

## PRIVACY POLICY

*One Path Trading, LLC (“One Path Trading” or “we,” “us” or “our”) is committed to protecting the privacy of all individuals who utilize the [www.onepathtrading.com](http://www.onepathtrading.com) website and any products or services made available via the such website (together with all content of the website, the “Site”). Please read the following policy to understand how we collect, use and safeguard the information you may provide to us via this Site. This Privacy Policy may be revised from time to time, so please revisit this page often to remain fully informed of our privacy related policies. Your continued use of the Site following posting of any revised Privacy Policy will constitute your acceptance of the modified Terms of Use.*

### WHAT INFORMATION DOES ONE PATH TRADING COLLECT FROM YOU?

Via the Site, One Path Trading collects from you: (i) personally identifiable information, and (ii) technical and other information.

- General Web Site Visitors. When you browse the Site, you do so anonymously; no personally identifiable information is collected.
- Contacting Us. The Site permits you to reach out to us via email and telephone. Whenever you send an email via the Site or otherwise contact us via the Site, you may be providing us with your first name, last name, email address and/or any other information you choose to provide us. For example, you may choose to provide your phone number, mailing address and/or other information necessary or helpful for us to address your query or concern.
- Applications for Account. When you register for an account with us, you may be required to provide us your name, email address and other personally identifiable information.
- Video and Audio Conferencing. From time to time, certain features of the Site (e.g. the Private Collaborate Room) may permit video and/or audio conferencing among Site users. In the event you subscribe to access any such features and participate in any video and/or audio conference, you may choose to make available images of you, your voice and any other indicia of your identity or persona as may be displayed, broadcast, recorded, transmitted and/or distributed via your use of any such features (collectively, “**Persona**”), as further described in the Terms of Use posted on the Site.
- Technical and Other Information. While you are browsing the Site, we automatically log your IP address (a number assigned to your computer when you use the Internet) and your activity while using the Site. Additionally, in order to personalize and enhance your experience on the Site, we may also collect information through “cookies.” Cookies are small strings of text that are sent by the Site to your browser and then stored by your browser on your computer’s hard drive. We use cookies to help diagnose problems with our servers and to administer the Site. We also use cookies to gather broad demographic information and to help identify you in respect to visits to the Site so that we may improve your user experience, and to determine whether you visited the Site from a particular Internet link or advertisement. While a code in the cookie file enables the Site to label you as a particular user, including identifying you by name or other personally identifiable information, such cookie files are encrypted in order to protect your information. Most web browsers automatically accept cookies, but it is possible to change your browser setup so that it does not accept cookies. However, rejecting cookies may prevent you from taking advantage of certain portions or features of the Site.

## TRACKING

Please note we do not engage in the collection of personally identifiable information about your online activities over time and across third party websites or online services. Accordingly, we do not currently process or comply with any web browser's "do not track" signal or other mechanisms that provide consumers with the ability to exercise choice regarding the collection of personally identifiable information about your online activities over time and across third party websites. Further, we have not knowingly authorized any third parties to collect personally identifiable information about your online activities over time and across different websites when you use the Site. Nonetheless, such third party companies (e.g., companies providing features or functionality on the Site, etc.) may collect and use non-personal information during your visits to the Site and other websites in order to provide advertisements on other sites about goods and services likely to be of greater interest to you. These companies typically use a cookie or a third party web beacon to collect such information.

## HOW IS YOUR INFORMATION USED?

- Our Use of Information. We collect, retain, and use your personally identifiable information for legitimate business purposes only, including without limitation for the following purposes:

to respond to an inquiry from you or address a request submitted by you (including contacting you directly to request additional information to process your inquiry or request);

to contact you and to provide you information regarding One Path Trading and/or our products and/or services;

to operate or improve the Site;

to correspond with you regarding the Site or our products or services;

to inform you of developments at One Path Trading or about products and/or services we believe may be of interest to you;

to monitor Site visitor traffic patterns and Site usage;

to comply with applicable laws, regulations and rules, and requests of relevant law enforcement and/or other governmental agencies;

to enforce our Terms of Use; and/or

to protect the rights, property, or safety of One Path Trading, our users, and others.

If you are participating in video or audio conferencing features of our Site, we may also display, publish and otherwise use your Persona to facilitate your use of such features and as otherwise set forth in our Terms of Use.

- Sharing Information.

If you participate in audio or video conferencing via the Site and/or one of the Site's user forums, or otherwise contribute User Content (as defined in the One Path Trading Terms of Use) via the Site, you may choose to make personally identifiable information (including your Persona) available to us and to third parties via the Site, as described in the Terms of Use.

