



Privacy Policy

Your Privacy Is Important to Quantitative Brokers, LLC.

In the course of serving you as an institutional client, Quantitative Brokers, LLC (“QB”) may obtain personal information about your entity, officers, directors and other key employees. Obtaining this information is important to our ability to deliver the highest level of service to you, but we also recognize that you expect us to treat this information appropriately.

This policy describes the types of personal information we may collect about you, the purposes for which we use the information, the circumstances in which we may share the information and the steps that we take to safeguard the information to protect your privacy.

The Sources of Information

The personal information we collect about you comes primarily from the account applications or other documents we request and receive as part of knowing our customer during the course of your relationship with us. We may also collect information about your transactions and experiences with QB relating to the products and services QB provides. In addition, depending on the products or services you require, QB may obtain additional information about you, such as your credit history, from consumer reporting agencies.

Finally, in the provision of financial services to you and subject to strict compliance with all applicable laws and regulations, information may be collected about you indirectly from monitoring or other means (e.g. monitoring e-mails). In these circumstances, the information is not accessed on a continuous or routine basis, but it may be used for compliance or security purposes.

The Information We Have about You

If you deal with QB in an institutional capacity, information we collect about you would include:

- ✚ Your entity name, address and other contact details;
- ✚ Your Clearing Firm information and Account Information of your Prime Broker
- ✚ A personal identifier such as, depending on your country of domicile, your Tax identification Number, National Insurance Number, Tax File Number, etc.
- ✚ Certain identifying information as required by laws and regulations addressing Anti-money laundering and related matters.

As an institutional client of QB, you are not required to supply any of the personal information that we may request. However, failure to do so may result in our being unable to open or maintain your account or to provide services to you. While we make every effort to ensure that all information we hold about you is accurate, complete and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal or entity information.

Our Use of Your Personal Information

We may use your personal information to:

- ✚ Administer, operate, facilitate and manage your relationship and/or account with QB. This may include sharing such information internally as well as disclosing it to third parties, as described in the following two sections, respectively;
- ✚ Contact you or, if applicable, your designated representative(s) by post, telephone, electronic mail, facsimile, etc., in connection with your relationship and/or account;
- ✚ Provide you with information or notifications about QB and our services; and
- ✚ Facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements.

If your relationship with QB ends, QB will continue to treat your personal and entity information, to the extent we retain it, as described in this policy.

Disclosures of Your Personal Information within QB

In order to provide efficient and reliable services and to improve product and service options available to you, more than one entity within QB may be given, or given access

to, your personal or entity information. For example, one QB entity might share your information with another in order to facilitate settlement of your transactions or the maintenance of your accounts, or as part of its arranging for the performance of specialized services such as US and international trade execution services. When so sharing your personal information, we adhere to applicable legal and industry standards regarding the protection of personal information. Additional information on how your personal information is protected while with QB is provided below, under Information Security: How We Protect Your Privacy.

Disclosures of Your Personal Information to Third Parties

QB does not disclose your personal information to third parties, except as described in this policy. Third party disclosures may include sharing such information with non-affiliated companies that perform support services for your account or facilitate your transactions with QB, including those that provide professional, legal or accounting advice to QB. Non-affiliated companies that assist QB in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your personal information only in the course of providing such services and only for the purposes that QB contractually dictates.

We may also disclose your personal information to fulfill your instructions, to protect our rights and interests and those of our business partners or pursuant to your express consent. Finally, under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations; for instance, when responding to a subpoena or similar legal process, to protect against fraud and to otherwise cooperate with law enforcement or regulatory authorities or with organizations such as exchanges and clearinghouses.

You should know that Quantitative Brokers, LLC. "Will Never" sell your personal information.

QB will provide notice of changes to our Privacy Policy at times if or when it is necessary to disclose any of your personal Information in a way that is inconsistent with this policy. We will give you advance notice of the proposed change(s) so that you will have the opportunity to opt-out of such disclosure. Clients that wish to opt-out of this disclosure may contact QB at 646-293-1800, or write to us at our company address above. Opt-outs remain in effect until revoked in writing.

Information Security: How We Protect Your Privacy

QB is committed to protecting the privacy and confidentiality of your personal information. We limit access to your personal information to authorized QB employees and, as described above in Disclosures of Your Personal Information to Third Parties,

our service providers are held to stringent standards of privacy. We also maintain physical, electronic and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure. Some of the other central features of our information security program are:

- ✦ A dedicated Information Technology Information Director – that designs, implements and provides oversight to our information security program;
- ✦ The use of specialized technology such as firewalls;
- ✦ Testing of the security and operability of products and services before they are introduced to the Internet, as well as ongoing scanning for publicly known vulnerabilities in the technology;
- ✦ Internal and external reviews of our Internet sites and services;
- ✦ Monitoring of our systems infrastructure to detect weaknesses and potential intrusions;
- ✦ Implementing controls to identify, authenticate and authorize access to various systems or sites;
- ✦ Protecting information during transmission through various means including, where appropriate, encryption; and
- ✦ Providing QB employees with relevant training and continually updating our security practices in light of new risks and developments in technology.

Other Privacy Policies or Statements; Changes to Policy

This policy provides a general statement of the ways in which QB protects your personal information. You may, however, in connection with specific products or services offered by QB, be provided with privacy policies or statements that supplement this policy. This policy may be changed from time to time to reflect changes in our practices concerning the collection and use of personal information. The revised policy will be effective immediately upon posting to our Web site. This version of the Policy is effective March 11, 2014.