



## **Lime Trading Privacy Policy**

Lime Trading Corp. ("**Lime Trading**") is a broker-dealer registered with the U.S. Securities and Exchange Commission ("**SEC**") and member of the Financial Industry Regulatory Authority, Inc. ("**FINRA**"), the National Futures Association ("**NFA**") and the Securities Investor Protection Corporation ("**SIPC**") provides various trading and investment advisory services, including web and mobile trading applications, to retail and institutional investors (the "**Services**").

Lime Trading understands that confidentiality and security of the personal information ("Personal Information") that you share with it is important. Lime Trading is responsible for the Personal Information that it may collect in the manner discussed below. Lime Trading (which is, at times, referred to using phrases such as "we", "us" or similar phrases) is committed to protecting the privacy of Personal Information, including Personal Information related to individuals who may be customers, employees, agents, job applicants or others.

In this regard, Lime Trading have developed policies and practices designed to protect the privacy of your Personal Information. By opening an account at Lime Trading or by utilizing the products, Services and applications available through Lime Trading, you have consented to the collection and use of your Personal Information in accordance with this privacy policy ("**Privacy Policy**"). Please read this Privacy Policy carefully.

This Privacy Policy is based on the privacy and data protection principles common to the countries in which it operates. This Privacy Policy is intended to summarize the Lime Trading's data protection practices generally and to advise its customers, prospective customers, job applicants, website visitors and other third parties about privacy policies that may be applicable.

This Privacy Policy is specifically addressed to those who provide Personal Information to Lime Trading or who visit or use Lime Trading's websites, trading platforms, software applications and/or social media sites.

### **How does Lime Trading collect Personal Information and what Personal Information does Lime Trading collect?**

Lime Trading collects and processes Personal Information from you. This may include, among other things, information:

- Provided during the account application processes or during use of any Lime Trading website applications (for example, your name, email address, telephone number, birth date, tax ID number, investment objectives, etc.);
- Acquired as a result of the transactions you conduct through Lime Trading systems or in connection with services offered by Lime Trading;
- Received from consumer-reporting agencies; and collected through Internet cookies (for further information on Lime Trading's use of cookies, please see the Cookie Policy).



## **Are you required to provide Personal Information?**

In order for you to utilize Lime Trading's Services, you will provide Lime Trading with your Personal Information entirely voluntarily. In many circumstances, Lime Trading cannot take action without utilizing certain of your Personal Information, for example, because this Personal Information is required to process your instructions or orders or provide you with access to its Services or marketing materials. In many cases, it would be impossible for it to provide the Services to you without the relevant Personal Information.

## **For what purposes will Lime Trading use your Personal Information?**

Lime Trading may use your Personal Information for the following purposes ("**Permitted Purposes**"):

- To provide you with brokerage and other services available on Lime Trading platforms, and/or to deal with any requests or inquiries you may have;
- To pursue legitimate interests, including to carry out, monitor and analyze Lime Trading's business or operations;
- To conduct Lime Trading's recruiting processes;
- To contact you (unless you tell us that you prefer us not to) regarding features and functionality that may be of interest to you;
- To enter into or carry out contracts of various kinds;
- To conduct monitoring by Lime Trading or any other person on its behalf using various methods, including: (i) the use of "intelligent" automated monitoring tools; (ii) through random monitoring of systems, for example systematically via electronic communication recording tools; (iii) specific monitoring of systems for example in relation to investigations, regulatory requests, subject access requests, litigation, arbitration or mediation; (iv) data tracking, aggregation and analysis tools that pull data from various disparate data sources to draw linkages and/or detect behavioral patterns, interactions or preferences for analysis (including predictive analysis); and/or (v) using other similar monitoring technology that may become available from time to time;
- To comply with applicable laws or regulations in any country;
- To provide third parties information in connection with the proposed or actual financing, insuring, sale, securitization, assignment, or other disposal of all or part of our business (including accounts) for the purposes of evaluating and performing the proposed transaction; and
- For any other purpose for which your Personal Information was provided to Lime Trading.

Lime Trading may process your Personal Information for the following purposes after obtaining your express consent where legally required:

- To communicate with you through the channels you have approved to keep you up to date on the latest developments, announcements and her information about Lime Trading services, products and technologies;



- To conduct client surveys, marketing campaigns, market analysis, or promotional activities; and
- To collect information about your preferences to create a user profile to personalize and foster the quality of Lime Trading's communication and interaction with you (for example, by way of newsletter tracking or website analytics).

Where legally required, with regard to marketing-related communication, Lime Trading will only provide you with such information after you have opted in and it will also provide you with the opportunity to opt out at any time if you do not wish to receive further marketing-related communication from us. Lime Trading likes to keep its clients, personnel and other interested parties, informed of company developments, including news relating to Lime Trading that it believes is of interest to them. If you do not wish to receive publications or details of events or seminars that Lime Trading considers may be of interest to you, please let it know by contacting [cs@lime.co](mailto:cs@lime.co). Where legally required, Lime Trading will not use your Personal Information for taking any automated decisions affecting you or creating profiles other than described above.

Depending on which of the above Permitted Purposes Lime Trading uses your Personal Information for, it may process your Personal Information on one or more of the following legal grounds:

- Because processing is necessary for the performance of a client instruction or other contract with you or your organization;
- To comply with Lime Trading's legal obligations (for example, to keep pension records or records for tax purposes);
- Since processing is necessary for the purposes of Lime Trading's legitimate interest or those of any third-party recipients that receive your Personal Information, provided that such interests are not overridden by your interests or fundamental rights and freedoms; and
- Since processing is useful or necessary in Lime Trading's discretion and is not prohibited under the law of the relevant jurisdiction.

In addition, the processing may be based on your consent where you have expressly given that to Lime Trading.

### **Who Lime Trading shares your Personal Information with, and in what circumstances.**

Lime Trading may share your Personal Information in the following circumstances:

- Lime Trading may share your Personal Information with affiliates on a confidential basis as allowed by applicable law or where required for the purpose of providing products or services and for administrative, billing and other business purposes. An affiliate is a company that Lime Trading owns or controls or with which there is common ownership with it and its parent company; Lime Trading may instruct its service providers, domestically or abroad, to process Personal Information for the Permitted Purposes on its behalf and in accordance with its instructions. Lime Trading generally requires these service providers to enter into confidentiality agreements with Lime Trading that limit their use of the information that they receive. Such agreements prohibit the service provider from using Lime Trading's customer information that they receive other than to carry out the purposes for which the information



was disclosed. If required by law, Lime Trading will retain control over and will remain responsible for your Personal Information and will use appropriate safeguards to ensure the integrity and security of your Personal Information when engaging service providers;

- Lime Trading may share information with joint marketing partners and alliances that offer products and services that might be a value to Lime Trading's clients. These offers will require that they be identified that an offer is being extended because of your relationship with Lime Trading. The use of Personal Information is limited to the purposes identified in Lime Trading's relationship with the partner or alliance;
- Lime Trading may share your Personal Information with companies providing services in the areas of fraud and crime prevention and with companies providing similar services, including financial institutions such as credit reference agencies and regulatory bodies;
- Lime Trading may share your data with third parties to assist Lime Trading with the conduct of its recruitment processes; Consistent with applicable law, Lime Trading may share your Personal Information with courts, law enforcement authorities, regulators or attorneys or other parties for the establishment, exercise or defense of a legal or equitable claim or for the purposes of a confidential alternative dispute resolution process; and
- Lime Trading may also use aggregated Personal Information and statistics for the purpose of monitoring website usage in order to help it develop its website and Services.

Otherwise, Lime Trading will only disclose your Personal Information when you direct it or give it permission to do so, when Lime Trading is allowed or required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

### **Personal Information about other people that you provide to Lime Trading**

If you provide Personal Information to us about someone else (such as one of your directors or employees or someone with whom you have business dealings), you must ensure that you are entitled to disclose that Personal Information to us and that, without Lime Trading taking any further steps, Lime Trading may collect, use and disclose that Personal Information as described in this Privacy Policy. In particular, you must ensure that the individual concerned is aware of the various matters detailed in this Privacy Policy, as those matters relate to that individual, including Lime Trading's identity, how to contact Lime Trading, its purposes of collection, Lime Trading's Personal Information disclosure practices (including disclosure to overseas recipients), any right the individual may have to obtain access to the Personal Information and make complaints about the handling of the Personal Information and the consequences if the Personal Information is not provided (such as Lime Trading's inability to provide the Services).

### **Keeping Personal Information about you secure**

To the extent required by law, Lime Trading will take appropriate technical and organizational measures to keep your Personal Information confidential and secure in accordance with Lime Trading's internal procedures covering the storage, disclosure of and access to Personal Information. Personal Information may be kept on Lime Trading's information technology systems, those of its service providers or in paper files.



## Updating your Personal Information

If any of the Personal Information that you have provided to us changes, for example if you change your email address or if you wish to cancel any request that you have made of us, please let us know by contacting Lime Customer Support at [cs@lime.co](mailto:cs@lime.co). Lime Trading will not be responsible for any losses arising from any inaccurate or incomplete Personal Information that you provide to us.

## How Long Does Lime Trading Retain Your Personal Information?

Lime Trading retains your Personal Information in an identifiable form in accordance with Lime Trading's internal policies which establish general standards and procedures regarding the retention, handling and disposition of your Personal Information. Personal Information is retained for as long as necessary to meet legal, regulatory and business requirements. Retention periods may be extended if Lime Trading is required to preserve your Personal Information in connection with litigation, investigations and proceedings or it may be retained for other reasons.

Notice to California Residents: Subject to certain exceptions and limitations, you have the following rights with respect to covered personal information.

