

# QUANTRADER LLC

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## PRIVACY POLICY

Quantrader LLC and its affiliates (“Quantrader”, “we”, “us” and/or “our”) offer portfolio management services through an automated investment adviser service (“Service”). Our Service is made available through Quantrader’s website, www.quantrader.ai (“Site”). This Privacy Policy describes how Quantrader treats your personal information when you use or evaluate our Site and/or Service or when you apply to and/or become an employee (“Employee”).

For the purpose of this Privacy Policy, a User is an individual who uses our Site to understand or evaluate our Service; and a Client is an individual who signs our Client Agreement that entitles the Client to have her or his investment portfolio managed by Quantrader.

Our Privacy Policy, Terms of Use and, where applicable, Client Agreement, collectively govern your use or evaluation of our Site, and/or Service.

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives the Client the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

### TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

The type of information we collect depends on whether you are a current or former User, Client and/or Employee. We collect Personal Information from you when you voluntarily provide it to us. Examples of instances when we collect personal information (“Personal Information”) include:

- when you answer questions on the Site to determine what kind of portfolio we might recommend if you were to become a Client,
- when you register to open an account,
- when you contact our client service organization with questions,
- when you become a Client, or
- when you apply to become or become an Employee.

Wherever Quantrader collects Personal Information, we endeavor to provide a link to this Privacy Policy and other relevant terms, such as our Terms of Use.

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information, Financial Account Numbers and/or Balances,

Sources of Income, and Credit Card Numbers or Information. When you are no longer our Client, we may continue to share your information only as described in this notice.

### PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

- For everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus;
- For our marketing – to offer our products and services to you;
- For joint marketing with other financial companies;
- For our affiliates’ everyday business purposes – information about your transactions and experiences and information about your creditworthiness; or
- For non-affiliates to market to you.

If you are a new Client we may begin sharing your information on the day you sign our agreement. When you are no longer our Client, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

We will not sell, rent, or trade your Personal Information (whether you are a current or former User, Client and/or Employee) to any nonaffiliated third-parties. We will not share your Personal Information (whether you are a current or former User, Client and/or Employee) with any nonaffiliated third-parties except as required by law, such as when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud, front running or scalping, situations involving potential threats to the physical safety of any person, or violations of our Terms of Use.

Quantrader may share your Personal Information among affiliated Quantrader entities in connection with the provision of Services to Clients and Users. There are certain circumstances, in which we may share your Personal Information with nonaffiliated third-parties without further disclosure to you. For example, from time-to-time, we hire third-parties to perform certain business and technology related functions (e.g., mailing information, database maintenance and payment processing). In the case we hire a third party to perform a function of this kind, we endeavor to only provide them with the minimum information they need to perform their specific function and to require these third parties to safeguard your information.

#### NO RENTING, SELLING OR TRADING OUT LIST

We will never rent, sell or trade your Personal Information to anyone.

#### INFORMATION REGARDING CHILDREN

Due to the nature of our business, Services and benefits are not marketed to minors. Except for beneficiary information as described above, Quantrader does not knowingly solicit Personal Information from children under the age of 18.

If you are under the age of 18, please do not submit any Personal Information to Quantrader.

If we learn that we have collected Personal Information directly from a minor, we will delete such information from our files.

If a parent or guardian becomes aware that his or her child under the age of 18 has directly provided us with Personal Information without his or her consent, he or she should contact us at support@quantrader.ai and we will delete such information from our files.

#### OTHER WAYS WE COLLECT INFORMATION

1. **Anonymized or aggregated Information.** Quantrader's Site automatically records certain anonymized or aggregated information about your use or evaluation of our Service. Anonymized or aggregated information is used for a variety of functions, including the

measurement of Users' interest in and use of various portions or features of the Site. Anonymized or aggregated information is not Personal Information, and we may use such information in a number of ways, including internal analysis, analytics and research. We may share this information with third parties for our purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.

2. **Cookies and Pixels.** Similar to other technology platforms and services, Quantrader uses cookies, a small piece of computer code that enables our Web servers to "identify" Users, each time an individual initiates a session on our Site. A cookie is set in order to identify you and tailor the Site to you. Cookies do not store any of the Personal Information that you provided to us; they are simply identifiers. You may delete cookie files from your own hard drive at any time. However, cookies may be necessary to provide access to much of the content and many of the features of the Site.
3. **Pixel Tags.** Along with cookies, we may use "pixel tags," also known as "web beacons," which are small graphic files that allow us to monitor the use of our Sites. A pixel tag can collect information such as the Internet Protocol ("IP") address of the computer that downloaded the page on which the tag appears; the URL of the page on which the pixel tag appears; the time the page containing the pixel tag was viewed; the type of browser that fetched the pixel tag; and the identification number of any cookie on the computer previously placed by that server.
4. **Site Activity.** Quantrader may also use third-party tracking technology, such as Google Analytics, to record similar information regarding you and your activity on our Site.
5. **"Do Not Track" Technology.** We do not collect Personal Information about your online activities over time and across different web sites or online services. Therefore, our Site does not respond to Do Not Track ("DNT") signals. We do not knowingly authorize third-parties to collect Personal Information about your online activities over time and across different web sites or online services.

#### HOW WE USE INFORMATION

##### 1. User Personal Information

We use your Personal Information to help you evaluate our Service, offer you new products or services, and enhance our Service. We may also use your personal information a number of ways, including research, internal analysis, and analytics.

##### 2. Client Personal Information

Quantrader stores, processes, and maintains Personal Information related to you in order to provide client support, offer new products or services and provide

our Service to Clients in accordance with the rules of regulatory bodies such as the Securities and Exchange Commission (the “SEC”). As a User, you may choose not to provide such information to us, but if you choose not to provide such information, you will not be able to become a Client.

Additionally, we may share the information required to become a Client with our brokerage partner(s) solely to allow our brokerage partner(s) to provide services to you.

If a Client is also a User, the provisions hereunder related to Users will apply to such Personal Information in those circumstances.

### 3. Mobile Computing

Quantrader provides websites and online resources that are specifically designed to be compatible for use with mobile computing devices. Mobile versions of our website are governed by the provisions hereunder related to the Site and may require that you log in with an account. In such cases, information about the use of each mobile version of the website may be associated with your accounts. In addition, we may enable individuals to download tools, such as an application, widget or other tool, that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools may transmit Personal Information to Quantrader to enable you to access your account information and to enable us to track the use of these tools. Some of these tools may enable users to e-mail reports and other information from the tool. We may use Personal Information or non-identifiable information transmitted to us to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices we provide.

### RESTRICTING COMMUNICATIONS

Quantrader may use your Personal Information to communicate with you regarding our Service or to tell you about blog posts or Services that we believe will be of interest to you. If you decide at any time that you no longer wish to receive communications from us, please follow the “unsubscribe” instructions provided in the communications or contact us at [support@quantrader.ai](mailto:support@quantrader.ai). Please note that you cannot opt-out of administrative communications such as regulatory, billing or service notifications.

### ACCESSING YOUR PERSONAL INFORMATION

Users or Clients may contact us at [support@quantrader.ai](mailto:support@quantrader.ai) to request information about how to access your Personal Information.

- Quantrader provides all Clients with continuous access via the Site to prompt reporting information

about account status, securities positions and balances.

- Clients can access or amend their Personal Information at any time by signing in to your Quantrader account via our Site.
- Your requests will be processed in line with local laws, including without undue delay and in accordance with any required time frames. Although Quantrader makes good faith efforts to provide individuals with access to their Personal Information, there may be circumstances in which we are unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others’ privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the individual’s privacy in the case in question or where it is commercially proprietary. If we determine that access should be restricted in any particular instance, we will endeavor to provide you with an explanation of why that determination has been made within one month of the request, a contact point for any further inquiries and any other legally required information. To protect your privacy, we will take commercially reasonable steps to verify your identity before granting access or making any changes to your Personal Information.

### RETENTION AND DELETION

Quantrader retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Site or Services or as necessary to fulfill the purpose(s) for which it was collected, to provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, or as otherwise required to comply with contracts and comply with all applicable laws.

You may request deletion of Personal Information by contacting us at [support@quantrader.ai](mailto:support@quantrader.ai) and providing us enough information to identify your account and prove that you are the owner of the identified account. However, we may retain residual information related to your account, as well as any data related to your trades, in accordance with applicable laws. In no case will we share any individual trading data unless required by regulators or other government bodies, or in accordance with applicable laws.

### PROTECTING CONFIDENTIALITY OF CURRENT AND FORMER CLIENT’S INFORMATION; SECURITY

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

Quantrader takes reasonable steps, endeavoring to use appropriate technical or organizational measures, to protect

your Personal Information from loss, misuse, and unauthorized access, alteration, disclosure, or destruction. However, no Internet, email, or electronic operating system that enables the transmission of data is ever fully secure or error free therefore, we cannot ensure or warrant the security of any information you transmit to us.

#### FEDERAL & STATE LAW ALLOWS YOU TO LIMIT SHARING – OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for non-affiliates’ everyday business purposes – information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

#### OTHER IMPORTANT INFORMATION

- **Advertising.** We do not allow third-party advertising on our Site.
- **Social Media and Links to Other Web Sites and Applications: “Linked Third-Party”**

This Privacy Policy and these terms apply only to Quantrader operated services and applications. Please note that our Sites may contain links to other websites, applications, social media accounts, and information for your convenience that are not operated or controlled by Quantrader. Quantrader does not control Linked Third-Party websites or their privacy practices, which may differ from those set out in this Privacy Policy. Quantrader does not endorse or make any representations about Linked Third-Party information. Any Personal Information you choose to give to Linked Third-Parties is not covered by this Privacy

Policy. We encourage you to review the privacy policy of any company or website before submitting your Personal Information. Some third- parties may choose to share their users’ Personal Information with us; that sharing is governed by that company’s privacy policy, not this Privacy Policy.

#### CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time as we deem necessary at our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law.

Quantrader encourages you to review this Privacy Policy periodically to be informed regarding how we are using and protecting your information and to be aware of any policy changes. Your continued relationship with Quantrader after the posting or notice of any amended Privacy Policy shall constitute your agreement to be bound by any such changes. Any changes to this Privacy Policy take effect immediately after being posted or otherwise provided by us. Each version of this Privacy Policy will be identified on this page by its effective date.

This document constitutes Quantrader’s complete Privacy Policy for Quantrader and its affiliates and the Service and Site.

**DEFINITIONS:** Affiliates – companies related by common ownership or control. They can be financial and non-financial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

***Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.***