



## CXM Direct LLC

### Privacy Policy

#### 隐私政策

Protecting the privacy and safeguarding the personal and financial information of our clients and Web site visitors is one of our highest priorities. The following Privacy Statement explains how we collect and protect your information. By opening an account or by using our Web site, you give your consent to the collection and use of personal information by us as explained in this privacy statement.

保护客户及网站访问者的隐私和保障其个人及财务信息安全是我们的首要责任之一。以下隐私声明中解释我们是如何收集和保护您的信息。通过开立账户和使用我们的网站，您已同意我们如隐私声明中所诉的收集和使用您的个人信息。

#### COLLECTION OF PERSONAL INFORMATION

We collect information required to open an account, to transact business effectively and to safeguard your assets and your privacy. To do this, we gather information to help us assess your needs and preferences.

The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address and to identify who you are. We also collect demographic information when you open an account, including, birth date, education, occupation, etc. We also assess your trading experience, your approximate annual income and approximate net worth to assess your financial position.

#### 个人信息收集

我们收集信息用于开户、交易并保护您的资产和隐私。为实现此目的，我们收集信息帮助我们更好地评估您的需求和偏好。

我们直接从您处收集的信息和可以联系上您的信息用以确认您的身份，包括姓名、邮箱、手机、邮寄地址。当您打开账户时，我们同样收集您的人口统计信息，包括生日、教育、职业等。我们同样评估您的交易经验、大致年收入和净资产用以评估您的财务状况。

#### USAGE OF PERSONAL INFORMATION

We use personal information only as appropriate to provide you quality service and security. For example, we may use the information collected from you to verify your identity and contact information. We may also use this information to establish and set up your trading account, issue an account number and a secure password, maintain your account activity, and contact you with account information. This information helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

#### 个人信息使用

我们仅以给您提供高质量服务和财务安全的目的使用个人信息。例如我们使用所收集信息确认您的身份和联系方式。我们同样使用信息为您建立账户、开立账号和安全密码，保证您的账户交



易并使用账号信息与您联系。这些信息能够帮助我们提高服务质量，定制您的浏览习惯，通知您可能感兴趣的新产品、服务。

## OUR AFFILIATES AND PARTNERS

We may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer. We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

我们的附属公司和合作伙伴

若我们或附属公司根据您的需求提供产品和服务需要提供信息时，我们将于我们的附属公司共享信息。我们同样会和其他为客户提供有价值的高质量服务和产品的公司达成包括联合市场协议在内的伙伴关系。为保证这些产品和服务满足您的需求并以有用且相关的方式传达给您，我们可能与一些合作伙伴、附属公司和联盟公司共享信息，这给予他们更好地理解产品和服务是有用且相关的。您的个人信息仅限用于和我们达成关系的合作伙伴和附属公司。

## NON-AFFILIATED THIRD PARTIES

We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below.

We reserve the right to disclose your personal information to third parties where required by law to regulatory, law enforcement or other government authorities. We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property.

To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a party with client information from our database to help us to analyze and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task we request and for no other purpose. All third parties with which we share personal information are required to protect personal information in a manner similar to the way we protect personal information.

非附属关系的第三方

我们不会以任何理由以买卖、许可、租借的方式向任何第三方公开您的信息除非发生以下情形

当法律法规、监管政策和其他政府机构要求时，我们保留权利公开您的个人信息。当信用报告收集机构需要或为保护我们的权利和财产时，我们同样可能公开您的信息。

为有助于提升服务质量，我们可能从事其他商业以帮助我们开展特定的内部功能，例如账户处理、账户履行、客户服务、客户满意度调查或其他与我们商业相关的数据收集活动。我们可能给第三方提供数据库中的个人信息从而帮助我们分析和识别客户需求并通知客户我们所提供的产品和服务。共享信息的使用严格地限制于提升性能的目的上而不用其他目的。所有与我们共享个人信息的第三方要求和我们以相似的方式保护个人信息。



## RESTRICTION OF RESPONSIBILITY

If at any time you choose to purchase a product or service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Statement. We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded Web site or to a linked Web site, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party, and you should familiarize yourself with the privacy policy provided by that third party.

### 责任限制

若您选择在任何时刻买卖其他公司提供的产品和服务，所有您在该公司分享的个人信息将不再被我们的隐私声明所控制。我们对我们的链接出去的网站内容和和这些网站收集信息不负隐私政策责任，我们不能控制使用和保护您提供的信息被这些网站收集。当您选择链接去一个联名网站或链接网址，您可能须提供注册和其他信息，请注意，个人信息将进入该第三方公司，您需熟悉该第三方公司的隐私政策。

## OPTING OUT OF DISCLOSURES OF NON-PUBLIC PERSONAL INFORMATION

You may direct us not to disclose non-public personal information to certain non-affiliated third parties. To opt out of sharing non-public personal information with non-affiliated third parties, please contact a client service representative. An opt out election made by one account owner of a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account you hold with us.

