

JCV Investment Systems, LLC Privacy Policy

JCV Investment Systems, LLC (JCV) specializes in performing Market Data Audits for our client base, including, but not limited to world-wide exchanges and other purveyors of Market Data. Our auditing software and analysts do not require or use individual names to perform an audit. However, during the course of an audit some names may come to us from the entity being audited. Occasionally, some companies will use employee names as a unique field identifier rather than an Employee ID or User number. We do not divulge the names to anyone other than our client who requested the audit, if necessary. The names are never used outside the scope of our audit. When the audit is complete all records of the effort (including the names) are destroyed. JCV values the privacy of our clients and their clients as well. JCV has an affirmative commitment to adhere to the following:

“EU- U.S. Privacy Shield”

JCV complies with the EU-U.S. Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. JCV has certified that it adheres to the Privacy Shield Principles of *Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement and Liability*. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

What follows is JCV’s privacy statement addressing each principle as it relates to your rights and our industry specific data and personal information privacy concerns.

NOTICE: Personal and identifying information used by JCV is done so with the expressed permission of our clients to meet their needs for a comprehensive audit. Because personal information is not necessary for successful completion of most audits, we do not request it, nor can we give any notice of its receipt.

CHOICE:

ACCOUNTABILITY FOR ONWARD TRANSFER: JCV is not required to give notice nor provide choice when personal information is transferred to third party that is affiliated with, contracted by, or acting as an agent on our behalf. However, we do have potential liability and take reasonable measures to ensure your privacy through one or more of the following ways. JCV contracts with the third party to provide adequate procedures for using and maintaining private information. JCV requires the agent to notify the organization if it can no longer meet its obligation to provide the protection as is required by the Principles; JCV will take appropriate actions to stop and remediate unauthorized processing. In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, JCV is potentially liable.

JCV may also be required to disclose personal information in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.

SECURITY: JCV takes reasonable precautions to protect personal information it receives and uses from loss, misuse, unauthorized access, disclosure, alteration and destruction.

DATA INTEGRITY AND PURPOSE LIMITATION: Data that is accurate, complete, and current is essential to our work. Therefore, we take adequate measure to ensure the reliability of all data. In addition, any data we collect is relevant to the stated and explicit purpose. Personal information will not be processed for reasons other than its intended use without applying the Privacy Shield principles.

ACCESS: JCV acknowledges that EU individuals have the right to access the personal information that we have received about them. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data, should direct his query to Daria@jcvsys.com. If requested to remove data, we will respond within a reasonable timeframe. In some cases, the cost or burden of providing access to an individual is greater than the risk to that individual's privacy; or, making the information accessible violates a third party's privacy. In these cases, access is not guaranteed.

RECOURSE, ENFORCEMENT AND LIABILITY: As a EU-U.S. Privacy Shield self-certifying organization, we will regularly verify our compliance with these privacy principles by prominently displaying our published statement and ensuring its accuracy, comprehensiveness, and full implementation. JCV has procedures in place for educating its employees on the correct handling of personal information. Should you have any questions, concerns, and/or complaints regarding JCV's use of personal information, we encourage you to contact us and we will work with you to resolve any disputes as best we can in accordance with the EU-U.S. Privacy Shield principles. The enforcement authority that has jurisdiction over JCV compliance with the Privacy Shield is the Federal Trade Commission.

In compliance with the EU-U.S. Privacy Shield Principles, JCV commits to resolve complaints about your privacy and our use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact JCV at:

JCV Investment Systems, LLC

Attn: Daria Veneziano

40 Mountain Road

Colchester, CT 06415

Daria@jcvsys.com

860-537-6747

JCV has further committed to refer unresolved privacy complaints, free of charge to the individual, under the EU-U.S. Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint. There is a possibility, under certain limited conditions, as set forth in terms of Annex I, for individuals to invoke "last resort" binding arbitration before the Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission.