## ****QEI Privacy Policy****

### ****Effective Date:**** [June 21, 2021]

### ****Last Updated:**** [August 15, 2023]

### ****Page 1: Introduction****

**Welcome to QEI’s Privacy Policy.**

QEI respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you about how we collect, use, process, store, and protect your personal data when you use our website, products, or services. It also outlines your rights regarding your personal data under applicable data protection laws, including the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and any other relevant data privacy regulations.

This policy applies to all interactions you may have with us, including through our website, customer service communications, trading platforms, and any third-party services that integrate with QEI’s systems.

**By using our services, you consent to the terms outlined in this Privacy Policy.** If you do not agree with any part of this policy, please stop using our services immediately.

We reserve the right to modify this Privacy Policy at any time, so please review it frequently. Any changes will be posted on this page, and we will notify you by email or through a notice on our website if the changes are significant.

### ****Page 2: Data Collection****

**1. What Personal Data We Collect**

QEI collects various types of information depending on how you use our services. The types of personal data we may collect include:

* **Personal Identification Information**: This includes but is not limited to your full name, contact details (email address, phone number), physical address, date of birth, government-issued identification (passport, driver’s license), and financial information such as your bank account or payment details.
* **Account Information**: When you create an account, we collect login details, security questions, and any other information needed to set up your account on our platform.
* **Trading Information**: We collect information about the trades you execute, assets you hold, and your portfolio’s performance. This may include transaction histories, market interactions, and trading preferences.
* **Technical Data**: This includes your IP address, device information, browser type, time zone settings, and information about how you use our website or trading platforms.
* **Cookies and Tracking Data**: We use cookies and similar technologies to track your activity on our website. This includes session cookies, preference cookies, and security cookies.

### ****Page 3: Use of Personal Data****

**2. How We Use Your Information**

QEI uses your personal data for various purposes, which include:

* **Providing Services**: We use the data to deliver the services you request, such as facilitating trades, processing transactions, and providing customer support. Your financial information is used for processing payments, withdrawals, and deposits securely.
* **Enhancing User Experience**: We analyze user behavior data to improve the functionality, usability, and performance of our services. This can involve personalizing the content you see, recommending new products, or offering features based on your trading history.
* **Communication and Notifications**: We use your contact information to send transactional emails, such as confirmations, reminders, or alerts about your trading activity. You may also receive marketing communications about new features, services, or promotions that we believe might interest you.
* **Legal and Regulatory Compliance**: We process your data to comply with our legal obligations under applicable laws. For example, we use your personal data to satisfy KYC (Know Your Customer) and AML (Anti-Money Laundering) requirements.

### ****Page 4: Data Sharing****

**3. Sharing Your Information**

QEI does not sell your personal data to third parties. However, we may share your personal data in the following situations:

* **Service Providers**: We work with trusted third-party service providers, such as cloud hosting platforms, payment processors, data analytics services, and customer support providers, to help us deliver our services. These providers are contractually obligated to keep your data secure and use it only for the purposes we specify.
* **Legal Compliance**: If required by law, we may disclose your data to legal authorities, regulatory bodies, or law enforcement agencies. This includes responding to subpoenas, court orders, or other legal processes.
* **Business Transfers**: If QEI is involved in a merger, acquisition, or sale of assets, your data may be transferred to the new owner. In such cases, we will notify you before your personal data is transferred and becomes subject to a different privacy policy.
* **Fraud Prevention**: We may share information with third-party fraud prevention agencies to protect QEI and its clients from fraud or cyberattacks. This includes identity verification, fraud detection, and cybersecurity measures.

### ****Page 5: Data Protection & Security****

**4. How We Protect Your Information**

QEI takes the security of your personal data seriously. We implement strict technical, organizational, and administrative measures to ensure that your data is protected from unauthorized access, alteration, disclosure, or destruction. Some of the key security measures we use include:

* **Encryption**: All sensitive data is encrypted both at rest and during transmission using industry-standard encryption technologies (such as SSL/TLS). This ensures that your data cannot be intercepted or tampered with.
* **Access Control**: We restrict access to your data to authorized personnel only, ensuring that only those employees who need access to your data for legitimate business purposes can access it.
* **Two-Factor Authentication (2FA)**: We offer two-factor authentication as an additional security measure for your QEI account. This means that even if your login credentials are compromised, your account will remain secure.
* **Regular Audits**: Our systems undergo regular security audits, both internal and external, to ensure that we remain compliant with industry standards and continuously improve our security infrastructure.

Despite our best efforts, no system can guarantee 100% security, and we cannot completely eliminate risks. We encourage users to take additional steps to protect their personal information, such as using strong, unique passwords and enabling 2FA.

### ****Page 6: Data Retention****

**5. How Long We Retain Your Personal Data**

QEI retains your personal data for as long as necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. The factors that determine retention periods include:

* **Legal Compliance**: Certain financial and transactional records must be retained to comply with legal obligations, such as tax or regulatory requirements. For instance, we may retain trading records for a period of up to five years as required by financial regulations.
* **Operational Needs**: We retain your data for as long as your account is active or necessary to provide you with the services you’ve requested. If you close your account, we may still retain certain information to comply with legal requirements, resolve disputes, or enforce our agreements.
* **Marketing Preferences**: If you’ve opted into receiving marketing communications from QEI, we will retain your contact information until you opt out or request deletion of your data.

