

## **PRIVACY NOTICE**

The Commodity Futures Trading Commission (“CFTC”) recently adopted a rule that requires all Futures Commission Merchants (“FCMs”) to provide its existing consumers/customers with a privacy notice regarding the disclosure of non-public personal information. This notice is provided to you on behalf of Rand Financial Services, Inc. (“Rand”).

In servicing your needs, we collect personal information about you to the extent necessary to enable us to perform those services. The following information may be collected:

- Information provided as a result of your completion of customer account agreements and other related documents and forms provided at the time or subsequent to the account review and approval process;
- Information available as a result of your transactions at Rand or with others;
- Information that Rand receives from outside entities, including consumer reporting agencies, relating to the application approval process; and
- Information that Rand may obtain as a result of your use of Rand’s website and other online services. Such information may be available by the utilization of a user ID and password assigned by Rand or from a Rand “cookie” or Rand service provider’s cookie.

### **Personal Information Limitations and Retention**

Personal information is retained and disclosed only as necessary to serve our customers. Such personal information about current and former customers is only used or disclosed to third parties in the following limited circumstances, and in accordance with applicable law:

- As required to process or service your account or transactions (wire transfers, withdrawals, etc.);
- As permitted by law to our service providers, including those that perform marketing services on our behalf. Rand will monitor these providers and make reasonable efforts to ensure the privacy and security of your information;

- As required by regulators, tax authorities and examiners, law enforcement personnel and/or in response to a subpoena or legal process whereby Rand believes that such disclosure is required;
- As may be appropriate to protect against fraud or illegal activity, for the safety of customers, employees, or property, or is otherwise permitted by law; and
- As you may disclose or specifically direct the firm to disclose on your behalf, personal information to a third party.

### **Protecting the Confidentiality and Security of your Personal Information**

Rand protects the confidentiality and security of your personal information by implementing and maintaining appropriate security safeguards. Examples of our safeguards include:

- Restricting access to your personal information to those employees who need to know such information in order to provide products or services to you; and
- Maintaining physical, electronic, and procedural safeguards to protect your personal information.

### **Accuracy**

Rand strives to keep your personal information as accurate, complete and up-to-date as necessary. Please contact Rand immediately if you identify any inaccuracy in your personal information so your records may be updated.

### **Notice**

Rand will provide annual notices to its individual consumers who are customers regarding its privacy policy, and if there is any change to the policy prior to the time that an annual notice would otherwise be provided, a revised privacy notice will be provided.