



Cürex Group Holdings, LLC

Privacy Policy

Version 1

10/25/2012



Introduction

Cürex Group Holdings, LLC (“**Cürex Group**”) has created this privacy policy (this “**Privacy Policy**”) because we know that you care about how information you provide to us is used and shared. References in this Privacy Policy to “**we,**” “**us**” or “**our**” refer to Cürex Group and its affiliates, collectively.

This Privacy Policy relates to our information collection and use practices in connection with the website at www.curexgroup.com and any other websites and trading platforms that we own or operate, including the foreign exchange trading platform operated by Cürex Group’s affiliate Cürex FX LLC (such websites and trading platforms are referred to in this Privacy Policy, collectively, as the “**Cürex Properties**”).

Notwithstanding anything to the contrary, any bids, offers, pricing, spreads, trading volume, block trades, liquidity and other trading information that is submitted to or generated by any of our trading platforms (collectively, “**Trading Information**”) does not contain personally-identifiable information and is not subject to this Privacy Policy. If you are a user of any of our trading platforms, please refer to your trading platform user agreement for the terms and conditions that apply to the Trading Information.

By visiting or using any of the Cürex Properties, you agree to the terms of this Privacy Policy.

Type of Information Collected

In the course of operating the Cürex Properties, we may collect or receive the following types of information:

- **Relationship Information.** If your firm is a prospective or registered user of our trading platform, we will collect contact and other information regarding your firm as part of the platform user registration process and/or in the course of our ongoing business relationship with your firm (“**Relationship Information**”). Relationship Information may include personally-identifiable information, such as the names and e-mail addresses of individuals at your firm who will serve as contact points for trading platform operational matters. Any such personally-identifiable information will constitute “**Personal Information**” for the purposes of this Privacy Policy. The Relationship Information does not include any Trading Information, which is not subject to this Privacy Policy.
- **Other Information.** In addition to the Relationship Information, we may collect additional information (collectively, the “**Other Information**”). Such Other Information may include:
 - **From Your Activity.** When you access the Cürex Properties, we and/or our technology providers may automatically collect information when you visit, access, and/or use the Cürex Properties, such as your computer’s IP addresses, Internet service provider, browser type and language, and information regarding your usage of the Cürex Properties. We may use this information to, for example, administer the Cürex Properties and to help diagnose any problems with our servers.



- From Cookies. We may collect information using “cookie” technology. Cookies are small packets of data that a website stores on your computer’s hard drive so that your computer will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us collect Other Information and to enhance your experience using the Cürex Properties. Cookies that we use do not contain any personal information, nor do they contain account login or password information. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Cürex Properties may not function properly.

How We Use and Share the Information

We may use the Relationship Information and Other Information (collectively, the “**Information**”) for the following purposes:

- to operate our businesses, and to operate and provide our products and services and the Cürex Properties, including, but not limited to: (i) to ensure that you are a representative of a registered institutional user of our trading platform and (ii) for internal monitoring, administration and analysis of the frequency of your use of the Cürex Properties; and
- to improve the our products and services and the Cürex Properties.

In addition, we may also use and/or share Information as described below:

- We may access, use, and share the Information as required to fulfill our contractual obligations to you.
- We may employ other companies and individuals to perform functions on our behalf. Examples may include providing technical assistance. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law.
- We may share some or all of the Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.
- If we or all or substantially all of our assets are acquired (or if any of our business units or all or substantially all of the assets of such business unit are acquired), we expect that the Information would be transferred along with the other business assets.
- To the extent permitted by law, we may also disclose the Information: (i) when required by law, court order, or when required or requested by any other governmental or law enforcement authority or regulatory agency or self-regulatory organization; or (ii) whenever we believe that



disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of us or others.

Communications

We communicate with users regarding issues relating to their accounts or connectivity. Users of our products and services can expect to be contacted by our personnel via telephone or through electronic mail.

Accessing and Modifying Information

Users who have provided Personal Information to us may access, remove, review, and/or make changes to the same by contacting us as provided below in this Privacy Policy. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our databases.

How We Protect the Information

We use physical, technical and procedural safeguards designed to protect any sensitive Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction, including sophisticated and rigorous encryption techniques and security devices used by major financial institutions. These safeguards include the following:

- Our servers are protected using packet filtering, firewalls, and a variety of confidential active defenses.
- When you use the Cürex Properties, you are provided a unique user ID and password. Only our authorized personnel will have access to this information.
- All of our employees are kept up to date with our strict security and privacy policies. Annually, and every time our security and privacy policy are updated, all of our employees are notified and trained on the importance of our users privacy.

Please understand, however, that no security safeguards are impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that any information that you supply will not be intercepted while being transmitted to and from us over the Internet.

External Websites

The Cürex Properties may contain links to third-party websites. We have no control over the privacy practices or the content of these websites. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.



Changes to This Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time by posting the revised Privacy Policy on our web site. By accessing the Cürex Properties after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

How to Contact Us

If you have questions about this Privacy Policy, please contact COMPANY via e-mail at privacyofficer@curexgroup.com with "PRIVACY POLICY" in the subject line, by phone at 212-488-4950 or by mailing us at the following address:

Cürex Group
Attention: Privacy Issues
120 West 45th Street, 22nd Floor
New York, NY 10036

