

## Policy of Privacy and Information Security

For QUANT DECISIONS S. L., privacy and information security are a strategic objective and a fundamental asset for the consolidation of a culture based on security. For this reason, the Management declares its express commitment to the continuous improvement of its Integrated Management System (IMS), the scope of which is as follows:

"The information systems that support consulting services and development of computer applications for the assessment and management of data and financial risks, in accordance with the statement of applicability in force on the date of issuance of the certificate."

At QUANT DECISIONS S. L., we are committed to:

- Strengthen the security of our services, as well as the information and data that they include and that are necessary for their correct and adequate provision.
- Ensure that the data we request is adequate, specific and necessary for the purpose for which it is collected and will not be used for anything other than that for which it has been transferred.
- Keep personal data inventoried by treatment, to facilitate its control, management and protection.
- Manage and protect the privacy of the personal data of our stakeholders to help ensure compliance with the laws and regulations applicable to the collection, storage, use, transmission, disclosure to third parties and the retention of personal and / or confidential data.
- Comply with and respect the Intellectual Property Law regarding the use of software, obtaining the corresponding licenses and keeping a record and control for its proper use in the development of activities.

Francisco Velasco

Presidente

Madrid, 21<sup>th</sup> Abril 2024

# Privacy Policy Details

## Data collection and consent

QUANT DECISIONS S. L. is the CONTROLLER for the processing of the USER's personal data and informs them that these data will be treated in accordance with the provisions of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016, regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data and by which Directive 95/46 / CE (hereinafter RGPD) and Organic Law 3/2018 are repealed , of December 5, Protection of Personal Data and Guarantee of Digital Rights (hereinafter LOPDGDD).

The purpose of the processing of your data is to maintain a commercial relationship or maintain a professional relationship (for the legitimate interest of the person in charge, art. 6.1.f GDPR) and to send communications of products or services (with the consent of the interested party, art. 6.1 .a GDPR).

## Purposes of the treatment

The data that we request are adequate, specific and necessary for the purpose for which they are collected and will not be used with any other than that for which they have been transferred. In no case is the user obliged to provide these to QUANT DECISIONS S. L., however, it must be noted that failure to do so implies the inability to provide the services of QUANT DECISIONS S. L. in the normal way.

QUANT DECISIONS S. L. is not responsible for the processing of personal data on web pages that the user can access through the different links that our web page contains.

Unless expressly indicated, it will be considered necessary to fill in all the fields of each form. These data provided by the user must be true, accurate, complete and up to date.

The user will be solely responsible for any loss or damage, direct and indirect, caused to QUANT DECISIONS S. L. or to any third party, by filling in the forms with false, inaccurate, incomplete, or outdated data, or with third party data.

Our website obtains the user's personal data by receiving forms, and by email, for the following purposes:

- Subscription to online newsletters, physical publications, web pages and commercial and promotional communications related to the services of QUANT DECISIONS S. L.
- Management of QUANT DECISIONS S. L. for information or registration as a collaborating company and for management and registration as a user of other QUANT DECISIONS S. L. products
- Commercial: When the interested person sends the personal data and the electronic address to QUANT DECISIONS S. L., they are expressly authorizing their use for the purposes of periodic communications, implicitly including those made by email. Registration or registration in certain services entails obtaining express consent for the sending of commercial or promotional communications from QUANT DECISIONS S. L.. Likewise, QUANT DECISIONS S. L. will provide users with mechanisms so that, in a simple and free way, they can withdraw the consent granted for the purpose of sending electronic communications, fully complying with European and national regulations on the aforementioned matter.

QUANT DECISIONS S. L. reserves the right to decide whether to include the personal data of these people in its files.

## Data Protection Rights

The user has the right to access their personal data collected in the QUANT DECISIONS S. L. files, rectify them if they are not correct, cancel them or oppose their treatment, in the terms established by Law, by contacting QUANT DECISIONS S. L. through the email [dpo@quant.global](mailto:dpo@quant.global) or, by writing to QUANT DECISIONS S. L., C / Arturo Soria 122, 28043 in Madrid, always accompanying a photocopy of your ID, or document accrediting the entity to the that it represents.

