



PRIVACY POLICY

Our Commitment to Your Privacy: MidasFX and its subsidiary companies (collectively referred to herein as “MidasFX”, “our”, “us” or “we”) are committed to protecting the confidentiality and security of information we collect about consumers and our customers. We will not share nonpublic information about you (“Information”) with third parties outside of our securities affiliate’s clearing firm(s) without your consent, except for the specific purposes described below. This notice describes the Information we may gather and the circumstances under which we may share it.

Why We Collect and How We Use Information: We limit the collection and use of Information to the minimum we require to deliver and improve service to you. Such service includes processing transactions requested by you, providing you with trading software analysis tools (and related educational, training and support), and administering our business.

How We Gather Information: We get most Information directly from you, when you apply for, access and use financial (and related) products and services offered by MidasFX through its affiliated companies and its business partners—whether in person, by telephone or electronically. We may verify this information or get additional information from consumer or investigative reporting agencies or public sources. This Information may relate to your finances, employment, avocations or other personal characteristics, as well as transactions and interactions between or among our affiliated companies or others. The personal information we collect may include your name, address, telephone number, email address, Social Security number and date of birth, as well as details about your professional affiliations, net worth, income, investments and investment experience. In addition, Web tools are used on our Web site to help us monitor traffic patterns and to see how the user navigates through our site. These Web tools are used by us and our affiliates for internal purposes only and are not used to collect or disseminate personal information to any third party.

How We Protect Information: We maintain physical, electronic and procedural safeguards that are designed to comply with industry rules and regulations to guard your Information. Our employees are required to protect the confidentiality of Information and to comply with our established policies. They may access Information only when there is an appropriate reason to do so, such as to administer our products or services. We also maintain physical, electronic and procedural safeguards to protect Information which comply with all applicable laws. Employees who violate our Privacy Policy are subject to disciplinary process. MidasFX offers a secure server with password-protection. Secure



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Sockets Layer (SSL) encryption is used to increase the protection of your information. SSL encodes and decodes the transmission of personal information to help prevent interception by another party. We also use firewalls and other security technology to help protect our network and systems from external attack. In addition to our efforts to protect Information, you can also help to protect your identity. When using the Internet: keep your security software current and turned on; protect your password information; shred personal documents; and check your credit report regularly.

Disclosure of Information: We do not disclose any nonpublic information about our customers or former customers to anyone, except as required or permitted by law. We may disclose any Information to or when we believe it necessary for the conduct of our business, or where disclosure is required or permitted by law. Information may be disclosed for audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies, for example, to help us prevent fraud. In addition, we may disclose Information to affiliated and non-affiliated third party service providers (i) to enable them to provide business services for us, such as performing computer related or data maintenance or processing services, (ii) to facilitate the processing of transactions requested by you, (iii) to assist us in offering products and services to you, or (iv) for credit or other background review and reporting purposes. Except in those specific, limited situations, without your consent we will not make any disclosures of Information to other companies who may want to sell their products or services to you. For example, we do not sell customer lists and we will not sell your name to a catalogue company. It is MidasFX's policy to require all third parties that are to receive any Information to sign strict confidentiality agreements.

Opt-Out Information: Current law allows you to limit the sharing of Information with nonaffiliated third parties under certain circumstances. Since we do not currently share your Information with nonaffiliated third parties, other than as described in this policy, there is no need for you to opt-out. Your election to limit marketing offers from our affiliates will apply unless and until you request that we change your choice.

Consumers and Former Customers: Even if you never became, or are no longer, a customer, our Privacy Policy will continue to apply to you.

Access to and Correction of Information: If you desire to review any file we may maintain for your personal Information, please contact us. If you notify us



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that any Information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which we will include in future disclosures of the disputed Information. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available.

Further Information: We reserve the right to change this Privacy Policy. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive.