

Quantel AI, Inc.
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<https://quantel.ai>

Quantel AI, Inc. United States Privacy Policy

At Quantel AI, Inc., we take privacy and security very seriously; you are trusting us with your information. We will work hard to protect your information and to give you the opportunity to manage your privacy and security. This Privacy Policy explains how Quantel AI, Inc. and its affiliates and subsidiaries (collectively, the “Company,” “Quantel,” “we,” “our,” or “us”) process the information we collect about you through our websites, mobile apps, and other online services (collectively, the “Services”) and when you otherwise interact with us, such as through customer service.

We collect information to provide better Services to all our users; to personalize our Services, and to better understand the demographics of our users. The information we collect, and how that information is used, depends on how you use our Services and how you manage your privacy controls.

This Privacy Policy does not apply to information collected offline or through any other means, including on any other website or application operated by any third-party, including through any application or content that may link to or be accessible from or through our Services.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, you may choose not to use our Services. By accessing or using our Services, you are deemed to have accepted the practices described in this Privacy Policy.

TYPES OF INFORMATION COLLECTED

We collect the following types of Personal Information you provide when you use our Services, like when you sign up for an account, request a transaction, enroll in a promotion or program, or otherwise engage or communicate with us.

- A. Identity Data** includes your full name, date of birth, gender, social security number, and other data on government-issued identification documents.
- B. Contact Data** includes your email address, mailing address, and telephone numbers.
- C. Financial Data** includes your bank account and payment card details, suitability information, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores.

- D. Profile Data** includes your username and password, purchases or orders made by you, your knowledge assessment results, and your interests, preferences, feedback, and survey responses.
- E. Additional Information** includes information that you submit via focus groups, contests/sweepstakes, job applications, customer support, or other similar means; communications between Quantel AI or any of its subsidiaries and you (including recording calls made to or by Quantel AI) and any other information you provide to Quantel AI.
- F. Usage Information** includes information about how you access and use our Services, such as your actions on the Services, including your interactions with others on the Services, photos or media you upload to the Services, your username, and other content you provide ("Usage Information"). This information is available to us only with your permission.
- G. Contact List Information** includes your contact list on your mobile device or in your email accounts. This information is available to us only with your permission.
- H. Location Data** includes current and historical information concerning your geographic location, GPS location, transaction location, and IP addresses that you use in conjunction with our Services. This information is available to us only with your permission.

HOW WE COLLECT INFORMATION

- A. No Tracking of Personal Information.** Quantel does not track, collect or distribute personal information not entered by you. Through web site access logs we may collect clickstream data and HTTP protocol elements, which generate certain kinds of non-identifying site usage data, such as the number of hits and visits to our sites. This information is used for internal purposes by technical support staff for research and development, user analysis and business decision making, all of which provides better services to you. The statistics garnered, which contain no personal information and cannot be used to gather such information, may also be provided to third-parties.
- B. Use of Tracking Technologies.** Quantel or its third-party vendors, collect non-identifiable and personal information through the use of various technologies, including cookies, Flash objects, web beacons, embedded scripts, location identifying technologies, file information, and similar technology. We may collect information about your device and its software, such as your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique ID (that allows us to uniquely identify your browser, mobile device, or your account), and other similar information. Some browsers have options that allow you to control whether the browser will accept cookies, reject cookies, or notify the user each time a cookie is sent. You may elect to reject cookies by adjusting your settings but doing so will limit the range of features available to you on our Services and other websites. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow

us to know whether you have accessed our email, used our Services, or performed certain functions with it.

- C. Location Data.** Quantel may also collect information about your location through GPS, Wi-Fi, wireless network triangulation, or other methods in order to obtain your location. We may also approximate your location by your IP Address. We also use the Google Maps API to gather information about your location. Google uses various technologies to determine your location, including IP address, GPS, and other sensors that may, for example, provide Google with information on nearby devices, Wi-Fi access points, and cell towers (see Google's Privacy Policy to learn more).
- D. Other Sources.** Quantel may also obtain personal information from other sources such as from business partners, marketing, and vendor partners as well as publicly available data. We may combine with personal information we collect either automatically or directly from you.
- E. Third Parties.**
 - 1. Account Linking.** Quantel will be offering account linking and aggregation services ("Linking Services") through Plaid Inc. ("Plaid"). By utilizing these Linking Services, you acknowledge and agree that the terms of Plaid's Privacy Policy (currently located at <https://plaid.com/legal/#end-user-privacy-policy>) will govern Plaid's use of such information, and you expressly agree to the terms and conditions of Plaid's Privacy Policy. Further, you expressly grant Plaid the right, power, and authority to access and transmit your information as reasonably necessary for Plaid to provide the Linking Services to you.
 - 2. Third Party Services.** If you link, connect, or log in to your Quantel Account with a third-party service (e.g. Google, Apple), the third-party service may send us information such as your profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- F. Collection of Non-Identifiable Information.** Quantel may collect non-identifiable information from your use of the Services in order to provide better customer service. Examples of such collecting include: traffic analysis; measuring your activity; system administration; user analysis; and business decision making. Quantel or its third-party partners may use this data to analyze trends and statistics.
- G. Collection of Personal Information.** Quantel collects personal identifying information from you during a transaction. Quantel may extract some personally identifying information about that transaction in a non-identifiable format and combine it with other non-identifiable information. This information is used and analyzed only at an aggregate level (not at an individual level) to help Quantel understand trends and patterns. This information is not reviewed at an individual level.

HOW WE USE YOUR INFORMATION

We use and process the information we collect for purposes described in this Privacy Policy or as otherwise described to you on our Services or in connection with our Services. For example, we use your information to:

- A. Authenticate your identity, enhance the safety and security of our Services, business, and users, and investigate or provide notice of fraud or unlawful or criminal activity;
- B. Monitor and administer our Services, including troubleshooting, data analysis, testing, research, statistical, and survey purposes;
- C. Send you transactional information, including confirmations, invoices, technical notices, product and services information and announcements, software updates, security alerts, support and administrative messages, and information about your transactions with us;
- D. Conduct research and analytics to understand our visitors and customers and tailor our product offerings;
- E. Handle billing and account management; and
- F. Fulfill our legal and regulatory obligations;

We also participate in interest-based advertising and use third-party advertising companies to serve you targeted advertisements based on your online browsing history and your interests. As a self-directed broker-dealer, we do not advertise on behalf of specific securities or investment options on our Services. We permit third-party online advertising networks, social media companies, and other third-party services to collect information about your use of our Services over time so that they may play or display ads on other websites, apps, or services you may use, and on other devices you may use. Typically, though not always, the information used for interest-based advertising is collected through cookies or similar tracking technologies. You may also be able to set your browser to delete or notify you of cookies by actively managing the settings on your browser or mobile device. Please note that some advertising opt-outs may not be effective unless your browser is set to accept cookies. Furthermore, if you use a different device, change browsers, or delete the opt-out cookies, you may need to perform the opt-out task again.

HOW WE SECURE YOUR INFORMATION

- A. Commitment to Online Security.** Quantel employs physical, electronic and managerial procedures to safeguard the security and integrity of personal information. Billing and payment data is encrypted whenever transmitted or received online. Personal information is accessible only by staff designated to handle online requests or complaints. All Quantel agents and contractors with access to personal information are also bound to adhere to Quantel security standards.
- B. No Liability for Acts of Third Parties.** Quantel will exercise all reasonable efforts to safeguard the confidentiality of customer personal information. However, transmissions protected by industry standard security technology and implemented by human beings cannot be made absolutely secure. Consequently, Quantel shall not be liable for unauthorized disclosure of personal information due to no fault of

Quantel including, but not limited to, errors in transmission and unauthorized acts of Quantel staff and/or third-parties.

