

STRIKE DERIVATIVES INC. PRIVACY POLICY

Effective Date: January 1, 2020

Strike Derivatives Inc. and its affiliates (“**Strike**”) have adopted and implemented this privacy policy (“**Privacy Policy**”), which outlines how we collect, use, store, disclose, and process personal information (“**Personal Information**”) across all of our products and services, including without limitation, the website www.strikerderivatives.com (collectively, the “**Services**”). It is important that you read this Privacy Policy and any other privacy notices that we may provide on specific occasions when we are collecting or processing Personal Information.

Strike may change this Privacy Policy from time to time. If we make changes, we will notify you by posting the new version of the Privacy Policy on our website with an updated effective date at the top of the Privacy Policy. If we make any material changes to the Privacy Policy, we will email you at the email address you have provided to us, if any, or place a notice on our website. Your continued use of the Services following the posting of such changes will be deemed your acceptance of those changes.

Information We Collect from You

Under this Privacy Policy, Personal Information refers to any information about an individual from which that person can be identified, and we have grouped categories of Personal Information that we collect together as follows:

- **Account and Profile Information** we receive from you on account opening applications or other forms (for example, your name, email address, telephone number, job title, residential address, office location, date of birth, passport or other identification documents which may contain your photograph, social security number, tax identification number, or other national identity number, financial information, username).
- **Transaction Information** about your transactions with us or others (for example, your transaction history, account balance, payment history, or parties to transactions).
- **Technical Information** provided via our website(s) and electronic or other forms of communications (for example, your IP address, time zone setting and location, operating system, device and Internet service provider information, web browser details, the address of any referring website).
- **Usage Information** about how you use our systems and Services (for example, details about how you have accessed Strike Prime, access times, the pages or other content

you view, your searches, feedback responses, transactions you undertake, and other actions through the Services including trades, positions, and other details). We may automatically collect log information when you use Strike Prime, even if you have not logged in (for example, when orders are still processing).

- **Marketing Information** about your preferences in receiving marketing communications from us and your communication preferences.

We may use cookies, log files, web beacons, device identifiers, advertising identifiers and similar tracking technologies, including those from third-party service providers like Google Analytics, Google Tag Manager, HubSpot, and other cloud-based tools, to automatically collect your preferences, performance data and information about your usage of the Services. This may include collecting geolocation signals from your IP address or device settings to determine your location so that we may operate and personalize the Services for you, including to provide more relevant ads and search results. We may also collect information about your online activity, such as pages viewed and interactions with other users. You can learn more about targeted ads and your ability to opt out of receiving interest-based ads at optout.aboutads.info and www.networkadvertising.org/choices.

The Services are not designed to recognize or respond to “do not track” signals received from browsers. You can control the information collected by such tracking technologies or be alerted when cookies are sent by adjusting the settings on your Internet browser or devices, but such adjustments may affect or disable certain functionality of the Services. You can learn more about Google Analytics and your options for opting out of interest-based Google ads at <https://adssettings.google.com>.

We also may periodically obtain information about you from affiliated entities and other independent third-party sources and will add it to our database of information. For example, we may receive information about your interaction with advertisements on third-party websites.

You have the choice on what information to share with us and what Services you want to engage. You can choose not to provide information to us, but in general some information about you is required in order for you to access certain functionality of the Services and for us to provide the Services to you.

How We Use Your Information

We collect and use your Personal Information to enable us to manage our relationship with you effectively, lawfully, and appropriately during the course of providing you the Services. This

includes using information to enable us to comply with any legal requirements and pursue the legitimate business interests of Strike. We may use your Personal Information to:

- **Open Your Account(s) with Us** - We collect **Account and Profile Information** as part of our account opening process, including as may be required by the Know Your Customer (KYC) protocols of regulated third parties with whom we do business.
- **Optimize and Personalize the Services** - We use **Technical Information, Usage Information, and Marketing Information** primarily to better tailor and personalize our Services and communications to you, both online and offline, and for any other purpose that complies with applicable law and regulation.
- **Improve the Services** - We use and otherwise process the Personal Information we collect from you to help us deliver our online services; to administer, evaluate and improve our business (including developing new products and services, improving existing products and services, performing data analytics and other research tasks, communicating with you via any means, and performing accounting, auditing and other internal functions); manage our risks; to market our services and products; and to comply with and enforce applicable laws and regulations, relevant industry standards, contractual obligations and our policies.
- **Use of Aggregate Data** - We also use data that we collect on an aggregate or de-identified basis (such that it does not identify any individuals or customers) for various business purposes, where permissible under applicable laws and regulations.
- **Process transactions** - We may use the information you provide about yourself, including **Transaction Information**, to fulfill your requests and orders. We do not share this information with outside parties except to the extent necessary to provide the Services and related offerings.
- **To send periodic emails** - The email address you provide through our contact forms, will be used to send information and updates pertaining to the Services. It may also be used to respond to your inquiries or other requests. If you opt in to our mailing list, you may receive emails that include Strike news, updates, related product and service information, and marketing material. If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email or you may contact us via the contact information below.

