

ANNUAL 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 Gain Capital Group, LLC (“GAIN”).

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 GAIN or with others;
- Information that GAIN receives from outside entities, including consumer reporting agencies, relating to the application approval process; and
- Information that GAIN may obtain as a result of your use of GAIN’s website and other online services. Such information may be available by the utilization of a user ID and password assigned by GAIN or from an GAIN “cookie” or GAIN 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. GAIN 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 GAIN 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

GAIN 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

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

Notice

GAIN 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.