Last Updated: July 14, 2026

FACTS

WHAT DOES Topstep Brokerage LLC ("Topstep Brokerage") DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you engage with through us. This information can include: ■ Social Security number, Tax ID Number, and other government identifiers ■ Your name and contact information (email address, physical address, telephone number) ■ Investment objects and data related to your transactions and your performance ■ Account numbers, details, balances and transaction history ■ Disclosed financial information such as income, net worth, source of funds, trading experience
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Topstep Brokerage chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Topstep Brokerage share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), as required or permitted by applicable law (for example, cooperating on or filing suspicious activity reports and responding directly or indirectly to requests or inquires made by clearinghouses and Futures Commission Merchants ("FCMs")), to respond to court orders and legal investigations and inquiries, in connection with direct or indirect regulatory investigations, inquiries and requests, or to report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	We don't share
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

To limit our sharing	■ Call 888-407-1611 **or** ■ Email us at dpo@topstep.com Please include your name and applicable contact information in your request. **Please note:** If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice (or such shorter periods as needed for legal or regulatory purposes). When you are *no longer* our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.
Questions?	Call 888-407-1611 or go to dpo@topstep.com

Who we are

Who is providing this notice?	Topstep Brokerage, LLC

What we do

How does Topstep Brokerage protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and reasonable and appropriate measures designed to secure files and buildings.
How does Topstep Brokerage collect my personal information?	We collect your personal information, for example, when you ■ Open an account with Topstep Brokerage ■ Interact with an FCM with which we partner ■ Utilize the services and products on our website ■ Want a payout or make an order or trade request We may also collect your personal information from others, such as affiliates, the FCMs with which you interact, and other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. ■ Our affiliates include companies with the Topstep name and ProjectX Trading LLC
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. ■ Other financial service providers (such as FCMs and other brokerages) to whom we have introduced you and exchanges
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. ■ Other financial service providers (such as FCMs, other brokerages, and exchanges)

Other important information

Do Not Call Policy. This notice is the Topstep Brokerage Do Not Call Policy under the Telephone Consumer Protection Act. We do not solicit via telephone numbers listed on the state or federal Do Not Call lists, unless the law allows. Our employees receive training on how to document and process telephone marketing choices. Consumers who ask not to receive telephone solicitations from Topstep will be placed on the Topstep Do Not Call list and will not be called in future campaigns, including those of Topstep affiliates.

Call Monitoring and Recording. If you communicate with us by telephone, we may monitor or record the call.

For Nevada residents only. We are providing you this notice under state law. You may be placed on our internal Do Not Call List by following the directions in the *To limit direct marketing contact* section. Nevada law requires we provide the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Avenue, Suite 3900, Las Vegas, NV 89101; Phone number: 702.486.3132; email: aginfo@ag.nv.gov; and Topstep Brokerage LLC, Chicago Board of Trade Building, 130 S. Jefferson St., Suite 400, Chicago, IL 60661; Phone Number: 888-407-1611; email: dpo@topstep.com.

Vermont: Under Vermont law, we will not share information we collect about Vermont residents with companies outside of our corporate family, unless the law allows. For example, we may share information with your consent, to service your accounts or under joint marketing agreements with other financial institutions with which we have joint marketing agreements. We will not share information about your creditworthiness within our corporate family except with your consent, but we may share information about our transactions or experiences with you within our corporate family without your consent.

California: Under California law, we will not share information we collect about you with companies outside of Topstep Brokerage, unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing among our companies to the extent required by California law.