

## **Purpose**

At BGC Partners, Inc. (“BGC”, “BGC Partners”, “we”, “our”, or “us”), we are committed to handling your information responsibly and would like to let you know that we recognize and respect your right to privacy. This Privacy Statement applies to the BGC Partners websites (collectively, the “Sites”).

This Privacy Statement describes the types of personal information we collect on the Sites, how we may use that information and with whom we may share it.

As used in this Privacy Statement the terms “include(s)” and “including” mean “including without limitation.”

This Privacy Statement may be updated by us at any time and any changes will be effective once posted on the Sites.

## **Personal information we collect and how we use it**

We may collect the following personal information on our Sites for the following purposes:

- Information you provide to us: We collect information that you provide to us when you access and use our Sites or communicate with us, including as follows:
- Access to our Sites, newsletter subscriptions and email alerts. You may register an account with us or sign up to receive news, alerts and publications from BGC. To register or sign-up we may ask you for information, including your name, email address and topics of interest. We will use this information to send you the communications you request. We may also use this information to communicate with you about other topics which we think may be of interest to you. If you are a registered user/have an account with us, you can unsubscribe from receiving these e-mails at any time by clicking the “unsubscribe” link contained in our email messages.
- Contact Us. If you communicate with us through the “Contact Us” link on our Sites, we may ask you for information including your name, email address and telephone number so we can respond to your questions and comments.
- Use of the Site. We may collect information about your actions on the Sites and content you post to the Sites, including comments or inquires you may post or ask to the Sites.
- Information from Tracking Technologies: When you access or use our Sites we may also collect usage information through cookies, clear gifs, log files, and other tracking technologies, and we may use third party analytics partners, for example Google Analytics and Matomo, to assist with this collection. The type of information collected may include information about how you use the website (e.g., the pages you view, the links you click), information about your browser and usage patterns (e.g., your IP address, browser type, referring/exit pages), and information about your device used to access the website (e.g., mobile device ID, device type and operating system). We use this information to monitor aggregate use metrics, analyze traffic patterns, track content you may be interested in, diagnose and fix technology problems and otherwise plan for and enhance our Sites. Please note that, as of the latest update of this privacy statement, this website does not currently take actions to respond to “Do Not Track” signals in browsers.

- Information from other sources: We may obtain information from other sources, such as third-party information providers, or through mergers and acquisitions, and combine this with information previously collected.

In addition to the uses described above, we may also use the personal information you provide and/or we collect on the Sites as follows:

- To operate, maintain, and provide to you the features and functionality of the Sites..
- Manage the day-to-day operations of the Sites and maintain the links we provide to you.
- To contact you (including by e-mail), in order to respond to your inquiries and comments.
- To monitor, enhance, and improve the Sites and any products or services we may provide through the Sites, including through market research and data analytics.
- Communicate directly with you, such as to send you email messages about our products and services.
- For compliance with our legal obligations and policies and procedures.

#### Information we share

BGC is not in the business of selling your information. We consider this information to be a vital part of our relationship with you, and do not share your personal information with any third party except when explicitly authorized by you. Notwithstanding the foregoing, there are, however, certain circumstances in which we may share your personal information with certain third parties without further notice to you, as set forth below:

Within the BGC Partners group: We may make personal information available to other companies and brands owned or controlled by BGC Partners and other companies under common ownership with BGC Partners. These companies will use your personal information in the same way as we may use it under this Privacy Statement.

Our third-party service providers: We may share personal information with our service providers or business partners who help us deliver or improve our services or who perform service on our behalf, including software, system and platform support, cloud hosting services, advertising, data analytics, administrative or business management, and order fulfilment and delivery. Our third-party service providers are required only to share or use personal information we make available to them for the purpose of providing services to us.

Third parties for legal reasons: We may share with, or disclose personal information to, third parties to the extent that we determine in good faith that we are required to do so under any applicable laws, rules or regulations, orders, or in enforcement of our rights or property or the defense of claims, or if we reasonably believe disclosure is necessary to prevent harm or financial loss, or in connection with preventing fraud or illegal activity, and/or to enforce our Terms of Use.

Third parties due to sale or transfer of business or assets: We may share with, or disclose personal information to, third parties in the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). In such event we will use reasonable efforts to ensure that any transferred information is treated in a manner consistent with this Privacy Statement.

Others: We may share information in an aggregated or unidentified form. For example, we may provide information about our users in aggregate to demonstrate the effectiveness of our services.

We do not share your personal information or company information with third parties for marketing purposes without your consent.

### **Links to other sites**

Occasionally, we provide links to other websites for your convenience and information. These websites operate independently from our Sites and are not under our control. These websites may have their own privacy notices or terms of use, which we strongly suggest you review if you visit any linked websites. We are not responsible or liable for the content of these websites, any products or services that may be offered through these websites, or any other use of the linked websites.

### **How we protect personal information**

We maintain administrative, technical and physical safeguards for the Sites that are designed to protect against loss, misuse, unauthorized access, disclosure, alteration or destruction of the personal information we collect through our Sites.

### **Data processing locations**

We may transfer the personal information we collect through the Sites to other countries where we do business, which may not have the same data protection laws as the country in which you reside. The measures we may take to provide appropriate levels of data protection may include approved standard contractual clauses, intragroup agreements, and other measures designed to cause recipients of your personal information to protect it. We partner with and are supported by service providers, including some who are located outside the European Economic Area.

### **Minor information**

Please note that this website is not designed to be used by or collect any personal information from individuals under the age of majority.

### **Additional Rights of EU Residents**

Please see below for the rights available to EU residents under the General Data Protection Regulation (EU) 2016/679 ("GDPR").

Your personal information will be controlled by the relevant BGC affiliate that is providing services to you or communicating with you and each such entity is regarded as an independent controller of your personal information. This Privacy Statement applies to all such entities.

The GDPR entitles European residents certain rights in relation to their personal information. Under certain circumstances, if you are a European resident by law you have the right to:

- update, modify, delete or obtain (commonly known as a “subject access request”) a copy of the personal information that we have collected; or
- restrict or stop us from using any of the personal information that we have collected.

You can exercise these rights by contacting [DPM@BGCPartners.co.uk](mailto:DPM@BGCPartners.co.uk). We endeavour to respond to such requests within a month or less, although we reserve the right to extend this period for requests we deem complex. Where appropriate, we will respond to your requests in writing or by email. If you require our response in a different format, please let us know.

In addition, if EU based individuals have a complaint about the way we have handled their personal information or a subject access request, they have the right to contact a supervisory authority to lodge a complaint. They may contact the supervisory authority in the European Union (or European Economic Area) state where they work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

### **Rights of California Residents**

California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of the Sites who are California residents the right to request certain information regarding our disclosure of personal information (as defined in California Civil Code Section 1798.83(e)(7), available at this link: [Cali. Civ. Code Section 1798.83\(e\)\(7\)](#)) to third parties for their direct marketing purposes. To make a request to access such information, please contact us at [CCPA@fenics.com](mailto:CCPA@fenics.com). After receiving such a request, we will provide a list of the categories of such personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the address specified in this paragraph.

For California consumers who are California residents, please see our Notice to California Consumers subject to the California Consumer Privacy Act here: [www.fenics.com/ccpa](http://www.fenics.com/ccpa) .

### **Contact Us**

If you have any questions about this Privacy Statement, the practices of the Sites, or your dealings with the Sites, please contact our Compliance Department at 212 938 5000 or write to us at BGC Financial, Attn: Compliance Department, 199 Water Street, New York, NY 10038.

Last updated: December 30, 2019