

Deutsche Boerse Systems, Inc.
Data Privacy Framework

Deutsche Boerse Systems, Inc., a Delaware corporation, (the “Company”) complies with the European Union (“EU”)-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. Data Privacy Framework (UK Extension to the EU-U.S. DPF) and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) 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 “Data Privacy Principles”). The Company has certified to the Department of Commerce that it adheres to the Data Privacy Principles when processing Personal Data of its current and prospective customers who reside in the UK, EU, or Switzerland. For purposes of this Policy, “Personal Data” means any information received by the Company from the UK, 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 Data Privacy Framework as well as the Company’s certification on the Data Privacy as well as the Company’s certification on the Data Privacy List is available at www.dataprivacyframework.gov/.

The Company’s Collection and Use Of Personal Data

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

Personal Data Collected	Purpose for Collection & Use
Personal Data of Individual Customers: 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">• Provide services to and communicate with customers;• Market the Company’s services to current and perspective customers;• Facilitate the operation of the Company’s systems and network in Switzerland; and• Build business relationships.

The Company’s Disclosure of Personal Data

The Company may disclose the Personal Data of its current and prospective customers located in UK, 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 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 dbsinc@deutsche-boerse.com.

Individuals’ Right to Access and Correct Their Personal Data

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 Data Privacy Principles. Individuals who wish to exercise these rights can do so by contacting the Company through the following email address: dbsync@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 Data Privacy or the processing of their Personal Data at dbsync@deutsche-boerse.com.

In compliance with the Data Privacy 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 UK, EU, or Switzerland. Any individual who has a complaint should submit the complaint to dbsync@deutsche-boerse.com. The Company will promptly investigate, and attempt to resolve, such complaints in accordance with this Policy and the Data Privacy 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 <http://www.jamsadr.com/DPF-Dispute-Resolution> for more information about JAMS and to submit a complaint. In certain circumstances, European Union ("EU")-U.S. Data Privacy Framework, UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework provide the right to invoke binding arbitration to resolve complaints not resolved by other means, as described in [Annex I](#) to the Data Privacy Principles. The Federal Trade Commission has jurisdiction over the Company's compliance with the Swiss-U.S. Data Privacy Framework.