SIP GLOBAL

Privacy Policy

Effective date: 2026-10-03

1. Who we are

Systematic Index Partners Ltd., trading as SIP Global ("SIP", "we", "us"), is a company registered in Alberta, Canada (Alberta Corporate Registry no. 2027853205), based in Calgary, Alberta. We are the controller of personal information collected through sipglobally.com (the "Site"). Our business is acting as a physical commodity counterparty and broker across 23 commodity classes.

Privacy contact: brayden@sipglobally.com or mitch@sipglobally.com. This policy is written to meet Alberta's Personal Information Protection Act (PIPA), Canada's Personal Information Protection and Electronic Documents Act (PIPEDA), the EU General Data Protection Regulation and UK GDPR, and the California Online Privacy Protection Act (CalOPPA) and California Consumer Privacy Act (CCPA).

2. No cookies, no tracking

The Site does not use cookies, local storage, session storage, analytics, advertising pixels, fingerprinting or any third-party tracking. We do not load third-party scripts or fonts. Fonts are served from our own servers. Because we do not track visitors, we have no tracking to opt out of, and we do not respond to Do Not Track signals differently from any other request.

3. Information we collect

We collect only what you choose to send us through the Site forms. All forms submit to the same enquiry endpoint.

- **Contact form:** name, email, message, and optionally the market, side (buy, sell, price guarantee, storage), quantity, timing, company and phone number.
- **Reference price request form:** name, email, message, commodity, grade, origin, side and market.
- **Credit application form:** full name, company, business type, email, side, quantity, company registration number, phone, mailing address, desired delivery date, bank or trade reference, message, and your acceptance of the terms and this policy.
- **Technical data:** when you submit a form we record a truncated IP address (the network portion only, with the host portion removed) and the time of submission. Our hosting provider also keeps standard server logs for security and operation.
- **Correspondence:** anything you send us by email, and our replies.

We do not knowingly collect sensitive personal information. Please do not include it in free-text fields. Tools on the Site (HS code lookup, landed cost, container loading and unit converter) run in your browser and we do not receive what you enter into them.

4. Why we use it and our legal bases

We use personal information only for the purposes below.

- **Responding to enquiries and price requests** (steps at your request before entering a contract, and our legitimate interests in running our business).
- **Assessing credit applications and onboarding counterparties**, including know-your-customer checks and sanctions screening (steps before a contract, legal obligations, and legitimate interests in managing credit and compliance risk).
- **Entering into and performing trades** (performance of a contract).
- **Security, fraud and abuse prevention**, including a hidden spam-trap field and per-IP rate limiting held in memory (legitimate interests).
- **Meeting legal and regulatory obligations** and establishing or defending legal claims (legal obligation and legitimate interests).
- **Consent:** where we ask for your agreement, for example the checkbox on the credit application, we rely on your consent for that processing. You may withdraw consent at any time, though this may stop us processing your application. Under PIPA and PIPEDA we also rely on implied consent where you volunteer information to receive a response.

We do not send marketing email unless you have asked for it, and we do not use your information for automated decision-making or profiling.

5. Who receives it

We do not sell personal information. We share it only with service providers acting on our instructions, and where required by law.

- **Google LLC (Google Workspace and the Gmail API):** delivers form submissions to our trading desk by email and hosts our mailboxes.
- **DigitalOcean, LLC:** hosts the Site and the enquiry log, in data centres in Canada or the United States.
- **Professional advisers, banks, insurers, inspection agencies and sanctions or credit screening providers**, where needed to assess or perform a trade.
- **Regulators, courts and law enforcement**, where we are legally required or permitted to disclose.
- A successor to our business in a merger, acquisition or sale of assets, subject to this policy.

6. International transfers

Our providers may process information in Canada, the United States and other countries where they operate, and a counterparty or trade may involve recipients elsewhere. Where personal information of people in the European Economic Area or United Kingdom is transferred outside those regions, we rely on an adequacy decision where one exists (the European Commission recognises Canada as providing adequate protection for commercial

organisations under PIPEDA, and the United Kingdom recognises Canada under its adequacy regulations), or on the European Commission Standard Contractual Clauses and the UK International Data Transfer Addendum or Agreement, together with supplementary measures. Under PIPA and PIPEDA, information held outside Canada may be accessible to foreign courts and authorities under the laws of those countries. You can ask us for details of our service providers outside Canada using the contact above.

7. How long we keep it

- **Enquiry log** (form fields and truncated IP address): 24 months from submission, then deleted.
- **Email copies of submissions and correspondence in Google Workspace:** 24 months, then deleted.
- **Trade, credit, KYC and sanctions records for counterparties we transact with:** as long as the relationship continues and for the period required by law or needed to defend claims (generally up to seven years after the last trade).
- **In-memory rate-limiting data:** held only in server memory and discarded when it expires or the server restarts.

8. Security

We use encryption in transit (HTTPS), access controls on the log and mailboxes, and limit access to those who need it. No method of transmission or storage is completely secure. If you believe your information has been compromised, tell us at brayden@sipglobally.com. We will notify affected individuals and regulators where the law requires, including under PIPA's and PIPEDA's breach notification rules.

9. Your rights

Depending on where you live, you may have the right to access your personal information, correct it, delete it, restrict or object to our processing, receive a portable copy, withdraw consent, and not be discriminated against for exercising your rights. Under PIPA and PIPEDA you may also ask how we have used and disclosed your information. To exercise a right, email brayden@sipglobally.com from the address you used with us. We may need to verify your identity, and will respond within 30 days (or the period the applicable law requires). We may decline requests where the law allows, for example where we must keep records. Authorised agents may act for you with written proof of authority.

10. Complaints

Please contact us first so we can try to resolve your concern. You may also complain to a regulator:

- Office of the Information and Privacy Commissioner of Alberta (oipc.ab.ca)
- Office of the Privacy Commissioner of Canada (priv.gc.ca)
- If you are in the EEA, your local data protection supervisory authority (a list is at edpb.europa.eu)
- If you are in the United Kingdom, the Information Commissioner's Office (ico.org.uk)

- If you are in California, the California Attorney General or the California Privacy Protection Agency

11. California privacy notice (CCPA and CalOPPA)

In the past 12 months we have collected the following categories of personal information. We do not sell personal information and we do not share it for cross-context behavioural advertising. We have no actual knowledge of selling or sharing the personal information of anyone under 16.

Category	Examples	Source	Disclosed for a business purpose to
Identifiers	Name, email, phone, mailing address, truncated IP address	You, and your browser on submission	Google, DigitalOcean
Customer records	Company, registration number, business type, bank or trade reference	You	Google, DigitalOcean, screening providers
Commercial information	Commodity, side, quantity, timing, trade enquiries	You	Google, DigitalOcean
Internet or network activity	Time of submission and truncated IP address	Your browser	DigitalOcean
Professional information	Company and role	You	Google, DigitalOcean
Sensitive personal information	None collected	Not applicable	Not applicable

California residents may request to know, delete or correct the personal information we hold and may opt out of sale or sharing (which we do not do). We will not discriminate against you for exercising these rights. Email brayden@sipglobally.com to make a request. Because the Site does not track visitors, there is no tracking to disable.

12. Children

The Site is for business use and is not directed at children. We do not knowingly collect information from anyone under 16. If you believe a child has sent us information, contact us and we will delete it.

13. Changes

We may update this policy. The effective date at the top shows when it last changed, and material changes will be noted on this page. Questions: brayden@sipglobally.com.