

6. Personal Identifiable Information Management Policy

Quant recognizes the importance of the protection of natural persons with regard to the processing of their Personal Identifiable Information (PII) as a fundamental right. In that respect, the Company complies with the principles of PII lawful processing, respects the rights and freedoms of the data subjects and secures that the possessed PII is:

- collected for specified, explicit and legitimate purposes, which are stated at the Company's Record of Processing Activities, and are also collected after data subject's consent is given, when necessary,
- are processed only for the purposes for which they have been collected and / or for legal and regulatory reasons and / or for the defense of the Company's legal interests,
- not further processed in a manner that is incompatible with the specified purpose(s),
- adequate, relevant, and limited to the minimum data required in relation to the specified purpose(s),
- subject to legal processing according to data subjects' rights, they are accurate, and, where necessary, kept up to date, particularly before taking critical decisions concerning the data subjects,
- not retained for longer than is necessary for the purposes for which the data were collected or for which they are further processed or for compliance of the Company with legal and regulatory requirements,
- retained in a secure (physical or digital) location protected from unauthorized access, unauthorized modification, loss, or breaches,
- transferred to third parties provided that secure level of data protection is ensured.

The above-mentioned are followed by all Company's employees and third parties that process PII of natural persons on behalf of the Company.

The Company ensures full compliance with all the above by:

- applying a PII and Information Security Management System, which covers its activities for monitoring and controlling the implementation of this policy, as well as effectiveness assessment regarding the regulatory framework and best practices for PII protection,
- applying procedures for satisfying the complete and effective fulfillment of data subjects' rights, by responding within one month after the submission of request or three months in case there are reasonable justification for the delay which is notified to the data subject within the first month.
- explicitly informing data subjects regarding the processing of their PII,
- incorporating PII processing requirements to all operational functions, that are relevant to their processing,

- recognizing all internal and external interested parties and their requirements towards their PII protection,
- specifying roles and responsibilities associated with PII management,
- giving explicit directions to staff and third parties, who execute processing on behalf of the Company, for data use and data transmission according to the established Policies and Procedures,
- ensuring that data transmission to and processing by third parties on behalf of the Company, complies with the regulatory framework for data protection as well as with the current policy and procedures,
- designing, adopting, and monitoring a system of indicators and objectives for secure and lawful PII management,
- investing in continuous staff training and awareness on PII issues as well as in constant improvement of know-how and its sharing with the staff,
- providing all the necessary resources for ensuring PII Management System effective application,
- having designated a Data Protection Officer (DPO),
- sharing the policy and procedures with all the employees continuously updating this policy and procedures according to the applicable regulatory and legislative framework

QQuant is committed to continuously monitor and enforce the regulatory and legislative framework and to continuously implement and improve the effectiveness of PII and Information Security Management System.