## **Privacy Policy**

At Bluewater Trading Solutions ("BW"), we value our customers, and maintaining customer trust and confidence is our highest priority. BW must obtain certain information about our customers and verify their identities in order to comply with the Anti-Money Laundering Rules under the U.S. Patriot Act. While it is necessary that we obtain accurate and current information about our customers in order to provide the highest level of customer service, we are dedicated to protecting the privacy and confidentiality of our customer's information.

**BW will never sell your personal information to anyone.** We will not use or distribute your personal information in any way without prior notification to you. We promise that we will uphold the privacy policies and procedures as set forth below.

#### Information we collect about our Customers

- The personal information we collect from you comes from information you supply to us in account opening applications (whether written or electronic), or in other forms you may provide to us. This information may include your name, address, social security number or tax identification number, and financial information about you.
- Information regarding your transactions with us including your trading history at various FCM's, your history of meeting margin calls or your use of the various services and products that we provide.
- Information about your credit history and information we may receive from your introducing broker or associated person and other consumer reporting agencies.

#### Information we may share about our Customers

- BW will not sell personal information regarding our current or former customers.
- BW may share personal information about our current and former customers with FCM's and service providers. In either case, your personal information will remain subject to the strictest confidentiality protections.

#### Information we may disclose

- We may disclose information about current or former customers in order to cooperate with legal or regulatory authorities or pursuant to a court order or subpoena.
- We may also disclose personal information as necessary to perform credit checks, collect debts, enforce our legal rights or otherwise protect our interests and property.

### Security

# BW is committed to protection of your personal information and to protecting your privacy.

• Only authorized BW employees, agents, or affiliates will have access to your personal information. All of our employees and service providers are held to the highest standards of privacy and security.

If this privacy policy changes you will be notified by e-mail or in other appropriate ways. If you have questions relating to this policy, please contact your BW representative.