

# STRONG CAPITAL MARKETS

## PRIVACY POLICY

Last Modified: 5,10, 2022

### 1. INTRODUCTION<sup>1</sup>

Strong Capital Markets, LLC. (hereinafter, “Strong Capital Markets”, "the Company", "we", "us" or "our") is committed to protecting and respecting your privacy. In addition, we recognize that persons who use Strong Capital Markets value their privacy. This Privacy Policy together with our Terms of Service governs our collection, processing and use of your Personal Information. This Privacy Policy applies to information shared during our provision of services to you, your use of our websites, mobile applications, and other online products and services that link to this Privacy Policy (collectively, our “Services”), contact our customer service team, engage with us on social media, or otherwise interact with us. By accessing Strong Capital Markets, you are consenting to the information collection and use practices described in this Privacy Policy.

If you are located in a province, country, or other government jurisdiction outside of the United States, and if you choose to provide your Personal Information (as defined below) to the Company through our Services, please be aware that your personal information will be transferred to and maintained on computers located in the United States and the applicable US privacy laws, which may be lower than those of the jurisdiction in which you reside. You should note that you are not obliged to give your Personal Information to Strong Capital Markets, but if you choose not to do so, we may not be able to provide our Services, or your access to our Services may be limited.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy and, in some cases, we may provide you with additional notice (such as adding a statement to our website or providing you with a notification). We encourage you to review this Privacy Policy regularly to stay informed about our information practices and the choices available to you.

### 2. PURPOSE OF PRIVACY POLICY

The purpose of this Privacy Policy is to set out in an accountable and transparent way the collection and use of information by Strong Capital Markets.

### 3. PERSONAL INFORMATION

"Personal Information" is information which identifies you personally or by which your identity can reasonably be ascertained. This may include but is not limited to:

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<sup>1</sup> NTD: This draft excludes any references to cookies, because we were advised that there are not any cookies use. If this changes, we need to update.

- (a) Full legal name, address for service, e-mail address, phone number, date of birth, photographic identification, government issued identification and other contact details.
- (b) Strong Capital Markets requires the highest level of browser permissions that could potentially lead to procurement of more Personal Information than enclosed in the definition of Personal Information.
- (c) World Wide Web related information, including but not limited to IP Addresses, operating system and browser type may be received by Strong Capital Markets as a result of your interactions with Strong Capital Markets.

#### 4. CONTROL OF YOUR INFORMATION

Users of our Services residing in certain countries or areas, such as the European Union, are afforded certain rights regarding their personal information. Except where an exception or exemption applies, these rights may include the ability to request access to, correct, and/or deletion of your personal information that we hold, as well as the right to request information about our data collection practices and the right not to be treated any differently for exercising any of the foregoing rights. While these rights are not globally applicable, our users and customers are entitled to access their personal information that we hold.

If you wish, you may also direct questions or any requests related to seeking, accessing, correcting, amending, or deleting data associated with our Services and regarding your privacy rights by contacting us at [info@strong-cap.com](mailto:info@strong-cap.com). Residents of California may also designate an authorized agent to exercise certain privacy rights on their behalf, and should make any such request by contacting the above email address. We will respond to your request within a reasonable timeframe, unless, for reasons beyond our control, a longer response time is necessary, in which case, you will be advised accordingly. Please note that we may retain certain information as required by law or as necessary for our legitimate business purposes as described herein.

#### 5. PURPOSE OF PERSONAL INFORMATION COLLECTION

- (i) We primarily use the information we may collect or receive about you to provide respond to your requests, provide Services, or improve our Services. We may also use Personal Information in order to:
  - (ii) Provide our Services efficiently and effectively;
  - (iii) Personalize your experience while using our Services;
  - (iv) Inform you about new products or features;
  - (v) Develop, enhance, market and deliver products and Services to you;
  - (vi) Understand your needs and your eligibility for products and Services;

- (vii) Provide information to you about developments and new products, including changes and enhancements to the Site;
- (viii) Process billing and collection of any fees;
- (ix) Conduct surveys and get feedback from you;
- (x) Establish and maintain a responsible commercial relationship with you and respond to your inquiries and for other customer service purposes;
- (xi) Provide you with news and other matters of general interest to you as Strong Capital Markets customer;
- (xii) Meet Strong Capital Markets's legal and regulatory requirements (e.g., information required to verify your identity).

***Important Note Regarding Opening a New Account*** - To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

## 6. SECURITY, PROTECTION AND USE OF PERSONAL INFORMATION

Strong Capital Markets is committed to protecting your privacy. We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. Access to Personal Information is limited internally to those employees, agents, contractors, and other third parties who have a business need to know. These individuals will only process your Personal Information on our instructions and they are subject to a duty of confidentiality.

