



## Privacy Policy

Vision is committed to maintaining the confidentiality, integrity and security of personal information of our current and prospective customers. We want you to understand how we collect and share that information. We understand that privacy is an important issue for you, and we also want you to understand how we protect your privacy when we collect personal information about you.

It is our policy not to release your personal information except as permitted by law, with your consent, as requested by you or set forth below. Within Vision, we restrict access to your personal information to those who require it to provide products or services to you.

<b>Facts</b>	<b>What does Vision do with your personal information?</b>
<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	<p>The types of personal information we collect and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• your account agreements and other related documents and forms (for example, name, address, social security number, birth date investment experience, risk tolerance and financial information)</li> <li>• transaction history (for example, trading with us, history of meeting margin calls and your use of various products and services that we provide)</li> <li>• credit reporting agencies, to obtain information such as verification of identity, credit-scores, credit history, purchasing and investment preferences).</li> </ul> <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
<b>How?</b>	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Vision chooses to share; and whether you can limit this sharing.

<b>Reasons we can share your personal information</b>	<b>Does Vision share?</b>	<b>Can you limit this sharing?</b>
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We do not share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	Yes	No
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We do not share

<b>To Limit our Sharing</b>	Please call us or e-mail us via the contact information below to opt out of sharing. Please note that if you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we may continue to share your information as described in this notice. However, you may contact us at any time to limit our sharing.
<b>Questions</b>	Toll Free: +1.877.836.3949 Direct: +1.203.388.2714 E-Mail: <a href="mailto:clientservices@vfmarkets.com">clientservices@vfmarkets.com</a>

<b>Who we are</b>	
<b>Who is providing this notice?</b>	Vision Financial Markets LLC (“Vision”) and its affiliates under common ownership and control. These include Vision Brokerage Services, LLC, Vision Investment Advisors, LLC and HR Trader, which is a DBA unit of Vision.
<b>What we do</b>	
<b>How does Vision protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. For more information, please visit <a href="http://www.vfmarkets.com/disclosures-disclaimers/#securitystatement">http://www.vfmarkets.com/disclosures-disclaimers/#securitystatement</a> .
<b>How does Vision collect my personal information?</b>	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>• Open an account</li> <li>• Make deposits or withdrawals from your account</li> <li>• Direct us to buy securities</li> <li>• Direct us to sell your securities</li> <li>• Tell us about your investment or retirement earnings</li> </ul> We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
<b>Why can’t I limit all sharing?</b>	Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>• Sharing for affiliates’ everyday business purposes – information about your creditworthiness</li> <li>• Affiliates from using your information to market to you</li> <li>• Sharing nonaffiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.

<b>Definitions</b>	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• Vision's affiliates include Vision Brokerage Services, LLC, Vision Investment Advisors, LLC and HR Trader, which is a DBA unit of Vision Financial Markets LLC</li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• Vision does not share with nonaffiliates.</li> </ul>
<b>Joint Marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>• Vision doesn't jointly market.</li> </ul>



## Vision's General Data Protection Regulation (GDPR) Privacy Notice for EEA Residents

This Privacy Notice describes how Vision Financial Markets LLC and its affiliates (collectively "Vision") collects and protects personal data of individuals in the European Economic Area (EEA). The information in this Notice is provided to the extent that the European Union's General Data Protection Regulation ("GDPR") applies to your business with Vision.

*Vision's data collection and retention procedures are subject U.S. laws and regulations, and your rights under the GDPR may be limited by those laws and regulations.*

### Basis for and Purpose of Data Processing

Vision collects and processes your personal data when processing is necessary for the performance of a contract with you. We also process your personal data to comply with applicable U.S. laws and regulations.

### Personal Data Obtained from Outside Sources

Vision obtains personal information about you from other sources to assist us in verifying your identity and financial history. This may include paid third-party vendors and publicly accessible data,

### Recipients of Personal Data

Vision shares your personal data with third-party service providers to help conduct our business. These arrangements are subject to due diligence and monitoring to ensure that these vendors have their own data protection agreements. Vision's vendors may include:

- Audit, accounting or recordkeeping services;
- Statement providers;
- Trading platforms;
- Credit bureaus, background-check providers and legal data services;
- Prospectus/corporate action mailing service;
- Other vendors as necessary.

