

## Privacy Policy

### What is the Effective Date of this Privacy Policy?

This Privacy Policy is effective as of August 25, 2025.

### Why is a Privacy Policy important to me?

QCX LLC d/b/a Polymarket US (“the Exchange”) and QC Clearing LLC d/b/a Polymarket Clearing (the “Clearinghouse,” together with the Exchange, “PMUS”) is firmly committed to respecting the privacy of users of the PMUS website and related services (“Customers,” which term shall refer collectively to Customers and Participants (as hereinafter defined)), as well as its current and former participants that have executed a Participant Agreement with PMUS (“Participants”) and protecting the security and confidentiality of the personal information that it collects.

This Privacy Policy applies when you access or use any of the services or websites that PMUS makes accessible to you through a web browser, and when you have other interactions with PMUS (e.g. customer service inquiries, etc.) (collectively, the “Services”). PMUS maintains high standards to safeguard such personal information and will remain vigilant in protecting that information and in using it in a fair and lawful manner. This Privacy Policy embodies PMUS’s commitment to its protection through adherence to fair electronic information practices. PMUS is committed to not electronically processing personal information that it collects in any way if such action is inconsistent with this Privacy Policy.

Note that any external third-party websites, including any third-party websites to which the Services may provide a link, such as third-party websites of exchanges on which Participants may execute transactions that are cleared through the Clearinghouse, or websites providing software to access the Exchange, are not covered by this Privacy Policy and those websites are not subject to PMUS’s privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

### What information does PMUS collect?

PMUS will collect and receive information through operating the Services and through other interactions with PMUS, including the following:

- **Customer Data**

In order for you to become a Participant on PMUS and to access and use the Services to execute and/or clear transactions, PMUS will need to collect and maintain certain personal information about you, including nonpublic personal information subject to the Gramm-Leach-Bliley Act (“GLBA”):

- PMUS collects and maintains information provided by you on your application when you request to open an account with PMUS. Such information may include your name, mailing address, phone number, email address, Social Security number, date of birth, bank account information, employment information and other background information.
- After you have created an account with PMUS, PMUS collects and maintains information about your transactions. Such information may include your account balance, trading and/or clearing activity and money movement into and out of your

account. This information helps PMUS administer your account and provide you with better service.

- PMUS may collect and maintain information about you from consumer reporting agencies in order to verify your identity and ensure that no one is using your information without your authorization. Such information may include your name, Social Security number, date of birth and address. PMUS may also collect and maintain this information in accordance with certain state and federal regulations based on the Exchange's status as a designated contract market ("DCM") and the Clearinghouse's status as a derivatives clearing organization ("DCO"), in each case, doing business within the United States.

- **Other Information**

PMUS also collects, generates and/or receives the following additional categories of information:

1. *Usage Information:*

- a. *Services metadata.* When you interact with the Services, metadata is generated that provides additional context about the way that you use the Services. For example, PMUS logs the date and time, specific features, links clicked, and third-party services used (if any) when you interact with the Services.
- b. *Log data.* As is common practice for most websites and online services, our servers automatically collect information when you access or use the Services and record it in log files. This log data may include, but is not limited to, your Internet Protocol (IP) address, the address(es) of websites you visited before or during your use of the Services, browser type and settings, information about browser plugins, language preferences, and other related information that is available as a result of your interactions with the Services.
- c. *Device information.* PMUS collects information about the devices you use to access its Services, including the type of device, the operating system used, device settings, application IDs, unique device identifiers and crash data. Whether we collect some or all of this information often depends on the type of device used and its settings.
- d. *Location information.* We receive information from you and other third parties that helps us to approximate your location. This may be through an IP address, by asking you for an address, or by requesting access to your location through device location integration. We use this information to assist in localization, for security purposes, and for complying with geographical access restrictions that we are required to adhere to.

2. *Cookie Information:*

Cookies are small text files sent from the web server to your computer. PMUS uses a variety of cookies and similar technologies (such as single-pixel gif and web beacons) to deliver the Services and to help us collect information about you. We use both session-based and persistent cookies. PMUS creates and

accesses cookies that we create on our Services on domains owned and operated by PMUS. In addition, we use third-party cookies for additional functionality such as analytics. Some cookies are required for the proper operation of the Services, but some other cookies, if disabled or blocked, will not affect the Services functionality.

Some cookies are associated with your account and personal information to remember that you are logged in, store user preferences, and give you a personalized experience that is consistent with your user settings. Other cookies are not tied to your account but are unique and allow us to carry out analytics and customization, among other similar things. Cookies are also used to improve the performance of the Services and make them more secure.

