

CUSTOMER PRIVACY POLICY – QYON

This Customer Privacy Policy was created to describe and inform the processes of collection, use, sharing and storage of personal information, in order to inform Qyon Customers of their rights and ensure that such personal information is treated safely and subject to a transparent privacy policy. Federal law gives consumers the right to limit some but not all the processing of personal information. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

1. Collection of Personal Information

When accessing the QYON website or app, requesting, contracting or using QYON products or services, QYON may access and collect personal information, which may be processed by QYON, according to its purpose. In some cases, the personal information is provided directly by the Customer, but there is also the possibility that some personal data will be collected automatically, as specified below.

The Customer must only provide true, current and accurate personal information, being solely responsible for false, outdated or inaccurate information provided to QYON.

1.1 Personal information provided by the Customer.

Includes all information that the Customer entered or provided, voluntarily, as any personal information that, in any way, identifies the User / Customer as an individual, such as, but not limited to, name, identification documents, social security number, nationality, profession, address, date of birth, affiliation, gender, telephone, e-mail address, and bank and payment information.

1.2 Navigation and device information

This includes IP address of the mobile device used to access QYON services or products, technical data, such as URL, network connection, provider, and device information, Cookies (as detailed below), device attributes, such as ID, operating system, browser and model; and device geolocation data if Customers authorize collection from their device.

1.3 Personal information collected from QYON platforms

This includes account balances, credit history, transaction history, payment history and income information.

1.4 Public records

Includes personal information that may be accessed in public databases or are entered into public records.

1.5 Processing of special categories of personal data

Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation will only be made if necessary for the purposes of carrying out legal or regulatory obligations, or processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

1.6 Children personal information

QYON does not knowingly collect child and adolescent personal information through its digital platforms. Therefore, if the parent or guardian becomes aware of the improper provision of such information, he / she may request the elimination of the respective personal information, in the manner established by this Policy.

2. Why does Qyon collect, use, share and store some of your personal information?

QYON uses the personal information collected to when such personal information is necessary for the performance of our contracts to provide products and high quality services; to guarantee the security of its Platforms, in addition to complying with legal and regulatory obligations that require knowledge and sharing with competent authorities of personal information. We detail below the purposes for which we use your personal information:

- Comply with regulatory or legal obligations;
- Exercise the right of defense in judicial, administrative or arbitration proceedings;
- Comply with decisions of authorities, administrative, regulatory or judicial;
- Check the identity and ensure greater security during your navigation on our channels, as well as adopt fraud prevention procedures, in order to offer protection to the Consumer or QYON;
- When processing of personal information is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- Handle complaints, doubts and requests and provide support to the Customer; and
- Use cookies, according to this Policy.

3. Electronic Fund Transfers (“EFTs”) and Account Balances.

QYON has partnered with financial services software company Sila Inc. to offer you EFTs. When you create a QYON Account, you might also be prompted to sign up for a Sila Account. You authorize QYON to share your identity and banking information with Sila Inc. to open and support your QYON Account. It is your responsibility to make sure the data you provide us is accurate and complete. You must comply with Sila Inc.’s privacy policy (the “Sila Privacy Policy”) when creating or using your QYON Account. The Sila Privacy Policy may be modified from time to time, and the governing version is incorporated by reference into this Privacy Policy. Any term not defined in this section but defined in the Sila Privacy Policy assumes the meaning as defined in the Sila Privacy Policy.

4. Customer's Rights:

QYON is committed to complying with the legal rules that affect the processing of personal information of any Customer, in good faith and, mainly, but not only, guided by the following principles: a.) transparency, b.) purpose, c.) suitability, d.) necessity, e.) quality, f.) accuracy, g.) security, h.) prevention and i.) no discrimination.

Customers may exercise protection of their rights, whenever they understand/verify any possible non-compliance by QYON, through communication addressed to the following channels: email: privacy@qyon.com.

QYON guarantees the possibility of submitting requests based on the following rights:

- a) confirmation of the existence of personal information processing;
- b) access to personal information;
- c) the correction of incomplete, inaccurate or outdated personal information;
- d) the anonymization, blocking or elimination of unnecessary, excessive personal information that does not comply with the Law;
- e) portability of personal information to another supplier, if possible;
- f) the elimination of personal information processed with the User's consent, except in the cases of legal custody and others provided for by law;
- g) obtaining information about the public or private entities with which QYON shared its personal information;
- h) information about the possibility of not giving your consent, as well as being informed about the consequences, in case of refusal;
- i) revocation of consent;
- j) opposition to processing of personal information carried out on the basis of one of the hypotheses of waiver of consent, in the event of any non-compliance with the provisions of applicable law;

k) the review of decisions made solely on the basis of automated processing of personal information that affect the interests of Customers, respecting QYON's commercial and industrial secrets, such as, but not limited to, those based on criteria to prevent fraud or from contract performance.

