

## **PRIVACY POLICY**

**Your Privacy Is Important to International Monetary Exchange, Ltd. ("IMEX") You should know that IMEX will never sell your personal information.**

In the course of serving you as an individual client or as someone associated with a corporate or institutional client, IMEX may obtain personal information about you. Obtaining this information is important to our ability to deliver the highest level of service to you, but we also recognize that you expect us to treat this information appropriately.

This policy describes the types of personal information we may collect about you, the purposes for which we use the information, the circumstances in which we may share the information and the steps that we take to safeguard the information to protect your privacy. As used throughout this policy, the term "IMEX" refers to International Monetary Exchange, Ltd. and its subsidiary affiliates worldwide, IMEX USA and IMEX Korea.

We may place cookies and similar files on your hard drive for purposes such as security, to facilitate site navigation, and to personalize your experience on our site. Our cookies do not identify you by name as an individual or by account number. When you visit our sites, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our Web sites. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our Web design and functionality. We may use third-party service providers to help us analyze certain online activities. For example, these service providers may help us measure the performance of our online advertising campaigns or analyze visitor activity on our Web sites. We may permit these service providers to use cookies and other technologies to perform these services for IMEX.

### **The Sources of Information**

The personal information we collect about you comes primarily from the account applications or other forms and materials you submit to IMEX during the course of your relationship with us. We may also collect information about your transactions and experiences with IMEX relating to the products and services IMEX provides. In addition, depending on the products or services you require, IMEX may obtain additional information about you, such as your credit history, from consumer reporting agencies.

Finally, in the provision of financial services to you and subject to strict compliance with all applicable laws and regulations, information may be collected about you indirectly from monitoring or other means (e.g. recording of telephone calls and monitoring e-mails). In these circumstances, the information is not accessed on a continuous or routine basis, but it may be used for compliance or security purposes.

### **The Information We Have about You**

If you deal with IMEX in your individual capacity (e.g. as a private client), or as a trustee/beneficiary of a trust, or as an owner or principal of a company or other investment vehicle established to invest on your behalf or on behalf of your family, etc., the typical information we collect about you would include:

- Your name, address and other contact details;
- Your age, occupation and marital status;
- Extensive financial information, including source of wealth, investment experience and objectives, risk tolerance and, in certain jurisdictions, representations required under applicable law or regulation concerning your financial resources;
- A head and shoulders photograph from, as applicable, your passport, national identity card or driver's license, as required by laws and regulations addressing due diligence and related matters; and
- A personal identifier such as, depending on your country of residence, your Social Security Number, National Insurance Number, Tax File Number, etc. If you are an employee/officer/director/principal, etc. of one of our corporate or institutional clients, the typical information we collect about you personally would include:

- Your name and contact details;
- Your role/position/title and area of responsibility; and
- Certain identifying information (e.g. passport photo, etc.) as required by laws and regulations addressing money laundering and related matters.

Of course, you are not required to supply any of the personal information that we may request. However, failure to do so may result in our being unable to open or maintain your account or to provide services to you. While we make every effort to ensure that all information we hold about you is accurate, complete and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information.

### **Our Use of Your Personal Information**

We may use your personal information to:

- Administer, operate, facilitate and manage your relationship and/or account with IMEX. This may include sharing such information internally as well as disclosing it to third parties, as described in the following two sections, respectively;
- Contact you or, if applicable, your designated representative(s) by post, telephone, electronic mail, facsimile, etc., in connection with your relationship and/or account;
- Provide you with information (such as investment research), recommendations, or advice concerning products and services offered by IMEX; and
- Facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements.

If your relationship with IMEX ends, IMEX will continue to treat your personal information, to the extent we retain it, as described in this policy.

### **Disclosures of Your Personal Information within IMEX**

In order to provide efficient and reliable services and to improve product and service options available to you, more than one entity within IMEX may be given, or given access to, your personal information. For example, one IMEX entity might share your information with another in order to facilitate settlement of your transactions or the maintenance of your accounts, or as part of its arranging for the performance of

specialized services such as US and international brokerage, asset management and advisory and trust services. When so sharing your personal information, we adhere to applicable legal and industry standards regarding the protection of personal information. Additional information on how your personal information is protected while within IMEX, entitled "Information Security: How We Protect Your Privacy" is available by contacting Customer Service.

### **Disclosures of Your Personal Information to Third Parties**

IMEX does not disclose your personal information to third parties, except as described in this policy. Third party disclosures may include sharing such information with non-affiliated companies that perform support services for your account or facilitate your transactions with IMEX, including those that provide professional, legal or accounting advice to IMEX. Non-affiliated companies that assist IMEX in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your personal information only in the course of providing such services and only for the purposes that IMEX dictates.

We may also disclose your personal information to fulfill your instructions, to protect our rights and interests and those of our business partners or pursuant to your express consent. Finally, under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations; for instance, when responding to a subpoena or similar legal process, to protect against fraud and to otherwise cooperate with law enforcement or regulatory authorities or with organizations such as exchanges and clearinghouses.

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