



PRIVACY POLICY STATEMENT

Last Updated May 24, 2018

ACCEPTANCE OF PRIVACY STATEMENT

O'Neil Securities, Inc. ("**O'Neil Securities**", "**we**", or "**us**") and its corporate affiliates are committed to respecting and protecting your personal privacy. This Privacy Statement, including any future modifications (this "**Privacy Statement**") applies to all personal information (information that uniquely identifies a specific natural person) that we may collect through your use of oneilsecurities.com (the "**Site**") and any other services, sites, applications (or "**apps**"), software, features, events, surveys or studies, or content offered by us from time to time that link or otherwise refer to this Privacy Statement (collectively, including the Site, the "**Services**"), whether as a visitor or a customer. This Privacy Statement is effective with respect to all information that we have collected from you, or will collect from you in the future. Please read this Privacy Statement carefully before you use the Services. **By accessing and/or using the Services, you expressly consent and agree to be bound and abide by this Privacy Statement, any applicable Terms of Use for the Services ("Terms of Use"), and to comply with all applicable laws, rules, and regulations (collectively, "Applicable Laws").** If you do not want to agree to this Privacy Statement and the Terms of Use, you must not access or use the Services.

WHAT TYPES OF INFORMATION DOES O'NEIL SECURITIES COLLECT?

INFORMATION YOU PROVIDE TO US

When you access, use, or purchase our Services, communicate with us, upload information, submit a request (e.g., a request through customer services), attend an event (in-person or otherwise), or otherwise communicate with us, directly or through a third party, we may collect and store any personal information you may provide. O'Neil Securities will only collect your personal information if you provide it to us voluntarily. By providing this information, you consent to your information being collected, used, disclosed, and stored by us in accordance with this Privacy Statement. If you do not want your information to be collected by us, please do not submit it.

INFORMATION FROM YOUR USE OF THE SERVICES

O'Neil Securities uses cookies, web beacons, pixels, and other similar tracking technologies to collect information about your use of the Services, including without limitation, device information (e.g., a unique device ID from your computer or mobile device), your browser type and version, IP address, wireless mobile subscriber ISDN number, geo-location (including precise location), operating system and platform, when you open email that we send you, the time content was accessed, usage statistics, the existence of cookies from prior sessions, the URL you came from before accessing our Site, which URL you go to next, and/or other similar information related to your use of the Services. Many sites automatically collect this information. At any time, while accessing our Site, any user, while online, may decline participation in any activity that asks for information (e.g., a survey email or e-commerce). Ultimately, your information helps



us to provide the Services, including, without limitation, to improve and enhance the user experience and help us understand the behavior of our visitors and customers.

INFORMATION FROM OTHER SOURCES

We may obtain further personal information about you from the Internet, offline sources, other public or commercial sources, or third parties (e.g., researchers, analysts, and/or marketers). This information could include statistical, demographic, or other similar information. We may merge the data we collect from your activity on the Services with data available from third parties in order to better understand your interests. Third party information could include information you have provided to social media services (e.g., your name, username, gender, birthday, profile picture, avatar, “likes”, etc.).

O’Neil Securities may also partner with third parties, including third parties that serve advertisements or other similar service providers, that provide or use information related to your visit on the Services and across other third party web sites and services over time to better provide advertisements to you about goods and services that may be of interest to you. Your information tracked by such parties may include demographic information, inferred interests, aggregated information, and/or activities. Please note that we may also combine your personal information with other information, including, without limitation, information we obtain from third parties such as our business partners. We do not provide third party advertising companies with your name, address, or telephone number.

O’Neil Securities is not responsible for the privacy practices of third parties; when you provide information about yourself to third parties, it may be publicly accessible/viewable by other users of such services and we cannot prevent further access by others. If you wish to know how third parties (including social media services) handle your information, please review their respective terms of use, cookie policies, and/or privacy policies; such parties may permit you to modify your privacy settings.

AGGREGATE/ANONYMIZED DATA

O’Neil Securities may aggregate and/or anonymize personal information for various purposes. Once aggregated or anonymized, the information will no longer be considered personal information because it will no longer be able to identify you individually and/or any of your devices used to access the Services.

HOW DOES O’NEIL SECURITIES TRACK MY ACTIVITIES?

As stated above, O’Neil Securities uses cookies, web beacons, pixels, and other similar tracking technologies to collect information about your use of the Services. Your choice not to participate will in no way affect your ability to use any other feature on our site. We may also obtain information about you from certain third parties’ use of similar technologies.

COOKIES

Cookies are messages placed on your computer or mobile device when you visit a website or page. For example, the messages store information so that our Services may immediately recognize you each time you visit. This permits us to personalize our Services for each user, allow access to the secure parts of our



Services that individual users have registered for, and provide users with up-to-date information about their own account. We may also use cookies store visitor preferences, record session information, record user-specific information on what pages users access or visit, track and record past activity on the Services in order to provide better service when visitors return, customize web page content based on visitors' browser type, or other information that the visitor sends. If you choose to disable cookies, you may find that certain sections and functionalities of our Services will not work properly or at all.