Strong Capital Markets's systems and data are constantly under review to ensure that you are getting the best level of service and that market leading security features are in place. However, we give no guarantee that such misuse, loss, unauthorized access, modification or disclosure will not occur. There are protective measures that you should take which as well include but are not limited to changing password regularly, not sharing your Personal Information with other unless you clearly understand the purpose of their request and you know with whom you are dealing.

Strong Capital Markets reserves the right to retain and share certain Personal Information in order to meet our regulatory and statutory requirements. In addition, Strong Capital Markets reserves the right to retain and share certain Personal Information with our corporate partners, and third parties acting on behalf of Strong Capital Markets, Strong Capital Markets and may retain such information indefinitely in order to fulfill the purposes collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In some circumstances Strong Capital Markets may anonymize your Personal Information so that it can no longer be associated

with you for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Personal Information and other related data may be exported outside of the jurisdiction in which you reside. Your Personal Information may be processed and stored in a foreign country or countries. Under those circumstances, the governments, courts, law enforcement or regulatory agencies of that country or those countries may be able to obtain access to your Personal Information through foreign laws.

In the event that Strong Capital Markets is involved in a merger, acquisition, sale, bankruptcy, insolvency, reorganization, receivership, assignment or the application of laws or change of control, there may be a disclosure of your information to another entity related to such an event.

## 7. CONSENT

Consent is required for the collection of Personal Information and the subsequent use or disclosure of Personal Information. The form of consent may vary depending upon the circumstances and the type of Personal information obtained. Accessing our website constitutes your consent to the collection and use of Personal Information as described in this Privacy Policy. Strong Capital Markets reserves the right to use and disclose Personal Information without your knowledge or consent as permitted by applicable law.

## 8. DISCLOSURE OF PERSONAL INFORMATION

We use the Personal Information for the purposes indicated at the time you provide us with such information, and/or otherwise for the purposes set out in this Privacy Policy and/or as otherwise permitted by law. We may make available the Personal Information that you provide to us to our affiliates, agents, representatives, service providers and contractors for these purposes. We also reserve the right to disclose Personal information that Strong Capital Markets believes, in good faith, is appropriate or necessary to enforce our Terms of Use, take precautions against liability or harm, to investigate and respond to third-party claims or allegations, to respond to a court order or official requests, to protect security or integrity of Strong Capital Markets and to protect the rights, property or safety of Strong Capital Markets, our uses or others.

We may share your Personal Information with any financial dispute resolution scheme to which the Company subscribes, and other law enforcement bodies, regulatory agencies, courts, arbitration bodies and dispute resolution schemes, both in the United States and internationally, as may be required by law.

## 9. ACCESS AND CHANGING OF PERSONAL INFORMATION

You have the right to access the Personal Information we hold about you, and to require the correction, updating and blocking of inaccurate and/or incorrect data by sending an email to us. We will aim respond to your request within 14 business days. You may also request the deletion or destruction of your Personal Information by sending an email to us. Strong Capital Markets will act on your request only when it is not inconsistent with its legal and regulatory obligations

and compliance procedures. Upon your written request, we will inform you of the use and general disclosure of your Personal Information. Depending on the nature of your request, there may be a minimal charge for accessing your Personal Information.

#### 10. USERS UNDER AGE OF 13

Strong Capital Markets does not knowingly collect or store any personal information about children under 13 without verifiable prior parental consent. If you believe such information has been inadvertently collected, we will take necessary steps in order to remove such information from our database. Users under 13 must seek and obtain parental consent to use this website.

#### 11. CHANGES

This policy is current as of the Effective Date set forth above. Our policies, content, information, promotions, disclosures, disclaimers and features may be revised, modified, updated, and/or supplemented at any time at the sole and absolute discretion of the Company. Privacy laws and practices are constantly developing, and so our policies and procedures are under continual review, and we may change this Policy from time to time, so please be sure to check back periodically. If we change this Privacy Policy, we will take steps to notify all users by a notice on our website and will post the amended Privacy Policy on the website.

#### 12. CONTACT US

If you have any questions, comments, or concerns regarding our Privacy Policy and/or practices, please contact us at [info@strong-cap.com](mailto:info@strong-cap.com).

Customer complaints and any changes to your account record should be directed to our customer service department at [info@strong-cap.com](mailto:info@strong-cap.com) or in writing to: 193 Sun Dance Road, Stamford CT, 06905 or [info@strong-cap.com](mailto:info@strong-cap.com).

#### 13. FINRA BrokerCheck

FINRA has a program, BrokerCheck, whereby you may obtain information about a member firm or its representatives. You may obtain information by calling the FINRA BrokerCheck's hotline at 1-800-289-9999 or by going to the FINRA Regulation website at <http://brokercheck.finra.org>.