

**Deutsche Boerse Systems, Inc.**  
**Privacy Shield Privacy Policy**

Deutsche Boerse Systems, Inc., a Delaware corporation, (the “Company”) complies with the European Union (“EU”)-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred from the EU or Switzerland to the United States (the “Privacy Shield Principles”). The Company has certified to the Department of Commerce that it adheres to the Privacy Shield Principles when processing Personal Data of its current and prospective customers who reside in the EU or Switzerland. For purposes of this Policy, “Personal Data” means any information received by the Company from the EU or Switzerland, recorded in any form, which relates to an individual who is identified in, or identifiable based on, the Personal Data received. More information about the Privacy Shield Framework as well as the Company’s certification on the Privacy Shield List is available at [www.privacyshield.gov](http://www.privacyshield.gov).

**The Company’s Collection And Use Of Personal Data**

The Company receives the Personal Data of current and prospective customers located in the EU and Switzerland. The table below lists the categories of Personal Data received from the EU and Switzerland and the purposes for which that data is collected and used.

<b>Personal Data Collected</b>	<b>Purpose for Collection &amp; Use</b>
<b>Personal Data of Individual Customers:</b> name, title, business contact information (including business address, telephone number, and email address), trader identification information, customer history, customer interaction history, and photographs or recordings, such as video recordings.	<ul style="list-style-type: none"><li>• Provide services to and communicate with customers;</li><li>• Market the Company’s services to current and perspective customers;</li><li>• Facilitate the operation of the Company’s systems and network in the EU and Switzerland; and</li><li>• Build business relationships.</li></ul>

**The Company’s Disclosure Of Personal Data**

The Company may disclose the Personal Data of its current and prospective customers located in the EU or Switzerland, subject to written agreement, to authorized service providers who provide services related to the purposes for which the Company collects that Personal Data. The Company may be liable for the onward transfer of Personal Data to third parties. The Company may be required to disclose, and may disclose, Personal Data in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements.

**Choices For Limiting The Use And Disclosure Of Personal Data**

For those current and prospective customers in the EU or Switzerland whose Personal Data has been transferred to the United States, the Company will provide the opportunity to opt out from: (a) the disclosure of their Personal Data to a non-agent third party; and (b) the use of their Personal Data for purpose(s) that are materially different from the purpose(s) for which the Personal Data was originally collected or subsequently authorized by the individual. The Company will provide individuals with clear, conspicuous and readily available mechanisms to exercise their choices should such circumstances arise. Individuals who otherwise wish to limit the use or disclosure of their Personal Data should submit their request to [DBSIncCompliance@deutsche-boerse.com](mailto:DBSIncCompliance@deutsche-boerse.com).

**Individuals’ Right To Access And Correct Their Personal Data**

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Upon request, the Company will grant current and prospective customers access to their Personal Data and will permit them to correct, amend or delete Personal Data that is inaccurate or incomplete or that is being processed in violation of the Privacy Shield Principles. Individuals who wish to exercise these rights can do so by contacting the Company through the following email address: [DBSIncCompliance@deutsche-boerse.com](mailto:DBSIncCompliance@deutsche-boerse.com). For security purposes, the Company may require verification of the requester's identity before providing access to Personal Data.

#### **More Information And What To Do If You Have a Complaint**

Individuals can contact the Company with any inquiries about the Privacy Shield or the processing of their Personal Data at [DBSIncCompliance@deutsche-boerse.com](mailto:DBSIncCompliance@deutsche-boerse.com).

In compliance with the Privacy Shield Principles, the Company commits to resolve complaints about its collection, use or disclosure of the Personal Data of its current and prospective customers located in the EU or Switzerland. Any individual who has a complaint should submit the complaint to [DBSIncCompliance@deutsche-boerse.com](mailto:DBSIncCompliance@deutsche-boerse.com). The Company will promptly investigate, and attempt to resolve, such complaints in accordance with this Policy and the Privacy Shield Principles. Any individual who is not satisfied with the internal resolution of a complaint may seek redress, at no cost to the individual, with JAMS, the Company's independent dispute resolution mechanism. JAMS has locations in both the EU and the United States. Please visit <https://www.jamsadr.com/file-an-eu-us-privacy-shield-claim> for more information about JAMS and to submit a complaint. In certain circumstances, the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework provide the right to invoke binding arbitration to resolve complaints not resolved by other means, as described in [Annex I](#) to the Privacy Shield Principles. The Federal Trade Commission has jurisdiction over the Company's compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework.

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