



PRIVACY POLICY

At Track Data Corporation, your privacy is one of our top priorities. That's why we carefully maintain the security and confidentiality of personal information of all our current and former customers.

Please take a few minutes to read through this Privacy Policy to understand how your privacy is safeguarded. Please keep it with your other account information.

FEDERAL COMPLIANCE

This policy applies to the following Track Data Corporation entities:

Track Data Corporation
Track Data Securities Corp
Track ECN

(together, these entities are referred to herein as "Track Data Corp")

and is provided in accordance with the Federal Financial Privacy Law, 15 U.S.C. 6801-6810.

PROTECTING YOUR INFORMATION

Track Data Corp does not sell non-public personal information about our customers ("Customer Information") to anyone. We will only share Customer Information with others as stated in this policy, unless we provide you with additional notice or ask for your permission.

INFORMATION SECURITY IS A PRIORITY

One of our most important activities is that of maintaining the security of Customer Information. We value your trust; therefore, we carefully handle the information we possess about you. We restrict access to your Customer Information to those employees who need to know that information to provide products or services to you. All Track Data Corp associates who have access to your information are bound by a code of conduct that requires the confidential treatment of Customer Information, and they are subject to disciplinary action if they fail to follow this code. In addition, Track Data Corp maintains physical, electronic and procedural safeguards that comply with federal standards to protect Customer Information. We continually assess new technology for protecting information and, when appropriate, upgrade our information security systems.

INFORMATION WE COLLECT

Track Data Corp. collects and uses various types of information to service your accounts, save you time and money, and better understand your needs. We strive to help you learn more about Track Data Corp products and services that may be of interest to you. The Customer Information we collect and store generally consists of the following:

- (1) Information gathered from applications, forms and other information you provide us, whether in writing, in person, by telephone, electronically or by any other means, such as your name, address, social security number, assets, income, and debt;
- (2) Information about your transactions and your account experience with Track Data Corp, such as your account balances, trading activity, payment history and parties to transactions;
- (3) Information from a consumer reporting agency regarding your creditworthiness or credit history;
- (4) Information from other outside sources regarding their employment, credit, or other relationship with you, or verifying representations made by you to them, such as your employment history, loan or credit card balances, or your property insurance coverage;
- (5) Other general information we obtain about you that is not assembled for the purpose of determining your eligibility for credit, insurance, employment, or other product or service you request, such as demographic information; and
- (6) Information, as described above, that we obtain from any of our affiliates (not limited to those listed above).

MANAGING INFORMATION FOR YOUR CONVENIENCE

The information we share within Track Data Corp helps us provide you with greater service and brings you greater convenience and more choices.

SHARING INFORMATION WITHIN TRACK DATA CORP

Track Data Corp may share all of the above Customer Information that we collect, as described above, with its affiliates, except as limited below. By sharing information about your accounts and relationships, we can save you time and money and make it easier for you to do business with us. For example, if you have an account with one of our affiliates and want to open an account with another of our affiliates, we may share information about you and your transactions. This could save you time in opening your new account by eliminating the need to furnish the same information twice.

YOU CAN LIMIT THE INFORMATION WE SHARE ABOUT YOU WITH OUR AFFILIATES

Sharing Customer Information for certain purposes is also subject to the Fair Credit Reporting Act (“FCRA”). Under the FCRA, Track Data Corp may share with its affiliates any information about its transactions or experiences with you. Besides information about our transactions and experiences with you, we may also share other information about you with our affiliates. This includes information you provide to us such as your income or information that we obtain from third parties, including from a consumer report, such as your credit score, or from others, such as your open lines of credit or your employment history.

YOU CAN LIMIT MARKETING BY OUR AFFILIATES

You may limit our affiliates from marketing their products or services to you based on certain Customer Information that we share with them, such as your income, your account history with us, and your credit score. This limitation, if you choose to impose it, will not apply in certain circumstances, such as if you currently do business with one of our affiliates or if you ask to receive information or offers from them. If you so choose to do so, your decision to limit marketing offers from our affiliates will apply for five years. Once the period expires, you will be allowed to extend your decision. If you so choose to do so, your decision to limit marketing offers from our affiliates will apply for five years. Once the period expires, you will be allowed to extend your decision. To limit the marketing offers that you receive from our affiliates, simply send an e-mail to optout@trackdata.com. Please include the words “opt out” in the subject line and your name and account number in the text of the e-mail. Note that this request will apply only to information other than transaction and experience information.

SHARING INFORMATION WITH COMPANIES THAT WORK FOR US

We do not disclose Customer Information about our customers or former customers to non-affiliated third parties, except as permitted by law and regulation. For example, we may share all of your Customer Information with unaffiliated third parties who perform services for Track Data Corp. We may also share Customer Information with unaffiliated third parties who perform services for us that are connected with the processing or servicing of products and services that you already have or have requested. We share information with such companies to support your experience of and relationship with Track Data Corp. These companies may include other financial service providers such as insurance companies, payment processing companies, as well as companies such as check printing and data processing companies. These companies might assist us in a number of ways; for example, in fulfilling your service requests, or processing your transactions, or mailing your account statements. We may also share all of your Customer Information with companies we have hired to provide marketing and other services on our behalf, or with other financial institutions with whom we have joint marketing agreements. All of these companies are contractually obligated to keep the information that we provide to them confidential, and use the information only for the purposes of providing the services we've asked them to perform for us or for you. To the extent we may collect personally identifiable medical information in connection with the sale of insurance products or services, we will not – either internally or externally – share such information for any purpose other than the underwriting or administration of an insurance policy, claim or account, or as otherwise specifically disclosed when the information is collected or with your consent.

DISCLOSING INFORMATION IN OTHER SITUATIONS

We may also disclose Customer Information we maintain about you to credit bureaus and similar organizations, when permitted by law. Such shared information may include a disclosure in connection with a subpoena or similar legal process, a fraud investigation, an audit or examination. In addition, we will exchange Customer Information with reputable reference sources and clearinghouse services for purposes of credit reporting and verification. We may also share information with entities outside Track Data Corp for services you have requested, e.g., to process your credit of frequent flyer miles in connection with our mileage award promotions. We may also disclose Customer information to other non-affiliated third parties as permitted by law, such as to prevent fraud or to protest the confidentiality of our records

MAKING SURE INFORMATION IS ACCURATE

Keeping your account information accurate and up to date is very important. We provide you with access to your account information in a number of ways, through account statements, by telephone with a Customer Service Representative, online from your PC or wireless devices, or at any of our branch offices nationwide. If your account information is ever inaccurate, incomplete, or in need of updating, please contact us at the telephone number on your account statement, trade confirmation, or other Track Data Corp documentation, write to us, or stop in at your local branch office and we'll update your information. If you have any questions, or feel that we have not handled information about you properly, you may always contact Track Data Corp Customer Service and we will provide an answer or investigate your complaint.

KEEPING UP-TO-DATE WITH OUR PRIVACY POLICY

Track Data Corp will provide notice of our privacy policy annually, as long as you maintain an account with us. Track Data Corp reserves the right to make changes to this policy. You can always review our current policy online at myTrack.com, or contact us for a copy at **1-800-myTrack**.

OUR FORMER CUSTOMERS

Even if you are no longer a Track Data Corp customer, our privacy policy will continue to apply to you. You may request that we refrain from sharing with our affiliates any information about you (such as credit bureau reports). This request does not, however, cover information about our transactions or experiences with you.