



## **Privacy Policy 2020**

In the United States of America there are regulations which impose various requirements on a financial institutions' treatment of customer information. These regulations require that financial institutions develop privacy policies and disclose these policies to its customers.

Zytrade LLC considers your privacy one of our utmost concerns. This Privacy Notice outlines our current policies and practices regarding how information about individual customers is collected and used. This notice applies to former customers as well as our current customers.

### **How and Why We Collect Personal Information**

In order to provide you with individualized service, Zytrade collects personal information about you from your account application and other forms that you may deliver to us. Personal information is information about you such as your name, address, email address or phone number, and that is not otherwise publicly available. For some financial products and services, we might also request your date of birth, social security number, occupation, income, assets, and your net worth, previous investment experience, and any other confidential information that we consider necessary by us or your FCM to obtain in order to establish an account.

Zytrade might combine the information you submit with information we have received from other affiliated independent firms and other companies to improve the quality of our products and services. Zytrade LLC depends on our users to update and correct their personal information when necessary. Zy trade also collects information about your transactions with us and our affiliated independent firms. We may use this information to open an account for you, process your requests and transactions and to provide you with additional information about our products and services. In order to service your account and mail correspondence to you, we provide your personal information to other affiliated independent firms that specialize in providing these services. These firms include our clearing firm(s), forex counterparties, consulting firms, and our printing/ mailing vendors. We require these other independent firms to protect the confidentiality of your information and to use the information only for the limited purpose for which the disclosure is made.

### **How we Protect Personal Information**

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. Our employees are required to protect and maintain the confidentiality of your personal information. Our employees are instructed as to the best methods for processing and maintaining personal and confidential customer information.

We maintain physical, electronic and procedural safeguards that comply with US federal standards to guard your personal information.

We do not disclose or sell any nonpublic personal information about our customers to other independent firms, organizations or individuals except in furtherance of our business relationship with you, or as otherwise permitted or required by law. In addition, if you decide at some point to close your Zytrade account, we will continue to adhere to the privacy policies and practices described in this notice. However, Zytrade reserves the right to disclose personal information in relation to our regulatory obligations including the NFA or CFTC, to protect our intellectual or physical property, collect or report debits owed to Zytrade, or exercise any right under law on behalf of Zytrade.

If you prefer that we limit disclosures of personal information about you, you may notify us via email at [compliance@zytrade.com](mailto:compliance@zytrade.com) or by calling (888) 240-7099, Monday through Friday, between the hours of 8 a.m. and 5p.m. CST. If you determine to opt out of this policy, you can instruct us to what extent we are able to disclose your non-public personal information to affiliated independent firms. If you have any questions or concerns regarding the privacy of your information at Zytrade or would like to discuss your opt out options please contact us at your convenience using the information provided above.

## **NOTICE TO CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS (AS PROVIDED BY CALIFORNIA CIVIL CODE SECTION 1798.83)**

A California Resident who has provided personal data to a business with whom he/she has established a business relationship of personal, family, or household purposes ( a “California Customer”) may request information about whether the business has disclosed personal information to any third parties for the third parties’ direct marketing purposes. In general, if the business has made such a disclosure of personal data, upon receipt of a request by a California customer, the business is required to provide a list of all third parties to whom personal data was disclosed in the preceding calendar year, as well as a list of categories of personal data that were disclosed. California customers may request further information about our compliance with this law by emailing [compliance@zytrade.com](mailto:compliance@zytrade.com). Please note that Zytrade is required to respond to one request per California Customer each year and we are not required to respond to requests made by any means other than through this email address above.

### **Important Information for California Residents**

This section applies only to California residents. It describes how we collect, use and share Personal Information of California residents in operating our business, and their rights with respect to that Personal Information. For purposes of this section, “Personal Information” has the meaning given in the California Consumer Privacy Act of 2018 (“CCPA”) but does not include information exempted from the scope of the CCPA.

### **Your California privacy rights**

As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

#### **Information**

You can request the following information about how we have collected and used your Personal Information during the past 12 months: the categories of Personal Information that we have collected; the categories of sources from which we collected Personal Information; the business or commercial purpose for collecting and/or selling Personal Information; the categories of third parties with whom we share Personal Information; whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third party recipient; or whether we’ve sold your Personal Information, and if so, the categories of Personal Information received by each category of third party recipient.

#### **Access**

You can request a copy of the Personal Information that we have collected about you during the past 12 months.

#### **Deletion.**

You can ask us to delete the Personal Information that we have collected from you.

#### **Opt-out of sales**

Zytrade does NOT sell any of your Personal Information. If we were to do so in the future, you will be notified and will have the opportunity to opt-out. In addition, if you direct us not to sell your Personal Information, we will consider it a request pursuant to California’s “Shine the Light” law to stop sharing your personal information covered by that law with third parties for their direct marketing purposes.

### **Opt-in**

If we know that you are younger than 16 years old, we will ask for your permission (or if you are younger than 13 years old, your parent's or guardian's permission) to sell your Personal Information before we do so.

### **Nondiscrimination**

You are entitled to exercise the rights described above free from discrimination. This means that we will not penalize you for exercising your rights by taking actions such as denying you services; increasing the price/rate of services; decreasing service quality; or suggesting that we may penalize you as described above for exercising your rights.

### **How to exercise your rights**

You may exercise your California privacy rights described above as follows:

Right to information, access and deletion. You can request to exercise your information, access and deletion rights by writing to [compliance@zytrade.com](mailto:compliance@zytrade.com)

Right to opt-out of the "sale" of your Personal Information. We do not sell your Personal Information in the conventional sense (i.e., for money). However, like many companies, we use services that help deliver interest-based ads to you. California law classifies our use of these services as a "sale" of your Personal Information to the companies that provide the services. This is because we allow them to collect information from our website users (e.g., online identifiers and browsing activity) so they can help serve ads more likely to interest you. You can request to opt-out of this "sale" of your personal information here: Do Not Sell My Personal Information.

Zytrade will need to confirm your identity and California residency to process your requests to exercise your information, access or deletion rights. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. Except as described in this privacy policy, we will not use your personal information for any other purpose unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so.

We know the importance of your privacy and thank you for trusting us with your information.

Thank you for your business,

Zytrade LLC

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