WEB BEACONS

Web beacons, also called web bugs and clear GIFs, are used in combination with cookies to help us understand the behavior of our users. A web beacon is typically a transparent graphic image that is placed on our site or in an email. The use of a web beacon allows O'Neil Securities to record the simple actions of the user opening the page that contains the beacon. When a user's browser requests information from a website in this way, certain simple information can also be gathered, such as: the IP address of your computer; time the material was viewed; the type of browser that retrieved the image; and the existence of cookies previously set by that server. Web beacons provide a convenient way of gathering statistics and managing cookies.

LOCAL STORAGE

O'Neil Securities and other third parties may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches. If you want to adjust your settings for or delete all local storage mechanisms, go to your browser's settings to do so. If information is stored in local storage in addition to a cookie, you will need to remove both the local storage and the cookie in order to fully delete the information. We may also use local shared objects, sometimes known as Flash cookies, to store your preferences or display content based upon what you view on our Services to personalize your visit. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored. Cookie management tools provided by your browser will not remove Flash cookies. To learn how to manage flash cookies please visit the following website for more details:

http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html.

DEVICE INFORMATION

O'Neil Securities and other third parties may collect certain device information from you when you use the Services and apps from a mobile device such as the type of device you use, unique device ID, geo-location (including your precise location), wireless mobile subscriber ISDN number, IP address, operating system, browser type, and information about your use of the Services. You may manage the information transmitted from your device from your device's settings, including opting-out of cross-device tracking. However, if you prevent tracking on your device, it will be more difficult, and may be impossible, for you to use the Services or certain portions of the Services.

THIRD PARTY TRACKING



O'Neil Securities may use web beacons and/or unique cookies provided by third party advertising companies (through your browser or use of an advertising ID for environments that do not support cookies). Web beacons enable us to recognize a browser's cookie when a browser visits this site, and to learn which banner ads bring users to our Services.

FOR WHAT PURPOSES DOES O'NEIL SECURITIES USE YOUR INFORMATION?

O'Neil Securities uses your personal information in order to provide and improve our services, content, features, and tools. Specifically, O'Neil Securities uses your personal information as follows:

TO PROVIDE AND IMPROVE THE SERVICES

O'Neil Securities, our corporate affiliates, service providers, business partners, and other third parties use the information collected from the Services to provide the Services to you and other users. This includes, without limitation, maintaining, measuring, and enhancing users' experiences on our Services, providing you with information, or services, fulfilling offers that you request from us, developing new services, understanding and resolving issues with the Services, and protecting you, other users, and the Services. We will share your information to allow our affiliates, service providers, and other third parties to assist in providing and managing the Services.

We use your information to provide and improve the Services, for example, improving algorithms, determining usage patterns, and to provide customer support. online interactions may be recorded for similar purposes. Financial information is used for billing purposes, including, without limitation, order tracking and fraud detection/prevention. If we have trouble processing an order, this information is used to get in touch with the user. By submitting such information, you agree that this information may be shared with third parties for purposes of facilitating the completion of any purchase transaction initiated by you or on your behalf.

TO CONTACT YOU AND PROVIDE TECHNICAL SUPPORT AND ASSISTANCE

O'Neil Securities, and its affiliates, use your personal information to send you information about your account, the Services, or other services, upcoming events, and to notify you about issues with or changes to the Services. From time to time, we may use your information to send important notices, such as communications about purchases, software updates, and changes to our terms, conditions, and/or policies. We may also make various email series and one-time emails available to recipients in our database to help them get the most value from our Services. Such emails include, but are not limited to: newsletters, new service offerings, service updates, educational materials, surveys, and special offers from O'Neil Securities, our affiliates, and/or selected business partners.

We may also send you marketing or other promotional materials (including certain materials from our affiliates and select business partners). If you do not wish to receive these communications, you may opt-out, as described below in the section entitled "How Can I Change my Email Communication Preferences." O'Neil Securities will not send you marketing messages if you have opted out.



Please note, however, that you cannot opt-out of certain administrative communications and O'Neil Securities reserves the right to send such transactional messages and business relationship messages via email to facilitate agreed upon transactions or update customers about existing business relationships. Such emails include, but are not limited to: welcome emails, transaction receipts, billing notifications, service updates and announcements (including information about critical updates), renewal notices, notification of activation of online privileges, technical support responses, and other communications required to service customers' accounts on the Services and/or customers' subscriptions with O'Neil Securities or its affiliates. Customers cannot unsubscribe from these email messages.

