

Privacy Policy

OVERVIEW

The purpose of this Privacy Policy is to describe how and why OTC Markets Group Inc. and its subsidiaries and affiliates (collectively, "OTC Markets Group," "we," "our" or "us") collects and processes personal information about you, how this information is protected, and your rights in relation to it. Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

Additional data privacy terms may apply to your use of certain services or products offered by OTC Markets Group.

PERSONAL DATA WE COLLECT

Your Browsing Activity

Like the operators of many other websites, we receive and collect information about your session, including the IP (internet protocol) address, domain name, browser type, operating system you use, the files you download, pages you visit and dates/times of those visits. This information about your session or about you may be collected by technology such as, "cookies" and "web beacons" (see "Cookies" section below). This information may be used by third party advertisers that we work with to provide advertisements to you (see "Third Party Advertising" section below).

Personal Data You Provide to Us

We also collect and process personal information that you provide by conducting business with us (individually or on behalf of your employer/company) by filling in forms on our website, or at a trade show, conference, or anywhere else we conduct business, by subscribing to newsletters or other communications, or by corresponding with us by phone, e-mail or otherwise using our contact details or providing your contact details or other information to us. This may include your name, phone number, email address, location, date of birth, title and other personal data provided at the time of requesting information or services from us, soliciting business, performing a service or negotiating a contract for products or services.

Personal Data Provided by Third Parties and Public Sources

In order to provide our services to our customers, we rely on content and information provided by third party suppliers, customers, as well as content that is available to the public. Some of that

information includes general business information about names and contact information of directors, board members, service providers and other official persons of companies published on publicly accessible websites and documents (for example, EDGAR company filings). Our customers may also transfer personal data to us in connection with their contractual obligations. For example, corporate subscribers to our market data products may disclose personal information of end-users for data usage and reporting purposes. Similarly, subscribers to our Corporate Services products may provide contact information of company directors and employees for background checks and other compliance purposes.

HOW WE USE PERSONAL DATA

We will typically only process personal information under the following circumstances:

- the processing is necessary to perform a contract with you (or your employer/ company) or take steps to enter into a contract at your request, such as to negotiate a contract with us, to fill an order, or to provide product information that you have requested;
- the processing is necessary for us to comply with a relevant legal obligation, such as keeping accounting records;
- the processing is in our legitimate interests, which are not overridden by the interests and rights of the relevant individual whose personal data is collected; or
- you have consented to the processing.

Where our reason for processing personal information is because it is in our legitimate interests, our purpose for processing it will typically be one of the following:

- to identify you (or your employer/company) as a prospective customer for products or services and provide you with relevant information about these services and/or invitations to events;
- to manage our relationship with you by communicating with you (or your employer/company) about or providing to you our services;
- to carry out our contractual obligations to customers and users of our services and to exercise our rights and obligations under such contracts; to conduct, operate, market, and develop our business activities and improve our services in order to better serve our customers and users;
- to create aggregate data for informational materials and statistical reports related to our products and services;
- to improve the quality of our website(s) and tailor them to your preferences;

- to detect and prevent fraud to ensure the integrity of our markets, including by conducting surveillance of issuers and trading activities and reporting suspected misconduct to applicable regulators and authorities;
- to comply with our obligations as an operator of Alternative Trading Systems (e.g. Regulation Systems Compliance and Integrity);
- to monitor security threats involving the use of our products, website(s), or other services;
- to pursue and enforce our legal rights or defend claims or potential claims against us related to our business, products, and services; and/or to implement social networking features you have activated.

When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your data privacy interests or fundamental rights and freedoms. If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this Privacy Policy.

PERSONAL DATA WE DISCLOSE

We have disclosed certain categories of personal information to third parties over the past 12 months. The categories of the information disclosed and the third parties receiving the information are as follows:

- **Regulatory or Legal Requests:** Personal information provided to federal and state agencies in response to requests, including contact information, employment information, civil or criminal history, information related to company ownership or other information described above related to your or your company's use of our services.
- **Third Party Service Providers:** Personal information provided to third party vendors and business partners (e.g. third party advertisers, described below), including website activity, contact information or other information described above related to your or your company's use of our services.
- **Our Subsidiaries:** Personal information provided to our subsidiaries, OTC Link LLC, OTC Markets Group International Ltd., and Qaravan Inc., including website activity, contact information, employment information or other information described above related to your or your company's use of our services.

COOKIES

There is a technology called "cookies," which are small text files that a website transfers to a user's hard disk or browser. Cookies can be used by a website to enable its users to store tailored information from the website. Whenever you interact with our website(s), we automatically receive and record information on our server logs from your browser including your IP address, "cookie" information, and the page you requested. These cookies act as identifiers we transfer to your computer or mobile device that allow us to recognize your browser or mobile device and tell us how and when pages in our website(s) are visited and by how many people. Because cookies are simple text and not "executable," a cookie will not give your computer a virus or other harmful program. We also use Google's Analytics Demographics service to collect data such as age, gender and interests. This data is used to better understand our audience and ensure more targeted advertising on our website(s). Google opt out information can be found [here](#).

