

# ZOOM PRIVACY POLICY

This Privacy Policy constitutes an agreement between **ZOOM** ("**Company**" or "**us**" or "**we**" or "**our**" or "**ZOOM**") and you or the entity you represent ("**you**"). Please read this document carefully to be sure that you understand it. By viewing, accessing or using the Company website or by registering to take part in the token sale and the further activities of the Company, you agree to this Privacy Policy as a binding legal agreement between you and us, without limitation or qualification.

Privacy is of utmost importance at our company. We recognize the significance of protecting information which is stored on our computers or is intended to be stored on our computers and which relates to an individual. The data we protect is the "Personal Data" which is any information relating to an identified or identifiable person, sometimes called a data subject, and have made protecting privacy and the confidentiality of Personal Data a fundamental component of the way we do business. This Privacy Policy informs you of the ways we ensure privacy and the confidentiality of Personal Data. We are compliant with applicable privacy laws in the countries in which we operate. This policy describes the information we gather, how we may use those Personal Data and the circumstances under which we may disclose such information to third parties.

If you cannot, or will not, provide us with the personal information we reasonably require, we may be unable to provide you with the information, goods or services you have requested. Our company that is the controller for the processing of your Personal Data as set out in this Privacy Policy and your rights and obligations will depend on which products, services and or activities you are interested in or have engaged with. Being the controller means that this company is responsible for ensuring that your Personal Data is processed in compliance with applicable privacy and data protection legislation.

Any information stored on Company's platform is treated as confidential. All information is stored securely and is accessed by authorized personnel only. Company implements and maintains appropriate technical, security and organisational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

## 1. Personal Data

- 1.1. The Company may collect personally identifiable information, which includes, but is not limited to, your name, email address, phone number, entity name, physical address, date of birth, government-issued photo identification or other identification, account numbers, gender, nationality, country of residence and cryptocurrency addresses. If you purchase the Company's products, services and/or participate in the Company's activities with fiat, we collect billing and credit card information. This information is solely used to complete the purchase transaction. The Company may also collect anonymous demographic information, which is not unique to you, included but not limited to your age, gender, household income, political affiliation, race, religion, and business information. We may gather additional personal or non-personal information in the future.
- 1.2. Information about your computer hardware and software may be automatically collected by the Company. This information can include, but is not limited to: your IP address, browser type, browser language, files accessed, pages viewed, errors generated, time zone, hardware model, operating system, domain name, device identifiers, mobile network information, device location, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Company websites .

- 1.3. Information that is communicated through the Company's websites is automatically collected. Please keep in mind that if you directly disclose identifiable information or personally sensitive data through the Company's public message boards, including but not limited to the Telegram group chat, this information may be collected and used by others.

## **2. Website Visitors**

- 2.1. If you are a Visitor to our website only, and not a user of our platform (yet), then this section is relevant for you. By visiting this website, you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, please do not visit this website. If required by applicable law, we will seek your explicit consent to process Personal Data collected on this website or volunteered by you. Kindly note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this website may not be possible.
- 2.2. Company may collect, record and analyze information of Visitors to its website. We may record your IP address and use cookies. Company may add information collected by way of pageview activity. Furthermore, Company may collect and process any Personal Data that you volunteer to us in our website's forms, such as when you register for events or sign up for information and newsletters. If you provide Company with your social media details, Company may retrieve publicly available information about you from social media.
- 2.3. Such Personal Data may comprise your IP address, first and last name, your postal and email address, your telephone number, your job title, data for social networks, your areas of interest, interest in Company products, and certain information about the company you are working for (company name and address), as well as information as to the type of relationship that exists between Company and yourself.
- 2.4. Company uses the collected data to communicate with Visitors, to customize content for Visitors, to show ads on other websites to Visitors, and to improve its website by analyzing how Visitors navigate its website.
- 2.5. Company may also share such information with service vendors or contractors in order to provide a requested service or transaction or in order to analyze the Visitor behavior on its website.