O'Neil Securities will also use your information to provide technical support and assistance for the Services, depending on the specific Service, via telephone, text, e-mail, instant message, or another online platform. By using the Services you agree that O'Neil Securities, our affiliates, or our agents may email, call, or instant message you regarding your account or your transactions, including without limitation, using an automatic dialing/announcing device, and that we may make such calls to a mobile telephone or other similar device.

TO AGGREGATE/ANONYMIZE DATA

O'Neil Securities may aggregate and/or anonymize any personal information collected through the Services for various purposes. Once aggregated or anonymized, the information will no longer be considered personal information because it will no longer be able to identify you and/or any of your devices used to access the Services. O'Neil Securities may use such information for any purpose (e.g., research and development purposes), including sharing such information with third parties.

FOR OTHER PURPOSES TO WHICH YOU HAVE CONSENTED

Your information will also be used to fulfill any other purpose for which you provide the information or otherwise provide your consent for O'Neil Securities and/or other third parties to use such information.

WHO DOES O'NEIL SECURITIES SHARE YOUR INFORMATION WITH?

O'Neil Securities uses personal information obtained from its users as stated in this Privacy Statement and to enhance users' experiences on our Services. We do not share your personal information with others except as indicated in this Privacy Statement or when we inform you and give you an opportunity to "opt-out" of having your personal information shared. We will not sell your personal information to anyone, for any reason, at any time. We may employ other companies and individuals to perform functions on our behalf. Our employees, agents, and contractors who have access to personal information are required to protect the information in a manner that is consistent with this Privacy Statement. Below are examples of how we may share your information:

Authorized Service Providers: We may share your personal information with service providers who perform certain services on our behalf. This could include service providers that perform research services, provide operational support, provide marketing platforms, fulfill orders, handle payments, content creators, etc.



Affiliates and Business Partners: When you make purchases, or engage in promotions offered through the Services, we may share personal information with our affiliates and/or business partners with whom we partner to offer you those services and/or promotions. When you elect to engage in an affiliate's or business partner's offer or program, you authorize us to provide your email address and other information to that affiliate and/or partner.

Educational Seminars, Webinars, and Live Events ("Events"): O'Neil Securities may collect and/or receive information about your registration and/or attendance at one of its Events. O'Neil Securities may also collect and share your information for an Event offered in conjunction with its partners and sponsors, in which case you will be notified at the point of registration.

Payment Processors: Your payment information may be shared with third parties who perform tasks required to complete the purchase transaction.

Other access/sharing: O'Neil Securities may share your name and physical address with our affiliates and/or business partners as necessary in the course of doing business. However, we will not disclose your email address, phone, or fax numbers in our database without your advance permission. We may also share aggregate/anonymized information about your use of the Services.

HOW CAN I CHANGE MY E-MAIL COMMUNICATION PREFERENCES?

With the exception of the mandatory O'Neil Securities transactional and business relationship emails mentioned above, recipients have an opportunity to update their email communication preferences with O'Neil Securities and the Site. Customers may choose to "opt-in" or "opt-out" from these email communications at will.

To Unsubscribe: Clients may unsubscribe from specific email categories by: (1) clicking the "unsubscribe" link included at the bottom of any email sent by O'Neil Securities or its affiliates; (2) sending an email to O'Neil Securities at privacy@daicompanies.com.

HOW CAN I CORRECT OR UPDATE MY PERSONAL INFORMATION?

When you contact us via email or submit a request, we may include the contact information you provide to us (e.g., your address, phone number, or email address) in your customer account profile. If your email, address, or other personal information changes, please contact our Sales Trader to update.

HOW DOES O'NEIL SECURITIES PROTECT MY PERSONAL INFORMATION?

SECURITY MEASURES AND SAFEGUARDS

The security of our users' information is very important to us. When users submit personal information via the Services, that information is protected by generally accepted industry standards, and in accordance with applicable data privacy laws, including both online and off-line security measures and safeguards. O'Neil Securities uses a combination of administrative, technical, personnel, and physical measures to safeguard personal information in its possession against loss, theft, and unauthorized use, disclosure, or



modification. Employees are kept up-to-date on our security and privacy policies and practices and are regularly required to acknowledge a Code of Ethics agreement which addresses the proper handling and protection of sensitive client data.

However, no one can guarantee the complete safety of your information. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting O'Neil Securities in accordance with the instructions below. However, please remember that no method of electronic storage or transmission over the internet is one-hundred percent secure and therefore, while we strive to use commercially reasonable means to protect your personal information, and will comply with applicable data privacy laws, we cannot guarantee the absolute security of such information.

PHISHING

Phishing is a term used to describe a type of internet scam in which inauthentic emails that appear to be coming from a legitimate source are sent in an attempt to trick you into providing confidential information. These emails usually invoke a sense of urgency and often imply that your account is about to be closed unless immediate action is taken. They will often ask you to click on a link that leads you to a webpage that simulates that of the legitimate source, but it is really a page specially designed to get you to input your confidential information such as account number, password, social security number, or credit card number. The thieves then use that information to commit fraud and identity theft against you. The Office of the Comptroller of Currency has set up a website providing information warning consumers about the dangers of these scams and how to protect yourself. To learn more about phishing, please click on the following link: www.occ.gov/consumer/phishing.htm.

