



## **JonesTrading Institutional Services LLC Privacy Policy**

At JonesTrading Institutional Services LLC (“JonesTrading,” “we,” “our,” or “us”), we are committed to managing your information responsibly and would like to let you know that we recognize and respect your right to privacy. This Privacy Statement applies to the JonesTrading websites (collectively, the “sites”). This Privacy Statement describes the types of personal information we collect on the sites, how we may use that information and with whom we may share it. As used in this Privacy Statement the terms “include(s)” and “including” mean “including without limitation.”

This Privacy Statement may be updated by us at any time and any changes will be effective once posted on the sites.

### **Personal information we collect and how we use it:**

- **Information you provide to us:** We collect information that you provide to us during onboarding, when you access and use our sites, or communicate with us, including as follows:
  - During onboarding, we request information regarding your company and your management via onboarding documents.
  - You may register an account with us or sign up to receive news, commentary, and publications from JonesTrading. To register or sign up we may ask you for information, including your name, email address and topics of interest. We will use this information to send you the communications you request. We may also use this information to communicate with you about other topics which we think may be of interest to you. If you are a registered user/have an account with us, you can unsubscribe from receiving these e-mails at any time by clicking the “unsubscribe” link contained in our email messages (if applicable) or by replying back “unsubscribe” to the correspondence.
  - **Contact Us.** If you communicate with us through a link on our sites, we may ask you for information including your name, email address and telephone number so we can respond to your questions and comments.
  - **Use of the sites.** We may collect information about your actions on the sites and content you post to the sites, including comments or inquiries you may post or ask to the sites.
- **Information from Tracking Technologies:** When you access or use our sites, we may also collect usage information through cookies, clear gifs, log files, and other tracking technologies, and we may use third party analytics partners to assist with this collection. The type of information collected may include information about how you use the website (e.g., the pages you view, the links you click), information about your browser and usage patterns (e.g., your IP address, browser type, referring/exit pages), and information about your device used to access the website (e.g., mobile device ID, device type and operating system). We use this information to monitor aggregate use metrics, analyze traffic patterns, track content you may be interested in, diagnose, and fix technology problems and otherwise plan for and enhance our sites. Please note that, as of the latest update of this privacy statement, this website does not currently take actions to respond to “Do Not Track” signals in browsers.
- **Information from other sources:** JonesTrading may collect nonpublic personal information about you from any of the following sources:
  - We may obtain information from other sources, such as third-party information providers, or through mergers and acquisitions, and combine this with information previously collected.
  - From its affiliates JonesTrading International Limited (“JonesTrading International”) and JonesTrading Canada Inc. (“JonesTrading Canada”).
  - From you or your representative on applications or forms (for example, name, address, Social Security/Tax Identification number, birth date, assets, income)



- From transactional activity in your account (for example, trading history and balances)
- From other interactions with JonesTrading (for example, discussions with our operations staff)
- From verification services and consumer reporting agencies (to ensure the accuracy of application data, or assess creditworthiness if you apply for credit products)
- From other sources with your consent or with the consent of your representative (for example, from other institutions if you transfer positions to JonesTrading)

In addition to the uses described above, we may also use the personal information you provide and/or we collect on the sites as follows:

- To operate, maintain, and provide you with the features and functionality of the sites.
- Manage the day-to-day operations of the Sites and maintain the links we provide to you.
- To contact you (including by e-mail), in order to respond to your inquiries and comments.
- To monitor, enhance, and improve the sites and any products or services we may provide through the sites, including through market research and data analytics.
- Communicate directly with you, such as sending you email messages about our products and services.
- For compliance with our legal obligations and policies and procedures.

