

PRIVACY NOTICE

Your privacy is very important to us. This notice (“**Privacy Notice**”) is provided by TradeLink Holdings L.L.C. and applies to entities affiliated with TradeLink Holdings, including TradeLink Worldwide Ltd., Montec LLC and TradeLink Capital LLC (collectively, “**we**” or “**us**”), and sets out our policies with respect to the collection, sharing, use (collectively “**processing**”) and protection of personal information. “Personal information” means information about individuals (including you), and from which such individuals could be identified. The Privacy Notice applies when you interact with us through this Website.

How we collect information about you

We may collect personal data about you through this website, through information provided directly to us by you, or third parties. We collect and use different types of personal information about you, which will vary in type and detail depending on our relationship with you and the law.

We may also, in some circumstances, receive personal information about you from third parties, such as service providers or trading counterparties, regulatory or law enforcement agencies, credit reference agencies and other agencies conducting background checks. Personal information may also be obtained from publicly accessible sources of information, such as public databases, industry associations, social media and online professional networks.

Why we collect information about you

We do not collect your personal data for direct marketing purposes. Should this change, you have the right to object to the use of your personal data for direct marketing purposes.

We may collect and use your personal information for a number of purposes. We may collect and use personal information for the purposes of administering the relationship between us, communicating with you or the businesses with which you are associated, monitoring and analyzing our activities, for recruitment purposes, and complying with applicable legal or regulatory requirements.

We will use one of the permitted grounds under the applicable law to collect and process your information. Such grounds include instances where you have given your consent and cases where your consent is not required under applicable law, such as where we are required to comply with a legal obligation, or where we, or a third party, determine that it is necessary for our legitimate interests to collect and use your personal information.

What are the consequences of failing to provide your personal information?

Our regulated financial entities are subject to legal and regulatory obligations that may require us, depending on our relationship with you, to collect and store your personal information, such as the requirements to comply with the applicable law on prevention of financial crime, tax and regulatory reporting, or the rules on recording and monitoring of communications.

We may also need to collect and use your personal information for the purposes of entering into or performance of a contractual arrangement between us.

A refusal to provide us with personal information may, depending on the purpose for which your personal information is required, have various consequences such as us being unable to communicate with you, the termination of any service or other contractual arrangement between us, or, where we have a reasonable suspicion of illegal activity, we may be required to make a report to regulatory or law enforcement agencies.

The types of personal data we may collect and use

The categories of personal data we may collect may include names, residential addresses or other contact details, signature, nationality, date and place of birth, social security or other tax identification number, photographs, copies of identification documents, bank account details, information about assets or net worth, credit history, source of funds details, or other sensitive information, such as certain special categories of personal data contained in relevant documents or materials (including, in some circumstances, information about a person’s ethnic origin, religious or political beliefs, health, or biometric data).

Do we share your personal information with third parties?

We may (to the extent relevant to the purpose for which we collect your information), share your personal data with third parties, such as:

- our affiliates or other entities that are part of our group;
- any person to whom we have a right or obligation to disclose personal data, or where we determine that disclosure is necessary to protect or defend our rights or property, including with regulators, courts of law, governmental, regulatory or law enforcement agencies;
- our internet, IT, telecommunications and other service providers, including legal advisers, accountants, payroll administrators, insurance and employee benefits providers;
- trading counterparties, placement agents or distributors, brokers, banks, trading venues, clearing houses, custodians, corporate services providers, administrators of our funds;
- credit reference agencies and other third parties conducting background checks in the context of employment or client or counterparty due diligence;
- any person, as directed by you; or
- any person to whom we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or who is otherwise deemed to be our successor or transferee.

We do not collect your personal data for direct marketing purposes. We do not share your information with non-affiliates for them to market their own services to you.

Processing of personal information in countries outside of the European Economic Area (EEA)

Your personal data may be processed in the United States and other countries outside the European Economic Area (“**Third Countries**”), that may not offer the same level of data protection as that afforded by the EU General Data Protection Regulation (“**GDPR**”). We will process personal data (or procure that it be processed) in the Third Countries in accordance with the requirements of applicable law, which may include having appropriate contractual undertakings in legal agreements with service providers who process personal data on our behalf in such Third Countries.

Retention periods and security measures

We will generally keep personal information about you for as long as necessary in relation to the purpose for which it was collected, or for such longer period if required under the applicable law or necessary for the purposes of our other legitimate interests.

The applicable retention period will depend on various factors, such as any legal obligation to which we or our service providers are subject as well as on whether you decide to exercise your right to request the deletion of your information from our systems. At a minimum, information about you will be retained for the entire duration of any business relationship we may have with you, and for a minimum period of five years after the termination of any such relationship. We will, from time to time, review the purpose for which we have collected information about you and decide whether to retain it, update it, or securely delete it, if the information is no longer required.

To protect your personal information from unauthorised access and use, we apply organisational and technical security measures in accordance with the applicable law. These measures include computer safeguards and secured files and buildings. We will notify you of any material personal data breaches affecting you in accordance with the requirements of the applicable law.

When third party organisations are used to process your personal information on our behalf, we ask them to demonstrate their compliance with our security requirements, and any instructions we may give them and their compliance with the GDPR and any other relevant data protection legislation.

What are your rights?

Under the GDPR, you have a right to access your personal information, to object to the processing of your personal information, to rectify inaccurate or incomplete information, to erase, to restrict or object to the processing of your information in certain circumstances, to withdraw your consent, where you have given consent to the processing of your data, and to port your personal information. You are entitled to make any Subject Access Requests (“SAR”). A SAR is a request made by you which requires us to provide you with details of your Personal Data which we hold and process and a description of how we process it.

If you have any questions, complaints, or wish to exercise your rights under the GDPR, you may contact us directly. We will consider and address your request in accordance with applicable laws.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time. When we update this Notice, we will revise the “Effective Date” date below and post it to the Website. If material changes are made, we will place a prominent notice on our Website for at least 30 days prior to the change taking effect, or, for current clients or others with whom we have a business relationship, we will communicate with you directly by email.

Use of Cookies

We may send text files (e.g., “cookies” or other cached files) or images to your web browser to store information on your computer. Such text files and images are used for technical convenience to store information on your computer. For instance, we may use a session cookie to store form information that you have entered so that you do not have to enter such information again. We may use information stored in such text files and images to customise your experience on this website and to monitor use of this website. You may set your browser to notify you when you receive a cookie. Many web browsers also allow you to block cookies. If you block cookies you may not be able to access certain parts of this website. You can disable cookies from your computer system by following the instructions on your browser or at www.allaboutcookies.org.

How to Contact Us

If you have any questions about this Privacy Notice or requests with regards to the personal data we hold about you, you may contact our Director of Compliance at info@trdlnk.com, telephone (+1 312 264 2000) or by writing to TradeLink L.L.C., 71 South Wacker Drive, Suite 1900, Chicago, IL 60606, United States.

Effective May 25, 2018