Please know that O'Neil Securities takes the privacy of our subscribers very seriously. If you ever question the legitimacy of an email or other communication from O'Neil Securities, or otherwise have a question about the security of our Services, please send an email to O'Neil Securities at privacy@daicompanies.com if you believe you have been the victim of a scam, you can file a complaint with the Federal Trade Commission at: www.consumer.gov/idtheft/.

DO NOT TRACK SIGNALS

At this time, O'Neil Securities does not recognize or respond to browser's "Do Not Track" signals.

DATA RETENTION

O'Neil Securities will not retain your personal information longer than is necessary for the purpose for which it is collected or as required by applicable laws or regulations. We may retain backup information related to your account on our servers for some time after cancellation for fraud detection or to comply with Applicable Laws or our internal security policies. Additionally, it is not always possible to completely remove or delete all of your information due to technical constraints, contractual, financial, or legal requirements. For example, if you request that O'Neil Securities no longer send you emails, O'Neil Securities would need your name and email address to ensure that you no longer receive emails from us.



Where it is not possible to remove or delete all information, O'Neil Securities shall continue to safeguard your information as detailed herein.

SENSITIVE INFORMATION

We do not intentionally collect sensitive personal information, such as social security numbers, political opinions, religious or other beliefs, health information, criminal background information, sexual history or sexual orientation information, or trade union membership ("**Sensitive Information**") and we ask that you do not disclose it on the Services. However, if Sensitive Information is included in your posts on the Services, we will have access to such information described above and such information will be treated in the same way as information that is not sensitive.

CALIFORNIA PRIVACY RIGHTS

Pursuant to California's "**Shine the Light**" law, California residents may opt-out of O'Neil Securities' disclosure of personal information to third parties for such third parties' direct marketing purposes. Note, however, opting out does not prohibit disclosures for non-marketing purposes. You may opt-out by: (1) sending an email to O'Neil Securities at unsubscribe unsubscribe privacy@daicompanies.com ;

PERSONAL INFORMATION OF CHILDREN

The Services are for a general audience and are not targeted to children. O'Neil Securities and its affiliates do not knowingly collect or solicit personal information from children under the age of thirteen (13). If such a situation is discovered, we will delete that information immediately. If you believe O'Neil Securities has any information from a child under the age of thirteen (13), please contact us by: sending an email to O'Neil Securities at privacy@daicompanies.com.

If you are a California resident under 18 years of age and are a registered user of the Services, you have the right to request removal of certain content posted by you on our Services. To request removal, please contact us by: (1) sending an email to O'Neil Securities at privacy@daicompanies.com ;

USING/ACCESSING OUR SERVICES FROM OUTSIDE THE UNITED STATES

O'Neil Securities is a Delaware corporation with its headquarters located at 211 Congress Street, 5th floor, Boston, MA 02110, United States. Our Services are governed by, and operated in accordance, with the laws of the United States. The United States is where the Services, including our servers and central database, are hosted, located, and operated. If you are accessing the Services from outside the United States, you will be voluntarily transmitting your personal information to the United States where your information will be stored and processed by O'Neil Securities. Your data may also be processed by certain third party data processors located in the United States (including O'Neil Securities' affiliated entities).

There are obvious risks that apply when data are transferred from one jurisdiction to another (e.g., an unauthorized interception of the data, misuse, etc.) and the data protection and other laws of the United



States and/or other countries might not be as comprehensive as those in your country. Additionally, in certain circumstances, law enforcement or regulatory agencies, courts, or security authorities in the United States may be entitled to access your personal information. **By using our Services, you acknowledge and agree that your personal information will be transferred to and processed in the United States (and by our affiliates in India and China) and by those third parties with whom we share your information as described in this Privacy Statement.** Please be assured that we take commercially reasonable steps to ensure that your privacy is protected. For users of the Services that are residents of the European Union (“EU”) or the United Kingdom (“UK”), please review O’Neil Securities’ European Data Privacy Addendum below, which details your rights under the EU’s General Data Protection Regulation (“GDPR”) and provides you with an explanation of how you may exercise your rights.

