

QnA Privacy Policy

Last updated: [September 2024]

Statement of Policy

QnA and its affiliates (together, “QnA”) respects the privacy rights of our users and is strongly committed to protecting your privacy. This privacy policy ("Privacy Policy") applies to this website and any other service or product of QnA, including other websites, mobile applications, or other digital properties where expressly indicated by QnA, such as through a link or other reference to the applicability of this Privacy Policy. It explains our online information practices and the choices you can make about the way your information is collected and used at the Site.

Collection of Your Personal Information

When you visit www.qna.com (the “Site”) or register for or use our products and services, QnA, or where relevant a designated service provider, collects personal information about you. We use this personal information for the business purpose of providing our products and services, promoting our products and services to you and to new and potential customers, and providing you with personalized recommendations and customized content. Information collected includes personal information you provide through the Site or mobile applications, information you provide on third-party websites and applications when you access QnA through such services, information captured automatically in the course of your interactions with our products and services, and/or information obtained from our service providers and other third party data providers.

The categories of personal information we collect may include:

- **Identifiers:** This includes, for example, your name, nickname, username, signature, email address, phone number, postal address or other geolocation data, Internet Protocol address, account names and passwords, other contact information, and cookies or other identifiers which we assigned to uniquely identify you or which others assigned to uniquely identify you.
- **Demographic Information:** This includes, without limitation, information such as age, date of birth, gender and other characteristics of protected classifications under California, federal or foreign law.
- **Commercial Information:** This includes trading or portfolio information contained or implied in your user contributions or use of the Site, list of authors you follow, investment style preference, broker information and payment information (including bank account details, to enable payments to you and from you when you register as a subscriber or contributors).

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- Internet or other electronic network activity information: This includes, for example, device screen size, device type (unique device identifiers), browser information, your interactions with the Site and preferred language used to display the Site.
- Geo-location data: This includes your country location (based on your IP address) and local location when accessible.
- Audio, Video and other Electronic Data: This includes audio, electronic, visual or similar information such as chat and any interaction that you may have with us (such as for customer service purposes) as well as your profile photo. It also includes any information you submit in forums, chat or message boards, and feedback or testimonials you provide about our products and services.
- Professional or employment-related information: This includes your job title, employer, education information, CFA, FINRA and other professional licenses and registrations, and other biographical information including professional interests and areas of expertise.
- Profiles and Inferences: This includes inferences drawn from any of the information identified above to create a profile reflecting preferences, characteristics, predispositions, behavior, and attitudes.

The sources from which we collect personal information are:

- Directly from you: For example, when you create an account, post user-created content, link user-created or third party content on the Site, make a purchase, request user support, etc.
- Directly and indirectly from an activity on the Site and other services.
- Service providers who provide services on our behalf such as those used to fulfil orders, process your payments and requests, verify your information, monitor activity on our products and services, provide analysis and analytics, maintain databases, administer and monitor emails and marketing, administer and send mobile messages, serve ads on this and other services, and provide consulting services.
- Third party data providers, where these third parties have confirmed to us that they either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

Uses of Your Personal Information

We use personal information collected for purposes described in this Privacy Policy or disclosed to you in connection with our products and services. For example, we may use your information to:

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- Create your account
- Improve the accuracy of our records
- Provide and deliver products and services you request
- Send you QnA-related information updates, alerts, support, and administrative messages
- Send you marketing communications and personalized content, such as showing you articles and news about your companies of interest or content by authors you follow
- Respond to your inquiries
- Enable you to send and receive messages to other registered users and contributors, and to post comments and other content
- Carry out analytics and to improve the quality and relevance of the Site
- Survey your input through surveys or questionnaires
- Serve and measure the effectiveness of our marketing and other products and services accessible through the Site
- Protect the integrity of our products and services and enforce our Terms of Use and other applicable terms, including to detect and prevent fraud and unauthorized activities, to secure our systems and the services, and prevent activities that may violate our policies or be illegal
- Detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and prosecute those responsible for that activity
- Assemble aggregated or de-identified data that does not specifically identify you in service of the purposes listed above and other lawful uses.

