



Privacy Statement

The Spratt Global Resource Investment, Ltd's (Spratt Global) Privacy Statement describes how we collect and protect your personal information in the course of providing you with financial services.

Our Privacy Policy

We are very committed to protecting the privacy of your personal information. Spratt Global wants you to know that:

- We do not sell, rent or license your personal information to anyone.
- We maintain physical, electronic and procedural safeguards that restrict unauthorized access to your personal information.
- We train our employees about privacy and limit access to this information.

Personal Information We May Collect

We collect personal information about you, which may include your name, physical address, e-mail address, telephone number, Social Security number and other information as required.

We obtain this information from the following sources:

- Information you provide online, on written applications or forms, and other information you may provide;
- Information entered online that may be stored even if you do not complete or submit an application;
- Information from third parties in order to verify your identity or to prevent fraud;
- Information from third parties that you authorize to provide information to us; and
- Information about your transactions, account experience, account balance, trading activity and payment history.

Personal Information We Use or Disclose

Spratt Global does not sell, rent or license your personal information to anyone. This applies to both current and former customers.

We use your personal information to provide services you may have requested, to respond to communications from you, and to help you open new or additional accounts.

We disclose your personal information, as permitted by law, to non-affiliated third parties that help us provide financial services to you. This includes third parties who provide statements of your accounts, transaction confirmations and check printing; or provide custody, depository or recordkeeping services. All non-affiliated third parties that accept or receive personal information from us are obligated contractually or by law or regulation to keep this information confidential and to use the information only to provide the services we ask them to perform.

We disclose personal information to government and regulatory agencies and to comply with a lawful summons, court order, subpoena, fraud investigation, audit or regulatory examination.

Security of Your Personal Information

We maintain physical, electronic and procedural safeguards that restrict access to your personal information. We comply with applicable laws and regulations. Our online environment uses industry leading security technologies including layered security and access controls over personal information.

These safeguards are reviewed and may be adjusted in response to advances in technology and the latest security threats.