

PIONEER COMMODITIES LLC

Privacy Policy

Your Privacy is Our Priority

PIONEER COMMODITIES LLC is committed to safeguarding the personal information that you provide us. This Privacy Policy describes how we handle and protect personal information we collect about individuals, such as you, who apply for or receive our products and services. The provisions of this notice apply to former customers as well as our current customers.

Why and How We Collect Personal Information

When you apply for or maintain an account with PIONEER COMMODITIES LLC, we collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about products and services that may be of interest to you, and providing customer service. The personal information we collect about you includes:

- Information you provide to us on applications and other forms, such as your name, address, date of birth, social security number, occupation, assets, and income;
- information about your transactions with us and with our affiliates;
- information we receive from consumer reporting agencies, such as your credit history and creditworthiness, and other entities not affiliated with PIONEER COMMODITIES LLC; and
- information you provide to us to verify your identity, such as a passport, or received from other entities not affiliated with PIONEER COMMODITIES LLC.

How We Protect Personal Information

We limit access to your personal information to those employees who need to know in order to conduct our business, service your account, and help you accomplish your financial objectives, such as providing you with a broad range of products and services. Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so. We maintain physical, electronic, and procedural safeguards to protect your personal information. We do not rent or sell your name or personal information to anyone.

Sharing Information With Our Affiliates

We may share personal information described above with our affiliates for business purposes, such as servicing customer accounts and informing customers about new products and services, and as permitted by applicable law. Our affiliates are companies controlled or owned by us, or companies controlling or under common control with PIONEER COMMODITIES LLC and us; and include financial service companies, such as dealers, other brokers, futures commission merchants, and advisers.

The information we share with affiliates for marketing purposes may include the information described above, such as name, address and PIONEER COMMODITIES LLC account information, but will not include other credit information, such as credit history appearing on a consumer credit report or net worth and income information appearing on applications for our products and services.

Disclosure to Non-Affiliated Third Parties

In order to support the financial products and services we provide to you, we may share the personal information described above with third-party service providers and joint marketers not affiliated with us, including:

- financial service institutions (e.g., advisers, dealers, brokers, trust companies and banks) with whom we have joint marketing agreements, such as agreements to market financial services or products that we jointly offer, endorse or sponsor; and
- companies under contract to perform services for us or on our behalf, such as vendors that prepare and mail statements and transaction confirmations or provide data processing, computer software maintenance and development, transaction processing and marketing services.

These companies acting on our behalf are required to keep your personal information confidential.

In addition, we may disclose personal information with non-affiliated companies and regulatory authorities as permitted or required by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect our rights or property. Except as described in this privacy policy, we will not use your personal information for any other purpose unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so.

Accessing and Revisiting Your Personal Information

We endeavor to keep our customer files complete and accurate. We will give you reasonable access to the information we have about you. Most of this information is contained in account statements that you receive from us and applications that you submit to obtain our products and services. We encourage you to review this information and notify us if you believe any information should be corrected or updated. If you have a question or concern about your personal information or this privacy notice, please contact your PIONEER COMMODITIES LLC representative.

Privacy Choices Form – Opt Out

If you prefer that we limit disclosures of personal information about you, you may notify us via email at optout@comtrustinc.com, by calling 561-362-3945, or via US Postal Service, that you elect to opt out of our privacy policy procedures. Please send correspondence where you maintain your account(s) as listed on your account statements, along with your account number(s) to: PIONEER COMMODITIES LLC Royal Palm Place 101 Plaza Real South Suite 207 Boca Raton, FL 33432.

Our account records will then indicate the following preferences:

- Limit disclosure of personal information about me to nonaffiliated third parties
- Limit the personal information about me that you share with PIONEER COMMODITIES LLC affiliates
- Remove my name from your marketing lists shared with affiliates in non-commodity lines of business.

Please allow approximately 30 days from our receipt of your request for your instructions to become effective. You do not need to notify us, if you have previously instructed PIONEER COMMODITIES LLC, in writing, not to share information about you.