Disclosure of Your Personal Information

QnA currently has no corporate affiliates, though we expect to create affiliates in the future. When corporate affiliates are launched, we will share personal information with other QnA companies who help us to provide our products and services. We also share personal information with third parties for the business purposes of providing our products and services and marketing our products and services to existing and potential customers. The categories of these third parties with whom we share personal information are:

- Public companies whose virtual meeting rooms you seek to access on the Site
- [Your employer]
- Hosting and infrastructure providers
- IT services
- Email service providers
- Advertising partners
- Payment processors.

We may also share personal information with the following:

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- Relevant law enforcement agencies, regulators, government agencies, courts or other third parties where we believe disclosure is necessary (i) as a matter of court order or applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person
- Actual or potential buyers (and their agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy
- Other persons where you have given your consent.

Use of Cookies and other Electronic Technologies

QnA and the parties with whom we work (e.g., service providers, business partners, advertisers, ad technology providers and advertising servers) may place, view, and/or use “cookies”, web server logs, web beacons, pixels or other electronic technologies (collectively, “cookies”) to collect statistical and other information about you and your use of the Site. This information may include information about the IP address of your computer, browser type, language, operating system, your mobile device, device ID, geolocation data, the state or country from which you accessed the Site’s services, the webpages visited, the date and the time of a visit, the websites you visited immediately before and after visiting the Site, the number of links you click within the Site, the functions you use on the Site, the databases you view and the searches you request on the Site, the types of articles you read, the data you save or download from the Site and the number of times you view an advertisement.

QnA and the parties with whom we work may use the information collected for various reasons, either on behalf of QnA or for the other parties’ own purposes, including research, analysis, to better serve visitors to the Site (such as by enabling log-in, providing access to certain sections of the Site, providing customized content or customized contextual advertisements, or presenting online advertising on the Site or other websites tailored to your interests as described further below), to compile aggregate and anonymous information about usage of the Site and other websites, other statistics, etc. However, if you have deleted and disabled cookies, these uses will not be possible to the extent they are based on cookie information.

[To opt out of Google Analytics please click [here](#). To opt out of Parse.ly analytics, please click [here](#). We also use Microsoft Clarity to capture how you use and interact with our Services. Microsoft Clarity uses cookies to capture this information. For more information on Microsoft Clarity, visit the [Microsoft privacy statement](#).][Activate the Google and Microsoft links as applicable]

If you prefer that we not use information that has been collected through cookies, about you, your use of the Site or other websites or combine your information with other

collected information, then please manage, delete or disable cookies for each browser, on each computer you use to surf the Web.

Most browsers are set to accept cookies by default. You can usually set your browser to disable cookies or to alert you when cookies are being sent. Likewise, most mobile devices allow you to disable the ability for geolocation information to be collected from your mobile device. The help function on most browsers and mobile devices contains instructions on how to set your browser to notify you before accepting cookies, disable cookies entirely, or disable the collection of geolocation data. You need to set each browser, on each device you use to surf the Web. Thus, if you use multiple browsers (e.g., Chrome, Safari, Internet Explorer, Firefox, etc.), you should repeat this procedure with each one. Similarly, if you connect to the Web from multiple devices (e.g., work and home), you need to set each browser on each device. Depending on your jurisdiction, you may be able to utilize additional cookie management tools. However, if you disable certain cookies or refuse to accept a request to place a cookie, it is possible that some parts of the Site, such as the polls, surveys, contests, and product sales, and certain areas of the Site for which you need to log in, will not function properly, and the advertising you receive when you visit the Site may not be advertisements tailored to your interests.

Advertising

QnA, its designated service providers, or third-party advertisers or their advertising servers may also place or recognize unique cookies on your computer or use other electronic technologies to help display advertisements that you see on the Site or on other websites. Information about your visits to, and activity on, the Site and other websites, an IP address, the number of times you have viewed an advertisement, your interests and preferences and other such usage information is used, alone or in combination with other information, to create aggregate groups of users and to display advertisements that may be of particular interest to you or a group of users with similar interests to you.

