

Privacy Policy

Effective as of July 13, 2017

Virtual QE operates and maintains an online database of consultants that serves as a directory available through the website virtualqe.com ("**virtualqe.com**" or "**Virtual QE**" or "**Virtual QE Database**" or "**Consulting Directory**" or "**Site**"). As used in these terms and conditions, "**Virtual QE**" refers to Virtual QE, LLC and its subsidiaries. We may refer to Virtual QE as "**we**", "**us**", or "**our**". We may refer to you as, "**you**", "**user**" or "**your**". The purpose of this policy is to inform you about the information we collect, how we use and share that information, and the ways in which you can control how we use and share that information. By submitting your information through our Site, you agree to the terms of this policy and you expressly consent to the collection, use, and disclosure of your information in accordance with this policy.

You acknowledge that this Privacy Policy is designed to be read in connection with the [Site Terms and Conditions of Use](#), and that by accessing or using our Site, you agree to be bound by the Site's Terms and Conditions of Use, as well as this Policy.

We reserve the right to change this Privacy Policy from time to time. We may make changes to our privacy policy based on our ongoing review of new technologies, best business practices, and our database users' needs. Please check this page periodically for updates. We will notify you about significant changes in the way we treat personal information by either sending a notice to the primary email address specified in your account, or by placing a prominent notice on our site, and by updating any privacy information on this page. Your continued use of the Site and or Consulting Directory available through this Site after such modifications will constitute your acknowledgment of the modified Policy and your agreement to abide and be bound by that Policy.

1. Types of Information We Collect

In order to better provide you with the services on our Site and Consulting Directory we collect the following types of information:

- a) **Information Provided Directly by You to Us.** We collect information that you provide when you register for and update your Virtual QE account, submit and post information to participate in the recruiting process, enter a sweepstakes or contest sponsored by us or one of our partners, sign up for special offers from selected third parties, send us an email message or a message within the Virtual QE Site, enroll in payment processing services, engage in communication with other users within the Site, engage in customer service communication to resolve issues. Specific types of information that we may collect in this manner include your email address, name, physical address (city, state, and zip code), government-issued identification (i.e. driver's license), employment details (such as employer, job title and department), telephone number, your Virtual QE user account password, user-to-user communications within the Site, and all information that you choose to provide while using the Site and Consulting Directory.
- b) **Other Information Collected During Use of the Site and Consulting Directory.** Anytime you access or use our Site or Consulting Directory, we may automatically collect the following information about you:
 - i. *Device Information.* Information that we collect regarding your computer or mobile device used to access the Site or Consulting Directory, which may include device identifiers, model, operating system, version, and mobile network.
 - ii. *Log and Aggregate Information.* We collect information that is logged during your use of the Site. Aggregate information is information that does not by itself identify a specific individual. We gather certain information about you based upon your use of the Site, and what other sites may have directed you to us. This information, which is collected in a variety of different ways, is compiled and analyzed on both a personal and an aggregated basis. This information may include the Website's Uniform Resource Locator ("URL") that points to the site you just came from, which URL you go to after visiting our Site, what browser you are using, and

your Internet Protocol ("IP") address, time of access, pages viewed, the last page visited prior to accessing the Site, and browser type.