CHANGES TO OUR PRIVACY STATEMENT/COMMUNICATING CHANGES

This Privacy Statement is subject to change at any time. All changes will be posted on the Site. If the changes are significant we will notify you by email (at the last email we have on file for you) or by prominently posting a notice on our Services. Changes will become effective as of the earlier of the date we post the revised Privacy Statement, send an email detailing any changes, or post such a notice. While we will do our best to inform you of any changes, we encourage you to review our Privacy Statement periodically to ensure that you remain informed of changes that may have occurred, including changes that relate to what information we collect, how we use it, and how we share it. **By continuing to use the Services after a change has taken place, you are confirming that you have read and agree to the latest version of this Privacy Statement and expressly consent to the use of your personal information as detailed herein.**

LEGAL DISCLAIMER

Though we make every effort to preserve user privacy, we may need to disclose your personal information. We may share your information to provide information to our representatives, advisors, corporate affiliates, and business partners, and in the event of a sale, merger, public offering, bankruptcy or other change in control of O’Neil Securities and/or its affiliates, your information may be shared with the person or business obtaining ownership and control. O’Neil Securities may also be required to disclose information in connection with satisfying applicable laws, regulations, or governmental requests. Your information may be used to protect the rights, including legal rights, and safety of ourselves and others. We may also use your information to enforce our rights arising from any contracts entered into between you and us, including, for billing and collection. Furthermore, disclosure of personal information may be required by law where we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order, or legal process. In such cases, we may raise or waive any legal objection or right available to us.

LARGE TRADER RULE

In accordance with Securities Exchange Act Rule 13h-1, market participants that conduct a substantial amount of trading activity are required to file Form 13H in order to identify themselves as a “large trader” to the SEC. The SEC assigns a large trader identification number that must be provided to the participants



registered broker-dealers. Broker-dealers are then required to maintain records, including large trader transaction times, which may be required upon the request of the SEC.

THIRD PARTY SERVICES

Other websites and services to which we link, through which you access the Services, or share information from the Services and which are not owned or controlled by us are not subject to the terms of this Privacy Statement. We are not responsible for the privacy practices or the content of any other web sites or services and any visit you make to those other services is at your own risk. Third parties that support the Services, including by providing advertising or other services, such as analytics, may use tracking technologies to collect information about your use of the Services or other third party services. We do not control these third party technologies or services and their use is governed by the privacy policies of third parties using such technologies. Such third party's use of any information you share is governed by the third party's Privacy Statement.

O'NEIL SECURITIES CONTACT INFORMATION

If you have any questions or concerns about O'Neil Securities' Privacy Statement or data processing, please contact us at: O'Neil Securities at privacy@daicompanies.com.

O'NEIL SECURITIES EUROPEAN DATA PRIVACY ADDENDUM

Last Updated May 24, 2018

PURPOSE FOR ADDENDUM

This European Data Privacy Addendum, including any future modifications (the "**Addendum**"), forms a material part of O'Neil Securities' Privacy Statement and applies to any "**personal data**" (as defined under the GDPR) that we may "**process**" (as defined under the GDPR) through your use of the Services, whether as a guest or a customer. The purpose of this Addendum is to briefly describe: 1) your rights under the GDPR; 2) the legal bases that support O'Neil Securities' processing activities; and 3) whether any automated processing methods are used for processing your personal data.

YOUR RIGHTS AS A EUROPEAN DATA SUBJECT

The GDPR provides "**data subjects**" (essentially natural persons that are the subject of personal data and are residents of the EU or UK) with a wide array of rights related to data privacy. O'Neil Securities' is considered a "**data controller**" under the GDPR with respect to its processing of your personal data. A data controller is essentially a person or organization that can determine how and why your personal data is processed and is responsible for ensuring that you are able to exercise certain privacy rights. Although O'Neil Securities' affiliates, service providers, and business partners will also collect and process your personal data, as described in the Privacy Statement, O'Neil Securities' will always be the data controller in respect to such processing. If you wish to exercise any of the rights detailed below, please send an e-mail sufficiently detailing such request to: Privacy@daicompanies.com. Please note that if we receive a



request from you to exercise your rights, O'Neil Securities' has the right to have you take reasonable steps to confirm your identity, including your residency within the EU or UK.

RIGHT TO TRANSPARENT COMMUNICATION

You are entitled to a receive information from O'Neil Securities' regarding its collection and processing of your personal data. All such information must be provided in a concise, transparent, intelligible, and easily accessible form, using clear and plain language. Such information has been provided by O'Neil Securities' in its Privacy Statement, as it is amended from time to time.

RIGHT TO ACCESS BASIC INFORMATION

You have the right to obtain confirmation from O'Neil Securities' as to how your personal data are being processed, including the following information:

- Confirmation of whether, where, and by whom your personal data are being processed;
- Purpose(s) for the processing;
- Categories of personal data being processed;
- Categories of recipients with whom the data may be shared;
- The period for which the data will be stored (or the criteria used to determine that period);
- The source of the data (where you were not the source); and
- Information about the existence of, and an explanation of the logic involved in, any automated decision-making that has a significant effect on you.

