

Privacy Statement

Your privacy and trust are important to us. We're committed to keeping your personal information safe and confidential. This Privacy Statement ("**Statement**") provides important information on how we might collect and process your personal information through your use of this website, including any data you may provide when you sign up to be contacted by us through this website or request materials from us.

Please read this Statement carefully and contact us at DPM@BGCPartners.com if you have any questions about our privacy practices or your personal information choices. It is important that you check back often for updates to this Statement.

This Statement aims to give you information on how Sunrise Brokers LLP ("**Sunrise**", "**we**", "**our**" or "**us**") may collect and process your personal information through your use of this website, including any data you may provide (actively or passively). If you submit someone else's personal information through this website it is your responsibility to notify that individual that you have provided us with their personal information and bring this Statement to their attention.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

This website is not intended for children and we do not knowingly collect data relating to children.

Contacting us for help

When you contact us, you may provide some additional personal information, like your name, address and phone number(s). We will use this information to respond to your query. Email isn't always secure, so we advise you to keep the personal information you share by email to a minimum.

Emails we receive are stored on our standard internal contact systems which are secure and can't be accessed by external parties.

Collecting your Personal Information

We use different methods to collect data from and about you through this website including through:

Direct interactions. You may give us your data by filling in forms through this website. You may give us your personal information when you request materials to be sent to you, or when you give us some feedback.

Requesting us to contact you. When you request through this website that we contact you or send you materials, we require you to provide your first and last name, your email address and your company or organisation name. We may use this information to provide technical and customer support to you, verify your identity, and send you important account and service information.

Automated technologies or interactions. Aside from the forms you fill out as you browse the pages of our website we may automatically collect and store certain technical data about your visit. This could include your internet protocol (IP) address, your browser type and version and any related

plug-ins, time zone settings and location, your operating system and platform and other technology on the devices you use to access this website. This type of data regarding your equipment, browsing actions and patterns may be collected through cookies, server logs and other similar technologies.

More information about cookies. Cookies are small pieces of information, stored in simple text files, placed on your computer by a website. Cookies can be read by the website on your subsequent visits. The information stored in a cookie may relate to your browsing habits on the website, or a unique identification number, so that the website can identify you on your return visit. This website automatically collects and stores IP addresses. This information does not, in and of itself identify you and is necessary to maintain the security and integrity of our website. If you do not wish for us to collect this information, you may disable cookies in your Internet browser settings.

Use and disclosure of your Personal Information

We may use your personal information to provide you with the services and/or products you request through this website and to perform our contractual obligations in relation to those services and/or products. We will notify you separately if we process your personal information for any other purpose and, if required, ask for your consent.

We may be required to use and retain your personal information for legal and compliance reasons, such as the prevention, detection or investigation of a crime; loss prevention; or fraud. We may also use your personal information to meet our internal and external audit requirements, for information security purposes and as we believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (c) to enforce our terms and conditions; or (d) to protect our rights, privacy, safety, property, or those of other persons.

You acknowledge and agree that in certain circumstances we may be obliged to disclose personal information relating to you to third parties, for example, where we use third party service providers to assist us in providing services to you, where it is required by a settlement services provider and other agents of yours or ours where necessary to allow them carry out their terms of engagement in the context of providing you with the services required, to comply with any legal or regulatory requirement, to carry out our obligations under our terms of business or any relevant agreement with you, as well as to protect and defend the rights of property of Sunrise or any of its affiliates, licensors and/or other clients. In any other circumstances we will only share information with third parties with your written consent.

Data Storage and Processing Locations

We may transfer personal information from the European Economic Area to other countries in which applicable laws do not offer the same level of data privacy protection as in the European Economic Area. One instance of this is Google, an analytics provider, which is based outside of the European Economic Area. We take measures to provide appropriate levels of data privacy protection. For example, we use approved standard contractual clauses, intragroup agreements, and other measures designed to ensure that recipients of your personal information protect it.

Data Security

We take the security of your personal information seriously. We use appropriate technologies and procedures to protect personal information. Our information security policies and procedures are closely aligned with widely accepted international standards. We review and update them regularly, as necessary to meet our business needs, changes in technology and regulatory requirements.

Data Retention

We retain personal information for as long as we reasonably require it for legal or business purposes. In determining data retention periods, we take into account local laws, contractual obligations, and the expectations and requirements of our customers. When we no longer need personal information, we securely delete or destroy it.

Disclaimer of liability

Sunrise, its directors, employees, agents, affiliates or other representatives and their respective parent and associated companies, shall not be liable in respect of any claims, emergencies, demands, causes of action, damages, losses, expenses, including without limitation, reasonable legal fees and costs of proceedings arising out of or in connection with the use and/or dissemination of personal information relating to you in accordance with this Statement and your consents.

Your rights

The laws of your state of residence may give you the right to request certain information from us. To request a copy of such information, please contact us by clicking on the email link provided below and include your name, state of residence and specific information requested.

The GDPR entitles European residents certain rights in relation to their personal information. Under certain circumstances, if you are a European resident by law you have the right to:

- update, modify, delete or obtain (commonly known as a "subject access request") a copy of the personal information that we hold on you; or
- restrict or stop us from using any of the personal information which we hold about you;

you can request this by contacting DPM@BGCPartners.com. We endeavour to respond to such requests within a month or less, although we reserve the right to extend this period for complex requests.

Where appropriate, we will respond to your requests relating to your personal information in writing or by email. If you require our response in a different format, please let us know.

Complaints

If you are not happy with the way that we have handled your personal information or a data subject access request, you also have the right to lodge a complaint with a supervisory authority, in particular (for EU based individuals) in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The

supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: [0303 123 1113].

This Statement was last updated on 25 May 2018.