

# / Disclosures

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**Please verify that you have received and read the following Disclosures Documents by initialing at the bottom.**

## **Anti-Money Laundering Notification**

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person who handles transactions on behalf of others.

Upon applying for Dash's services, Dash is required to collect (at a minimum) information such as the following from you: Your Name  
Date of Birth Address  
Identification number, such as:

U.S. Citizen: taxpayer identification number (social security number or employer identification number)

Non-U.S. Citizen: taxpayer identification number, passport number, and country of issuance, alien identification card number, or government-issued identification showing nationality, residence, and a photograph of you.

You may also be asked to show your driver's license, corporate documentation or other identifying documents. A corporation, partnership, trust or other legal entity may need to provide information such as principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement or a trust agreement.

## **Investor Education and Protection**

Pursuant to FINRA Rule 2267, please note that the toll-free number for the Public Disclosure Program of FINRA (which provides certain information about the disciplinary history of FINRA members and their associated persons) is 1-800-289- 9999, the FINRA website is [www.finra.org](http://www.finra.org) and an investor brochure that includes information describing the Public Disclosure Program is available upon request from FINRA.

## **Notice Regarding the NFA's BASIC System**

Dash is required to inform its customers of the National Futures Association ("NFA") Background Affiliation Status Information Center ("BASIC"). The BASIC system compiles various information on registrants and anyone can access this system on the Internet.

The information in the BASIC system includes Commodity Futures Trading Commission ("CFTC") registration information and membership information from the NFA. Additionally, regulatory and non-regulatory actions contributed by the NFA, the CFTC and U.S. futures exchanges regarding futures-related activity are included.

The NFA BASIC system may be accessed at <http://www.nfa.futures.org/basicnet/>. To locate information on a registrant, simply enter the registrant's NFA ID number when prompted. For questions regarding this system, you may contact the NFA information center at 1-800-621-3570 between the hours of 8:00 a.m. to 5:00 p.m. CST.

## **SIPC Disclosure**

In accordance with FINRA Rule 2266, Dash is providing notice to you that information pertaining to the Securities Investors Protection Corporation ("SIPC") including an SIPC Brochure, may be obtained by contacting the following or the web at:

Securities Investor Protection Corporation 805 15th Street, N.W. Suite 800  
Washington, D.C. 20005-2215  
202-371-8300  
[www.sipc.org](http://www.sipc.org)

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## **Options Disclosure Document**

Pursuant to SEC Rule 9b-1 and various exchange rules, Dash is required to provide all clients who trade options or who receive options-related sales materials, a current copy of the Options Disclosure Document (“ODD”) including supplements, issued by the Options Clearing Corporation. A copy of the ODD can be found here: <http://www.theocc.com/about/publications/character-risks.jsp>.

## **SEC Rule 606**

SEC Rule 606 requires broker-dealers that route customer orders in NMS securities and listed option securities to make publicly available quarterly reports that identify the venues to which client orders are routed for execution. Dash’s Rule 606 report is available at [https://www.dashfinancial.com/files/SEC\\_reports.pdf](https://www.dashfinancial.com/files/SEC_reports.pdf).

You may contact Dash for the identity of the venue to where the client’s orders were routed for execution in the (6) six months prior, whether the orders were directed orders or non-directed orders, and the time of the transaction, if any that resulted from such orders by sending an email to the Dash Concierge Team ([concierge@dashfinancial.com](mailto:concierge@dashfinancial.com)).

## **SEC Rule 607**

SEC Rule 607 requires all registered broker-dealers to provide disclosures to customers of payment for order flow practices upon the opening of a new account and annual thereafter. In accordance with this requirement, the below is provided to you as your annual notification:

Dash receives payment for order flow from U.S. options exchanges via the SEC-approved marketing fees mandated by those exchanges for directing client orders to such exchanges. Absent any direction or preference from you on your order, Dash may route to these exchanges based upon a number of factors including size and complexity of the order, liquidity of the market, available price improvement, and potential price impact.

## **ISE Solicitation Orders**

Pursuant to International Stock Exchange Rule 716, Dash is required to provide the following disclosure, informing you of our intent to use the Solicited Order mechanism to cross customer options orders. ISE Rule 716(e) (3) provides:

When handling an order of 500 contracts or more on your behalf, Dash may solicit other parties to execute against your order and may thereafter execute your order using the International Securities Exchange’s Solicited Order Mechanism. This functionality provides a single-price execution only, so that your entire order may receive a better price after being exposed to the Exchange’s participants, but will not receive partial price improvement. For further details on the operation of this Mechanism, please refer to International Securities Exchange Rule 716, which is available at [www.ise.com](http://www.ise.com) under “Membership, Rules & Fees-Regulatory-ISE Rules”.