How We Share Your Information

If you apply to open an account with us for access to certain Services, we may share your Personal Information with certain partners, service providers, contractors, agents and other third parties (for example, a custodian or third party trading platform provider) in order to open and service your account(s), protect against fraud, unauthorized transactions, claims, or other liability,

including in order to facilitate your registration for a service provided by a third party. Such third parties may contact you as necessary to obtain additional information about you, facilitate any use of the Services, or respond to a request you submit.

Third-party vendors who provide products, services or functions on our behalf may include business analytics companies, customer service vendors, communications service vendors, marketing vendors, and security vendors. We may also authorize third-party vendors to collect information on our behalf, including as necessary to operate features of the Services. Third-party vendors have access to and may collect Personal Information only as needed to perform their functions, may only use Personal Information consistent with this Privacy Policy and other appropriate confidentiality and security measures, and are not permitted to share or use the information for any other purpose.

We also may share your information:

- In response to subpoenas, court orders, or other legal process or regulatory requirements; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us.
- When we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, interests, or safety of our company or the Services, our customers, or others; or in connection with our Terms of Service and other agreements.
- In connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale.

Sharing Aggregate Data. We may publish, share, distribute, or disclose non-personal information, which may include Personal Information that has been aggregated with information from other users or otherwise de-identified in a manner that does not allow such data about you to be separated from the aggregate data and identified as originating from you, to third parties, including Strike partners. Such non-personal information may help Strike identify and analyze training, demographic, and psychographic trends and information, and report to third parties how many people saw, visited, or clicked on certain content, areas of the Services, ads, or other materials. We may also use such data for research purposes.

When you are no longer our customer, we continue to share your information as described in this Privacy Policy.

How We Store and Secure Your Information

Personal Information collected by Strike may be stored and processed in your region, in the United States, and in any other country where Strike or its affiliates, subsidiaries, or service providers operate facilities. Strike will retain your information as long as necessary for the purposes outlined in this Privacy Policy and for a commercially reasonable time thereafter for backup, archival, fraud prevention or detection or audit purposes, or as otherwise required by law.

Strike takes technological and organizational measures to protect your Personal Information against loss, theft, and unauthorized access, use, disclosure or modification. For example:

- we transmit data over secured communication channels using SSL Login credentials
- all Personal Information is stored by trusted third-party providers (e.g., HubSpot and AWS)
- all systems used to provide the Services are password protected
- all Services usage is restricted on a per-user basis on the principle of least privilege

We rely on HubSpot's and AWS' security programs to protect Personal Information while stored in their respective controlled facilities. For more information on AWS' security practices and processes, please see <https://aws.amazon.com/security/>. For more information on Hubspot's security practices and processes, please see https://www.hubspot.com/hubfs/security_documents/HubSpot_Security_Overview_v9.1_en.pdf?t=1509903716895

Strike complies with applicable data protection laws, including applicable security breach notification requirements.

Accessing and Updating Your Information

To the extent provided by the law of your jurisdiction, you may (i) have the right to access certain Personal Information we maintain about you and request details about how we process it, (ii) request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes, (iii) request that we update or correct inaccuracies in that information, (iv) object to our use of your Personal Information, (v) ask us to block or delete your Personal Information from our database, and (vi) request to download the information you have shared on the Services. You may make these requests and any other inquiries about this Privacy Policy by emailing privacy@strikederivatives.com. Any such requests are subject to the protection of other individuals' rights and applicable law. Additionally, to help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your Personal Information that we maintain.

Additional Privacy Information

Third Parties. Any information you provide directly to a third party provider, website or application is not covered by this Privacy Policy. We are not responsible for the privacy or security practices of third parties with whom you choose to share your Personal Information directly. We encourage you to review the privacy policies of any third party to whom you choose to share your Personal Information directly. Certain Personal Information that you provide to us for ultimate submission to a third party, such as a custodian or third party trading platform provider, may also be subject to such third party's privacy policy. When this will be the case, we will inform you of which privacy policy will apply at the time that we request the Personal Information.

Data Transfer. Our databases are currently located in the United States. Strike makes no claim that its Services are appropriate or lawful for use or access outside the United States. If you access the Services from outside the United States, you are consenting to the transfer of your Personal Information from your location to the United States. You are solely responsible for complying with all local laws, rules and regulations regarding online conduct and access to the Services. By sending us your information, you further consent to its storage within the United States.

Collection of Data from Children. The Services are not directed to children, and you may not use the Services or provide any Personal Information to Strike if you are under the age of 18 or if you are not old enough to consent to the processing of your Personal Information in your country.

Your California Privacy Rights. California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please e-mail us or write to us at the addresses below or call us at the toll free number below.

How to Contact Us. You can e-mail us at privacy@strikederivatives.com, write to us at Strike Derivatives Inc., Attn: General Counsel, 510 Fifth Avenue, 3rd Floor, Ste #317, New York, NY 10036 or call us at 800-463-1276.