



CLIENT PRIVACY NOTICE

WHAT IS THE PURPOSE OF THIS DOCUMENT?

This privacy notice describes how we collect and use personal information about you during and after your relationship with us. It applies to all clients ("**you**", "**your**") of Virtu Canada Corp. ("**Virtu**", "**us**", "**our**").

WHAT DATA DO WE COLLECT?

Personal data, or personal information, means any information about an individual from which that person can be identified. Personal Information doesn't include the business contact information of an individual which is collected, used, or disclosed solely for the purposes of communicating or facilitating communications with the individual in relation to their employment, business, or profession.

Personal Information also doesn't include any information that is aggregated or anonymized. Virtu does not open accounts for individuals and as such any personal information collected is strictly related to an individual's role on an institutional entity account.

We may collect, store, and use the following categories of personal information:

- Personal Contact details, such as name, title, addresses, telephone numbers, and email address
- Date of birth (where required)
- Nationality (where required)
- Copies of Proof of ID, such as a passport or driving licence (where required)
- Copies of Proof of Address such as a utility bill (where required)
- For UBOs and Shareholders - ownership information (where required)

Virtu does not collect sensitive personal data about clients as there is no legal requirement to collect such data. Please do not send any sensitive personal data to us.



HOW DO WE COLLECT YOUR DATA?

Virtu primarily collects personal data about clients specified above through the on-boarding process directly from the client who will provide us details in relation to business contacts at the client, directors, shareholders, and ultimate beneficial owners. Virtu will also run checks on clients through systems such as Canчек or other open-source searches to determine any regulatory issues, fines, or PEP status in line with our policies.

Virtu may sometimes request additional information in relation to clients in order to fulfil our legal requirements regarding Anti-Money Laundering and Counter Terrorist Financing policies. This information may be requested at onboarding or on an ongoing basis after onboarding in accordance with our “Know-Your-Client” (“KYC”) procedures.

You should be aware that it is not a condition of your contract with us that you agree to the provision of personal data. However, as part of the on-boarding process where clients cannot provide the personal data when requested, we may not be in a position to offer services to the client due to the fact that we may be prevented from complying with our legal and regulatory obligations.

HOW WILL WE USE YOUR DATA?

Virtu may use client personal data to conduct business with our clients or when required by law. Most commonly, Virtu will use client personal data to comply with our obligations under our Anti Money Laundering and Counter Terrorist Financing policies.

The situations in which the Firm will process client personal data are listed below.

- Completing the onboarding process and complying with CIRO and FINTRAC Anti-Money Laundering obligations;
- Complying with requests from our regulators or exchanges further to our legal obligations;
- Monitoring the use of our information and communication systems to ensure compliance with our IT policies;
- Business management and planning, including accounting and auditing;
- Detecting and preventing fraud;
- Managing and assessing our risks, including risk of default and other operational risks;
- Investigating an anticipated breach of an agreement or a contravention of law;
- Pre-populating forms with personal information previously provided, when you apply for a new product or service, or we refresh KYC information on file; and



- to ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution,

DATA RETENTION

Personal data will not be used, disclosed, or retained for purposes other than those for which the information was collected, except with the permission of the individual, or as permitted or required by law. Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

DATA SHARING

Virtu does not engage any third parties for the purposes of processing client personal data except as noted herein. Third parties such as regulators or affiliate Virtu entities may receive client personal data in accordance with the below.

Under the Customer Agreement, you have authorised Virtu to transfer personal data to third parties to the extent necessary to provide the services or to comply with legal obligations to which Virtu is subject.

We may transfer client personal information to our group companies located in the following countries in connection with the provision of the services: Ireland, United Kingdom, United States, Hong Kong, Australia, and Singapore.

AUTOMATED DECISION-MAKING

Virtu does not employ an automated decision-making system for the purposes of processing personal information.

WHAT ARE YOUR DATA PROTECTION RIGHTS?

Under certain circumstances and in line with federal and provincial privacy laws, you have the following rights which you may exercise by contacting a Compliance Officer (as detailed below):

- **The right to access** – You have a right to access, update, and correct inaccuracies in your personal data that is in our custody and control (subject to certain exceptions prescribed by applicable laws and regulations). This includes obtaining details about what personal data was collected about you, how and why it was collected, how we process it, the jurisdictions where your Personal Information may be disclosed, and how long we retain your Personal Information.



- **The right to withdraw consent** – Subject to applicable legal and regulatory requirements, you may provide us with written notice that you wish to withdraw your consent to the processing of your personal data. You may withdraw your consent in whole or with respect to certain uses. In certain circumstances, withdrawing your consent will mean we can no longer administer products and services. You can only withdraw your consent subject to certain legal and contractual restrictions.

VIRTU REPRESENTATIVES

If you have any queries regarding this privacy notice, please contact Virtu's privacy officer at bboyd@virtu.com

RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

If, after contacting us, you feel your personal data concerns have not been adequately addressed, you may contact the Office of the Privacy Commissioner of Canada at:

30 Victoria Street
Gatineau, Quebec
K1A 1H3

Toll-free: 1.800.282.1376
Phone: 819.994.5444
TTY: 819.994.6591

Online: <https://www.priv.gc.ca/en/report-a-concern/>

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will make the new privacy notice available to you on our website when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.