You may be able to change the preferences on your browser or mobile device to prevent or limit its acceptance of cookies, but this may prevent you from taking advantage of some of our websites' features. Our advertising partners, which may include advertisers, advertising agencies, and ad networks, may also transmit cookies to your computer or device, when you view or interact with one of their ads that appear on our website(s). Also, if you click on a link to a third party website, such third party may also transmit cookies to you. This Privacy Policy does not cover the use of cookies by any third parties other than third party advertiser(s), as described below.

THIRD PARTY ADVERTISING

We use a third-party advertising company, InvestingChannel, Inc., to serve ads when you visit our website(s). When you visit our website(s), InvestingChannel uses information about your browsing activity to display advertisements about goods and services that may be of interest to you. Third party advertisers often use a cookie or third party web beacon to collect this information. The information collected does not include your name, address, email address or telephone number. InvestingChannel's use of your information to display advertisements may constitute a "sale" of personal information under the California Consumer Privacy Act ("CCPA"). To opt out of the "sale" of your personal information, click the following link, navigate to the "Opt out" pane on the left-hand side of the module, and select "Opt Out from sales": [Do Not Sell My Information](#). InvestingChannel's privacy statement(s) can be accessed from: <http://media.investingchannel.com/privacy-policy/> <http://stg.media.investingchannel.com/gdpr-notice/> and <https://investingchannel.com/ccpa>.

LOGGED FILES

We log IP addresses and browser types for systems administration purposes and these logs will be analyzed to constantly improve the value of the materials available on our website(s). We also track and store users' consent to our Terms of Service.

SECURITY OF YOUR INFORMATION

We keep personal data only for as long as required to fulfil the purposes for which it was collected (for example, to maintain an accurate record of customer dealings), subject to applicable legal, tax or accounting document retention requirements.

We take reasonable technical, administrative and physical security measures to protect your information, including applying generally accepted industry standards to protect the sensitive and/or personally identifiable information submitted to us during transmission and once we receive it. Despite these protections, however, we cannot guarantee that your data will be 100% secure. You should take measures to protect your personal 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 contact us immediately as detailed under the "Contact Us" heading below.

LINKS

This website contains links to other sites. Please be aware that OTC Markets Group is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our website(s) and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by OTC Markets Group.

YOUR RIGHTS

We will take steps in accordance with applicable legislation to keep personal data accurate, complete and up-to-date. You are entitled to have any inadequate, incomplete or incorrect personal data corrected. You also have the right to request access to your personal data as well as to obtain additional personal data about the processing. In the event the lawful ground (see above) for processing your personal data is your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing before withdrawal. Further,

you are entitled to object to the processing of your personal data or to have your personal data erased, under certain circumstances.

Users located in the European Union have certain rights pursuant to the General Data Protection Regulation (“GDPR”). The following rights apply to processing of personal data which is subject to the GDPR: the right to access your personal information, erase your personal information, restrict our use of your personal information, object to our use of your personal information, receive your personal information in a usable electronic format and transmit it to a third party (right to data portability), and to lodge a complaint with the data protection authority in the European country where you work, reside, or where the subject-matter of your complaint or concern arises. If you wish to exercise any of your rights, or if you have any inquiries or complaints regarding the processing of your personal data, please contact us as detailed under the “Contact Us” heading below.

Users located in California have certain rights pursuant to the California Consumer Privacy Act (“CCPA”). The following rights apply to processing of personal data which is subject to the CCPA: the right to request disclosure of personal information collected, used or disclosed by OTC Markets Group (see Contact Us section), request deletion of personal information collected by OTC Markets Group, opt out of the sale of personal information and non-discriminatory treatment for the exercise of a user’s rights under the CCPA.

To help protect the privacy of individuals and companies who use our services, we will take reasonable steps to verify the identity of a request or before deleting or granting access to personal information in response to requests.

NOTIFICATION OF CHANGES

If we decide to change this Privacy Policy, we will post those changes on our Homepage so our users are always aware of what information we collect, how we use it and under circumstances, if any, we disclose it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users and obtain your consent.

CONTACT US

To contact us directly with any questions, comments or requests you may have regarding our business, services or your personal information, you can reach us by phone at +1 929.376.1493 or email us at privacy@otcmarkets.com. We read every message sent in and try to reply promptly to every one. This information is used to respond directly to your questions or

comments. We may also file your comments to improve our website(s) and program, or review and discard the information.

This policy is effective as of July 8, 2020.