

### **Privacy and Security Policy**

FIRSTRADE is committed to protecting our clients' personal and financial information. In the course of providing you with FIRSTRADE's brokerage services, we need to collect and maintain certain nonpublic Personal Identifiable Information about you. Firstrade respects our clients' privacy concern and adhere to a strict confidentiality policy to protect your information. This Privacy and Security Policy describes what nonpublic Personal Identifiable Information we collect, what we do with it, and how we protect it.

What types of nonpublic Personal Identifiable Information about me does FIRSTRADE collect? When you apply for or maintain an account with FIRSTRADE, we collect Personal Identifiable Information including the following types of information:

- Information provided by you, such as your name, address, telephone numbers, Social Security number/Tax Identification number, date of birth, employment information, financial data, and any other personal information connected to identifying you.
- Transaction history with us such as account balance and trading activity will be reviewed periodically.
- In some cases, we may collect information from consumer-reporting agencies.

What types of nonpublic Personal Identifiable Information about me does FIRSTRADE disclose? FIRSTRADE discloses nonpublic Personal Identifiable Information about you described above, primarily to provide you with the financial services you seek from us. We do not sell your personal information. We do not disclose nonpublic personal information about present or former clients, except as required or permitted by law.

#### What are my rights to opt-out of disclosure and how can I exercise them?

If you prefer that we do not disclose nonpublic personal information about you to the non-financial services companies described in the paragraph above, you may opt-out of those disclosures, that is, you may direct us not to make those disclosures (other than those disclosures required by law).

You may provide your name, address, email address, daytime phone, your account number and opt-out request to us by email at <a href="mailto:service@firstrade.com">service@firstrade.com</a> or by calling 1-800-869-8800.

# To what other types of entities might FIRSTRADE disclose my nonpublic personal information? FIRSTRADE may disclose information we collect from you, such as your contact information, to service providers who perform marketing functions on our behalf. Specifically, your name, address and/or email address are sometimes provided to vendors who send email or regular mail on FIRSTRADE's behalf.

We disclose information to nonaffiliated companies that work for us in providing financial services to you. For example, we provide information to nonaffiliated companies that prepare and mail statements and transaction confirmations. These companies acting on our behalf are required to keep your personal information confidential.

Finally, FIRSTRADE discloses nonpublic personal information to nonaffiliated third parties as permitted or required by law. These parties include government/regulatory organizations such as the Internal Revenue Service (IRS) and the Securities and Exchange Commission (SEC). Disclosures for which you have provided your consent are also permitted.

#### How does FIRSTRADE use your Personal Identifiable Information?

We use your information to fulfill your requests for specific products and services like opening a brokerage account with us. We use your information to contact you regarding special offers, products and services that may be of your interest and also provide you with the best customer service experience at Firstrade.

Firstrade Securities, Inc. uses third parties to gather End User's data from financial institutions. By using our service, you grant our third-party provider the right, power and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution according to terms of our third-party provider's privacy policy.

## How does FIRSTRADE protect the confidentiality and security of my nonpublic Personal Identifiable Information?

We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information. We protect your account information by placing it on the secure portion of our website. Our servers have been enabled with Secure Sockets Layer (SSL) technology to prevent unauthorized parties from viewing your nonpublic personal information that you provide or access during a secure session. In addition, we employ Entrust's digital certificate services to encrypt the information exchanged between you and Firstrade web servers.

Access to your nonpublic personal information is limited to those employees who have valid business reason to access your information. These employees such as customer service personnel access as needed to provide you with the best customer service experience. All Firstrade employees are trained on the importance of protecting our client's information and maintaining the confidentiality and security of your Personal Identifiable Information.

You can take steps to maximize your security online and to protect your confidential information. NEVER share your Password with anyone, and change it periodically. You can change your Login Password at any time in the My Settings section under the My Account tab. When accessing the FIRSTRADE website, you should always exit by using the "Logout" button or close your browser completely.

#### What should I know about "cookies"?

"Cookies" are elements of data that a website can send to your browser and store on your computer. Cookies can note that your browser was used to visit certain sites, pages, or advertisements on a certain date. Cookies cannot be used to obtain data from your hard drive, get your e-mail address or steal sensitive or personal information about you. FIRSTRADE uses cookies to enhance navigation and functionality of our website, to securely verify your identity, and to personalize aspects of your experience on our website. We also use cookies to let us know how visitors are using our website, so that we can improve our website and your experience on it. You do have control over cookies. Most browsers can be set to notify you when a cookie is being placed on your computer. You can also set most browsers to refuse to accept cookies, although this may affect your Internet experience. You can also erase cookies that are already on your computer. For more information on working with cookies,

you should consult the User Manual, FAQ, or Help function of your specific browser and operating system software.

For answers to other questions regarding FIRSTRADE's Privacy Policy, please email <a href="mailto:service@firstrade.com">service@firstrade.com</a> or call 1-800-869-8800.