### Information we share

JonesTrading is not in the business of selling your information. JonesTrading considers privacy, security, and service in our online operations to be just as critical as in the rest of our business. We consider this information to be a vital part of our relationship with you, and do not share your personal information with any third party except when explicitly authorized by you. Notwithstanding the foregoing, there are, however, certain circumstances in which we may share your personal information with certain third parties without further notice to you, as set forth below:

- **Within the JonesTrading group:** We may make personal information available to other companies under common ownership and will use personal information in the same way as we may use it under this Privacy Statement.
- **Our third-party service providers:** We may share personal information with our service providers or business partners who help us deliver or improve our services or who perform service on our behalf, including software, system and platform support, cloud hosting services, advertising, data analytics, administrative or business management, and order fulfillment and delivery. Our third-party service providers are required only to share or use personal information we make available to them for the purpose of providing services to us.
- **Third parties for legal reasons:** We may share with, or disclose personal information to, third parties to the extent that we determine in good faith that we are required to do so under any applicable laws, rules or regulations, orders, or in enforcement of our rights or property or the defense of claims, or if we reasonably believe disclosure is necessary to prevent harm or financial loss, or in connection with preventing fraud or illegal activity, and/or to enforce any terms of use.
- **Third parties due to sale or transfer of business or assets:** We may share with, or disclose personal information to, third parties in the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). In such an event we will make reasonable efforts to ensure that any transferred information is treated in a manner consistent with this Privacy Statement.
- **Others:** We may share information in an aggregated or unidentifiable form. For example, we may provide information about our users in aggregate to demonstrate the effectiveness of our services.



We do not share your personal information or company information with third parties for marketing purposes without your consent.

### **Links to other sites**

Occasionally, we provide links to other websites for your convenience and information. These websites operate independently from our sites and are not under our control. These websites may have their own privacy notices or terms of use, which we strongly suggest you review if you visit any linked websites. We are not responsible or liable for the content of these websites, any products or services that may be offered through these websites, or any other use of the linked websites.

### **How we protect personal information**

JonesTrading has always considered the protection of sensitive information to be a sound business practice and a foundation of customer trust. We employ extensive information protection controls in keeping with industry standards and practices, and we regularly adapt these physical, electronic, and procedural controls to respond to changing requirements and advances in technology.

We maintain administrative, technical, and physical safeguards for the sites that are designed to protect against loss, misuse, unauthorized access, disclosure, alteration, or destruction of the personal information we collect through our sites.

JonesTrading uses a variety of proven protections to maintain the security of your online session. For example, we make extensive use of firewall barriers, encryption techniques and authentication procedures. We also use cookies and similar files that may be placed on your hard drive for security purposes, to facilitate site navigation and to personalize the appearance of our site.

### **Notifications**

In the unlikely event there were an breach incident identified that involves sensitive customer information that could create a reasonably likely risk of substantial harm or inconvenience to an individual identifies with the information if it were compromised, a notice (pursuant to Regulation S-P) will be provided to the customer as soon as practicable, but not later than 30 days, after the Firm has become aware of the unauthorized access or use of the sensitive customer information. The Firm has implemented a firm-wide Incident Response Plan to address any potential incidents like these and procedures for notifying our customers as quickly as practicable.

### **Minor information**

Please note that this website is not designed to be used by or collect any personal information from individuals under the age of majority.

### **Additional Rights of EU Residents**

Please see our Data Protection Policy for the rights available to EU residents under the General Data Protection Regulation (EU) 2016/679 (“GDPR”) found here:

<https://www.jonestrading.com/wp-content/uploads/2021/03/External-privacy-notice-JTIL-FINAL-06.10.2019.pdf>

### **Rights of California Residents**

California’s “Shine the Light” law (Civil Code Section §1798.83) permits users of the sites who are California residents the right to request certain information regarding our disclosure of personal information (as defined in California Civil Code Section 1798.83(e)(7), available at this link: [Cali. Civ. Code Section 1798.83\(e\)\(7\)](#)) to third parties for their direct marketing purposes. To make a request to access such information, please contact us at [compliance@jonestrading.com](mailto:compliance@jonestrading.com). After receiving such a request, we will provide a list of the categories of such personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once



per calendar year. We reserve our right not to respond to requests submitted other than to the address specified in this paragraph.

**Contact Us**

If you have any questions about this Privacy Statement, the practices of the sites, or your dealings with the sites, please contact us at [Compliance@jonestrading.com](mailto:Compliance@jonestrading.com).