### How Long Does Vision Retain Your Personal Data?

Vision processes and stores personal data for at least the duration of our contract with you, but will retain some data longer to comply with U.S. law and the rules of the securities regulatory authorities who oversee our activities.

### Your GDPR Rights

Under GDPR, you have fundamental rights regarding your personal data and you may exercise those rights -- subject to other laws or constraints that Vision must observe. These rights include:

- **Right to be informed.** You have the right to be informed that a file of your personal information is being collected, retrained and processed by Vision.
- **Access.** You have the right to obtain free access to your personal data.
- **Rectification.** You have the right to ask that incorrect or incomplete personal data be corrected.
- **Erasure.** You have the right to request that personal data be erased.
- **Restriction on processing.** You have the right to request the restriction of the processing of your personal data in specific cases.
- **Objection to processing.** You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your situation.
- **Portability.** You have the right to receive your personal data in a machine-readable format and to transmit it to another controller.

## How Vision Uses Your Personal Data

Business Function	Type of Data Collected	Lawful Basis for Processing Your Data
Open your securities account	<ul style="list-style-type: none"> <li>Contact information</li> <li>Identity documents</li> <li>Personal financial information</li> <li>Personal information regarding financial goals and risk tolerance</li> </ul>	<ol style="list-style-type: none"> <li>Performance of our contract with you</li> <li>Compliance with applicable federal/state laws and regulations</li> </ol>
Process your transactions including inflows of funds, securities transactions, investment/sweep of cash and outflow of funds	<ul style="list-style-type: none"> <li>Contact information</li> <li>Identity documents</li> <li>Purpose of the transaction</li> </ul>	<ol style="list-style-type: none"> <li>Performance of our contract with you</li> <li>Compliance with applicable federal/state laws and regulations</li> <li>Protection of Vision's interest in collecting funds owed by you</li> </ol>
Lend money to you for a margin account	<ul style="list-style-type: none"> <li>Contact information</li> <li>Identity documents</li> <li>Personal financial information</li> </ul>	<ol style="list-style-type: none"> <li>Performance of our contract with you</li> <li>Compliance with applicable federal/state laws and regulations</li> <li>Protection of Vision's interest in collecting funds owed by you</li> </ol>
Provide you with information concerning your account including, but not limited to: statements, balances, fees, margin balances, transaction history, changes in your account contract, risk disclosures, privacy policies and cyber threats	<ul style="list-style-type: none"> <li>Contact information</li> </ul>	<ol style="list-style-type: none"> <li>Performance of our contract with you</li> <li>Compliance with applicable federal/state laws and regulations.</li> <li>Safeguarding your account from outside threats</li> </ol>
Use data analytics to monitor your account activity	<ul style="list-style-type: none"> <li>Aggregated trading history</li> <li>Technical information including the URL used to access your account</li> </ul>	<ol style="list-style-type: none"> <li>Performance of our contract with you</li> <li>Compliance with applicable federal/state laws and regulation.</li> <li>Ensure trading activity in your account is lawful</li> <li>Safeguarding your account from outside threats</li> </ol>
Make suggestions to you via our website, by e-mail or your statements regarding account safety, important dates or to communicate new products and services to you	<ul style="list-style-type: none"> <li>Contact information</li> <li>Identity documents</li> <li>Personal financial information</li> <li>Personal information regarding financial goals and risk tolerance</li> </ul>	<ol style="list-style-type: none"> <li>Performance of our contract with you</li> <li>Compliance with applicable federal/state laws and regulations</li> </ol>

## Information about Cookies

Cookies are text files containing small amounts of information, which your computer or mobile device downloads when you visit a website. Like most firms, Vision uses cookies to help navigate between pages and remember your preferences. If you visit Vision's website, we use cookies to customize your online experience, store your login credentials, and to prevent and detect fraud. When you visit our website from any device (mobile, tablet or PC), we collect information about your use of the site, including information about the device and browser you use to access the site, the way you interact with this site, and the IP address your device connects from. You may not be able to initiate or complete some activities within our secure online services unless these cookies or similar technologies are installed.