### 退出披露个人非公开信息

您可能要求我们不向特定的非附属第三方公司披露个人非公开信息。为拒绝向非附属第三方披露非公开个人信息，请联系一位客户服务代表。账户所有人选择拒绝披露一个账号将适用于该账户所有人的所有关联账号，每个独立账号须逐个选择退出。

## USE OF "COOKIES"

We use cookies to assist us in securing your trading activities and to enhance the performance of our Web site. (Cookies are small text files sent from the Web server to your computer.) Cookies used by us do not contain any personal information nor do they contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on.

We may share Web site usage information about visitors to the Web site with reputable advertising companies for targeting our Internet banner advertisements on this site and other sites. For this purpose, pixel tags (also called clear gifs or web beacons) may be used to note the pages you've visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.

To administer and improve our Web site, we may use a third party to track and analyze usage and statistical volume information, including page requests, form requests, and click paths. The third party may use cookies to track behavior and may set cookies on behalf of us. These cookies do not contain any personally identifiable information.

### Cookies 的使用



我们使用 **Cookie** 帮助我们保护您的交易行为和强化我们的网站性能（**Cookie** 是小型的文本文件，由网络服务器发出并可能保存在您的电脑中）。我们使用的 **Cookie** 不包含任何个人信息，也不含任何账户或密码信息。**Cookies** 仅允许网站识别用户已经登录产生的网页需求。

我们可能以互联网广告定位为目的，与具有良好声誉的广告公司分享用户访问我们网站的信息。为此目的，网络信标（也称为网络行为标签或单像素 **GIF** 图片）为被用来标注您所浏览过的网页。广告公司通过这些网络信标收集的集信息并非个人身份信息。

为更好管理和提升我们的网站，我们可能使用第三方公司追踪和分析网站的使用情况和容量信息统计，包括网页请求、表项请求和点击路径。第三方公司可能使用 **cookies** 追踪访问行为以及代表我们设置 **cookies**。这些 **cookies** 不包含任何个人身份信息。

## COMMUNICATIONS

Unless otherwise indicated for a particular service, any communications or material of any kind that you e-mail or otherwise transmit through the services, including information, data, questions, comments or suggestions (your "Communications") will be treated as non-proprietary and non-confidential.

By accepting this Agreement you grant a license to us to use your Communications in any way we think fit, either on the Web site or elsewhere, with no liability or obligation to you. We are free to use any idea, concept, know-how or technique or information contained in your Communications for any purpose including, but not limited to, developing and marketing products.

We are entitled, but not obligated, to review or retain your Communications. We may monitor your Communications to evaluate the quality of service you receive, your compliance with this Agreement, the security of the Web site, or for other reasons. You agree that such monitoring activities will not entitle you to any cause of action or other right with respect to the manner in which we monitor your Communications. In no event we will be liable for any costs, damages, expenses or any other liabilities incurred by you as a result of our monitoring activities.

### 通信

除非特定服务表明，任何通过邮件或其他传播方式的信息、数据、问题、评论、建议等在内的任何形式的通信和材料都将视为非专属和非保密的。

通过接受此协议，不论是网站还是其他方式，您许可我们在任何我们认为合适的情形下不承担任何责任和义务的使用您的通信。我们可使用任何想法、概念、技能、技巧或您通信中的信息用于包括但不限于产品的开发和营销目的。

我们有权但并非有义务查看和保存您的通信。我们可能监控您的通信用于评估我们提供的服务质量，您是否履行协议和网站安全以及其他目的。您同意此类监控行为并不构成您以任何理由和权利起诉我们监控您的通信行为。任何应监控行为产生的成本、损失、费用和因您产生的负债我们均不負責任。

## CHANGES TO THIS PRIVACY STATEMENT

From time to time, we may update this Privacy Statement. In the event we materially change this Privacy Statement, the revised Privacy Statement will promptly be posted to the Web sites and we will post a notice on our Web sites informing you of such changes. You agree to accept posting of a revised Privacy Statement electronically on the Web site as actual notice to you. Any dispute over our Privacy Policy Statement is subject to this notice and our Customer Agreement. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. If



you have any questions that this statement does not address, please contact a Client Services representative.

#### 隐私政策的变更

有时我们会更新隐私政策，当我们变更隐私政策材料时，变更后的隐私政策将很快上传至网站并且我们将在网站发布变更通知告知于您。您同意接受以发布网站电子版的变更通知作为告知您的实际通知。任何对于隐私政策的争端以这份通知和客户协议为准。我们建议您定期查看并检阅隐私政策以至于能时刻了解我们收集哪些信息，我们如何使用信息和我们向谁公开信息。如果您有任何这份政策未提及的问题，请联系客户服务代表。