You may also request to receive an electronic copy of your personal data that are processed by O'Neil Securities. O'Neil Securities' is required to provide any requested information within one (1) month of receiving an access request. However, if O'Neil Securities' receives a large numbers of requests, or especially complex requests, this time limit may be extended by a maximum of two (2) further months as long as O'Neil Securities provides you with an explanation for the delay within the original one (1) month timeframe. If O'Neil Securities fails to meet these deadlines, you may complain to the relevant Data Protection Authority (explained below) and may be able to seek a judicial remedy in the relevant EU Member State's court system.

RIGHT TO DATA PORTABILITY

You have the right to transfer your personal data between controllers (e.g., to move account details from one online platform to another). Specifically, you have the right to:

- Receive a copy of your personal data in a structured, commonly used, machine-readable format that supports re-use;
- Transfer your personal data from one controller to another;
- Store your personal data for further personal use on a private device; and
- Have your personal data transmitted directly between controllers without hindrance.

Please note that any inferred or derived data (data derived through use of analytical processes) do not fall within the right to data portability, because such data are not provided by you. Additionally, O'Neil



Securities' is not obliged to retain personal data for longer than is otherwise necessary simply to service a potential data portability request.

RIGHT TO RECTIFY INFORMATION

O'Neil Securities' is required to ensure that inaccurate or incomplete data are erased or corrected. You have the right to request O'Neil Securities' correct or erase personal data that you believe to be inaccurate or incomplete.

RIGHT TO WITHDRAW CONSENT

Your consent can provide a lawful basis for O'Neil Securities' to process your personal data and/or transfer your data internationally. However, you have the right to withdraw such consent. However, please note that other lawful bases may apply to the processing or transfer of your data.

RIGHT TO ERASURE/RIGHT TO BE FORGOTTEN

Under the GDPR, in certain circumstances, you may have the right to have O'Neil Securities' erase your personal data, cease further dissemination of the data, and potentially have third parties halt processing your data upon your request. This right is commonly referred to as the "right of data erasure" or "the right to be forgotten." You have the right to erasure of your personal data if:

- The data are no longer needed by O'Neil Securities' for their original purpose (and no new lawful purpose exists);
- The lawful basis for the processing is your consent, you withdraw that consent, and no other lawful ground exists for O'Neil Securities' to process the information;
- You exercise your right to object to processing and O'Neil Securities has no overriding grounds for continuing the processing;
- The data have been processed unlawfully; or
- Erasure is necessary for compliance with other EU laws or the national law of a relevant EU Member State.

RIGHT TO OBJECT TO PROCESSING PERSONAL DATA FOR PUBLIC OR LEGITIMATE INTERESTS

Where O'Neil Securities is processing your personal data on the basis of having a "public interest" or "legitimate interests", those bases are not absolute and you may have a right to object to such processing. If you object, O'Neil Securities must cease such processing unless it either: 1) demonstrates compelling legitimate grounds for the processing which override your interests, rights, and freedoms; or 2) requires the data in order to establish, exercise, or defend legal rights.

RIGHT TO OBJECT TO PROCESSING FOR THE PURPOSES OF DIRECT MARKETING



You have the right to object to the processing of your personal data for the purposes of receiving direct marketing from O'Neil Securities (including "profiling" activities as detailed further below).

RIGHT TO OBJECT TO PROCESSING FOR SCIENTIFIC, HISTORICAL OR STATISTICAL PURPOSES

Where your personal data are processed for scientific and historical research purposes or statistical purposes, you have the right to object, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

RIGHT TO RESTRICT PROCESSING

In some circumstances, you may be entitled to limit the purposes for which O'Neil Securities can process your personal data. Specifically, you have the right to restrict the processing of your personal data if:

- The accuracy of the data is contested (and only for as long as it takes to verify that accuracy);
- The processing is unlawful and you request restriction (as opposed to exercising the right to erasure);
- O'Neil Securities no longer needs the data for their original purpose, but the data are still required by O'Neil Securities to establish, exercise, or defend legal rights; or
- If verification of overriding grounds is pending in the context of an erasure request.

FEES FOR REQUESTS

O'Neil Securities is required to give effect to your rights of access, rectification, erasure, and the right to object free of charge. However, O'Neil Securities may charge a reasonable fee for repetitive requests, unfounded or excessive requests, or further copies beyond the initial copy provided.

RIGHT TO MAKE A COMPLAINT TO THE RELEVANT DPA

Data Protection Authorities ("DPAs") are the regulatory authorities responsible for monitoring and enforcing data protection laws at a national level and providing guidance on the interpretation of those laws. DPAs are empowered to oversee enforcement of the GDPR, investigate breaches of the GDPR, and bring legal proceedings where necessary. If you believe that your rights have been infringed by O'Neil Securities, you have the right to ask O'Neil Securities to remedy the situation. If you believe you have not received an adequate response from O'Neil Securities, you may file a complaint with the relevant DPA (either the DPA for the EU Member State in which you live or work or the Member State in which the alleged infringement occurred). A list of DPAs may be found at:

http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080 (current as of April 2018).