We may use Web beacons, provided by third-party advertising companies, to help manage and optimize online advertising and product performance. Web beacons enable us to recognize a browser's cookie when a browser visits the Site, and to learn which banner ads bring users to the Site. The use and collection of your information by third-party service providers, and third-party advertisers and their advertising servers is not covered by this Privacy Policy.

[QnA adheres to the industry's Self-Regulatory Principles for Online Behavioral Advertising located [\[here\]](#). To "opt out" of advertising cookies placed by participating companies in the Self-Regulatory Program for Online Behavioral Advertising, and thereby limit the tracking of your online activity and the targeted advertising you receive, please click [\[here\]](#) for browsers and click [\[here\]](#) for mobile devices.ⁱ]

To “opt out” of advertising cookies placed by the Network Advertising Initiative’s or the Digital Advertising Alliance, consult their websites, <https://thenai.org> and <https://optout.aboutads>, respectively. If you are based in the EU or the UK, to opt out of advertising cookies for Your Online Choices consult <https://www.youronlinechoices.com/eu/> and <https://www.youronlinechoices.com/uk/>.

In addition, as stated above, we may use your personal information to enhance your experience on our Site and other sites. To accomplish this, we may share information about you along with a hashed version of your email address or phone number with third- party advertising companies so that they and we can facilitate customized ad campaigns and other offers on our Site and on other platforms. “Hashing” transforms your email into an unrecognizable series of numbers and letters (e.g. a “hashed” version of mike@email.com might be p86r2b65@email.com). You may opt out by clicking [[here](#)] or by using the designated “Do Not Sell or Share My Personal Information” tool within the Site.

Some third party websites and platforms also allow you to manage the collection and use of your information for advertising purposes. Google Ad Manager, Google Analytics for Display Advertising, and other designated service providers assist QnA with advertisement display functions and related analytics for the Site. To opt out of tailored advertising from Google tracking technologies, please click [[here](#)].

Note that even if you exercise choice for targeted advertising, you will still receive online advertising, but the advertisements will be more general in nature. You may continue to see targeted advertising if you do not opt out via the designated methods and/or if you wish to remain a subscriber.

Data Security and Retention

We have implemented various security policies, rules and technical and organizational measures to protect and safeguard the personal information that we collect and process about you. Any personal information you provide to QnA is kept on secure servers. QnA uses security measures appropriate to the provision of the relevant product or service, such as reasonable administrative, technical, personnel, and physical measures (a) that are designed to safeguard personal information against loss, theft, unauthorized use, disclosure, or modification; and (b) to ensure the integrity of the personal information. To help us protect your privacy, you should maintain the secrecy of the logon ID and password you may have set up in connection with your participation in this Site’s services.

Personal information is retained for as long as is necessary or advisable for the purpose(s) described in this Privacy Policy, or as may be permitted under applicable law. For example, personal information is retained if the information is reasonably necessary to manage your relationship with us or to provide our products and services to you. To determine the

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appropriate retention period, we will generally consider the following criteria: the length of time needed to achieve the purpose your information was collected for; whether you ceased using our services or products; the existence of any relevant legal proceedings; or applicable legal and regulatory requirements.

[When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.]**[Note: Bloomberg does not state a deletion policy]**

Children's Privacy Information

The Site is intended for a general audience of securities markets participants and is not directed at children under the age of 16, nor do we have actual knowledge that we “sell” or “share” the personal information of children under the age of 16. If you have knowledge that a child under the age of 16 has submitted personal information to us, we request that you contact us at privacy@qna.com and use the word “Privacy” in the subject line of your email. You may also contact us by writing to: You may also make such a request by writing to us at:

QnA

Attn: Legal Department

New York, NY _____

California Privacy Information ⁱⁱ

[TBD – Confirm with CA privacy research]

For California residents, the following information also applies to you and supplements the information contained in this Privacy Policy.

