies. They may access information only when there is an appropriate reason to do so, such as to administer our products or services. We also maintain physical, electronic and procedural safeguards to protect information, which comply with all applicable laws. Employees who violate our Privacy Policy are subject to a disciplinary process.

TradeStation uses secure servers with strong password protection. State-of-the-art Secure Sockets Layer (SSL) encryption is used to protect your information. SSL encodes and decodes the transmission of personal information to help prevent interception by another party. We also use firewalls and other security technology to help protect our network and systems from external attack.

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. Remember that TradeStation will never request by email or similar electronic means your account number, login password or Social Security number, so if you ever receive such a request via the Internet, it is not from us and you should not provide any information. If you have reason to believe that you have been the victim of identity theft, [contact us](#) immediately.

### **Disclosure of Information**

We do not disclose any nonpublic information about our customers or former customers to anyone, except as required or permitted by law. We may disclose any information to or as directed by our securities affiliate's clearing firm(s) or when we believe it necessary for the conduct of our business, or where disclosure is required or permitted by law. Information may be disclosed for audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies, for example, to help us prevent fraud.

In addition, we may disclose information to affiliated and non-affiliated third-party service providers (i) to enable them to provide business services for us or our securities affiliate's clearing firm(s), such as performing computer-related or data maintenance or processing services, (ii) to facilitate the processing of transactions requested by you, (iii) to assist us in offering products and services to you or to assist our clearing firm 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 information 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, other than our securities affiliate's clearing firm(s), to sign strict confidentiality agreements.

### **How We Use Cookies**

Cookies are blocks of textual information that are sent electronically from a web server to your browser and are stored on your computer. Cookies supplied by TradeStation software and services do not identify you individually or contain personal information about you. We may use cookies to facilitate the use of website analytics tools that measure and identify website traffic patterns and to track the performance of web features and advertisements. By increasing our understanding of how you and our other valuable customers and visitors use our websites and other web services, cookies enable us to continually improve the form and functionality of our websites 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 while browsing a TradeStation website. 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. 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 websites. 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.

### **Opt-Out Information**

**Non-Affiliates:** A non-affiliated company is an entity that is not related by direct ownership or control to TradeStation Group, Inc. 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.

**Affiliates:** An affiliated company is an entity that is directly related by ownership or control to TradeStation Group, Inc. 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. We

currently do not share creditworthiness information with our affiliates so it is not necessary for you to opt out in that regard. 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 below.

**How to Opt Out:** To opt out, please contact [Client Services](#) for assistance and further instructions. Your election to limit marketing offers from our affiliates will apply unless and until you request that we change your choice.

**State Considerations:** The practices described above are in accordance with federal law. You may have other protections under applicable state laws, such as those in Vermont and Nevada. To the extent these state laws apply, we will comply with them if we share your information. For example, Vermont law places additional limits on sharing information about Vermont residents, so we will not share information we collect about Vermont residents to companies outside of TradeStation, except:

- To companies that perform marketing or other services on our behalf;
- Contact information (like name and address), and transaction information (such as your payment history) to other financial institutions with which we have joint marketing agreements;
- With the authorization or consent of the Vermont resident; or
- As permitted or required by law.

Nevada Law. 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:

#### **TradeStation**

8050 SW 10th Street, Suite 2000  
Plantation, Florida 33324

#### **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, our Privacy Policy will continue to apply to you.

**To Whom This Policy Applies:** This Privacy Policy 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 information, please [contact us](#). 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 Policy. The examples contained within this Privacy Policy 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.