



## **Privacy Policy**

At TransAct Futures ("TransAct") we value our customers, and maintaining customer trust and confidence is our highest priority. While it is necessary that we obtain accurate and current information about our customers in order to provide the highest level of customer service, we are dedicated to protecting the privacy and confidentiality of our customer's information.

TransAct will never sell your personal information to anyone. We will not use or distribute your personal information in any way without issuing prior notification to you. We promise that we will uphold the privacy policies and procedures as set forth below.

### **Information we collect about our Customers**

- The personal information we collect from you comes from information you provide to TransAct in account opening applications (whether written or electronic), or in other forms you may provide to us. This information may include your name, address, social security number or tax identification number, account number, account balances and financial information about you
- Information regarding your transactions with us including your trading history at TransAct, cash transaction history with TransAct, your history of meeting margin calls or your use of the various services and products that we provide
- Information about your credit history and information we may receive from your introducing broker or associated person and other consumer reporting agencies
- "Cookies" are small text files consisting of encrypted information assigned to a computer's browser. Cookies do not collect or transmit your personal information. For users of the non-public areas of our website or electronic trading platforms that require a User ID or password, TransAct may use cookies to identify you so that you do not have to input your password multiple times as you navigate our site. TransAct may also use cookies for administrative purposes, such as to maintain security on our site

### **Information we may share about our Customers**

- TransAct will not sell personal information regarding our current or former customers.
- TransAct may share personal information about our current and former customers with our affiliated companies and service providers around the world. (TransAct affiliated companies include our subsidiaries, foreign correspondents and branch offices.) In either case, your personal information will remain subject to the strictest confidentiality protections.
- To the extent that we may engage unaffiliated companies to assist in providing services on our web site, such providers will be subject to stringent contractual requirements to maintain the confidentiality of any personal information they may obtain in connection with the performance of their services for us. We will make every effort to make sure that they receive the minimum amount of personal information necessary and will be allowed to retain that information only for as long as necessary in order to provide such services. Such service providers will only be allowed to use personal information in the course of providing services to TransAct and only for the purposes that we authorize.

### **Information we may disclose**

- We may disclose information about current or former customers in order to cooperate with legal or regulatory authorities or pursuant to a court order or subpoena.
- We may also disclose personal information as necessary to perform credit checks, perform background checks, collect debts, enforce our legal rights or otherwise protect our interests and property.

### **Security**

- TransAct is committed to protecting your personal information and privacy.
- Only authorized TransAct employees or agents will have access to your personal information. All employees, affiliates and service providers are held to the highest standards of privacy and security. Paper documents are stored in a locked room. Electronic information is password protected and only accessible by authorized employees. Only authorized employees have access and any unauthorized dissemination of nonpublic personal information shall result in disciplinary action up to and including termination of an employee.

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If this privacy policy changes you will be notified through the TransAct Futures web site or in other appropriate ways. If you have questions relating to this policy, please contact your representative.