

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:

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.

EU-U.S. Privacy Shield

JCV complies with the EU-US 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 transferred to the United States pursuant to Privacy Shield. JCV has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under 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/>

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, JCV is subject to the regulatory and enforcement powers of the U.S. Federal Trade Commission.

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.

CHOICE AND ACCOUNTABILITY FOR ONWARD TRANSFER: JCV is not required to give notice nor provide choice when personal information is transferred to third party, such as the exchanges and market data specialist we are hired by, for the purpose of performing audits. 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 a 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;

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to Daria@jcvisys.com.

JCV's accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, JCV remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless JCV proves that it is not responsible for the event giving rise to the damage.

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: Pursuant to the Privacy Shield Frameworks, EU individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also may correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to Daria@jcvisys.com If requested to remove data, we will respond within a reasonable timeframe.

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.

In compliance with the Privacy Shield Principles, JCV commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union individuals with Privacy Shield inquiries or complaints should first contact JCV by email at Daria@jcvsys.com or via post 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 under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/privacy-shield-complaints/> for more information and to file a complaint. This service is provided free of charge to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

Changes to Our Privacy Policy

We may modify, alter or update our privacy policy at any time, so we encourage you to frequently review our privacy policy at our website www.jcvsys.com. We will not provide individual notice to you of changes to our privacy policy, but when we make updates to our privacy policy, we will update the data in this section.

JCV Investment Systems, LLC Privacy Policy V3

Effective as of 21 October 2021