

X-CHANGE FINANCIAL ACCESS, LLC

PRIVACY POLICY STATEMENT

At X-Change Financial Access, LLC (“XFA”) 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 customers’ information.

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 supply to us 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, and financial information about you.
- XFA can also amass information regarding your transactions with us, including your trading history at XFA or any affiliated firm, or your use of the various services and products that we provide.
- XFA may obtain information about your credit history, including information we may receive from your clearing broker or 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. XFA may use cookies for administrative purposes, such as to maintain security on our website.

Information we may share about our Customers

- XFA will not sell personal information regarding our current or former customers.
- XFA does not disclose any nonpublic personal information about our customers or our former customers to anyone, except as permitted by law.
- To the extent that we may engage unaffiliated companies to assist in providing services, 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 XFA and only for the purposes that we authorize.
- XFA’s policy permits the sharing of customer information with its affiliates when for a valid business purpose.

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, collect debts, enforce our legal rights or otherwise protect our interests and property.

Security

XFA is committed to protection of your personal information and to protecting your privacy.

- Only authorized XFA employees or agents will have access to your personal information. All of our employees, affiliates and service providers are held to the highest standards of privacy and security.

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