In addition, with the introduction of the RGPD, the right to be forgotten, the right to portability of personal data and the right to limitation in the treatment are incorporated.

The right to be forgotten means preventing, by order of the affected party, the dissemination of personal information through the internet when its publication does not meet the adequacy and relevance requirements set forth in the regulations. This includes the right to limit the universal and indiscriminate dissemination of personal data in general search engines when the information is out of date or no longer has relevance or public interest, even if the original publication is legitimate.

The right to data portability empowers the interested party to obtain a copy of their personal data in a structured and commonly used electronic format and to transfer their data from one electronic processing system to another.

The right to limitation in the treatment consists of the power of the interested parties to request and obtain from the person responsible for the treatment or file, a limitation of the treatment of their personal data when any of the following conditions is met:

- The interested party challenges the accuracy of the personal data, for a period that allows the person responsible to verify the accuracy of these.
- The treatment is illegal, and the interested party opposes the deletion of personal data and requests instead the limitation of its use.
- The person in charge no longer needs the personal data for the purposes of the treatment, but the interested party needs them for the formulation, exercise, or defense of claims.
- The interested party has opposed the treatment.

It is important that, to keep personal data up to date, it is informed whenever there is any change; otherwise, QUANT DECISIONS S. L. is not responsible for the veracity of these.

If the user does not expressly cancel their personal data from the QUANT DECISIONS S. L. files, it is understood that the user is still interested in their remaining incorporated if they are adequate for the purpose for which they were obtained, and as long as QUANT DECISIONS S. L. deems it appropriate.

## Personal data security

That in accordance with the provisions of current regulations on personal data protection, the CONTROLLER is complying with all the provisions of the GDPR and LOPDGDD regulations for the treatment of personal data under its responsibility, and manifestly with the principles described in article 5 of the GDPR, for which they are treated in a lawful, loyal and transparent manner in relation to the interested party and adequate, pertinent and limited to what is necessary in relation to the purposes for which they are treated.

The CONTROLLER guarantees that he has implemented appropriate technical and organizational policies to apply the security measures established by the GDPR and the LOPDGDD to protect

the rights and freedoms of USERS and has communicated the appropriate information so that they can exercise them.

For more information on privacy guarantees, you can contact the CONTROLLER at C / Arturo Soria 122, 28043 in Madrid or by email at the address: [dpo@quant.global](mailto:dpo@quant.global).

## **Commercial communications by email**

In compliance with article 21 of the Law on Services of the Information Society and Electronic Commerce (Law 34/2002, of July 11, on services of the information society and electronic commerce), Regulation (EU) 2016 / 679 General Data Protection and Organic Law 3/2018, of December 5 (LOPDGDD), which prohibits the sending of commercial communications by email that have not previously been expressly authorized by the recipients, we inform you that Acceptance of commercial communications implies your express authorization to send you informative, commercial, advertising and promotional shipments, by this means to the address provided.

Our website obtains the user's personal data through email and contact forms, with the following purposes:

- QUANT DECISIONS S. L. management for information or registration as a collaborating company and for the management and registration as a user of other QUANT DECISIONS S. L. services.
- Commercial: When the interested person sends the personal data and accepts the sending of communications, they are expressly authorizing their use for the purposes of periodic communications.

The legal basis for the processing of your personal data for this purpose is your consent. You have authorized us to process your personal data through the affirmative declaration of will that implies the marking of the corresponding box next to the form when you enter your data.

Likewise, QUANT DECISIONS S. L. will provide users with mechanisms so that, in a simple and free way, they can withdraw the consent granted for the purpose of sending electronic communications, fully complying with European and national regulations on the aforementioned matter.

However, if you do not wish to receive our commercial communications, you can request it by contacting: QUANT DECISIONS S. L. in C / Arturo Soria 122, 28043 in Madrid. E-mail: [dpo@quant.global](mailto:dpo@quant.global), always accompanying a photocopy of your ID, or document accrediting the entity you represent.

