

PRIVACY POLICY

Date	Reviewer	Amendment	Version
26/06/2016	SY	Creation – identical to website version.	1.0

Protecting the privacy and safeguarding the personal and financial information of our existing customers, former customers and persons who visit our website is one of our highest priorities. The following statement explains how ADS Securities LLC (“**ADSS**” or “**we**” or “**us**”) collects, maintains and protects your information.

By your use of any website operated by ADSS or any of our affiliates or opening an account with ADSS or any of our affiliate, you give your consent to the collection and use of personal information by ADSS as explained in this statement.

COLLECTION AND RETENTION OF YOUR PERSONAL INFORMATION

We collect your personal information both directly from you and indirectly as a result of your relationship with us. We may use the information collected to verify your identity, open a trading account for you (including issuing you with an account number and password), provide statements and trade confirmations, facilitate account funding and withdrawals, amongst other account and customer service related reasons. We may also use this information to notify you of any new and existing products, services and promotions that may be of interest to you.

Most of the information we collect is provided directly by you. This information includes, but is not limited to, personal details, such as your name, address, date of birth, telephone number and e-mail address, information required pursuant to regulatory requirements verifying your identity, such as a passport or other government issued photo identification, financial information such as your account trading details, annual income, net worth, risk capital financial information, bank account details and credit card information, and other information such as your IP address, web browser type, operating system and your internet service provider. We will limit the collection of personal information to what is necessary to enable us to provide you with services and products.

You may request a copy of the most up-to-date version of your personal information held by us and you may request any correction, amendment or update to maintain the accuracy of your personal information.

Should you close your account with us, we will retain your personal information, but we will only use it to comply with our regulatory requirements and to periodically contact

you to notify you of new products, services and promotions we may offer from time to time.

DISCLOSURE WITH AFFILIATES

We may share your personal, financial and account information with our affiliates for business, marketing and customer service purposes, as permitted by applicable law. Our affiliates are companies which are controlled or directly or indirectly owned by us; and include financial service companies, such as dealers and other brokerage firms.

To help us improve our services to you, we may engage another business to help us 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 non-affiliated third party with client information from our database, including your name, address, phone number, and/or e-mail address, to help us analyze and identify client needs, notify clients of product and service offerings or conduct general marketing and market research for us.

DISCLOSURE WITH NON-AFFILIATED THIRD PARTIES

We will not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below.

In order to support the products and services we provide to you, we may share your personal and account information with third-party service providers and joint marketers not affiliated with us, including but not limited to financial service institutions with whom we have joint marketing agreements, such as agreements to market financial services or products that we jointly offer, endorse or sponsor; and companies under contract to perform services for us or on our behalf, such as vendors that prepare and mail statements and transaction confirmations or provide data processing, computer software maintenance, and development, transaction processing and marketing services.

We generally require that all non-affiliated third parties to which we provide your nonpublic information agree to keep your information confidential and use such information solely for the limited purpose for which we have engaged them, or as otherwise required by law. We also seek to ensure that these non-affiliated third parties maintain appropriate data security procedures to guard against unauthorized use of, or access to, your information. Please note that non-affiliated third parties are not covered by our Privacy Policy.

We may disclose personal information with non-affiliated companies and regulatory authorities as permitted or required by applicable law. For example, we may disclose

personal information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect our rights or property.

SECURITY OF YOUR PERSONAL INFORMATION

We employ physical, electronic, and procedural safeguards in order to protect your personal, financial and account information and to offer you a safe and secure trading environment. When you open an account with us, you are issued a unique account number and password, as well a unique user id and password to enable you to access our website securely.

- Our employees are required to maintain and protect the confidentiality of your information and must follow established procedures to do so.
- We limit access to your personal, financial and account information to those employees and employees of our affiliates who need to know in order to conduct business, including servicing your account. These employees will have access to your account number and user id. Although certain employees have the ability to reset your account password and website password for you, they will not have access to your password, as they are not saved in our systems.
- We have employed adequate security measures based on recognized international standards, to safeguard your information and protect from it from being disclosed, compromised or leaked.
- Your personal, financial, and account information, including your credit card details (where applicable), will be disposed of or purged from our records based on our data retention policy, which is compliance with recognized international standards.
- We use VeriSign certificates to encrypt the information contained on our website and system, including the webpages used for credit card funding and online account application.

You are ultimately and solely responsible for maintaining the secrecy of your account number, user id and passwords. In order to better safeguard this information, we highly recommend you the following precautions:

- Do not disclose your account number, user id and passwords to anyone;
- Do not save your account number, user id and passwords on any shared, public or private computer, tablet, mobile phone, or any other device;
- Avoid using public computers at internet cafes and similar places to access our website whenever possible;
- Immediately change your account website passwords after your first log-in;
- Change your account website passwords regularly and whenever you believe there may have been a breach or when you believe a breach may occur in the future;
- Choose strong passwords that are not easily breakable, include capitalized letters,

numerical values and symbols and differ from other passwords you are using for other accounts;

- Do not configure the save password option on the web browser you are using;
- Ensure that the computer, tablet, mobile phone, or other device you are using has security controls, such as, antivirus software;
- Ensure that the website you are accessing is the legitimate ADSS website;
- Make sure that the website is changed to “https” prior to entering any information, such as, personal information, log-ins, passwords and credit card information to ensure information is encrypted during transmission;
- Do not continue the transmission, if the SSL Certificate of the website you are accessing does not belong to ADSS and immediately notify ADSS;
- Validate all calls, emails or other communications from ADSS are genuine prior to disclosing any personal, financial or account information; and
- Notify ADSS immediately if you believe your account or website access has been compromised.

CHANGES TO THIS PRIVACY STATEMENT

In the event any material changes are made to this statement, the revised Privacy Policy will be posted on our website as soon as reasonably practicable. By your continued use of the website and/or by opening an account with us, you hereby agree to accept this as notice provided to you.

Any dispute over this statement is subject to the terms of this statement and our Terms of Business. If you have any questions that this statement does not address, please contact a support representative.