The following is a description of the types of cookies used by PMUS on or in conjunction with the Services:

- *Authentication.* If you are signed in to our Services, cookies help us show you the right information and personalize your experience.
- *Security.* We use cookies to enable and support our security features, and to help us detect malicious activity.
- *Preferences, features and services.* Cookies can tell us which language you prefer and what your communications preferences are. They can help you fill out forms on our websites more easily. They also provide you with features, insights, and customized content.
- *Marketing.* We may use cookies to help us deliver marketing campaigns and track their performance. Similarly, our partners may use cookies to provide us with information about your interactions with their services, but use of those third-party cookies would be subject to those service providers' policies.
- *Performance, analytics and research.* Cookies help us learn how well our Services perform. We also use cookies to understand, improve, and research products, features, and services, including to create logs and record when you access our Services from different devices, such as your computer or your mobile device.

Some people prefer not to allow cookies, which is why most browsers give you the ability to manage cookies to suit you. In some browsers, you can set up rules to manage cookies on a site-by-site basis, giving you more fine-grained control over your privacy. What this means is that you can disallow cookies from all websites except those that you trust. If you limit the ability of PMUS to set cookies, you may worsen your overall user experience and/or lose the ability to access the Services, given that some cookies are essential for accessing the Services (such as authentication cookies to ensure you are logged in).

### 3. *Third-Party Data:*

PMUS may receive data about the industry, lists of companies that are Customers, website visitors, marketing campaigns and other matters related to our business from parent corporation(s), affiliates and subsidiaries, our partners, or others that we use to make our own information better or more useful. This data may be combined with other types of information that we collect. In addition, it might include aggregate-level data, such as which IP addresses correspond to zip codes or countries and/or more specific data, such as how well an online marketing or email campaign performed.

4. *Additional Information:*

PMUS may also retain other information that you provide to us, such as responses or opinions, if you participate in a focus group or other event, feedback about our products or services, or if you request support, interact with our social media accounts or otherwise communicate with PMUS.

**How does PMUS use my personal information?**

Your personal information will be used by PMUS in accordance with your instructions, including to provide the Services, your use of Services functionality, and as required by applicable law.

PMUS may use your personal information for the following nonexclusive purposes:

- To verify your identity and establish and manage your account;
- To provide you with trading/and or clearing services;
- To provide you with advertisements, communications, and offers for or information about products and services from PMUS, and to review your ongoing needs;
- To help PMUS improve its products and services, including customer services, and develop and market new products and services;
- To evaluate your eligibility for certain types of offers, products or services that may be of interest to you, and analyze advertising effectiveness;
- To answer your questions and respond to your requests;
- To market, perform analytics, data analysis, send you surveys, and conduct consumer research;
- To send you reminders, technical notices, updates, security alerts, support and administrative messages, service bulletins, marketing messages, and requested information;
- To form a profile about you;
- To investigate or settle inquiries or disputes, or to investigate member compliance with PMUS's rules;
- To comply with applicable law, court order, other judicial process, or the requirements of any applicable regulatory authorities;
- Internal business purposes and record keeping;
- Corporate restructuring; and
- Security.

**What information is PMUS disclosing about me to third parties?**

PMUS takes great care in protecting the security and confidentiality of your personal information. Only PMUS's authorized personnel have access to your personal information. Such PMUS

personnel may use such information only in connection with executing and/or clearing transactions that you initiate, and in administering and providing you with service relating to your account, or as expressly authorized by you. PMUS may disclose your personal information to certain affiliates and/or to nonaffiliated third parties that perform valuable services or functions to or on behalf of PMUS.

PMUS may share personal and non-personal information with nonaffiliated third parties in the following nonexclusive circumstances:

- PMUS may disclose information to companies that assist it in processing the transactions that occur within your account via our websites, including our software, hardware and service providers, and for the purpose of marketing our products.
- If you choose to execute transactions on other exchanges that are cleared through the Clearinghouse, then PMUS may disclose information to such other exchanges.
- Information may also be disclosed to nonaffiliated third parties to the extent disclosure is necessary to comply with legal, judicial or regulatory processes or to protect the rights, property, or personal safety of PMUS, its Customers, or the public.
- Information may also be disclosed about you to your employer if you are employed by or affiliated with another exchange, regulatory or self-regulatory authority, or any entity that is regulated by a regulatory or self-regulatory authority including but not limited to the Financial Industry Regulatory Authority or the National Futures Association. Such entities may be required to monitor your trading and/or clearing activity as defined under applicable securities and commodities laws.