## **Policy modification**

QUANT DECISIONS S. L. reserves the right in the future to modify its data protection policy according to its criteria, or due to a change in legislation, jurisprudence, or business practice. If QUANT DECISIONS S. L. makes any changes, the new text will be published on this same page, where the user will be able to find out about the data protection policy. In any case, the relationship with the user will be governed by the rules provided at the precise moment in which the website is accessed and, therefore, it is mandatory to read them each time you provide us with your data through our website.

The use of the web attributes to whoever uses it the condition of User and accepts the present conditions of which they have had the opportunity to become aware.

## Obligation to make correct use of the website and its contents

All the contents included in this website are provided for informational purposes only, so that in no case can they serve as a basis for appeals or claims or constitute a source of rights. QUANT DECISIONS S. L. reserves the right to modify, without prior notice, the contents of the website.

The User agrees to the correct use of the Web and utilities that are provided to him in accordance with the law, this legal document, and the instructions and notices that are communicated to him.

The User agrees to the exclusive use of the Web, and all its contents, for lawful and not prohibited purposes, that do not violate current legislation and / or may be harmful to the legitimate rights of QUANT DECISIONS S. L. or any third party, and / or that may cause any damage or harm directly or indirectly.

For this purpose, the user will refrain from using any of the contents of the Web page for illegal purposes or effects, prohibited in this Legal Document, harmful to the rights and interests of third parties or that, in any way, may damage, disable, overload, deteriorate or prevent the normal use of the Web.

In particular, and merely indicative and not exhaustive, the user undertakes not to transmit, disseminate, or make available to third parties' information, data, content, messages, graphics, drawings, sound and / or image files, photographs, recordings, software and, in general, any kind of material that:

- In any way, is contrary, disparages or violates fundamental rights and public freedoms recognized constitutionally, in international Treaties and in the rest of the legislation.
- Induces, incites, or promotes criminal, degrading, defamatory, infamous, violent actions or, in general, contrary to the law, morals and generally accepted good customs or public order.
- Induces, incites, or promotes discriminatory actions, attitudes or thoughts based on sex, race, religion, beliefs, age, or condition.
- Incorporates, makes available or allows access to products, elements, messages and / or services that are criminal, violent, offensive, harmful, degrading or, in general, contrary to the law, morality and generally accepted good customs or order public.
- Is false, ambiguous, inaccurate, exaggerated, or untimely, in such a way that it induces or may be misleading about its object or about the intentions or purposes of the communicator.
- Is protected by any intellectual or industrial property rights belonging to third parties, without the User having previously obtained from the owners the necessary authorization to carry out the use that he or she makes or intends to make.
- Violate the business secrets of third parties.
- It is contrary to the right to honor, to personal and family privacy or to people's own image.
- In any way undermines the credit of QUANT DECISIONS S. L..
- Infringes the regulations on secrecy of communications.
- Constitutes, where appropriate, illicit, misleading, or unfair advertising and, in general, unfair competition.
- Incorporates viruses or other physical or electronic elements that may damage or impede the normal functioning of the network, the system or computer equipment (hardware and software) of QUANT DECISIONS S. L. or third parties or that may damage the electronic documents and files stored on said equipment computer science.
- Causes, due to its characteristics (such as format, extension, etc.) difficulties in the normal operation of the Service.
- The user agrees to refrain from:

- Reproduce, copy, distribute, make available or otherwise publicly communicate, transform or modify the Contents, unless you have the authorization of the owner of the corresponding rights, or it is legally permitted.
- Delete, manipulate or in any way alter the "copyright" and other identifying data of the reservation of rights of QUANT DECISIONS S. L..
- Try to obtain the Contents using means or procedures other than those that, depending on the case, have been made available to you for this purpose or have been indicated for this purpose on the Web page where the Contents are located or, in general, of those that are habitually used on the Internet for this purpose as long as they do not entail a risk of damage or disablement of the Web site, the Services and / or the Contents.

The user will be liable for damages of any kind that QUANT DECISIONS S. L. may suffer, directly or indirectly, because of the breach of any of the obligations derived from the general conditions or the law in relation to the use of the Web.

## **Intellectual property**

All the contents of QUANT DECISIONS S. L. are the intellectual property of the company and are protected according to the current national and international Intellectual Property legislation.