We do not, however, otherwise sell or rent any of your personally identifiable information to third parties. Except with respect to personally identifiable information you choose to make available as User Content, we share your information only with our affiliates and service providers (including, but not limited to, service providers assisting us with marketing and/or technology services) and/or other companies we may partner with from time to time, or as otherwise described herein, to provide you the Site and/or products and/or services. Also, we may share in aggregate, statistical form, non-personal information regarding the visitors to the Site, traffic patterns, and Site usage with business associates and/or advertisers. In addition, we will disclose information we maintain, including personally identifiable information: (i) when required to do so by law, or in response to a request from a law enforcement agency or authority or any regulatory authority; (ii) to protect the integrity or security of the Site or the interests, rights, or property of One Path Trading; (iii) in the context of a transfer of our business, as addressed below; and/or (iv) to enforce the Site's Terms of Use.

## **MODIFICATIONS**

We strive to maintain the accuracy of any personally identifiable information that may be collected from you, and will use our commercially reasonable efforts to respond promptly to update our database when you tell us the information in our database is not accurate. It is your responsibility to ensure that such information is accurate, complete and up-to-date. You may obtain from us, by email, the information in our records. If you wish to make any changes to any personally identifiable information you have provided to us, you may do so at any time by contacting us at [info@OnePathTrading.com](mailto:info@OnePathTrading.com).

## **OPT OUT**

You may opt out of receiving materials or other communications from us by contacting us at [info@OnePathTrading.com](mailto:info@OnePathTrading.com).

## **CHILDREN**

In compliance with the Children's Online Privacy Protection Act, 15 U.S.C. §§ 6501-06 and 16 C.F.R. §§ 312.1-312.12, we do not knowingly collect information from children. Moreover, we do not permit use by individuals under the age of 18 of any of the password protected areas of our Site or use of any other products or services that may be provided via the Site from time to time. By using the Site, you represent that you are at least 18 years of age.

## **THIRD PARTY WEBSITES**

One Path Trading may reference or provide links to third party websites. We are not responsible for the third party websites, and you should review the privacy policies posted on such sites. Please be aware that One Path Trading does not control, nor are we responsible for, the privacy policies or information practices of third parties or their websites.

## **PROTECTING YOUR PERSONALLY IDENTIFIABLE INFORMATION**

Because security is important to both One Path Trading and you, we make reasonable efforts to ensure the security of our systems. Please be aware, however, that Internet data transmission is not always secure and we cannot and do not guarantee that information you transmit utilizing the Site (including, but not limited to, via any audio and/or video conferencing or chat features) is secure.

## **BUSINESS TRANSFER**

One Path Trading may, in the future, sell or otherwise transfer some or all of its assets to a third party. Your personally identifiable information and/or technical information we obtain from you via the Site may be disclosed to any potential or actual purchasers of such assets and/or may be among those assets transferred.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

Pursuant to Section 1798.83 of the California Civil Code, residents of the State of California have the right to request from a business with whom the California resident has an established business relationship certain information with respect to the types of personally identifiable information the business shares with third parties for those third parties' direct marketing purposes and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To exercise your rights, you may make one such request each year by e-mailing us at [info@OnePathTrading.com](mailto:info@OnePathTrading.com). Please also refer to this Privacy Policy for a description of our information disclosure practices.

## **USERS OUTSIDE THE UNITED STATES**

If you are a resident of a country other than the United States of America, by using this Site and providing us your personally identifiable information you explicitly acknowledge and agree to: (i) the transfer of your personally identifiable information (including, but not limited to, all personally identifiable information as is included or incorporated within your Persona and/or other User Content you make available or accessible via the Site) to and from the United States and all other jurisdictions worldwide, including but not limited to jurisdictions that do not have data protection laws similar to such laws in the jurisdiction(s) in which you reside; and (ii) the collection and use of your personally identifiable information in accordance with this Privacy Policy and the One Path Trading Terms of Use. [One Path Trading Terms of Use](#)

## **ACCEPTANCE OF THIS PRIVACY POLICY**

This Privacy Policy is incorporated into and subject to the terms of the One Path Trading Terms of Use. [One Path Trading Terms of Use](#). By using the Site and voluntarily providing your personally identifiable information to us, you consent to the collection and use of such personally identifiable information as set forth in this Privacy Policy. *If you do not agree to the terms of this Privacy Policy, please do not provide us with any information and do not use the Site.*

## **EFFECTIVENESS**

This Privacy Policy is effective as of [March \_\_, 2016]. We reserve the right, at any time, to modify, alter, or update this policy, and any such modifications, alterations, or updates will be effective upon posting. In the event we modify this Privacy Policy, your continued use of the Site will signify your acceptance of the modified Privacy Policy.

## **QUESTIONS?**

Questions regarding this Privacy Policy should be directed to [info@OnePathTrading.com](mailto:info@OnePathTrading.com). One Path Trading may also be contacted at the following address and phone number:

One Path Trading, LLC  
64 Wall Street, Suite 400

Norwalk, CT 06850  
Attention: Kathryn Burshtein

Email: [info@onepathtrading.com](mailto:info@onepathtrading.com)

Phone: 203.939.1784

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