

To learn more about our privacy practices, see our Privacy Policy Details.

SMBC Capital Markets, Inc. (“SMBC-CM”) believes in protecting your privacy. As a dealer in derivatives, SMBC-CM may be supplied with certain items of personal data in connection with its counterparty credit evaluations and know-your-client obligations. This information will, if at all, come from our affiliates in the European Economic Area. When we collect personal information from you, we comply with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from the European Union. These are our promises to you.

- 1. Notice:** When we collect your personal information from a non-affiliate, we will give you timely and appropriate notice describing what personal information we're collecting, how we'll use it, and the types of third parties with whom we may share it.
- 2. Choice:** We will give you choices about the ways in which we use and share your personal information, and we will respect the choices you make.
- 3. Relevance:** We will collect only as much personal information as we need for specific, identified purposes and we will not use it for other purposes without obtaining your consent.
- 4. Retention:** We will keep your personal information only for as long as we need it and for the purposes for which we collected it, or as permitted or required by law or regulation.
- 5. Accuracy:** We will take appropriate steps to make sure the personal information in our records is accurate.
- 6. Access:** We will provide ways for you to access your personal information, as required by law, so that you can correct inaccuracies.
- 7. Security:** We will take appropriate physical, technical, and organizational measures to protect your personal information from loss, misuse, unauthorized access or disclosure, alteration and destruction.
- 8. Sharing:** Except as described in this policy, we will not share your personal information with non-affiliated third parties without your consent.
- 9. International Transfer:** If we transfer your personal information to another country, we will take appropriate measures to protect your privacy and the personal information we transfer.
- 10. Enforcement:** We will regularly review how we are meeting these privacy promises, and we will provide an independent process to resolve complaints about our privacy practices.

To access about your information, ask questions about our privacy practices, or issue a complaint, please contact the Compliance Department at:

SMBC Capital Markets, Inc.
Attn: Compliance Department
277 Park Avenue, 5th Floor
New York, NY 10172
(212) 224 - 5082

If your inquiry is not satisfactorily addressed, contact the EU Data Protection Authorities at (<http://www.edps.europa.eu/EDPSWEB/>), who will serve as a liaison with SMBC-CM to resolve your concerns.

SMBC-CM reserves the right to modify this privacy policy in whole or in part at any time. The new policy will apply to all current and past users of our Web Site and will replace any prior policies which are inconsistent. Notification will be posted on our web site advising of any changes.