

## CCPA PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Effective August 12, 2021

Last Updated: August 12, 2021

This **CCPA PRIVACY NOTICE (“Notice”) FOR CALIFORNIA RESIDENTS** supplements the information contained in the Privacy Policy for RocketTrader, Inc., *dba* Quants Compete, LLC, and its respective parent, agents, associates, affiliates, and subsidiary companies, divisions, or designees (“us”, “we”, “our”, or “Quants Compete”) and applies solely to visitors, consumers, users, and others who reside in the State of California (“consumers” or “you”). Capitalized terms as used herein shall have the same meaning as provided in our Terms of Use and Privacy Policy.

We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Unless otherwise expressly stated, all terms in this Notice have the same meaning as defined in our Privacy Policy or as otherwise defined in the CCPA.

### **INFORMATION WE COLLECT.**

We may collect certain personal information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we may have collected the following categories of personal information (as defined by the CCPA) from consumers within the last twelve (12) months:

<b>CATEGORY</b>	<b>EXAMPLES</b>	<b>COLLECTED</b>
<b>Identifiers:</b>	Such as your name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	YES
<b>Customer records (i.e., categories of personal information set forth in Cal. Civ. Code 1798.80(e)):</b>	Such as your name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit or debit card number, other financial information, medical information, or health insurance information.	YES
<b>Characteristics of protected classifications under California or federal law:</b>	Such as race, religion, sexual orientation, gender identity, gender expression, or age.	YES
<b>Commercial information:</b>	Such as records of personal property, products or services purchased, obtained, or considered, or	YES

	other purchasing or consuming histories or tendencies.	
<b>Biometric information:</b>	Such as hair color, eye color, fingerprints, height, retina scans, facial recognition, voice, and other biometric data.	NO
<b>Internet or other electronic network activity information:</b>	Such as browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement.	YES
<b>Geolocation data:</b>	Such as physical location or information about a particular consumer or device.	YES
<b>Sensory data:</b>	Such as audio, electronic, visual, thermal, olfactory, or similar information.	NO
<b>Professional or employment-related information:</b>	Such as current or past job history and prior employers	NO
<b>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)):</b>	Such as education records directly related to a student as may be maintained by an educational institution or a party acting on its behalf, such as grades, transcripts, class list, student schedules, student identification codes, or similar information.	NO
<b>Inferences from personal information collected:</b>	Inferences drawn from any of the information identified above to create a profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	YES

**SOURCES OF PERSONAL INFORMATION.**

We obtain the categories of personal information listed above from the following sources:

- Directly from California residents, their agents, or other individuals acting on their behalf. For example, from a document or communication that a consumer provides to us related to the services, advisory tools, software, and/or programs offered by us.
- Directly and indirectly from your use and access of the Quants Compete Site, any and all Quants Compete Programs, and your interaction with our mobile application and/or social media.
- From third parties, affiliates, service partners and providers, including, but not limited to, contractors, vendors, advertisers, and other third parties in connection with the services and/or programs we offer.

## **USE OF PERSONAL INFORMATION.**

The purposes for which we may collect and use personal information depend on, among other things, our relationship or interaction with a specific California resident. We may use the personal information we may have collected to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, including the following:

- To perform and provide you with various services and/or programs, including maintaining or servicing your accounts and your use of our advisory tools, providing customer service, verifying customer information, providing advertising or marketing services, providing analytic services, or providing similar services.
- To enable your access to and use of our products, services, the Quants Compete Programs, and the Quants Compete Site features, as well as to allow you to participate in interactive elements of the Quants Compete Site and/or Quants Compete Programs, including our advisory tools.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing, collections, and similar authorized obligations.
- To personalize your experience and to allow us to deliver the type of content, advertising, and offerings in which you are most interested.
- To undertake activities to verify or maintain the quality or safety of a service or program offered by us, and to improve, upgrade, or enhance such service or program.
- To provide, maintain, protect, develop, and improve the Quants Compete Site, Quants Compete Programs, advisory tools, and/or the Quants Compete models, and to present such contents to you.
- To fulfill your requests for products, services, and programs, and process and deliver your transactions and orders.
- For testing, research, analysis, and product development.
- To provide you with information in response to your inquiries, and to provide you with customer support.
- To administer promotions, surveys, or other features on the Quants Compete Site and/or Quants Compete Programs.
- To email you information about the Quants Compete Site and/or Quants Compete Programs.
- As necessary or appropriate to protect the rights, property, or safety of us, our customers, and others.
- To assist us in taking data security precautions, detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- To detect, prevent, and address technical issues.
- To debug, identify, and repair errors that impair existing intended functionality.

- To respond and comply with applicable international, federal, state, provincial and local laws, directives, rules, regulations, and ordinances; civil, criminal or regulatory investigations; or other legal requirements, such as court orders.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

### **TO WHOM WE DISCLOSE PERSONAL INFORMATION.**

The categories of third parties with whom we may share personal information depend on, among other things, our relationship or interaction with a specific California resident. The categories of third parties to whom we may disclose personal information for our business purposes described in this Notice are:

- Affiliates and subsidiaries of Quants Compete.
- Service partners and providers, contractors, vendors, advertisers, and other third parties who provide services such as custodial functions, website hosting, storage, data analysis, payment processing, order fulfillment, shipping, information technology and related infrastructure, customer service and communications, email delivery, auditing, advertising and marketing, and marketing research activities.
- Social media services.
- Other third parties who enable customers to conduct transactions online and via mobile devices.
- Government agencies as required by laws and regulations.