O'NEIL SECURITIES' LEGAL BASES FOR PROCESSING YOUR PERSONAL DATA

Under the GDPR, in order to process your personal data, O'Neil Securities is required to identify a legal basis (or bases) for its processing activities. O'Neil Securities' legal bases for processing your personal data are as described below.



CONSENT

O'Neil Securities is permitted to process your personal data to the extent you have given consent for O'Neil Securities to perform processing activities. Please note that your consent to processing can be revoked at any time (though there may be other applicable legal bases that may justify ongoing processing of your personal data). Your consent may be revoked by sending an email to: Privacy@daicompanies.com.

CONTRACTUAL NECESSITY

O'Neil Securities is permitted to process your personal data to the extent the Processing is necessary:

- For the performance of a contract between you and O'Neil Securities (e.g., to comply with the terms of use for our Services and/or any subsequent agreement O'Neil Securities enters into with you);
- To respond to your request to access your personal data; or
- For the conclusion or performance of a contract between O'Neil Securities and a third party where it is in your interest for the processing to occur.

In order for you to be able to access the Services, it is critical that O'Neil Securities be able to process your personal data. Without being able to process your personal data, including your payment information, O'Neil Securities would be unable to provide the Services to you.

LEGITIMATE INTERESTS

O'Neil Securities is permitted to process your personal data to the extent the processing is necessary for the purposes of legitimate interests pursued by O'Neil Securities or a third party ("**legitimate interests**"), except where those legitimate interests are overridden by your interests, fundamental rights, or freedoms. You have the right to object to O'Neil Securities' processing of your personal data on the basis of legitimate interests; if you wish to raise such an objection, please send an email detailing your objection to Privacy@daicompanies.com. O'Neil Securities' identified legitimate interests for processing your personal data include:

- **Organizational Interests:** As O'Neil Securities is part of a larger group of related companies, it is often necessary for O'Neil Securities to transmit your personal data within the organizational group (including to our parent company). Processing is necessary so that data can be shared amongst our affiliates so that each entity can carry out their legal, regulatory, and/or contractual responsibilities and/or coordinate/implement business plans, logistics, and/or operations. This is especially true because O'Neil Securities' affiliated entities may perform critical services for O'Neil Securities, such as services related to: accounting, compliance, research and development, human resources, information technology and security, legal, management, etc.
- **Operational Interests:** Processing your personal data is necessary to facilitate the day-to-day operation of our business and to allow for business planning for strategic growth. This includes: managing our relationship with you, our employees, other users/clients, vendors, business partners, and/or others; sharing intelligence with internal stakeholders; implementing training procedures; planning and allocating resources and budgets; performing data modelling; facilitating internal



reporting; analyzing growth strategies; aggregating analytics; and/or processing personal information to create anonymized data (e.g., for service improvement, analytics, etc.).

- **Logistical Interests:** Processing your personal data is necessary to enable O'Neil Securities' business operations to run more efficiently, e.g., establishing how to allocate resources or to predict future demand.
- **Research and Development Interests:** Processing your personal data is necessary for us to deliver and/or improve our services. This includes processing your personal data to determine whether a service is working as intended, monitoring usage and conduct, and identifying and troubleshooting issues.
- **Market Intelligence and Analytical Interests:** O'Neil Securities has a legitimate need to conduct market intelligence so that we can better promote our services by creating a better understanding of our users' and/or customers' preferences. This could include using diagnostic analytics to optimize services, and/or marketing campaigns by assessing/monitoring users' usage of the services and/or conduct while using the services. Common metrics for evaluation could include monitoring pages and links accessed, ad performance and conversion tracking, number of posts, number of page views, patterns of navigation, time at a page, devices used, user reviews, where users are coming from, hardware used, operating system version, advertising identifiers, unique application identifiers, unique device identifiers, browser types, languages, wireless or mobile network information, etc. These metrics could be used to personalize services and communications; determine which users should receive specialized communications based on how they use the service; create aggregate trend reports; determine the most effective advertising channels and messaging; and/or measure the audience for a certain communication.
- **Personalization Interests:** We process personal data in order to enhance and personalize the "consumer experience" we offer our current and/or prospective users/customers in our services.
- **Monitoring Interests:** In order to identify recurring problems and/or analyze the patterns of behavior of users and/or customers, and comply with certain legal/regulatory obligations, it is necessary for O'Neil Securities to monitor your performance/behavior on our Services.
- **Direct Marketing Interests:** Processing your personal data is necessary for direct marketing purposes to occasionally update users on the Services, including occasional communications regarding updates to our activities, services, and/or events.
- **Business-to-Business Marketing and Sales Interests:** O'Neil Securities has a legitimate interest in processing personal data in the context of marketing our services to other businesses, e.g., processing the information of a business contact in order to market our services to the affected data subject's employer.
- **Due Diligence Interests:** It is necessary for O'Neil Securities to process your personal data for the purposes of conducting due diligence. This could include, for example, monitoring official watch-lists, sanction lists and "do-not-do-business-with" lists published by governments and other official bodies globally. This could also include keyword searches of industry and reputable publications to



determine if companies and individuals have been involved in or convicted of relevant offenses, such as fraud, bribery, and/or corruption.