When PMUS shares personal information with a nonaffiliated third party performing services or functions on its behalf, PMUS generally enters into a contractual agreement with the third party requiring it to maintain the confidentiality of such information and prohibiting it from using or disclosing such information, except for the limited purpose of performing services or functions on PMUS's behalf and to the persons for whom disclosure was intended and as otherwise permitted by law.

PMUS may disclose your information in the event we sell or transfer all or a portion of our business or assets (including, without limitation, in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation) to the successor of such business or assets. This includes disclosing your information for the purposes of evaluating such potential transactions.

### **Am I able to opt out under the rules of the GLBA?**

The GLBA and the Fair Credit Reporting Act allow you to “opt out” of the sharing of your nonpublic personal information with certain affiliated and nonaffiliated companies for those companies' marketing purposes. PMUS does not share your nonpublic personal information with any third parties that trigger this opt out right.

### **What if I want to review or change any of my personal information?**

Helping you keep your information accurate is important to PMUS. If you have a concern about your personal or account information collected and maintained at PMUS or want to correct, update, or confirm your information, please email PMUS at [support@qcex.com](mailto:support@qcex.com).

### **How does PMUS store my personal information and for how long?**

Safeguarding the privacy of your information is important to PMUS, whether you interact with PMUS personally, by phone, by mail, over the internet or any other electronic medium. PMUS stores personal information in a combination of secure computer storage facilities and paper-based files and other records and takes steps to protect the personal information PMUS holds from misuse, loss, unauthorized access, modification or disclosure.

When PMUS believes that personal information is no longer needed it will remove any information that can identify you or it will securely destroy the records. However, PMUS may need to maintain records for a significant period of time to comply with various regulatory obligations. For example, PMUS is subject to certain regulatory requirements that oblige it to retain information, such as your application data, documents used to verify your identity or banking information, and supporting evidence and records of your transactions, for a period of five years after its business relationship with you has ended.

Where you have opted-out of marketing communications, PMUS will retain your information and preferences so it knows you do not want to receive these communications. Note, however, that it may not be possible to opt out of certain communications that are required under CFTC regulations, which may include, but not be limited to, month-end statements.

### **Can I request that my personal information be deleted?**

You can ask PMUS to delete your personal information in certain circumstances, such as where PMUS no longer needs it or you withdraw your consent (where applicable) provided that PMUS has no legal or regulatory obligation to retain that data. Such request will be subject to any retention limits with which PMUS is required to comply in accordance with applicable laws and regulations and subject to this Privacy Policy.

### **How does PMUS protect my personal information?**

PMUS has made a significant investment in security programs, policies and procedures to offer its Customers a safe and secure trading and clearing environment. PMUS takes precautions to protect the security and confidentiality of your personal information. While no security system is absolutely impenetrable and while PMUS takes no responsibility for the security systems put in place by its affiliates and/or nonaffiliated third parties that provide services on its behalf, PMUS is constantly reviewing, refining and upgrading its security technology, as new tools become available.

### **Children's Personal Information**

The Services are geared toward a general audience, is not directed to children under 13 years of age and we do not knowingly collect personal information from children under the age of 13. If we become aware that we have collected personal information from a child under the age of 13, we will promptly delete the information, unless we are legally obligated to retain such information.

If you believe a child under the age of 13 may have provided us with personal information, please contact us at [support@qcex.com](mailto:support@qcex.com).

**How does this Privacy Policy apply if I am a Participant?**

In addition to this Privacy Policy, Participants on PMUS are bound by additional terms and conditions including, but not limited to the Participant Agreement, the Risk Disclosure Statement and the rules of the Exchange and the Clearinghouse. and any additional rules, terms and conditions for exchanges that contract with the Clearinghouse for clearing services. In the event of any conflict between the terms or conditions of this Privacy Policy and those of your Participant Agreement, the provisions, terms or conditions of the applicable Participant Agreement shall govern and control, and the terms of this Privacy Policy shall be modified hereby.

**What if there are material changes made to this Privacy Policy?**

PMUS reserves the right, at its sole discretion, to change, modify, add or remove portions of this Privacy Policy at any time. The most current version of this Privacy Policy is always available from a link at the bottom of the [qcex.com](http://qcex.com) website. It is your responsibility to check the Privacy Policy periodically for changes whenever accessing or using the Services. Your continued use of this Site following the posting of changes will mean that you accept and agree to the changes.

If at any time in the future material changes are made to this Privacy Policy, PMUS may notify you by email to the email address specified in your account and/or through a notice on the Services.

**Can I contact you if I have additional questions regarding this Privacy Policy?**

Should you have any questions or concerns about this Privacy Policy, please email PMUS at [support@qcex.com](mailto:support@qcex.com).