## **3. Cookies**

- 3.1. The Company affiliated websites may use temporary and permanent "cookies" to help you personalize and enhance your online experience of the Company's Services. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.
- 3.2. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize the Company's pages, or register with the Company site or services, a cookie helps the Company to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same website or app of the Company, the information you previously provided can be retrieved, so you can easily use the the Company's features that you customized.
- 3.3. Temporary cookies will be removed from your computer each time you close your browser. The Company's affiliated websites may store a permanent cookie in your

computer or mobile device so that you will not be required to sign-in by providing complete login information each time you return to our websites .

- 3.4. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Company's Services or websites you visit. The Company tie cookie information to your email address when you elect to remain logged in so as to maintain and recall your preferences within the website.
- 3.5. Technologies such as cookies, beacons, tags and scripts are used by the Company and our third party partners, affiliates, and/or service providers to analyze trends, administer the websites and/, track users' movements around the sites, provide advertising based upon browsing activities and interests and to gather demographic information about our user base as a whole. The Company and third parties with whom we partner to provide certain features on our websites or to display advertising based upon your Web browsing activity use Local Storage Objects (LSOs) such as HTML5 to collect and store content information and preferences. Various browsers may offer their own management tools for removing HTML5 LSOs.

#### **4. External Links**

- 4.1. Some pages of the Company's websites may contain external links. We encourage you to review the privacy statements of websites you choose to link to from the Company so that you can understand how those websites collect, use and share your information. We are not responsible for the privacy statements or other content on websites outside of the Company websites. We encourage you not to provide personal information, without assuring yourselves of the Privacy Policy Statement of other websites. This includes the usage of the Telegram group chat and other message boards, emails and blog posts that may contain external links.

#### **5. Use of your Personal Information**

- 5.1. The Company collects and uses your personal information to operate the Company's websites and deliver the services you have requested.
- 5.2. The Company may also use your personally identifiable information to inform you of other products or services available from the Company and its affiliates. The Company may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.
- 5.3. The Company may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (email, name, address, telephone number) is transferred to the third party.
- 5.4. The Company may share data and personal information with our trusted third party partners, resellers, service providers and business partners to help provide the Company's Services. The purpose for which the Company may disclose your personal information or data to our trusted third parties may include, but are not limited to, data storage, database management, web analytics, payment processing, statistical analysis, as well as Know-Your-Customer procedures and sending you email or postal mail or providing customer support. All such third parties are prohibited from using your personal information except to provide these services to the Company, and they are required to maintain the confidentiality and security of your personal information and comply with this Privacy Policy.

- 5.5. The Company may share generic aggregated demographic information not linked to any personal information regarding visitors and users with our business partners, advertisers, and other affiliated third parties.
- 5.6. Usage details such as time, frequency, duration and pattern of use, features used and the amount of storage used will be recorded by the Company in order to enhance user experience of the the Company's websites and services and to help provide users the best possible service.
- 5.7. The Company may keep track of the websites, apps and pages our users visit within the Company, in order to determine what the Company's services are the most popular. This data is used to deliver customized content and advertising within the Company to customers whose behavior indicates that they are interested in a particular subject area.
- 5.8. The Company will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on the Company or the sites; (b) protect and defend the rights or property of the Company; (c) investigate any suspected illegal activity or potential violation of the Company's Services terms and conditions and, (d) act under exigent circumstances to protect the personal safety of users of the Company, or the public.

## **6. User Account Contents**

- 6.1. The Company store and maintain files, documents, emails and other data stored in your user account. In order to prevent loss of data due to errors or system failures, the Company keep backup copies of data including the contents of your user account. Files and data may remain on our servers after user account deletion or termination. The Company may retain any customer data, personal information and any other data as necessary to comply with legal obligations, resolve disputes, and enforce company rights. The Company assure the contents of user accounts will not be disclosed to anyone and will not be accessible to the Company's employees except in circumstances specifically mentioned in this Privacy Policy and the Company's Terms of Service. The Company does not scan the contents of user accounts for serving targeted advertisements.

