

JUNE 28, 2016

PRIVACY POLICY

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1 Scope and acceptance

HedgePole and its affiliates (hereinafter referred to as "HedgePole") aim to protect the personal information of each client as well as its visitors and registered users (hereinafter referred to as "User") provided through the HedgePole's websites located at www.hedgepole.com, www.hedge-data.com and www.hedgeprice.com (hereinafter referred to as "HedgePole Sites"). This Privacy Policy (hereinafter referred to as "Policy") describes the type of personal information HedgePole collects, the purpose for which HedgePole uses the information, the circumstances in which HedgePole may disclose the information and the security measures implemented to safeguard the information provided by the Users.

By using the HedgePole Sites, Users consent to this Privacy Policy.

2 Collection of personal information

HedgePole collects personally identifiable information about the User, including, but not limited to, name, address, phone number, organization name and e-mail address, from information provided by the User, initially through the registration process and subsequently through other means such as, but not limited to, the use of the HedgePole Sites, the application or forms completed and various contact forms. HedgePole may monitor the User's conduct on the HedgePole Sites for training, misunderstandings, possible abuse, any lawful reason or purpose.

3 Storing personal information and data security

HedgePole may store the User's personal data in secure operating environments, accessible to HedgePole employees and developers only and follows generally accepted industry standards to safeguard the data. In order to prevent unauthorized access and to keep User's personal data secure, HedgePole has in place appropriate physical security, electronic security and managerial procedures.

When the HedgePole Sites are accessed by the User or in case the User tries to connect to the HedgePole site electronically, data related to the website User (the originator of the contact) is, in principle, transported via an open network accessible to all. Although the data is transmitted in an encrypted form, it has to be understood that data is transmitted over the internet (internationally), even if the visitor or User and the receiver are in the same country. By providing personal data to HedgePole, the User agrees to this transmission process.

4 Disclosing personal information

HedgePole will NOT disclose the User's personally identifiable information to third parties except: (i) to the extent necessary to provide the User with a service purchased from HedgePole and/or offered through HedgePole Sites (ii) in circumstances when HedgePole believes that any applicable law, regulation, or legal process requires such disclosure; (iii) if required by law, or (iv) in circumstances when HedgePole believes disclosure is necessary to protect its rights or the rights of another User(s).

Other than as set out above, the User will be notified when their personal information will be disclosed with

third parties, and will have an opportunity to oppose such disclosure.

5 Use of Cookies

A cookie is a file that is sent to the User's browser from a Web server and stored locally on User's hard drive. HedgePole uses cookies to store and track Users' preferences, authenticate Users and make HedgePole Sites work efficiently.

It is possible to remove cookies or block them, however, in such case, HedgePole may prohibit the User from participating in certain services and the services on the HedgePole Sites may not function properly.

6 Questions & Policy changes

If you have any questions or comments relating to this Policy, please contact us on info@hedgepole.com, and we will endeavour to respond to you promptly.

HedgePole reserves the right to change this Policy at any time, therefore, please ensure that you regularly read the latest version of this Policy. The User's continued use of the HedgePole Sites following the posting of any changes to this Policy constitutes their acceptance of the revised Privacy Policy.

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