Once the retention period has expired, we will securely delete or anonymize your personal data, ensuring it cannot be used or identified in any way.

### ****Page 7: Your Rights****

**6. Your Data Protection Rights**

QEI is committed to ensuring that you can exercise your rights over your personal data. Depending on your location and applicable laws, you may have the following rights:

* **Right to Access**: You have the right to request a copy of the personal data we hold about you. Upon request, we will provide you with a detailed record of the data we’ve collected and how it’s being used.
* **Right to Rectification**: If you believe that any of your personal data is inaccurate or incomplete, you have the right to request corrections.
* **Right to Erasure**: In certain circumstances, you may request that we delete your personal data. This is also known as the "right to be forgotten." However, this right is subject to legal obligations requiring us to retain some of your data.
* **Right to Restrict Processing**: You may request that we restrict the processing of your personal data in specific situations, such as while we verify the accuracy of the data or if you object to the way your data is being used.
* **Right to Data Portability**: You have the right to request a transfer of your data to another service provider in a machine-readable format, where technically feasible.
* **Right to Object**: You have the right to object to the processing of your personal data in certain situations, such as for direct marketing purposes.

If you would like to exercise any of these rights, please contact us at [email contact]. We will respond to your request within 30 days, in compliance with applicable data protection regulations.

### ****Page 8: International Data Transfers****

**7. International Data Transfers**

QEI operates globally, and as such, your personal data may be transferred to and stored in countries outside of your jurisdiction. This includes countries that may not offer the same level of data protection as your home country. For example, if you are located in the European Economic Area (EEA), your data may be transferred to and processed in the United States or other non-EEA countries.

When we transfer personal data internationally, we ensure that appropriate safeguards are in place to protect your data, including:

* **Standard Contractual Clauses (SCCs)**: We rely on the European Commission’s approved contractual clauses for data transfers, ensuring that your data is protected in line with EU standards.
* **Privacy Shield**: For transfers to the United States, we ensure that our service providers are certified under the Privacy Shield framework or comply with equivalent data protection regulations.
* **Binding Corporate Rules**: In cases where we transfer data within QEI’s group of companies, we adhere to binding corporate rules to ensure consistent protection of personal data across all entities.

You can request more details about the specific mechanisms we use for international data transfers by contacting us at [email contact].

### ****Page 9: Cookies and Tracking Technologies****

**8. Cookies and Tracking Technologies**

QEI uses cookies and other tracking technologies to enhance your experience on our website and trading platforms. Cookies are small text files stored on your device that allow us to recognize you when you return to our website and to personalize your experience.

**Types of Cookies We Use:**

* **Essential Cookies**: These cookies are necessary for the operation of our website and trading platforms. Without them, certain features of the site may not work as intended.
* **Analytics Cookies**: These cookies collect information about how visitors use our site, helping us understand user behavior and improve the functionality of our services.
* **Marketing Cookies**: We use these cookies to track your browsing behavior across our site and display relevant advertisements. These cookies may also be set by third-party advertisers.

You can control how cookies are used by adjusting your browser settings. However, please note that disabling cookies may affect your experience on our website.

### ****Page 10: Third-Party Services****

**9. Third-Party Services**

Our website and services may contain links to third-party websites or services, including social media platforms, payment processors, and data analytics providers. This Privacy Policy applies solely to QEI’s data collection and use practices, and we are not responsible for the privacy policies or practices of third parties.

When you interact with third-party services through our platform, any data you share with them will be subject to their privacy policies. We encourage you to review the privacy policies of any third-party service you interact with to understand how your data may be collected and used.

**Third-Party Analytics**: We use third-party analytics services, such as Google Analytics, to understand how users interact with our website and to improve our services. These third-party providers may collect information about your activity on our website using cookies or other tracking technologies.

**Third-Party Payment Processors**: When you make a payment through our platform, your payment information is processed by third-party payment processors. These processors adhere to the highest security standards to protect your financial data.

### ****Page 11: Children’s Privacy****

**10. Children’s Privacy**

QEI’s services are not intended for individuals under the age of 18. We do not knowingly collect or solicit personal data from minors. If we become aware that we have inadvertently collected personal data from a child under the age of 18, we will take steps to delete such information as soon as possible.

If you are a parent or guardian and believe that your child has provided us with personal data, please contact us immediately at [email contact], and we will take the necessary steps to remove the information.

### ****Page 12: Contact Us****

**11. Contact Information**

If you have any questions or concerns about this Privacy Policy, or if you would like to exercise any of your rights regarding your personal data, please contact us at:

* **Email**: [admin@qeiquantization.com]
* **Mailing Address**: [1995 Broadway, New York, NY 10023, USA]

We will respond to your request as soon as possible and are committed to resolving any concerns you may have regarding your privacy.

**12. Changes to This Privacy Policy**

QEI reserves the right to modify this Privacy Policy at any time. If we make material changes, we will notify you by email or through a prominent notice on our website. Your continued use of our services after any modifications indicates your acceptance of the updated Privacy Policy.