- iii. *Location.* When you access the Site we may collect location information from your computer or mobile device.
- iv. *Payment Information Collected by Stripe and PayPal.* The Site is integrated with Stripe and PayPal to collect payments from users. Both Stripe and PayPal provide payment services directly to users in accordance with their own respective privacy policy and terms. When users sign up for electronic payment services, payment information is collected directly by Stripe and PayPal, not. Examples of payment information that may be collected include debit or credit card numbers, government issued identification details, bank account information, or Social Security numbers.
- v. *Payment Information for Electronic Funds Transfer (EFT).* You may authorize Virtual QE to initiate electronic fund transfers between your account and our account. These transfers may be a one-time occurrence or may recur as directed by you. These transfers may use the Automated Clearing House (ACH) or other payment networks. When users sign up for EFT payments, users will be asked to provide their account number and financial institution information.
- vi. *Information from Tracking Technologies: Cookies and Web Beacons.* A cookie is a small data text file which is stored on your computer that uniquely identifies your browser. We use cookies to improve the user experience within the Site, and may use cookies to perform tasks such as monitoring aggregate site usage metrics, storing and remembering your passwords (if you allow us to do so), storing account and advertising preferences that you have set, and personalizing the Services we make available to you. Most browsers are initially set up to accept cookies, but you can reset your browser (on your computer or mobile device) to refuse all cookies or to indicate when a cookie is being sent. However, some aspects of the Site may not function properly if you elect to disable cookies. We may also use beacons or other technologies to better tailor the Site and Consulting Directory to provide better customer service. If these technologies are in use, when a visitor accesses the Site, a non-identifiable notice of that visit is generated which may be processed by Virtual QE or by its suppliers. Beacons usually work in conjunction with cookies. If you do not want cookie information to be associated with your access to the Site, you can set your browser to turn off cookies; however, Web beacon and other technologies will still detect visits to certain areas, but the notices they generate cannot be associated with other non-identifiable cookie information and are disregarded.
- vii. *Information from Third Parties.* We may obtain information from other sources in our efforts to improve user experience on the Site and Consulting Directory. We may receive reports of aggregate information from our advertising partners indicating the number of ads presented and clicked on. We may also obtain customer tracking metrics, which may include but are not limited to: last session, last transaction, amount of each transaction, time spent in Site, searches, and screens accessed. In addition, we may receive customer behavior metrics, which may include, but are not limited to: preferences, interests, or contacts with other users. Another possible occurrence is that we may receive payment transaction information from Stripe and PayPal, such as amount and time of transaction.

2. How We Use Information We Collect

We use collected information to provide service offerings to you and to enhance the operation of the Site. We may use information for a number of purposes, including to:

- i. Permit you to login and access the Site or Consulting Directory;
- ii. Personalize the Site's user experience for you, including content, layout, services;
- iii. Troubleshoot user technical issues, investigate disputes, resolve customer service matters, and diagnose other issues related to servers or software;
- iv. To deliver information to you and to contact you regarding administrative notices;
- v. Assist our third-party payment processors in fraud protection, and resolving errors or issues;

- vi. Assist our third-party service providers that help provide career industry information services;
- vii. Implement security and data protection measures within the Site to implement our anonymity feature, to protect your personal information and to facilitate a safe environment for secure transactions;
- viii. Statistically analyze Site use and conduct user research to enhance overall user experience and optimize performance of the Site and Consulting Directory;
- ix. Provide tailored marketing and promotional offerings from Virtual QE and other third parties, based on profile and interests; and to improve our internal marketing and promotional efforts; and
- x. Provide updates, notices, and alerts related to operation of the Site and Consulting Directory, security, and to enforce our agreements with you, including our Terms and Conditions of Use and this Privacy Policy.

In addition to these specific operational uses, we will generally use information that we collect to perform any other purpose for which the information was collected. If circumstances arise, we will also use information to comply with applicable legal, regulatory, or document retention requirements.

We will retain and use your Registration Data and the other information we collect about you for as long as your account is active or as needed to provide you access to the Directory. We will retain and use this information for the purposes for which it was collected (as specified in this policy or as VirtualQE discloses to its users outside of this policy), including, to providing Directory access to you, complying with our legal obligations, resolving disputes, and enforcing our agreements.

Virtual QE is located in the United States, in the state of Florida. Accordingly, the information that we collect is governed by U.S. law (and specifically Florida law, to the fullest extent). By accessing or using our Site (or providing information to us by any other method), you consent to the processing and the transference of information in and to the United States and other countries, where you may not have the same rights and protections that you do under local law.

3. How We Share Information

Sharing of Anonymized, Non-Personally Identifiable Data or Aggregated Data: We may share anonymized and non-personally identifiable data we receive or collect, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access the Service, with affiliates, service providers, partners and other third parties ("Service Partners"). We share such information for a variety of reasons, such as to analyze Site and Directory usage, improve the user experience, or for other similar purposes. The use and disclosure of such anonymized, non-personally identifiable, or aggregated information is not subject to any restrictions under this policy.

Sharing of Device Data: We may share information from devices you use to access the Site and Directory with our third-party vendors or service providers, manufacturing or distribution partners. We share this information for a variety of purposes such as tracking advertising conversion events, estimating the number of unique users, security and fraud detection, and debugging problems with the Site.

Profile Visibility: When you register for the Virtual QE Directory, the profiles of users that are consultants will only be visible to users that are recruiters – not to other consultants. Similarly, the profiles of recruiters will not be visible to other users that are recruiters. We provide you with the ability to change the degree of visibility of your profile.

