A.P. Gilfoyle™

Law Enforcement Data Request

Introduction

A.P. Gilfoyle[1] will not disclose client data (which may include personal information, together "**client data**") in response to third party requests from law enforcement, governmental, or regulatory agencies except where required to do so by law (for example, in response to valid and properly served legal process such as a subpoena or search warrant). A.P. Gilfoyle reviews the legality of all such requests prior to responding to ensure they are valid, and that A.P. Gilfoyle is legally obligated to comply. A.P. Gilfoyle challenges requests, including, where necessary, through court challenges and exercise of available appellate rights, if, after careful assessment, A.P. Gilfoyle concludes that the request exceeds the relevant agency's authority or is otherwise unlawful. When challenging requests, A.P. Gilfoyle seeks interim measures with a view to suspending the effects of the request until competent judicial authority has ruled on its merits.

A.P. Gilfoyle will notify its client about any legally binding request prior to disclosing client data in response to that request, and will notify its client if A.P. Gilfoyle becomes aware of any direct access by public authorities to client data, unless:

(1)   A.P. Gilfoyle is prohibited by applicable law from doing so, or

(2)   there are clear indications of unlawful conduct in connection with the client's use of A.P. Gilfoyle services.

If A.P. Gilfoyle responds to a request for disclosure, A.P. Gilfoyle will attempt to provide the minimum amount of information permissible, based on a reasonable interpretation of the request.

Notwithstanding any of the foregoing, A.P. Gilfoyle reserves the right to respond to urgent law enforcement requests if A.P. Gilfoyle believes in good faith that an emergency involving imminent danger of death or serious physical injury justifies such disclosure.

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[1] The term "A.P. Gilfoyle" refers, collectively, to A.P. Gilfoyle Markets, Inc.., or its affiliates or subsidiaries.