

SUPERFUND USA, INC.
PRIVACY NOTICE

When you use Superfund USA as your broker-dealer, you entrust us not only with your hard-earned assets but also with your personal and financial data. We consider your data to be private and confidential, and we hold ourselves to the highest standards of trust in their safekeeping and use.

We collect nonpublic personal information about Superfund USA clients such as you, from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates, or others; and
- If you visit our Website, information we collect via a Web server, often referred to as a “cookie”. Cookies indicate where a site visitor has been online and what has been viewed.

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. Moreover, we will not release information about our customers or former customers unless one of the following conditions is met:

- We receive your prior written consent;
- We believe the recipient to be you or your authorized representative; or
- We are required by law to release information to the recipient.

We only use information about you and your account to help us better serve your investment needs or to suggest services or educational materials that may be of interest to you.

To further protect your privacy, our Website uses securities programs and divides which we believe to be in accordance with current business practices, including data encryption, user names and passwords, and other tools. We maintain physical, electronic and procedural safeguards to guard your personal account information. We also restrict access to your personal and financial data to authorized Superfund USA associates who have a need for these records. We advise you not to send such information to us in non-secure e-mails.

Confidentiality and Security

We maintain physical, electronic and procedural safeguards to guard your personal account information. We also restrict access to your personal and financial data to authorized Superfund USA associates who have a need for these records. We require all nonaffiliated organizations to conform to our privacy standards and they are contractually obligated to keep the information provided confidential and used as requested. Furthermore, we will continue to adhere to the privacy policies and practices described in this notice even after your account is closed or becomes inactive.

We will continue to conduct our business in a manner that conforms with our pledge to you, your expectations and all applicable laws.