Privacy Policy – BGC Financial

Privacy Statement

Customer Privacy Notice

Protecting your privacy is important to BGC Financial and our employees. We believe the confidentiality and protection of customer information is one of our most fundamental responsibilities. Whether you are an existing customer or are considering a relationship with us, you have an interest in how we collect, use, retain and secure nonpublic personal information. And while information is critical to providing quality services, we recognize that one of our most important assets is our customers' trust.

If we change our privacy policies, a revised customer privacy notice will promptly be posted to our web site (<u>www.bgcpartners.com</u>). You agree to accept posting of a revised customer privacy notice electronically on the web site as actual notice to you. You should review the customer privacy notice periodically to remain informed of any changes. Any dispute between you and BGC Financial is subject to our customer agreement/terms and conditions and our general policies, terms, and procedures governing BGC Financial customer and other accounts, including where applicable, arbitration of disputes and limitation of damages.

If you have any questions that this customer privacy notice does not address or if you wish to discuss BGC Financial's privacy policies in greater detail, please contact our Compliance Department at 212 938 5000 or write us at BGC Financial, Attn: Compliance Department, 199 Water Street,, New York, NY 10038.

The Information We Collect

BGC Financial may collect nonpublic personal information about you from the following sources:

- 1. Information you provide to us on account opening documentation, applications, subscriptions or other forms;
- 2. Transactions with us, our affiliates, or others;
- 3. From non-affiliated third parties (e.g., credit reporting agencies and others).

Categories of Information that We May Disclose

We may disclose the following kinds of nonpublic personal information about you:

1. Information we receive on applications or other forms, such as name, address, social security number and e-mail address;

2. Information about your transactions with us, our affiliates, or other;

3. Information we receive from a consumer reporting agency, such as creditworthiness and credit history.

Parties to Whom We May Disclose Information

We do not disclose non-public personal information to any non-affiliated third party, except to non affiliated third parties that may assist us in servicing your account, to financial service institutions with whom we have joint marketing agreements, to securities and banking regulators upon requests, to others pursuant to subpoena and otherwise as permitted by law. We may from time to time disclose your nonpublic personal information to our affiliates, including but not limited to affiliated broker-dealers.

If you decide to close your account (s) or become an inactive customer, we will continue to adhere to the privacy and practices described in this notice, or subsequent notices, which may amend the policy stated herein.

Nothing in this customer privacy notice is intended to interfere with our ability to transfer all or part of our business and/or assets to an affiliate or non-affiliated third party at any time, for any purpose, without any limitation whatsoever.

Confidentiality and Security Procedures

BGC Financial takes steps to safeguard customer information and restrict access to your personal and account information to those employees who need to know that information in order for us to provide products or services to you. We emphasize the importance of confidentiality through employee training, operating procedures, written policies and this privacy policy. We maintain physical, electronic, and procedural safeguards to guard you nonpublic personal information.

Web Sites

Please see Privacy Statement.

Key Terms to Privacy

"Nonpublic Personal Information" - Personally identifiable financial information that is provided by a customer or potential customer to a financial institution, that results from a transaction with the customer or that is otherwise obtained by the financial institution in connection with providing a financial product or service.

"Affiliate"- Any entity that is part of BGC Financial's family by virtue of common ownership or control.

"Non-Affiliated Third Party" - Any entity that is not part of BGC Financial's family of companies.