The use of the content of our website without the written authorization of QUANT DECISIONS S. L. is absolutely prohibited.

It is forbidden to establish this page as a framework for others, however, it is possible to establish a link to our Internet address (<https://www.quant.global>) as long as they are not related to false, inaccurate, incorrect, that may lead to error or confusion or that are contrary to the law, morals or good customs.

The user will be able to download the Web page on his terminal as long as it is for private use, without any commercial purpose, so he will not be able to exploit, reproduce, distribute, modify, publicly communicate, assign, transform or use the content of the Web for purposes public or commercial.

The infringement of any of the aforementioned rights may constitute a violation of these provisions, as well as a crime punishable in accordance with articles 270 and following of the Penal Code.

The trademarks, logos and any other industrial property that appear on this site are the property of QUANT DECISIONS S. L.. The use of these trademarks is prohibited without the prior written authorization of QUANT DECISIONS S. L., or of the third parties that own the trademarks.

## **Service duration**

QUANT DECISIONS S. L. does not guarantee the availability and continuity of the operation of the Website. When reasonably possible, QUANT DECISIONS S. L. will give prior notice of interruptions in the operation of the website; nor does QUANT DECISIONS S. L. guarantee the usefulness of the Website for the performance of any specific activity, nor its infallibility.

Access to the QUANT DECISIONS S. L. website has an indefinite duration; However, QUANT DECISIONS S. L. reserves the right to suspend access without prior notice to users who, in its opinion, violate the rules of use of its website and to exercise the appropriate legal measures. In addition, QUANT DECISIONS S. L. reserves the right to restrict access to some sections of the Web to the public, limiting it only to specific users or group of users by providing an access password for which they will be responsible.

## Liability exclusion

QUANT DECISIONS S. L. makes every effort to avoid any error in the contents of the website, but does not guarantee the availability and continuity of the operation of its website or those other websites with which a link has been established, as well as QUANT DECISIONS S. L. does not will be responsible for any damages that may arise from:

- The interruption of the operation or the lack of availability of access to the Web page.
- The privacy and security in the use of the Web page by the User, and / or the unauthorized access of unauthorized third parties.
- The eventual transmission of elements that negatively affect computer systems.
- The accuracy, completeness, and timely updating of the contents of its website. Consequently, QUANT DECISIONS S. L. does not guarantee the reliability, availability or continuity of its website or its contents, so the use of these by the user is carried out at their own risk and expense, without any at this time, QUANT DECISIONS S. L. may be held accountable in this regard.

QUANT DECISIONS S. L. will not be responsible in the event of service interruptions, delays, errors, malfunctions and, in general, other inconveniences that have their origin in causes beyond the control of QUANT DECISIONS S. L. and / or due to malicious or negligent action. of the User and / or originated by force majeure. In any case, whatever its cause, QUANT DECISIONS S. L. will not assume any responsibility for direct or indirect damages, consequential damages and / or lost profits. QUANT DECISIONS S. L. will have the right, without any compensation to the user for these concepts, to temporarily suspend the services and contents of the website in order to carry out maintenance, improvement or repair operations on them.

QUANT DECISIONS S. L. excludes any liability for damages of any kind that may be due to the lack of veracity, accuracy, completeness and / or timeliness of the content transmitted, disseminated, stored, made available or received, obtained, or accessed. through the Web, nor for the content provided by third parties or entities.

QUANT DECISIONS S. L. will try as much as possible to update and rectify any information hosted on its website that does not comply with the minimum guarantees of truthfulness. However, it will be exonerated of responsibility for its failure to update or rectify it, as well as for the content and information contained therein.

QUANT DECISIONS S. L. is not responsible for the use that the user makes of the services and products of the website or their passwords, as well as any other material on the website, infringing the rights of intellectual or industrial property or any other right of third parties.

QUANT DECISIONS S. L. reserves the right to eliminate those contents that are ineffective, inaccurate, and contrary to the law, morals, public order and good customs.

## Legislation and jurisdiction

The provision of the service is governed by Spanish legislation, the Courts of Madrid being competent, to which the User expressly submits.