



Rcube Asset Management SAS

9 Avenue Franklin Roosevelt
Paris, France 75008

Phone : +33 1 45 64 31 03

Email : cyril.castelli@rcube.com

NFA ID #0465827

RCUBE ASSET MANAGEMENT SAS PRIVACY NOTICE

In the United States of America there are regulations which impose various requirements on a financial institutions' treatment of client information. These regulations require that financial institutions develop privacy policies and disclose these policies to its clients.

We at Rcube Asset Management SAS value our customer relationships and appreciate the trust that you have placed in us. As part of this relationship, and to provide you with services to meet your needs, you have given to us private information about yourself. Rcube Asset Management SAS considers your privacy one of our utmost concerns. We pledge to protect that information and ensure that it remains private.

This Privacy Notice outlines our current policies and practices regarding **how information about individual clients is collected and used**. We will send existing clients an updated Privacy Notice on an annual basis.

If you are using your account for business purposes, you may not technically be required to receive this Notice. Nevertheless we felt you may be interested in receiving it. **The following information in this Notice summarizes the categories of information that we collect, how that information is handled, and how we protect your information.**

In order to provide you with individualized service, Rcube Asset Management SAS collects information about you from your account application and other forms that you may deliver to us. Rcube Asset Management SAS also collects information about your transactions with us and our affiliates. We use this information to open an account for you, process your requests and transactions and to provide you with additional information about our products and services. In order to service your account and mail correspondence to you, we provide your personal information to other affiliated independent firms that specialize in providing these services. These firms include our clearing firm(s), trade partners, back office firms, and also our printing/mailing vendors. We require these other independent firms to protect the confidentiality of your information and to use the information only for the limited purpose for which the disclosure is made. We do not disclose any nonpublic personal information about our clients to other independent firms, organizations or individuals except in furtherance of our business relationship with you, or as otherwise permitted or required by law and regulations. In addition, if you decide at some point to close your Rcube Asset Management SAS account, we will continue to adhere to the privacy policies and practices described in this notice.

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with US federal standards to guard your personal information.

Updating Customer Information

When your account was established with Rcube Asset Management SAS, you provided information pertaining to your specific background including but not limited to beneficial ownership, control, and financial status. It is important that we maintain the most current information. You may have provided us with updated information either per our request or on your own. If there have been any material changes to the information last provided, we request that you contact Rcube Asset Management SAS via email at cyril.castelli@rcube.com or by calling +33 1 45 64 31 03. If you are not sure what information was provided, please contact us at the email or number above and a copy of the information on file will be sent to you.

Recording of Phone Conversations

As a reminder, Rcube Asset Management SAS may record phone conversations with its clients. Customer consents to the recording of Customer's telephone conversations with Rcube Asset Management SAS or any of its agents or associated persons by means of electronic recording devices with or without the use of an automatic tone warning device. Customer authorizes and consents to the use of such recordings, and transcripts thereof, as evidence by either party in any action arising out of the Advisory Agreement. Rcube Asset Management SAS may, but shall not be required, in its normal course of business, to erase such recordings following their production.

Information Sharing Opt Out

If you prefer that we limit disclosures of personal information about you, you may notify us via email at cyril.castelli@rcube.com or by calling +33 1 45 64 31 03, Monday through Friday, between the hours of 9 a.m. and 4 p.m. If you determine to opt out of this policy you can instruct us to what extent we are able to disclose your non-public personal information to affiliated third parties. If you have any questions or concerns regarding the privacy of your information at Rcube Asset Management SAS, or would like to discuss your opt-out options please contact us at your earliest convenience.

Thank you for your business,

Rcube Asset Management SAS

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