- You have the right to request the following information from Lime Trading.
  - Specific pieces of personal information Lime Trading has about you;
  - Categories of personal information Lime Trading has collected about you;
  - Categories of sources from which the personal information is collected;
  - Categories of personal information sold or disclosed, if any;
  - Categories of third parties with whom the personal information was sold or disclosed; and
  - The purpose(s) for collecting or selling the personal information.
- You have the right to request that Lime Trading delete the personal information it has collected about you.
- You have the right to request to be opted out from the sale of your personal information.
- In certain circumstances, you may have the right to receive personal information concerning you in a portable format.
- You have the right not to be denied goods or services, charged different prices or rates for goods or services, or receive a differing level of quality of goods or services as a result of exercising the above rights.

The rights described above do not apply to certain categories of personal information. The personal information excluded from coverage under the California Consumer Privacy Act (“**CCPA**”) includes, among other things:

- Personal information Lime Trading collected from or about you when you apply for or obtain a product or service for personal, family or household purposes;
- Personal information about communications or transactions with you when you are acting on behalf of a company or government agency to do business with Lime Trading; and



- Personal information sold or bought from a consumer reporting agency for use in a consumer report in compliance with applicable law.

Lime Trading will apply verifiable consumer requests to covered personal information. You or your authorized agent may submit a CCPA request via email at [compliance@lime.co](mailto:compliance@lime.co). Lime Trading will respond to authorized requests as soon as practicable and as required by law. The above rights are subject to Lime Trading's ability to reasonably verify your identity and authority to make these requests. In order to verify that you are authorized to submit a request, you may be required to provide the following information.

Your CCPA rights are subject to various exclusions and exceptions under the law. Under certain circumstances, Lime Trading may be unable to implement your request, pursuant to applicable law. Lime Trading will advise you of any reason for denying or restricting a request to the extent permitted by law.

Lime Trading will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health insurance or medical identification numbers, account passwords or security questions and answers, or other specific pieces of personal information if the disclosure presents an unreasonable risk to the security of personal information, customer accounts or Lime Trading's systems and network security.

### **Updates to this Privacy Policy**

This Privacy Policy was last updated in February 2022. Lime Trading reserves the right to update and change this Privacy Policy from time to time, for example, in order to reflect any changes to the way in which Lime Trading processes your Personal Information or changing legal requirements. In case of any such changes, Lime Trading will post the changed Privacy Policy on Lime Trading's website or publish it otherwise. The changes will take effect as soon as they are posted on Lime Trading's website.

### **How to contact Lime Trading**

Lime Trading welcomes your views about its website and its Privacy Policy. If you have any questions about this Privacy Policy, please contact Lime Customer Support at [cs@lime.co](mailto:cs@lime.co).

### **Lime Trading Cookie Policy**

#### **What are Cookies and Web Beacons?**

Cookies are pieces of data that a website transfers to a user's hard drive for record-keeping purposes. Web beacons are transparent pixel images that are used in collecting information about website usage, e-mail response and tracking. Generally, cookies may contain information about your Internet Protocol ("IP") addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the website or your usage of Lime Trading Services, including a history of the pages you view.



## **How Lime Trading Uses Cookies and Web Beacons**

Lime Trading collects information from cookies and web beacons and stores it in an internal database. This information is retained in accordance with Lime Trading's Privacy Policy. This website uses the following cookies and web beacons:

### **Strictly Necessary Cookies**

These cookies are necessary for the website to function and cannot be switched off in Lime Trading's systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can configure your browser to block or alert you about these cookies, but certain areas of the site will not function properly. These cookies do not store any personal data.

### **Performance Cookies and Web Beacons**

These cookies and web beacons allow Lime Trading to count visits and traffic sources so it can measure and improve the performance of Lime Trading's site. They help Lime Trading to know which pages are the most and least popular and see how visitors move around the site. All information that these cookies and web beacons collect is aggregated and, therefore, anonymous. If you do not allow these cookies and web beacons Lime Trading's aggregated statistics will not have a record of your visit.

### **Functional Cookies**

These cookies enable the website to provide enhanced functionality and personalization. They may be set by Lime Trading or by third party providers whose services Lime Trading had added to its pages. If you do not allow these cookies, some or all of these services may not function properly.

### **Targeting Cookies and Web Beacons**

These cookies and web beacons may be set throughout Lime Trading's site by its advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites. They do not store personal information that could identify you directly but are based on uniquely identifying your browser and internet device. If you do not allow these cookies and web beacons, you will experience less targeted advertising. The website does not track users when they cross to third party websites, does not provide targeted advertising to them and therefore does not respond to Do Not Track signals.

### **Managing Your Cookie Preferences**

You have many choices with regards to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. However, if you do decide to disable cookies you may not be able to access some areas of Lime Trading's website, or the website may function incorrectly. To learn more about your ability to manage cookies and web beacons and how



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to disable them, please consult the privacy features in your browser or visit

[www.allaboutcookies.org](http://www.allaboutcookies.org).

This website may link through to third party websites which may also use cookies and web beacons over which Lime Trading has no control. Lime Trading recommends that you check the relevant third parties' privacy policy for information about any cookies and web beacons that may be used.