### **NO SALE OF PERSONAL INFORMATION.**

In the past 12 months, we have not “sold” personal information subject to the CCPA, including personal information of minors under the age of 16.

### **YOUR CALIFORNIA PRIVACY RIGHTS AND CHOICES.**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how you may be able to exercise the following rights (subject to certain limitations at law):

- *The Right to Know and Access Specific Information.* You have the right to request that we disclose certain information to you about our collection and use of your personal information over the last 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:
  - The categories personal information we have collected about you;
  - The categories of sources for the personal information we collected about you;
  - Our business or commercial purpose for collecting that personal information;
  - The categories of personal information that we have disclosed about you to third parties for a business purpose, and the categories of third parties with whom that personal information was disclosed;
  - The specific pieces of personal information we collected about you (also called a data portability request); and,

- If applicable, the categories of personal information we have sold about you, and the categories of third parties to whom this information was sold.
- *Deletion Request Rights.* You have the right to request that we delete any of your personal information that we have collected from you and retained, subject to certain exceptions.
- *Right to Opt-Out of Personal Information Sales.* You have the right to direct us not to sell personal information that we may have collected about you to third parties now or in the future. If you are under the age of 16, you have the right to opt-in, or to have a parent or guardian opt in on your behalf, to such sales.
- *Right to Non-Discrimination.* As a California resident, you have the right not to receive discriminatory treatment for exercising any of the rights described above. We will not discriminate against you for exercising any of your CCPA rights and we will not deny you services, charge you a different price, or provide you with a lesser quality of services if you exercise any of your CCPA rights. However, please note that if the exercise of the rights described above limits our ability to process personal information (such as in the case of a deletion request), and we may no longer be able to provide you our products, services, the Quants Compete Programs or engage with you in the same manner.

### **HOW TO EXERCISE YOUR CALIFORNIA PRIVACY RIGHTS.**

To exercise the right to access, data portability, and right to request deletion, please submit a request by:

- Emailing [support@quantscompete.com](mailto:support@quantscompete.com) with the subject line "**California Rights Request**"; or
- Writing to us at the following address:

RocketTrader, Inc.  
dba Quants Compete  
2351 Sunset Blvd. Suite 170721  
Rocklin, CA 95765  
Telephone: (510) 788-0774  
Email: [support@quantscompete.com](mailto:support@quantscompete.com)

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request as identified above and as related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Non-affiliated third parties are independent from us, and if you wish to receive information about your disclosure choices or stop communications from such third parties, you will need to contact those non-affiliated third parties directly.

## **NOTICE OF FINANCIAL INCENTIVES.**

We do not offer incentives in exchange for the retention or sale of personal information. We currently do not hold contests or sweepstakes.

## **“SHINE THE LIGHT” LAW.**

California residents that have an established business relationship with us have rights to know how their information is disclosed to third parties for their direct marketing purposes under California’s "Shine the Light" law (Civ. Code § 1798.83) Under the “Shine the Light” law, California residents who provide certain personal information in connection with obtaining products or services for personal, family, or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer personal information and the names and addresses of those businesses with which we shared customer personal information for the immediately prior calendar year.

Such requests must be submitted to us in writing by contacting us in accordance with the “Contact Us” section in our Privacy Policy, and specifying that you want a copy of your "Shine the Light" California Privacy Rights Notice. Within the appropriate amount of time, we will provide the requested information to you at your email address in response. Please be aware that not all personal information that may be shared is covered by the “Shine the Light” requirements and only information on covered sharing will be included in our response, if any.

## **CALIFORNIA'S "DO NOT TRACK" NOTICE; THIRD PARTY BEHAVIORAL TRACKING.**

“Do Not Track” (“DNT”) is a preference you can set in your web browser to let the sites you visit know that you do not want them collecting information about you. We are strongly committed to not sharing personal information with third parties; under our Privacy Policy, we may share your information only under particular situations, as described herein. Because we protect all users in this manner, we do not change our behavior in response to a web browser’s “Do Not Track” signal. For further details regarding DNT, visit <https://allaboutdnt.com/>. Further, we may allow third party behavioral tracking, if deemed appropriated by us.

## **UPDATES.**

We may update this Notice from time to time. When we make changes to this Notice, we will change the "Last Updated" date at the beginning of this Notice. If we make material changes to this Notice, we will notify you by email to your registered email address, by prominent posting on our online services, or through other relevant communication channels. All changes shall be effective from the date of publication unless otherwise provided in the notification.

## **CONTACT US.**

If you have any questions, comments, or concerns regarding our Privacy Policy and privacy practices, please send an email to [support@quantscompete.com](mailto:support@quantscompete.com) or contact us in writing at the following address:

RocketTrader, Inc.  
*dba* Quants Compete  
2351 Sunset Blvd. Suite 170721  
Rocklin, CA 95765  
Telephone: (510) 788-0774  
Email: [support@quantscompete.com](mailto:support@quantscompete.com)