- **Fraud Detection and Prevention Interests:** Processing your personal data is necessary for O'Neil Securities to help detect and prevent fraud, e.g., verifying that the registered address of the cardholder for a particular credit or debit card is the same as the cardholder's normal place of residence or work.
- **Updating Customer Details and Preferences:** Processing your personal data is necessary to verify the accuracy of your user data and to create a better understanding of our past, present, and/or prospective users.
- **Network and Information Security:** Processing your personal data is necessary for the purposes of ensuring our network and information security, e.g., monitoring users' access to our network for the purpose of preventing cyber-attacks, inappropriate use of data, corporate espionage, hacking, system breaches, etc. This could include preventing unauthorized access to electronic communications networks and malicious code distribution and stopping "denial of service" attacks and damage to computer and electronic communication systems.
- **Business Continuity/Disaster Planning Interests:** O'Neil Securities processes your personal data because it is necessary to allow for the backup and protection of your information (e.g., utilizing cloud-based services to archive/protect data) in order to ensure that such information is not improperly lost or modified. Such processing is also necessary to archive/protect data in accordance with legal, regulatory, organizational, and/or contractual obligations.
- **Artificial Intelligence Interests:** In processing your personal data, O'Neil Securities may process your data utilizing an algorithm that helps to streamline organizational processes, e.g., our customer service department putting in place an algorithm that helps to manage customer service requests by routing customer contacts to the most appropriate part of the organization.
- **Compliance with Industry-Specific Self-Regulation:** O'Neil Securities is part of industry organizations including the Financial Industry Regulatory Authority ("FINRA"), the Securities Investor Protection Corporation ("SIPC"), and the New York Stock Exchange ("NYSE"). These organizations were formed in order to: develop industry standards and best practices to protect the industry; share intelligence or concerns about individuals (e.g., industry-specific watch lists); share intelligence or concerns that may have a negative or detrimental impact on the industry; and/or to ensure that participants in the industry are following agreed-upon standards. We are required to process data so that we may stay in compliance with such organizations' regulatory structures.
- **Compliance with Laws and Regulations:** O'Neil Securities is subject to binding legal or regulatory obligations and needs to process your personal data in order to comply with such laws or regulations. Examples include: complying with reporting obligations; complying with screening obligations; responding to law enforcement requests; and/or responding to judicial/regulatory agency requests.



- **Reporting Potential Threats to Public Security/Safety:** O'Neil Securities has a legitimate interest in reporting possible criminal acts or threats to public security/safety that we identify as part of our processing activities to a competent authority.

BINDING LEGAL OR REGULATORY OBLIGATIONS

O'Neil Securities is permitted to process your personal data where it has a binding legal or regulatory obligation to perform the processing to stay in compliance with applicable laws or regulations (e.g., tax reporting purposes). Other examples could include where O'Neil Securities or one of its affiliates is required to respond to a court order, subpoena, or law enforcement agency request, to prevent fraud or abuse, or to protect the safety of individuals.

INTERNATIONAL DATA TRANSFERS

If you access the Services from the EU or UK, O'Neil Securities will be transmitting your personal data to the United States so that O'Neil Securities can conduct certain processing activities as identified in the Privacy Statement. Your data will also be processed by certain third party data processors located in the United States (including O'Neil Securities' affiliated entities). O'Neil Securities shall ensure that any transfers made between itself and any data processors are made with appropriate safeguards in place to protect the information from unauthorized uses or disclosures to the extent reasonably possible. For processors that process your personal data on O'Neil Securities' behalf, and will then transfer data to the United States or another jurisdiction that is not deemed to have adequate safeguards, O'Neil Securities shall ensure that appropriate safeguards (e.g., "**Standard Contractual Clauses**"), are in place between O'Neil Securities and the processor. Standard Contractual Clauses are a set of standard data protection clauses approved by the European Commission ("**EC**") as an appropriate safeguard for protecting personal data when personal data are transferred internationally. The applicable Standard Contractual Clauses may be found at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32010D0087&from=EN>.

PERSONAL DATA OF DATA SUBJECTS UNDER THE AGE OF SIXTEEN (16)

The Services are for a general audience and are not targeted to data subjects under the age of sixteen (16). O'Neil Securities and its affiliates do not knowingly process personal data from EU residents under the age of sixteen (16) without parental consent. If such a situation is discovered, we will delete that information immediately. If you believe O'Neil Securities has any information from an EU resident under the age of sixteen, please contact us by: O'Neil Securities at privacy@daicompanies.com.