QYON will make every effort to fulfill such requests in the shortest possible time. However, even in case of exclusion request, the minimum storage period for information of users of internet applications, determined applicable legal determinations, will be respected.

5. California Privacy Rights.

If you are a resident of the State of California, under the California Consumer Privacy Act (CCPA), you have the right to request information on how to exercise your disclosure choice options from companies conducting business in California. Specifically:

- Exercising the Right to Know. You may request, up to twice in a 12-month period, the following information about the personal information we have collected about you during the past 12 months:
 - the categories and specific pieces of personal information we have collected about you;
 - the categories of sources from which we collected the personal information;
 - the business or commercial purpose for which we collected the personal information;
 - the categories of third parties with whom we shared the personal information; and
 - the categories of personal information about you that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that information for a business purpose.
- Exercising the right to delete. You may request that we delete the personal information we have collected from you, subject to certain limitations under applicable law.
- Exercising the right to opt-out from a sale. You may request to opt out of any “sale” of your personal information that may take place.
- Non-discrimination. The CCPA provides that you may not be discriminated against for exercising these rights.

To submit a request to exercise any of the rights described above, you may contact QYON either via email to legal@qyon.com or contact us via postal mail, proper postage prepaid, at: Eight Sharp Capital, LLC, Attn: Your California Privacy Rights
521 5th Avenue, 17th floor.
New York, NY 10175 - USA

Please indicate your preference as to how you would like us to respond to your request (i.e., email or postal mail).

All requests sent via postal mail must be labeled “Your California Privacy Rights” on the envelope or postcard and clearly stated on the actual request. For all requests, please include your name,

street address (if you would like a response via postal mail), city, state, and zip code. We may need to verify your identity before responding to your request, such as verifying that the email address or contact information from which you send the request matches your email address or contact information that we have on file. Authentication based on a government-issued and valid identification document may be required. We will not accept requests via telephone or fax. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

6. Storage and deletion of personal information

Customers' personal information will be stored for a period not exceeding that required to fulfill their purposes / objectives, as a result of which they are processed, observing the deadline for compliance with legal obligation, in which they are applicable to the applicable laws, or regulatory of the controller, observed, whenever possible, the anonymization of personal information.

7. Recipients and transfer of Personal Information

Personal Information processed by QYON may be shared with:

- (a) Research Organs, observed, whenever possible, the anonymization of personal information;
- (b) Public Entities; Regulatory Agencies and Governments, under the terms of applicable law;
- (c) Legal Entities with a contractual relationship with QYON, as long as the conditions of treatment related to the purposes informed to Customers are maintained, and Customers are allowed to be informed of such sharing.

The transfer of personal information may be carried out only to other countries, territories, or international organizations that ensure an adequate level of protection of the data of the holders, whether they are users and participants in the educational, academic, research or medical relationship.

If there is no adequate level of protection, QYON undertakes to guarantee the protection of data of the Customers in accordance with the most stringent rules, through specific contractual clauses for the proposed transfer, standard contractual clauses, global corporate norms or seals, certificates and codes of conduct regularly issued, in compliance with the most appropriate legislation in the case, under penalty of not transferring the data.

8. Cookies

When accessing QYON Platform, website and/or app, QYON may collect personal information about the services that Customers use and how such services are used. These information are necessary for the proper execution of the services, as well as to proceed with continuous improvements in the functionalities of the application.

(i) Geolocation information: information about your location can be collected, identified from data such as your IP address or the GPS of your mobile device, to offer you an optimized user experience. Most mobile devices allow you to control or disable the use of App Location Services in the device's settings menu.

(ii) Ways of Use: Information can be collected on the way you use the QYON Platform Services, such as the most used features, changes made, time of use, etc.

(iii) Log Data: Log data and device information can be collected automatically when using the services of the QYON Platforms, even if the Holder is not a customer.

QYON may use technologies to store temporary browsing information in order to improve and improve the experience in the use of its products. The main technological tools that do this are "cookies", similar technologies are also used.

With this, it is possible to know, for example, which websites were visited by the Customer, his Internet Protocol (IP), the version of his browser, etc.

However, it is possible for the Customer to configure his device to manage the use of cookies or to alert him when they are active. Some cookies may be necessary for navigation and deactivating them may impair some features of the QYON Services.

9. Miscellaneous

For more detailed information and for any communication with QYON regarding this Privacy Policy, please access channels of communication available to Customers, including through the virtual page www.qyon.com

QYON, as a legal obligation, must ensure compliance with the law and judicial decisions and provide Personal Data to respond to the authorities, ensure their rights and prevent risks of fraud. This Privacy Policy was updated on May 13, 2021, and QYON reserves the right to modify, change the information contained in this Policy, available on the website www.qyon.com

Anyone who has provided an e-mail address will be expressly notified in the event of a change to this Privacy Policy.