24X PRIVACY POLICY

24X Bermuda Holdings LLC, its operating affiliates and subsidiaries (including, among others, 24X National Exchange LLC) operate a multi-asset electronic trading platform and offers counterparty execution and a US-registered national securities exchange (collectively, "24X," "us," "we," or "our").

24X recognizes and respects the importance of maintaining the privacy of our customers and members and, as a result, we have established this Privacy Policy ("Privacy Policy"). This Privacy Policy applies to personal information that we collect through our website as well as any other related sites and applications. This Policy does not apply to websites operated by other organizations and other third parties. The Policy also applies to personal information that we collect when you use or interact with our services through any correspondence made with us by phone, e-mail or otherwise. The Policy aims to inform you about the type of information we gather, who we share it with, what we use it for, how we keep it secure and what your data privacy rights are.

The Information We Collect

We collect information from users when visiting or using our site and/or services, as applicable. In order to utilize our services, you will be required to register an account and provide us with certain Personal Information (as defined below). We may also collect Personal Information when you request information from us, sign up for newsletters or our email lists, complete online forms, use our chat or contact us for any other reason.

"Personal Information" means information that can be directly associated with a specific person or company such as a name, telephone number, address, e-mail address, or information about activities directly linked to a person or company, such as a person's or company's location. Examples of the Personal Information that we collect from you may include your name, address, social security number, Tax ID number, phone number, e-mail address, IP address, bank and account related information you provide us with for provision of the services and historical transactions, and any other information included account, chat conversations and other communication with 24X. It is your voluntary decision whether to provide us with any such Personal Information, but if you refuse to provide such information we may not be able to register you to the site and/or provide you with the services.

When you use the site or services, certain information may be automatically gathered about your computer, operating system, and any data you upload to the site in order to use the services.

How We Use Your Information

We use your information (including, but not limited to, Personal Information) to provide you with services which may include the following:

Solving Problems and Personalizing the services
We may use Personal Information internally – for example, to help diagnose problems with our servers, to make the site and/or services more useful, to customize the site and/or services and personalize its content for you, and to provide you with the services.

Statistical Information
In addition, by analyzing all information we receive, including all information concerning users, we may compile statistical information across a variety of such information and users ("Statistical Information"). Statistical Information helps us understand trends and customer needs so that new products and services can be considered and so existing products and services can be tailored to customer desires. Statistical Information is anonymous and aggregated.

We use various tools to collect information about the use of the site and/or services ("Tools"). The Tools collect information such as how often users visit this site, what pages they visit when they do so, and what other site(s) they used prior to coming to ours. The tools collect only the IP address assigned to you on the date you visit this site, rather than your name or other identifying information. We do not combine the information collected through the use of the Tools with Personal Information. We use the information we get from the Tools only to improve our site and services.

Regulatory Obligations
We may use your Personal Information in manners necessary to comply with applicable law, including but not limited to financial regulations, during the processing of payments, transactions, and transfer of funds, including sharing certain Personal Information with banks and governmental agencies, as required by applicable law.

We will keep Personal Information as long as it remains necessary to provide our clients with access to and use of the site and services, comply with our legal obligations, resolve disputes, and enforce our agreements.

Who We Share Information With
Except as expressly set forth herein, we will not share your Personal Information with third parties without your explicit permission, in response to subpoenas, court orders, or other legal process or in response to a law enforcement agency's request; to establish or exercise our legal rights; to defend against legal claims; or as we reasonably believe appropriate to comply with applicable laws, regulations, orders, legal processes or government or regulatory requests,

including tax authorities in Israel, the United States and elsewhere, as well as in order to comply with anti-money laundering laws and regulations. In such cases we reserve the exclusive right to raise or waive any legal objection or right available to us.

We may share your information, including Personal Information, as follows:

Service Providers and Subcontractors
We may disclose information, including Personal Information we collect from and/or about you, to our trusted service providers and subcontractors, who may use such information to: (1) help us provide you with services; and (2) aid in their understanding of how users are using our site and services.

Service providers and subcontractors may be located in countries other than your own. All our subcontractors will be subject to non-disclosure and non-use obligations. Nevertheless, some countries may have levels of protection of personal and other information which are not as high as in your country of residence or business. We will obtain your consent, however, before using your personal information for any purposes other than performing the services for which you provided the personal information.

Business Transfer
We may transfer our databases containing your Personal Information if we sell our business or part of it.

When we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of our company or this site, our clients, or others; and in connection with our Terms and other agreements, including where we believe you may have breached the Terms or other agreements with 24X or its affiliates, to detect, prevent or otherwise address fraud or illegal behavior, security or technical issues, or protect against imminent harm to the rights, property or safety of 24X, its affiliates or users or the public as required or permitted by law.

We review our retention periods for personal information regularly. We are legally required to hold some types of information to fulfil our statutory and regulatory obligations. We will hold your personal information on our systems for as long as is necessary to fulfil the purposes outlined in this Privacy Policy, or as long as is set out in any relevant contract you hold with us, unless a longer retention period is required or permitted by law.

How We Protect Information
We make efforts to follow generally accepted industry standards to protect the Personal Information submitted to and collected by us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your

Personal Information, we cannot guarantee its absolute security. 24X's employees are kept up to date on security and privacy practices.

Cookies

A cookie is a small piece of text that is sent to a visitor's browser. The browser provides this piece of text to the device of the originating visitor when this visitor returns. 24X uses cookies to help personalize your 24X experience. A "persistent" cookie may be used to help save your settings and customizations across visits. Also, if you log into the site, such a cookie will be used to recognize you as a valid user so you will not need to log in each time you use the site. Most Web browsers are initially configured to accept cookies, but you can change this setting so your browser either refuses all cookies or informs you when a cookie is being sent. Also, you are free to delete any existing cookies at any time. Please note that some features of the site may function improperly when cookies are disabled or removed.

Communications

We may send you emails or other messages and/or a newsletter about us or our services. By accepting the terms of this Privacy Policy or using the site and/or services, you affirmatively consent to receive such commercial messages. As a registered member, you can remove your Personal Information from our mailing list and stop receiving future communications from us by following the UNSUBSCRIBE link located at the bottom of each communication or by emailing us at support@24exchange.com. You will also be given the opportunity to unsubscribe from commercial messages in any such e-mail or message we send. Please note that we reserve the right to send you service-related communications, including service announcements and administrative messages, relating either to your account or to your transactions on the site without offering you the opportunity to opt out of receiving them. Should you not wish to receive such communications you may cancel your account.

Changes and Deletion of Information

By using our site, you automatically accept the terms of this Privacy Policy. If you do not agree with the terms hereof, please do not use this site or the services. We may update this Privacy Policy from time to time – we encourage you to review it periodically. By continuing to access or use the site after those changes become effective, you agree to be bound by the revised privacy policy.

We will delete information provided to us by a user within a reasonable time from the receipt of a written request, which may be sent to by such user to delete its account provided, however, that we may retain a copy of certain information for audit and record-keeping purposes. We cannot restore information once it has been deleted.

If you have any comments or questions about our privacy policy, please contact us at support@24exchange.com.