Information We Collect and Sources of Information

[In the past 12 months, we have collected] the information described in the section “Collection of Your Personal Information” above, which also includes categories of sources from which we have collected that personal information.

How we use and share information

We use personal information for the business and commercial purposes as described in the sections “Uses of Your Personal Information” and “Disclosure of Your Personal Information” above. QnA does not share your personal information except as approved by

you or as otherwise described in this Privacy Policy. [In the preceding 12 months, we have disclosed] the following categories of personal information described above for the business purposes described in this Privacy Policy:

- Identifiers such as those set forth above;
- Internet or other electronic network activity information;
- Demographic information/Protected Classification Characteristics;
- Commercial Information;
- Geo-location data;
- Audio, Video and other Electronic Data
- Professional or employment-related information; and
- Profiles and Inferences.

Under the California Consumer Privacy Act (CCPA), "sale" is defined very broadly and includes a wide array of data sharing. As the term is defined by the CCPA, [we "sold" the following categories of personal information in the last 12 months]: identifiers/contact information, Internet or other electronic network activity information, and inferences drawn from the above. We "sold" such information to advertising networks, data analytics providers, and social networks. The business or commercial purposes of "selling" personal information is for third-party companies to perform services on our behalf, such as marketing, advertising, and audience measurement. We do not have any actual knowledge that we "sell" personal information of consumers under 16 years of age.

Most modern web browsers give you the option to send a Do Not Track signal to the sites you visit, indicating that you do not wish to be tracked. However, there is no accepted standard for how a site should respond to this signal, and we do not take any action in response to this signal.

California Privacy Rights

If you are a California resident, you have the following consumer privacy rights:

- Right to Know: You have the right to request that we disclose to you the personal information we have collected, used, disclosed and sold over the past 12 months, and information about our data practices.
- Right to Request Deletion: You can request that we delete personal information about you. Although you may request deletion, we are allowed, under California law, to keep certain personal information. You can submit a request to delete by submitting a form [\[here\]](#).
- Right to Request Correction: You can request that we correct your personal information. Although you may request correction, we are allowed, under California law, to keep certain personal information. You can submit a request to correct by submitting a form [\[here\]](#).

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- Right to Opt Out of "Sale" of personal information: You can opt out of the "sale" of your personal information to "third parties" by clicking [[here](#)] (as those terms are defined in the CCPA).ⁱⁱⁱ
- Right to be Notified of Financial Incentives: You have the right to be notified of any financial incentives offers and their material terms and the right to opt-out of such incentives at any time. You may not be included in such incentives without your prior informed opt-in consent. We do not currently offer any such incentives.
- Right to Non-Discrimination: We will not discriminate against you for exercising any of these rights.

California law also permits you to request certain information regarding the disclosure of your personal information by QnA to third parties for the third parties' direct marketing purposes. We do not disclose your personal information to third parties for their own direct marketing purposes.

In addition to the specific forms listed above, you can exercise any of these rights by contacting us at privacy@qna.com and providing us with your name, email address and address (including zip code) or by submitting a request to us through your QnA account. We may verify your identity by asking you to submit a request through your password protected QnA account and by providing us with other proof of California residency.

You can also authorize an agent to submit a request on your behalf. An authorized agent must have your signed permission to submit a request on your behalf or provide proof that they have power of attorney in accordance with California probate law. Authorized agents that are business entities must be registered with the California Secretary of State to conduct business in California. Where you use an agent, we will ask for verification of your authorization, namely a copy of your written authorization for the agent to submit the request on your behalf.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We do not discriminate against any consumer for exercising their consumer rights.

European and UK Privacy Information

If you are a visitor to the Site from the European Economic Area, United Kingdom and certain other territories in Europe, the following information also applies to you and supplements the information contained in this Privacy Policy.

Data Controller

The data controller of your personal information is [QnA Ltd], located at _____-.

Representatives

If you are located in the UK, please contact our UK representative, [____ at qna@____.uk].

If you are located in the EU, please contact our EU representative, [____ at qna@____.eu].

