



Privacy Policy December 2020

This Privacy Policy sets forth the manner in which Dalzell Trading, LLC may collect, utilize and maintain nonpublic information about individual persons, as required under federal and other applicable law. Dalzell Trading is committed to protecting privacy and maintaining the confidentiality and security of a Clients' personal information.

Collection of Information

Dalzell Trading may collect personal information about Clients from the following sources:

- Client questionnaires and other information provided by the Client in writing, in person, by telephone, electronically or by any other means. This information may include name, address, employment information and financial and investment qualifications as applicable;
- Information about Clients from financial institutions and service providers with whom a Client may have authorized to provide such information to Dalzell Trading; and
- Verification services and consumer reporting agencies, including a Client's creditworthiness or credit history, as applicable.

Disclosure of Nonpublic Personal Information

Dalzell Trading does not disclose nonpublic personal information about Clients or potential Clients to affiliates or nonaffiliated third parties except as permitted by law. For example, Dalzell Trading may share nonpublic personal information about clients, without the Client's consent, with affiliated and nonaffiliated parties in the following situations, among others:

- in connection with the administration and operations of Dalzell Trading and other of Dalzell Trading products and services, with Dalzell Trading brokers, attorneys, accountants, auditors, administrators or other service providers;
- to respond to a subpoena or court order, judicial process or regulatory inquiry;
- in connection with a proposed or actual sale, merger or transfer of all or a portion of its business;
- to protect or defend against fraud, unauthorized transactions (such as money laundering), law suits, claims or other liabilities;
- to respond to requests for information regarding compliance with anti-money laundering laws;
- upon consent of a Client to release such information, including authorization to disclose such information to persons acting in a fiduciary or representative capacity on behalf of the Client; and,
- to assist Dalzell Trading in offering affiliated products and services to Clients.

As indicated above, the foregoing may include responses to inquires for purposes of compliance with anti-money laundering and ant-terrorist due diligence, disclosure or reporting requirements. Dalzell Trading also may share nonpublic personal information about Clients at Client direction or with Client consent.

Former and Prospective Clients

This same Privacy Policy applies to former and prospective Clients.

Protection of Subscriber Information

Dalzell Trading maintains physical, electronic and procedural safeguards that comply with federal standards to protect Client information. Dalzell Trading restricts access to the personal information of Clients to those associated persons who need to know that information in the course of their job responsibilities. When disposing of records containing Client information our associated persons are trained to use an electronic shredder or destruction locked box.

Further Information

Dalzell Trading reserves the right to change its Privacy Policy at any time. The examples contained within this Policy are illustrations and are not intended to be exclusive. Dalzell Trading's Privacy Policy complies with federal law regarding privacy. Clients may have additional rights under other domestic or foreign laws that may apply. (revised 12/2020)