## **CBOE Solicitation Orders**

Pursuant to Chicago Board Options Exchange Rule 6.74B, Dash is required to provide the following disclosure, informing you of our intent to use the Solicited Auction mechanism to cross customer options orders. CBOE Rule 6.74B provides:

Dash may electronically execute orders that it represents as agent against solicited orders provided the following terms and conditions are met: (i) the agency order must be 500 contracts or more (or 5,000 mini option contracts); (ii) the order must be designated as all-or-none; and (iii) the minimum price increment for single price submission will be determined by CBOE but may not be smaller than one cent. For further details on the operation of this Mechanism, please refer to CBOE Rule 6.74B, which is available at [www.cboe.com](http://www.cboe.com) under "About CBOE".

## **C2 Options Exchange Solicitation Orders**

Pursuant to C2 Options Exchange Rule 6.52, Dash is required to provide the following disclosure, informing you of our intent to use the Solicited Auction mechanism to cross customer options orders. C2 Rule 6.52 provides:

Dash may electronically execute orders that it represents as agent against solicited orders provided the following terms and conditions are met: (i) the agency order must be 500 contracts or more (or 5,000 mini option contracts); (ii) the order must be designated as all-or-none; and (iii) the minimum price increment for single price submission will be determined by C2 but may not be smaller than one cent. For further details on the operation of this Mechanism, please refer to C2 Rule 6.52, which is available at [www.c2exchange.com](http://www.c2exchange.com) under "About C2".

## **MIAX Solicitation Orders**

Pursuant to Miami International Securities Exchange, LLC Rule 515A, Dash is required to provide the following disclosure, informing you of our intent to use the Solicited Auction mechanism to cross customer options orders. MIAX Rule 515A provides:

Dash may electronically execute orders that it represents as agent against solicited orders provided the following terms and conditions are met: (i) the agency order must be 500 contracts or more (or 5,000 mini option contracts); (ii) the order must be designated as all-or-none; and (iii) the minimum price increment for single price submission will be determined by MIAX but may not be smaller than one cent. For further details on the operation of this Mechanism, please refer to MIAX Rule 515A, which is available at [www.miaxoptions.com](http://www.miaxoptions.com) under "Regulatory".

## **Extended Hours Execution Risks Disclosure**

Dash wishes to remind you of the following disclosures with respect to orders submitted to Dash for execution during the extended hours trading sessions (e.g., pre-market or post-market trading sessions). For the purposes of this disclosure, "extended hours" refers to trading outside of "regular trading hours". "Regular trading hours" generally refers to the time between 9:30 a.m. and 4:00 p.m. (EST).

### **Risk of Lower Liquidity**

Liquidity refers to the ability of market participants to buy and sell securities. Generally, the more orders that are available in a market, the greater the liquidity. Liquidity is important because with greater liquidity, it is easier for investors to buy or sell securities, and as a result, investors are more likely to pay or receive a competitive price for securities purchased or sold. There may be lower liquidity in extended hours trading as compared to regular market hours. As a result, your order may only be partially executed, or not at all.

### **Risk of Higher Volatility**

Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be greater volatility in extended hours trading than in regular market hours. As a result, your order may only be partially executed, or not at all, or you may receive an inferior price in extended hours trading than you would during regular market hours.

### **Risk of Changing Prices**

The prices of securities traded in extended hours trading may not reflect the prices either at the end of regular market hours, or upon the opening of the next morning. As a result, you may receive an inferior price in extended hours trading than you would during regular market hours.

### **Risk of Unlinked Markets**

Depending on the extended hours trading system or the time of day, the prices displayed on a particular extended hours system may not reflect the prices in other concurrently operating extended hours trading systems dealing in the same securities. Accordingly, you may receive an inferior price in one extended hours trading system than you would in another extended hours trading system..

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## **Risk of News Announcements**

Normally, issuers make news announcements that may affect the price of their securities after regular market hours. Similarly, important financial information is frequently announced outside of regular market hours. In extended hours trading, these announcements may occur during trading, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of a security.

## **Risk of Wider Spreads**

The spread refers to the difference in price between what you can buy a security for and what you can sell it for. Lower liquidity and higher volatility in extended hours trading may result in wider than normal spreads for a particular security.

