



PRIVACY POLICY

September 1, 2018
Version 1.0

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BOC INTERNATIONAL (USA) HOLDINGS INC.

1. Commitment

BOC International (USA) Holdings Inc. and its subsidiaries, BOC International (USA) Inc. and BOCI Commodities & Futures (USA) LLC (collectively, "BOCI"), is committed to safeguarding the non-public information that you provide us. This Privacy Policy describes how we handle and protect the non-public information we collect.

2. Why and how we collect non-public information

For any account established at BOCI, BOCI may collect information about the accountholder to evaluate his, her or its financial needs, processing requests or transactions, providing customer service, and informing customers about our financial products and services.

The information collected by BOCI may include:

- Information provided by customers on applications and other forms, such as the customer's name, address, date of birth, social security number, occupation, assets, and income;
- Information about customer's transactions with us or any of our affiliates;
- Information received from customer reporting agencies, such as the customer's credit history and creditworthiness, and other entities not affiliated with BOCI; and
- Information provided by customers to verify their identity or the identity of any principals or beneficial owners on the account, such as a passport or driver's license.

3. Sharing information with our affiliates

BOCI may share the public information described above with its affiliates for business purposes such as for servicing customer accounts and informing customers about new products and services, and as permitted by applicable law. Our affiliates include companies under common ownership with BOCI.

The non-public information shared with affiliates of BOCI for marketing purposes may include the customer's name, address, or email address and certain account information. It will not include credit information, such as credit history appearing on a consumer credit report or net worth and income information appearing on applications for BOCI's financial products and services.

4. Disclosures to non-affiliated third parties

In order to support the financial products and services provided by BOCI, we may share certain non-public information with third party service providers and joint marketers not affiliated with BOCI, including:

Companies under contract to perform services for BOCI or on its behalf, such as vendors that prepare and mail statements and transaction confirmations or provide data processing, computer software maintenance, or development and transaction processing; and other financial service companies, such as futures commissions merchants, brokers, or dealers, trust companies, banks and advisers, with whom we have a joint marketing agreement or an agreement to market financial services or products that we jointly offer, endorse or sponsor.

Any third party service provider acting on behalf of BOCI is required to keep any non-public information received from us strictly confidential.

In addition, BOCI may disclose non-public information with regulatory authorities or law enforcement agencies, as permitted or required under applicable law. For example, BOCI may disclose personal information to comply with a subpoena or other official request issued by a regulatory authority or law enforcement agency, and as necessary to protect the rights or property of BOCI.

Except as described in this Privacy Policy, non-public information will not be used for any other purpose and will only be used as described herein unless BOCI describes how such information will be used at the time you disclose it to us or we obtain your consent to disclose it.

5. How we protect your personal information

BOCI maintains physical, electronic, and procedural safeguards to protect the non-public information it possesses. Non-public information is never sold, rented, or disclosed for financial remuneration.

6. Opting out and limiting disclosures of your non-public information

If you prefer that BOCI limits disclosure of the non-public information it maintains about you, you may notify us by email or sending us a letter indicating that you elect to opt out of the disclosure of your non-public information. Our contact information is as follows:

BOC International (USA) Holdings Inc.
1045 Avenue of the Americas, Suite 1501
New York, NY 10018
Telephone +1212 259 0888 or +1 212 554 8800
Email: us.compliance@bocigroup.com

Please allow approximately thirty (30) days from our receipt of your request for your request to become effective.