

Privacy Policy

Effective Date: September 15, 2026

Introduction

This Privacy Policy describes how 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,” “we,” or “us”) collect, use, maintain, and disclose personal information of (i) users of the PMUS websites, located at <https://www.polymarketexchange.com/> and polymarketexchange.com/clearing/ (together, “Site”), and related services and (ii) its current and former participants and clearing members, as applicable, that have executed a Participant and Clearing Member Agreement with PMUS, or otherwise enter transactions on the Exchange or clear transactions via the Clearinghouse, whether intermediated or directly, (“Participants”) ((i) and (ii) collectively, “Customers” or “you”). This Privacy Policy applies when you access or use any of the services or offerings of the Exchange or Clearinghouse, or the website that PMUS makes accessible, and when you have other interactions with PMUS (collectively, the “Services”).

Financial services companies are permitted to share your personal information with third parties under certain circumstances, including to provide financial products to you. Federal law gives consumers the right to limit some but not all of this sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this Privacy Policy carefully to understand what we do.

We are committed to protecting your privacy. Our [Terms of Use](#) (“Terms”) govern the use of our Services and constitute your agreement with us. If you do not agree with the Terms, or the collection and use of your personal information as described in this Privacy Policy, please do not access or use our Services.

Applicability

This Privacy Policy applies to all information we collect from you in connection with your use and our provision of the Services. This Privacy Policy does not apply to information collected on any other website made available by us that does not display this Privacy Policy or on any other websites offered by any third party, including our affiliates and subsidiaries, 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.

For more information about how our affiliates, including independent software vendors, collect and process your personal information in connection with the Polymarket App and Polymarket.us website, please see the privacy policy covering that platform, located at <https://polymarket.us/privacy>.

Throughout this Privacy Policy, we use the term “personal information” to describe information that can be associated with a specific person and can be used to identify that person. Personal

information includes “nonpublic personal information” as defined under the Gramm-Leach-Bliley Act (“GLBA”). We do not consider personal information to include (i) information that has been aggregated, de-identified, and/or anonymized so that it does not identify a specific user, or (ii) publicly available information, such as public records held by the government or data made publicly available by you or with your permission.

Personal Information Collection

PMUS collects personal information from various sources, including:

- Directly from you when you provide it to us;
- Automatically as you navigate through the Site or interact with the Exchange or Clearinghouse;
- From third parties, such as our business partners, affiliates, nonaffiliates, consumer reporting agencies, and third-party service providers;
- From designated contract markets (“DCMs”), futures commission merchants (“FCMs”), derivatives clearing organizations (“DCO”), other intermediaries, independent software vendors (“ISVs”) (such as QC Tech LLC), introducing brokers (“IBs”), and from public or governmental sources; and
- Publicly available sources.

PMUS will collect and receive personal information from you, including the following:

- Information from Customers
 - PMUS collects and maintains information provided by you 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, balances, transactions, account and trading data (credentials, orders, executions, positions, balances, audit metadata), know your customer (“KYC”) / anti-money laundering (“AML”) / counter-terrorism financing (“CTF”) data (verification results, sanctions/politically exposed person checks), fund transfers, and similar information.
- Information about the Customer’s Transactions with PMUS or Affiliates
 - 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.
 - Our affiliates may provide information to us about trades you make or other transactions you initiate.

- Information about Customer's Transactions with Nonaffiliated Third Parties
 - Nonaffiliated third parties may provide us with information about you. We may use this information for the purposes described in the Privacy Policy, including to ensure and promote market integrity.
 - PMUS may receive data about the industry, Customers, website visitors, marketing campaigns and other matters related to our business. 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.
- Information from a Consumer Reporting Agency
 - PMUS may collect and maintain information about you from consumer reporting agencies to verify your identity and to 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 DCM and the Clearinghouse's status as a 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:
 - 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 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 (e.g., GPS location). We use this information to assist in localization, fraud detection, for security purposes, and for complying with geographical access restrictions to which we are required to adhere.

- Cookie Information:

Cookies are small text files sent from the web server to your computer. PMUS uses cookies to deliver the Services and to help us collect information about your use of the Site. 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. 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).

This Site uses Google Analytics. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Services. This data is shared with other Google Services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. For more information on Google Analytics and other Google tracking technologies, please visit <https://policies.google.com/>. We also encourage you to review Google's policy for safeguarding your data: <https://support.google.com/analytics/answer/6004245>.