Risk of Lack of Calculation or Dissemination of Underlying Index Value or Intraday Indicative Value (“IIV”)

For certain derivative securities products, an updated underlying index value or IIV may not be calculated or publicly disseminated in extended trading hours. Since the underlying index value and IIV are not calculated or widely disseminated during extended hours trading sessions, an investor who is unable to calculate implied values for certain derivative securities products in those sessions may be at a disadvantage to market professionals.

## **Business Continuity Planning**

### **November 2017**

Dash Financial Technologies LLC (“Dash”, the “Firm”, “we”, or “our”) has developed a Business Continuity Plan to address our response to events that significantly disrupt our business. We are providing you with this information regarding our business continuity plan.

**Contacting Us** – After a significant business disruption (“SBD”), you should contact us as you usually do by phone at 888-569-3270, or email at [concierge@dashfinancial.com](mailto:concierge@dashfinancial.com). For matters related to trading, you may also contact us at [tradedesk@dashfinancial.com](mailto:tradedesk@dashfinancial.com).

**Our Business Continuity Plan** –Our business continuity plan is designed to permit our Firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption. In the event of an SBD, our first priorities are to protect the safety of our employees and allow our customers to continue to transact business with as little interruption as possible.

Dash’s business continuity plan addresses: data backup and recovery; mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical counter-parties impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

**Varying Disruptions** – Significant business disruptions can vary in scope, as they may affect only our Firm, a single building housing our Firm, the business district where our Firm is located, the city where we are located, or the whole region. In either situation, we plan to continue business as soon as practicable. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer’s prompt access to their funds and securities.

**For more information** – If you have questions about Dash’s business continuity plan, please contact the Dash Concierge Team at [concierge@dashfinancial.com](mailto:concierge@dashfinancial.com).

## **Privacy Policy**

As a client of Dash, we understand that confidentiality and security of the personal information that you share with Dash is important.

By opening an account with Dash or by utilizing the products and services available through Dash, you have consented to the collection and use of your personal information in accordance with the privacy notice set forth below.

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In order to provide you with services and to comply with regulatory requirements, Dash collects certain personal, nonpublic information from you. This includes information:

- Information Dash receives from you on applications or other forms; and
- Information acquired as a result of the transactions you conduct with us; We safeguard the confidentiality of your information in a number of ways. For example:
  - Dash does not sell or license information about our clients or client email addresses to third party marketers.
  - Dash maintains and enforces employment policies that prohibit employees who have access to personal, non-public information from using or disclosing such information except for business purposes.
  - Only authorized Dash personnel via valid user names and passwords can access the Dashboard.
  - Dash will only disclose or report such information where necessary to authorize, effect, administer, or enforce transactions that you request or authorize in order to: maintain and administer your account; provide you with account confirmations; statements and records; maintain appropriate archive records; where we believe disclosure is required by applicable law; rules or regulations, to cooperate with law enforcement or regulatory or self-regulatory organizations; enforce our customer and other agreements; meet our obligations; or to protect our rights and property. If you decide to terminate your access to the services or are an inactive client, we will adhere to the Privacy Policy and practices as described in this notice.

In the course of using our site, however, we may automatically track certain information about you. This information may include, but is not limited to, what browser you are using, and your IP address. In addition, Dash tracks the path of the web pages you view while on the Dash site. Dash reserves the right to use cookies on certain pages of our site. Cookies are bits of textual information that are sent electronically from a web server to your browser and are stored on your computer. Cookies do not identify you individually or contain personal information about you, unless you have identified yourself or provided the information by, for example, opening an account or registering for an online service. Dash reserves the right to use cookies to track where you go on our site, or to make it easier for you to return on subsequent visits to those areas that are of most interest to you. In the event that Dash makes use of cookies, you have the option to decline our cookies if your browser permits; however, removing cookies may reduce the speed at which you move through our site.

By using the Dash site, you consent to the collection and use of this information by Dash. Dash may modify this Privacy Policy from time to time. If this Privacy Policy is modified, the changes will be posted on this page. Your continued use of our site following the posting of changes to these terms will mean you accept the changes.

If you have any questions about these policies, please contact the Dash Concierge Team at [conciierge@dashfinancial.com](mailto:conciierge@dashfinancial.com).

## **Client Complaints**

Pursuant to SEC Rule 17a-3(a)(18)(ii), please be advised that any complaints may be directed to the following:

Dash Financial Technologies LLC  
311 S. Wacker Drive, Suite 1000 Chicago, IL 60606  
Attn: Erin Preston (888) 569-3274

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