

Privacy Notice

All client's assets are held at Interactive Brokers which is our custodian.

Below is our and Interactive Brokers Group Privacy Notice

At Interactive Brokers ("IB"), we understand that confidentiality and security of the personal information that you share with us is important. That is why we have developed specific policies and practices designed to protect the privacy of your personal information.

By opening an account with IB or by utilizing the products and services available through IB, you have consented to the collection and use of your personal information in accordance with the privacy notice set forth below. We encourage you to read this privacy notice carefully.

IB does not sell customer lists or customer email addresses to third party marketers.

In order to provide brokerage services and to comply with regulatory requirements, IB collects certain personal, nonpublic information from you. This includes information:

Provided during the IB account application process (e.g., your name, e-mail address, telephone number, birth date, social security number, investment objectives, etc.);

Acquired as a result of the transactions you conduct through the IB system;

Received from consumer-reporting agencies;

Collected through Internet "cookies."

Cookies are bits of textual information that are sent electronically from a web server to your browser and are stored on your computer. They do not identify you individually or contain personal information about you, unless you have identified yourself or provided the information by, for example, opening an account or registering for an online service. IB may use cookies to measure and identify website traffic patterns and to track the performance of web features and advertisements. By providing IB with a better understanding of how you and others use IB's website and other web services, cookies enable IB to improve the navigation and functionality of its website and to present you with the most useful information and offers. IB may share information obtained from cookies with its employees, agents, and affiliates, but does not sell such information to unaffiliated third parties. IB may permit other companies or their third party ad servers to set cookies on your browser when you visit an IB website. Such companies generally use these cookies as we do. We also use cookies to improve the performance of our advertising on other websites. Although you may not opt out of receiving online advertisements generally, you may control the collection of data on our website that is used for targeted interactivebrokers.com advertising during your visits to other websites. To opt-out of data collection by Interactive Brokers for targeted advertising on other websites visit <https://www.interactivebrokers.com/en/index.php?f=464>.

We safeguard the confidentiality of your information in a number of ways.

For example:

We do not sell or license lists of our customers or the personal, nonpublic information that you provide to us.

We restrict access to the personal, nonpublic information that you have shared with us to those IB employees, agents and affiliates who need to know such information in connection with the services that IB or an IB affiliate provides to you.

We maintain strict employment policies that prohibit employees who have access to your personal, nonpublic information from using or disclosing such information except for business purposes.

We take substantial precautions to safeguard your personal, nonpublic information. For example, the IB system can be accessed only by authorized IB personnel via valid user names and passwords. In addition, our Internet-based systems include security measures such as encryption and firewalls.

We do not disclose personal, nonpublic information to individuals or entities that are not affiliated with IB, except as provided by law. For example, among other reasons, we may disclose or report such information: where necessary to authorize, effect, administer or enforce transactions that you request or authorize; to maintain and administer your account; to provide you with account confirmations, statements and records; to maintain appropriate archival records; where we believe that disclosure is required by applicable law, rules or regulations; to cooperate with law enforcement, regulatory or self-regulatory organizations; to enforce our customer and other agreements; to meet our obligations; or to protect our rights and property. As long as consistent with applicable securities laws and regulations, we may share anonymized account information or anonymized delayed order information with third parties (and/or share such information among our affiliates) for the purpose of analysis, research, market data compilation, product creation, establishing order routing and execution relationships, or for any other lawful purpose.

Finally, if you choose to subscribe to any of Interactive Brokers Investors' Marketplace suite of third-party services that are provided through the IB website, we may disclose such information to the service providers as necessary for them to provide the services that you have requested. IB requires these service providers to enter into confidentiality agreements with IB that limit their use of the information that they receive. Such agreements prohibit the service provider from using IB customer information that they receive other than to carry out the purposes for which the information was disclosed.

If you have any questions about these policies, please contact IB Customer Service through the IB website at interactivebrokers.com/help.