Data Subject Rights

You have the following data protection rights:

- Right to access, correct, or request deletion: You may be able to do some of this in your QnA account or by contacting us.
- Right to object or ask us to restrict processing: In certain circumstances, you can request that we stop processing your personal information.
- Right to request portability: In certain circumstances, you can request that we transfer personal information that you have provided to us in a structured, commonly used, machine-readable format.
- Right to opt out of marketing communications: You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you or by contacting us.
- Right to withdraw your consent: You can withdraw your consent at any time if you previously gave us consent for processing of your personal information. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- Right to complain: You have the right to complain to your local data protection authority. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. If you would like to exercise any of these rights or would like further information, please contact us using the contact details provided under the “How to contact us” heading below.

Legal Basis

Our legal basis for collecting and using the personal information is usually as follows:

- Performance of a contract: where we need the personal information to perform a contract with you, for example setting up and administering your account and providing our products and services
- Legal obligation: where we have a legal obligation to collect personal information from you, for example to comply with financial, accounting and other legal obligations
- Legitimate interests: where the processing is in our legitimate interests and not overridden by your rights, for example to analyze and improve how our products and services are used, and to provide you with customer service

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- Consent: where we have your consent to do so, for example in relation to certain types of marketing

International Data Transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident, including countries that may have different levels of privacy protection than your country. By using the Site or other of our products and services, you consent to such transfers and processing, including to and in the United States. The Site servers are located in [the United States and _____], and QnA and third party service providers and partners operate around the world. This means that when we collect your personal information, we may process it in any of these countries. Although legal requirements vary from country to country, QnA has taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy. In particular, the United Kingdom and the European Union recognize [_____] as a territory that provides adequate protection for personal information that is received from the EEA and UK.

When we transfer your personal information to any other territories, we will take such measures as are appropriate to safeguard your information in accordance with applicable law. For EEA and UK residents' personal information, this may include implementing the standard contractual clauses promulgated by the European Commission under the Global Data Protection Regulation for the protection of cross border transfers of data.

Third Party Sites

The Site may provide links or access to third-party websites or other digital properties, including social networking websites. Since we do not control third-party digital properties and are not responsible for any information you may provide while on such digital properties, we encourage you to read the privacy policies on those websites before providing any of your information on such digital properties.

Updates to this Privacy Policy

QnA reserves the right to change this Privacy Policy at any time by indicating revisions through the "Last Updated" date at the top of the Privacy Policy. Such changes will be effective upon posting.

How to Contact Us

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If you have any comments or questions regarding our Privacy Policy, or if you want to exercise your rights, please contact us at privacy@qna.com. If you are located in the UK, please contact us at qna@_____.uk. If you are located in the EU, please contact us at qna@_____.eu. We will address any issue to the best of our abilities as soon as possible and respond to requests within the time required under applicable law. Please include “Privacy” in the subject line of your inquiry.

If you have complaints about QnA’s processing of your personal information, you may have the right to contact the applicable supervisory authority.

ⁱ See https://www.iab.com/wp-content/uploads/2015/06/OBA_OneSheet_Final.pdf , and for a deeper dive, <https://www.ftc.gov/sites/default/files/documents/reports/federal-trade-commission-staff-report-self-regulatory-principles-online-behavioral-advertising/p085400behavadreport.pdf>

ⁱⁱ It is useful to note certain info that is excluded from protection of the CCPA: Personal information does not include publicly available information that is from federal, state, or local government records, such as professional licenses and public real estate/property records. The definition of publicly available information also includes information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media, or certain information disclosed by a consumer and made available if the consumer has not restricted the information to a specific audience.

ⁱⁱⁱ Bloomberg approach, for comparison: To opt-out of further “sales” or “sharing” of your personal information by downstream participants in tailored advertising who are signatories to the IAB Privacy, LLC’s Limited Service Provider Agreement (LSPA), please click and opt out on the listed digital property of the downstream participant. Additionally, where recognized, we treat global privacy control signals as a request to opt-out of the “sale” or “sharing” of personal information.