- 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 PMUS Uses Personal Information

PMUS will use your personal information for various purposes, including:

- To provide, operate, customize, personalize, measure, and improve the Site and Services, and the content and layout of the Site;
- To verify your identity and establish and manage your account;
- To prevent fraud, market abuse, prohibited or illegal activities, including through the use of our risk and fraud tools;
- To provide you with trading and/or clearing services;
- To provide you with advertisements, marketing, communications, and offers for information about products and services from PMUS (including marketing conducted by our business partners and affiliates);
- To help PMUS improve its products and services, including customer services, and develop and market new products and services;
- To compile statistical data and analysis for our use internally or by third parties;
- To ensure internal quality control, including to debug, identify and repair errors that impair intended functionality or improvements to the Site;
- To safeguard the Site, detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and prosecute those responsible for that activity;
- To answer your questions and respond to your requests;
- To send you reminders, technical notices, updates, security alerts, support and administrative messages, service bulletins, marketing messages, requested information, and other information about your use of the Services;
- 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 or requests of any applicable regulatory or self-regulatory authorities;
- To offer certain features or functionalities through the Site, which may involve interacting with artificial intelligence technology or tools;
- To enforce our Terms, and protect the rights, property, or safety of us or others;
- To respond to lawful requests by public authorities, or where otherwise required by law, court order, or other law enforcement or regulatory authority;
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer or 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 comply with legal/regulatory obligations (including U.S. Commodity Futures Trading Commission ("CFTC") regulations and obligations), to prevent and identify market manipulation or other market abuses, to comply with AML/KYC/CTF sanctions, surveillance, audit trail, and recordkeeping requirements; and
- As otherwise described to you when collecting your personal information, for any other purpose for which you provide consent, or as otherwise required or permitted by law.

We may aggregate, anonymize, and/or de-identify information such that it cannot be used to identify you and is not considered personal information under applicable laws. We use this information for product development and improvement, and other business activities.

To Whom PMUS Discloses or Shares Personal Information

PMUS may share personal information described in the “Personal Information Collection” section above with affiliated and nonaffiliated third parties, including:

- Companies that assist PMUS in processing the transactions that occur within your account via our Site;
- Third-party service providers, including artificial intelligence tool providers and those that assist us in fraud detection, KYC/AML/CTF and other regulatory obligations, or otherwise assist in providing the Services to you;
- Our parent companies, affiliates, subsidiaries, joint ventures, or other companies under common control or related by common ownership or control that assist us with providing the Services.
- DCMs, FCMs, DCOs, other intermediaries, ISVs (such as QC Tech LLC), and IBs, to the extent necessary to provide you the Services or as otherwise described in this Privacy Policy, including to support KYC/AML/CTF verification;
- Successor(s) of our business, relating to all or part of the business, to evaluate a proposed transaction or sale, reorganization, merger, acquisition, or other change of control;
- Other third parties or nonaffiliates as permitted by law or contract, to provide the Services, or to protect the rights, property, or safety of us or others;
- Law enforcement, government officials, or other third parties and nonaffiliates if we are compelled to do so by a subpoena, court order or similar legal procedure, when it is necessary to do so to comply with law, or where the disclosure of personal information is reasonably necessary to prevent physical harm or financial loss, to report suspected illegal activity or other unfair trading practices, to investigate violations of the Terms, as otherwise required by law; the CFTC in accordance with regulatory requirements; or whenever we believe in good faith that disclosing such information is necessary or advisable;
- If you choose to execute transactions on other exchanges that are cleared through the Clearinghouse, then PMUS may disclose information to such other exchanges;
- 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; and
- Nonaffiliates for everyday business purposes, such as to process transactions, maintain account(s), respond to court orders and legal investigations, report to credit bureaus, and as permitted by law. We may also disclose personal information to nonaffiliates for market integrity purposes and to identify and prosecute unfair trading practices.

We may also share or license your personal information with business partners, nonaffiliates, and other third parties so that those third parties can offer you certain products, services, and promotions. Additionally, we may also use third-party advertising companies to serve ads when you visit the Site, and those advertising companies may use information about your visits to the

Site and other websites that are contained in tracking technologies in order to provide advertisements about goods and services of interest to you. *You may be entitled to prevent us from sharing and/or licensing your personal information to other companies under applicable law. If you wish to exercise this right, please send an e-mail to legal@polymarket.com.*

We may disclose your personal information for additional purposes and/or to other third parties with your consent or at your direction. We may also disclose aggregated or de-identified data to third parties who may use that information for other purposes.

When you are no longer a Customer, we continue to share your information as described in this Privacy Policy.

Use of Personal Information for Regulatory and Marketing Purposes

PMUS may use your personal information and proprietary data for business or marketing purposes in addition to using such information for the purpose of complying with its regulatory obligations, and PMUS may disclose personal information and proprietary data to its affiliated entities for their business or marketing purposes. You may opt out of PMUS using this information for business and marketing purposes by contacting us at legal@polymarket.com. PMUS does not condition access to its trading facility on your consent to the use of personal information or other information for PMUS's business or marketing purposes. Where necessary, PMUS may disclose personal information to one or more DCMs, swap execution facilities, or derivatives clearing organizations registered with the U.S. Commodity Futures Trading Commission.