Operations with Service Partners: We do provide some of our service offerings through contractual arrangements made with Service Partners. We and our Service Partners may need to use some of your information in order to perform tasks between our respective sites, or to deliver services to you. For example, we must release your credit card information payment information to confirm EFT payments for products and services purchased on this Site; and provide order information to third parties that help us provide customer service. For payment processing, Stripe and PayPal collect information directly from users, and will use this information in accordance with the [Stripe privacy policy](#) and [PayPal privacy policy](#), in order to provide payment processing and possibly fraud protection services.

We will encourage our Service Partners to adopt and promote strong privacy policies. However, the use of your information by our Service Partners is governed by the respective privacy policies of those providers, and is not subject to our control. Except as otherwise discussed in this Privacy Policy, this document only addresses the use and disclosure of

information we collect from you. Other Sites accessible through this Site, including our Advertising and Service Partners, have their own privacy policies and data collection, use and disclosure practices. Please consult each Site's privacy policy. We are not responsible for the policies or practices of third parties.

Investigations, Legal and Law Enforcement: Occasionally we may be required by law enforcement or judicial authorities to provide information to the appropriate authorities. In such cases, we will disclose information upon receipt of a court order, subpoena, or to cooperate with a law enforcement investigation. We fully cooperate with law enforcement agencies in identifying those who use our services for illegal activities. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.

4. User Choices on Collection and Use of Information

Modification of Your Registration Data: We provide you with the ability to modify your Registration Data, which you may do through the Settings section of our Site or by contacting us. We generally respond to email requests within 24 hours of receiving a request, but it may take up to 7 business days depending on the volume of requests we receive.

Opt out of Certain Communications. We may, from time to time, send you email regarding new products and services that we feel may interest you. In addition, if you indicated upon registration that you are interested in receiving offers or information from us and our partners, we may occasionally call or send you direct mail about products and services that may be of interest to you. Only Company (or agents working on behalf of Company and under confidentiality agreements) will send you these solicitations, and only if you have previously indicated that you wish to receive them. If you do not want to receive solicitations from us, you can "opt-out" by accessing your account online editing your account information to no longer receive such offers and mailings.

Option to Disable Cookies. You also have choices with respect to cookies, as described above. By modifying your browser preferences, you have the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to reject all cookies some parts of our Site may not work properly in your case.

Cancellation, Deactivation of Account, or Removal of Information: If you would like to request removal from the Directory and the cancellation or deactivation of your account, you should contact us for assistance. Cancellation or deactivation of your account does not ensure complete or comprehensive removal of the content or information, or reverse the previous retrieval and viewing of information by other Directory users while you were a registered user. If at any time you receive information that leads you to believe that a profile in the Directory is fake or otherwise unauthorized, you should contact us.

We encourage you to promptly update your information if it changes. You may ask to have the information on your account deleted or removed; however, some information, such as past transactions, logs of technical support calls, or other information may not be deleted. In addition, it may be impossible to completely delete your information without some residual information because of backups.

5. Information Security

Virtual QE takes reasonable measures, consistent with current industry standards, to protect against unauthorized access, unauthorized alteration, disclosure, misuse, misappropriation, loss, theft, or destruction of your information.

In addition to our information security measures, information displayed on profiles is anonymized and not associated with the name of consultants.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) the security, integrity and privacy of any and all information and data exchanged between you and us through this Site cannot be guaranteed.

6. Miscellaneous

Policies Concerning Minors. Virtual QE prohibits registration by anyone under the age of 18 years of age. Our policy is that we do not knowingly collect, use or disclose personally identifying information about minor visitors. In the event we obtain actual knowledge that we have collected information from minors, we will take measures to remove such information from our servers. If you believe that we might have any personal information from a minor, please contact us.

Effect of Voluntary Public Disclosures. You should also be aware that when Personally Identifiable Information is voluntarily disclosed (i.e. your name, email address, etc.) in public areas on this Site, that information, along with any information disclosed in your communication, can be collected and used by third parties and may result in unsolicited messages (including unwanted spam messages) from third parties. Such activities are beyond our control and this Policy does not apply to such information. Please consult our Site [Terms and Conditions of Use](#) for our Site conduct policies.

Contact Us. If you have any questions regarding this privacy policy, or the privacy practices of VirtualQE, contact us for more information, at info@virtualqe.com.