DISCLOSURES OF PERSONAL INFORMATION

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the personal information we collect. We may share your personal information in the instances described below. We do not sell or rent your personal information to third-parties.

- A. Within Corporate Organization.** Quantel may share your personal information within the Quantel corporate organization, including its affiliates and subsidiaries, and may transfer the information to countries in the world where Quantel conducts business. Some countries may provide less legal protection for customer personal information. In such countries Quantel will still handle customer personal information in the manner described herein.
- B. Mergers and Acquisitions.** Circumstances may arise where for business reasons, Quantel decides to sell, buy, merge or otherwise reorganize its businesses in the United States or some other country. Such a transaction may involve the disclosure of personal identifying information to prospective or actual purchasers, and/or receiving such information from sellers. It is Quantel's practice to seek appropriate protection for information in these types of transactions.
- C. Agents.** Quantel employs or engages other companies and individuals to perform business functions on behalf of Quantel. These persons are provided with personal identifying information required to perform their functions but are prohibited by contract from using the information for other purposes. These persons engage in a variety of functions which include, but are not limited to, fulfilling orders, removing repetitive information from customer lists, analyzing data, providing marketing assistance, processing credit card payments and providing customer services.
- D. Marketing Analysis by Third Parties.** Quantel reserves the right to disclose to third-parties personal information about customers for marketing analysis; however, any information disclosed will be in the form of aggregate data that does not describe or identify an individual customer.
- E. Disclosure to Governmental Authorities.** Under certain circumstances, personal information may be subject to disclosure pursuant to a judicial or other government subpoenas, warrants or orders.

PRIVACY POLICY CHANGES AND OPT-OUT RIGHTS

- A. Changes to Privacy Policy.** Quantel reserves the right to change or modify this Privacy Policy at any time and in our sole discretion. If we make changes to this Privacy Policy, we will provide notice of such changes by providing notice through the Services or updating the "Last Updated" date at the beginning of this Privacy Policy. Your continued use of our Services after we make changes is deemed to be

acceptance of those changes. We encourage you to review this Privacy Policy whenever you use or access the Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy.

- B. Opt-Out Right.** You have the right at any time to cease permitting personal information to be collected, used or disclosed by Quantel and/or by any third-parties with whom Quantel has shared and/or transferred such personal information. This right of cancellation may be exercised by contacting Quantel via e-mail privacy@quantel.ai. After processing the cancellation, Quantel will delete your personal information from its data base.

ACCESS RIGHTS TO YOUR INFORMATION

- A. Information Maintained by Quantel.** Upon your request, Quantel will provide a reasonable description of your personally identifiable information that Quantel maintains in its data bank. Quantel can be contacted by e-mail at _____.
- B. Corrections and Changes to Personal Information.** Help Quantel to keep your personal information accurate. If your personal information changes, or if you see an error upon review of your information that Quantel has on file, please promptly e-mail Quantel at _____ and provide the new or correct information.
- C. Your California Privacy Rights.** Beginning on January 1, 2005, California Civil Code Section 1798.83 permits customers of Quantel who are California residents to request certain information regarding Quantel's disclosure of personal information for their direct marketing purposes. To make such a request, please write to: Quantel AI, Inc., 5 Penn Plaza, New York, NY 10002 or by sending an email to privacy@quantel.ai. We may verify the request by asking you to provide information that matches information we have on file about you. You can also designate an authorized agent to exercise these rights on your behalf, but we will require proof that the person is authorized to act on your behalf and may also still ask you to verify your identity with us directly. Within 30 days of receiving such a request, Quantel will provide a list of the categories of personal information disclosed to third-parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third-parties. This request may be made no more than once per calendar year. Quantel reserves its right not to respond to requests submitted other than to the address specified in this paragraph.

HOW TO CONTACT US

If you have any questions about this United States Privacy Policy or the Services, please contact us at info@quantel.ai.