Your Right to Limit PMUS's Disclosure of Nonpublic Personal Information

All financial services companies need to share customers' personal information for everyday business purposes. In this section, we list the reasons that PMUS may share Customer's personal information and whether you can limit this sharing. To exercise your right to limit our sharing to third parties, please contact us.

Reasons we can share your personal information	Does PMUS share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	Yes, for more information please see the section titled “Use of Personal Information for Regulatory and Marketing Purposes”
For joint marketing with other financial companies	No	N/A
For our affiliates’ everyday business purposes— information about your transactions and experiences	Yes	Yes
For our affiliates’ everyday business purposes— information about your creditworthiness	No	N/A
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

To limit the sharing of your personal information, please contact legal@polymarket.com.

Automated decision-making and profiling

We may use automated tools for fraud detection, sanctions/KYC/AML/CTF screening, surveillance, and risk controls. These automated tools may include artificial intelligence tools.

Your Rights and Choices

Subject to certain exemptions under applicable law, you may have certain rights related to your personal information.

- i. **The right to access.** You have the right to access, know about, or confirm the processing of your personal information, including the categories of, and sources of, personal information that we collect about you, the business or commercial purpose(s) for

collecting, selling, or sharing your personal information, the categories of third parties to which your personal information is disclosed, and the specific pieces of personal information we have collected about you.

- ii. **The right of correction or rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- iii. **The right to object.** You have the right to object to certain processing of your personal information, such as processing for direct marketing purposes.
- iv. **The right of restriction.** You have the right to request that we restrict the processing of your sensitive personal information.
- v. **The right to data portability.** You have the right to be provided with a copy of your personal information in a structured, machine-readable and commonly used format, to the extent technically feasible.
- vi. **The right to withdraw consent.** You also have the right to withdraw your consent at any time where we rely on your consent to process your personal information.
- vii. **The right to erasure.** If you wish to discontinue the use of the Services, you have the right to request that we delete your personal information.
- viii. **The right to opt-out of the “sale” or “sharing” of your personal information,** or the use of your personal information for “targeted advertising” (as these terms are defined under applicable privacy laws). Please note that we may disclose your personal information to our third-party business partners for their marketing purposes and as otherwise described in this Privacy Policy. The information we may disclose may include your personal information and information about your use of the Services. To opt out of the sale or sharing of your personal information, please contact us at legal@polymarket.com.
- ix. **The right to opt out of disclosures of nonpublic personal information** to (i) affiliates for their everyday purposes (specifically with respect to nonpublic personal information concerning your creditworthiness), (ii) affiliates to market to you, and (iii) nonaffiliated companies to market to you.

You will not be discriminated against for exercising any of these rights. To exercise your choices and rights, please contact us using the contact information provided in this Privacy Policy. We may request or require additional information to verify your identity to fulfill your request.

However, we may deny certain requests: (a) when denial of access is required or authorized by law; (b) when granting access would have a negative impact on another individual's privacy; (c) to protect our rights and property; (d) where the request is frivolous or vexatious, or (e) for other reasons permitted by law.

You may designate an authorized agent to make a request on your behalf. Authorized agents will be required to provide proof of their authority to act on your behalf by providing relevant

documentation. We may contact you to confirm an authorized agent's representation and to verify your identity.

Data Retention

PMUS will retain personal information for as long as needed to comply with its regulatory obligations or applicable laws, including retention periods required under CFTC recordkeeping regulations, which are generally five years. 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.

Transfer of Data

By using the Services, you consent to the transfer of your information to jurisdictions outside your country of residence, which may have data protection rules that are different from those of your country. For example, we may store, process, use, and disclose personal information in the United States. In certain circumstances, courts, law enforcement agencies, regulatory agencies or data protection authorities may be entitled to access your personal information.

Security

PMUS takes precautions to protect the security and confidentiality of your personal information. To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. Please be aware that despite our efforts, no data security measures can guarantee security, and no method of transmission over the Internet or electronic storage is 100% secure. Therefore, we urge you to take adequate precautions to protect your personal information as well. Any transmission of personal information is at your own risk. We are not responsible if you intentionally circumvent any privacy settings or security measures on the Site.

Personal Communication Preferences

If required by law, we will request your consent to send you marketing text messages and phone calls. You may manage your receipt of marketing and non-transactional communications from us by clicking on the "*Unsubscribe*" link located on the bottom of any marketing communication, replying STOP to a marketing text message, or by sending us an email at legal@polymarket.com with the subject line, "*Unsubscribe from Marketing*." Registered users cannot opt out of receiving transactional or administrative emails related to their account. We will use commercially reasonable efforts to process such requests in a timely manner, in compliance with applicable laws. In connection with our use of SMS messaging for marketing purposes, your phone number will not be shared with third parties or affiliates for their marketing or promotional purposes. Any sharing with third parties for any other purpose will not include your phone number and opt-in data, unless permitted or required by applicable law and for the purposes described in this privacy policy, such as fraud detection.

