Fingerprint Information Privacy Policy

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Purpose

The Fingerprint Information Privacy Policy (“Policy”) sets forth the policy regarding the collection, use, safeguarding, storage, retention and destruction of fingerprint information collected by Cboe Global Markets, Inc., including its fully-owned subsidiaries (collectively, the “Company”). In accordance with Section 17(f)(2) of the Securities Exchange Act of 1934 (“Exchange Act”) and the Company’s rules and governing documents, the Company currently collects and stores fingerprints from: (1) its members and Associated Persons of its members; (2) Company directors, officers, and employees; and (3) temporary personnel, independent contractors, consultants, vendors and service providers who have or are anticipated to have access to its facilities and records.

The Company collects fingerprints, in order to: (1) enable Exchange members and exchange applicants to comply with the fingerprint requirement under Section 17f(2) of the Exchange Act and Rule 17f-2 thereunder; (2) enable the Company to obtain background information from law enforcement records concerning whether individuals should be permitted to become a member, or Associated Person of a member, of a regulated subsidiary of the Company; (3) enable the Company to obtain background information from law enforcement records concerning whether individuals should be granted employment with the Company or should become a director of a Board of the Company; (4) enable the Company to obtain background information from law enforcement records concerning whether individuals should be granted access to the Company’s premises; and/or (5) identify automatically and accurately those persons who are permitted to access the Company’s premises and to grant those persons such access.

Scope

All Company personnel shall comply with this Policy and any and all associated guidelines and procedures that may be issued from time to time in connection with this Policy.

2 “Members” means any individual, corporation, partnership, limited liability company or other entity authorized by the Company’s rules and governing documents to access one or more facilities of the Company for the purpose of effecting transactions on those facilities.
Fingerprint Collection, Retention, Disclosure and Destruction

An individual’s fingerprints will not be collected or otherwise obtained by the Company without prior written consent of the individual. The Company will inform the individual of the reason his or her fingerprint information is being collected, the length of time the data will be retained, and to whom the information may be disclosed. Such disclosures and written consent will be memorialized in a written Release For the Collection and Retention of Fingerprints Form (or similar document).

The Company will store, transmit, and protect from disclosure all fingerprint information (1) using the reasonable standard of care applicable to national securities exchanges; (2) in a manner that is no less protective than the manner in which the Company stores, transmits, and protects other confidential and sensitive information; and (3) in accordance with applicable laws including, but not limited to, the Illinois Biometric Information Privacy Act. The Company will not sell, lease, trade, or otherwise profit from an individual’s fingerprint information.

Fingerprint information will not be disclosed by the Company unless (a) consent is obtained, (b) disclosure is necessary to complete a financial transaction requested or authorized by the subject, (c) disclosure is required by law, or (d) disclosure is required by subpoena. As outlined in the Release For the Collection and Retention of Fingerprints Form, fingerprint information may be sent by the Company to Federal or State law enforcement agencies.

Any fingerprint information collected by the Company shall be retained for a period of five years or for such additional time as may be required under State or Federal law and will be promptly destroyed thereafter.

A copy of this Policy will be made publicly available at www.cboe.com.