

PRIVACY STATEMENT

**JOOL Markets AS
January 2018**

1 Purpose and scope

The purpose of this Privacy Statement ("Statement") is to provide information about how your fundamental rights and freedoms are protected from being compromised by JOOL Markets AS ("JM") processing of personal data. At JM personal data shall be processed in accordance with applicable Norwegian legislation and the reasonable expectations of the natural persons the personal data is related to ("Data Subjects").

This Statement sets out the policy statement for JM and will be supported by internal Policies and Procedures outlining further details on implemented measures and internal procedures.

The Statement applies to all legal entities directly or indirectly controlled by JM, including tied agents, collectively referred to as "JM", "the Firm" "the Group".

2 Privacy statement

JM is committed to maintaining the confidentiality, integrity and security of personal information about current, former and prospective clients. At JM we understand our obligation to keep information about you both confidential and secure at all times. We maintain procedures for the collecting, using, securing, and sharing of personal and/or non-public information ("Client Information"). In keeping with our principle of "ethics we can all be proud of", you can be assured that we are committed to protecting your privacy at all times. Specifically:

- We will not sell or disclose any non-public personal information about you to anyone except as is required by law under any investigation by the relevant jurisdictions.
- We will not provide Client information to third parties for their marketing purposes without obtaining your express consent in writing.
- We will never use your Client Information to your unfair advantage.
- Our commitment to privacy will remain in place for former clients (with whom the relationship with JM has been terminated) and also applies to prospective clients.

3 How and why we obtain personal information

In the normal course of our business, we may collect and use various types of information which we consider essential for operating our business and providing you with the best possible client service. Such information is expected to be shared amongst our affiliates solely in the normal course of business. Such information may include:

- Your Personal Data received from you such as name, date of birth, address and other contact details etc., including information we receive

- from you in order to perform our KYC-obligations.
- Information we receive from you – in either written or verbal format – regarding your relationship, client agreement and/or transactions with us or others.
 - Information regarding your interactions with JM and your usage of our services (including trading activity and information gathered via online data gathering tools).

We are required to record telephone conversations where we provide investment services to our clients. We record all conversations we have with our clients. Recordings will be stored for at least five years, which is the same length of time we are obligated to store written documentation. The recordings will be deleted when there is no longer any need to store them.

4 Information security

We are committed to preventing others from accessing your Client Information, and we maintain procedures and technology designed for this purpose. In particular, we restrict access to information about you to those partners and employees who need to know that information in order to provide you with the best possible products and services.

JM, and its affiliates, will have access to your non-public personal information. JM agrees to hold such information in confidence and to comply with this privacy statement.

5 How we share information about you with third parties

When you do business with JM, you may rely on us to keep your information confidential. We will not provide Client information to third parties outside the JM Group for their marketing purposes without obtaining your express consent in writing.

In some cases, we are required to give information to authorities and others who have a statutory right to request it.

6 Cookies and similar technologies

JM and our third-party service providers may use cookies and similar technologies to support the operation of our websites. Cookies are small amounts of data that a website exchanges with a web browser or application on a visitor's computer or mobile device. Cookies help us to collect information about visitors to our websites, including date and time of visits, pages viewed, amount of time spent on our sites, or general information about the device used to access the site. Cookies are also

used for security purposes and to personalize your experience, such as customizing your screen layout.

You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. If you refuse cookie through your own settings, you may experience some inconvenience in your use of our websites. For example, you may not be able to sign in and access your account, or we may not be able to recognize you, your device, or your online preferences.

7 Other Information

If you decide to close your account, we will continue to adhere to the privacy statement and practices as described herein.

The examples contained within this Statement are illustrations, and they are not intended to be exclusive. We are continually improving our methods of communication and adding new functionality and features to our website and to our existing services. Due to these ongoing changes, changes in applicable law and the changing nature of technology, our data practices will change from time to time. We therefore reserve the right to change this Statement. If and when our data practices change, we will notify you of the changes by posting an updated version of this Statement on our website.

8 Rights

All who ask are entitled to basic information about treatment of personal data in a company pursuant to article 12, of the General Data Protection Regulation. Jool Markets has provided this information in this declaration and will refer to it when requested. Those registered (data subjects) in one of Jool Markets' systems are entitled to access to their own information. The data subject also has the right to request that incorrect, incomplete or information that Jool Markets are not allowed to treat are corrected, deleted or supplemented. Claims from the data subject must be answered free of charge and no later than 30 days.

If any of the treatments, e.g. marketing purposes, is based on your consent you have the right to withdraw the consent at any time.

Data subject have the right to object to the processing of personal data by Jool Markets and may also lodge a complaint to the Norwegian supervisory authority - Datatilsynet.

Data subjects have the right to receive personal data concerning him or her, which he or her has provided to Jool Markets, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

9 Contact information DPO

For all matters concerning personal data you can contact our Data Protection Officer (DPO):

Truls Lindmo
DPO

Mobile: +47 91 61 38 00
Office: +47 21 01 85 30
E-mail: tl@joolmarkets.no