Children's Personal Information

The Services are not directed to minors under 18 years of age, and we do not knowingly collect personal information from minors under the age of 18. If we become aware that we have collected personal information from a minor under the age of 18, we will promptly delete the information, unless we are legally obligated to retain such information. If you believe a minor under the age of 18 may have provided us with personal information, please contact us at legal@polymarket.com.

Participant Specific Disclosures

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.

Changes 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 Site. It is your responsibility to check the Privacy Policy periodically for changes whenever accessing or using the Services.

Contact Information

If you have questions or concerns about this Privacy Policy, please email PMUS at legal@polymarket.com.

State-Specific Privacy Notice

U.S. state laws, including the California Consumer Privacy Act, require us to disclose the following additional information with respect to our privacy practices. If you are a California resident or a resident of a state that requires us to provide certain privacy-related disclosures, this section applies to you in addition to the rest of the privacy policy.

California Shine the Light Disclosure

We will provide information about the types of personal information as defined by California Civil Code § 1798.83 (the "Shine the Light Law") that we may share with or disclose to third parties, other than our affiliates, for their direct marketing purposes. If you are a California resident, you may request information about our compliance with the Shine the Light Law by

contacting us. Any such request must include “Request for California Privacy Information” in the subject line and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through the email address or mailing address referenced above.

Categories of Personal Information that We Collect and Disclose

You can find a list of the categories and examples of personal information that we collect in the “Personal Information Collection” section above. We collect and use personal information for the business or commercial purposes described in the “How PMUS Uses Personal Information” section above.

In the last 12 months, we have disclosed the following categories of personal information to various third-party recipients:

<i>Category of Personal Information</i>	<i>Examples</i>	<i>Purpose of Use</i>	<i>Disclosure</i>	<i>Sold or Shared?</i>
Identifiers	Name, email address, Social Security number, physical address, IP address, device identifiers	Site functionality, analytics, responding to requests, legal obligations (e.g., reporting unfair trading practices), marketing	• Service providers • Government entities and market integrity third-party entities • Affiliates and business partners	Yes
Internet or electronic network activity information	Browsing paths, clicks, session data on the Site, automatically collected information about your use of the Site	Site operation, analytics, Site improvement, compliance with legal obligations, marketing	• Service providers • Government entities and market integrity third-party entities • Affiliates and business partners	Yes

<i>Category of Personal Information</i>	<i>Examples</i>	<i>Purpose of Use</i>	<i>Disclosure</i>	<i>Sold or Shared?</i>
Any personal information described in subdivision (e) of Section 1798.80	Name, Social Security number, government identification cards	Compliance with legal obligations	• Service providers • Government entities and market integrity third-party entities	No
Sensory information (e.g., audio, visual, olfactory information)	Not intentionally collected	N/A	N/A	No
Geolocation	IP-derived country/region, GPS, Wi-Fi, or other location coordinates	Fraud detection, localization, compliance with legal obligations	• Service providers • Government entities and market integrity third-party entities	No
Commercial Information	Services purchased, trades made	Responding to inquiries, requests and customer support, compliance with legal obligations, marketing	• Service providers • Government entities and market integrity third-party entities • Affiliates and business partners	Yes
Biometric Data	Facial imagery from a live selfie and government-issued photo identification	Identity verification, fraud prevention, and	• Service providers • Affiliates and business partners	No

<i>Category of Personal Information</i>	<i>Examples</i>	<i>Purpose of Use</i>	<i>Disclosure</i>	<i>Sold or Shared?</i>
	captured during identity verification and account re-verification, processed by our identity verification service provider	account re-verification		
Health Data	Not intentionally collected	N/A	N/A	No
Sensitive personal information	Social Security number	Compliance with legal requirements	• Service providers • Government entities and market integrity third-party entities	No
Inferences drawn from the categories described above	Not intentionally collected	N/A	N/A	No

Sensitive Personal Information

We only collect sensitive personal information, as defined by applicable privacy laws, for the purposes allowed by law or with your consent. We do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

Rights Available under California Law

For information about the rights that may be available to you under California law and how to exercise those rights, please see the “Your Rights and Choices” section above.

Appeals

Depending on applicable law, you may have the right to appeal our decision to deny your request or a request submitted by an authorized agent on your behalf. To submit an appeal, please contact us.

Notice of Financial Incentives

From time to time, we may offer financial incentives in connection with the collection or use of personal information. The material terms of the financial incentive will generally be presented to you at the time you sign up. You may withdraw from any financial incentive at any time by contacting us. However, if you ask us to withdraw any financial incentive, we may be unable to return previously provided incentives at a later time.