## **7. Processing Data in various jurisdictions**

- 7.1. For users with accounts located in Company's European Data Region, all processing of Personal Data is performed in accordance with privacy rights and regulations following the EU Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 (the Directive), and the implementations of the Directive in local legislation. From May 25th, 2018, the Directive and local legislation based on the Directive will be replaced by the Regulations (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation (GDPR), and Company's processing will take place in accordance with the GDPR.
- 7.2. For users with accounts in the Company US Data Region, Company processes data solely in data centers located in the US. Company has adopted reasonable physical, technical and organizational safeguards which substantially mirror the EU safeguards against accidental, unauthorized or unlawful destruction, loss, alteration, disclosure, access, use or processing of the user's data in Company's possession. Company will promptly notify the ser in the event of any known unauthorized access to, or use of, the

user's data. Company's contract with its hosting provider ensures that all hosting is performed in accordance with the highest security regulations. Company's policy is to protect and safeguard any personal information obtained by Company in accordance with United States state or federal laws governing the protection of personal information and data. Accordingly, Company adheres to practices and policies that aim to safeguard the data.

- 7.3. For users with accounts in the Company Canada Data Region, Company processes data solely in data centers located in Canada. Company has adopted reasonable physical, technical and organizational safeguards which substantially mirror the EU safeguards against accidental, unauthorized or unlawful destruction, loss, alteration, disclosure, access, use or processing of the users data in Company's possession. Company will promptly notify the user in the event of any known unauthorized access to, or use of, the user's data. Company's contract with its hosting provider ensures that all hosting is performed in accordance with the highest security regulations. Company's policy is to protect and safeguard any personal information obtained by Company in accordance with Canadian laws governing the protection of personal information and data. Accordingly, Company adheres to practices and policies that aim to safeguard the data.
- 7.4. For users with accounts in our Asian Pacific Data Region, Company processes data solely in data centers located in Singapore. Company has adopted reasonable physical, technical and organizational safeguards which substantially mirror the EU safeguards against accidental, unauthorized or unlawful destruction, loss, alteration, disclosure, access, use or processing of the users data in Company's possession. Company will promptly notify the User in the event of any known unauthorized access to, or use of, the User's data. Company's contract with its hosting provider ensures that all hosting is performed in accordance with the highest security regulations. Accordingly, Company adheres to practices and policies that aim to safeguard the data.

## **8. Accessing, Updating and Removing Personal Information.**

- 8.1. Upon request, the Company will provide you with information about whether we hold any of your personal information. Users who wish to correct, update or remove any personal information including those from a public forum, directory or testimonial on our site may do so either by accessing their user account or by contacting the Company.

## **9. Retention and deletion**

- 9.1. Company will not retain data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations. For Respondent data, Company's users have control of the purpose for collecting data, and the duration for which the Personal Data may be kept. For Respondent data, Users with an active account will therefore have the responsibility to delete data when required. When users' accounts are terminated or expired, all Personal Data collected through the platform will be deleted, as required by applicable law.

## **10. Acceptance of these Conditions**

- 10.1. We assume that all Visitors of our website, Respondents to surveys powered by Company and users Company's platform have carefully read this document and agree to its contents. If someone does not agree with this privacy policy, they should refrain from using our website and platform. We reserve the right to change our privacy policy as necessity dictates. Continued use of the website and platform after having been informed of any such changes to these conditions implies acceptance of the revised privacy policy. This privacy policy is an integral part of Company's terms of use.

## **11. Withdrawal of Consent**

11.1. Except as required or enabled by law (including, for the avoidance of doubt, the laws of the member states of the European Union we have mentioned above), we will not use or disclose your Personal Data for any purpose for which you refuse consent or later withdraw your consent. If you withdraw consent, you agree that in spite of this withdrawal, we may continue to use those Personal Data previously provided to us to the extent that we are contractually or otherwise legally obliged to do so and to the extent necessary to enforce any contractual obligation you may have towards Company or in any other way permitted by law. You also understand that although you can use our site for some purposes without providing Personal Data, we need certain Personal Data, including data linked to payment or involving an ongoing relationship with Company or our partners. If you refuse to provide us with Personal Data we require or later withdraw your consent, we may no longer be able to provide you with certain services.

## **12. Our Legal Obligation to Disclose Personal Information**

12.1. We will reveal a user's personal information without his/her prior permission only when we have reason to believe that the disclosure of this information is required to establish the identity of, to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property belonging to Company or to others who could be harmed by the user's activities or of persons who could (deliberately or otherwise) transgress upon these rights and property. We are permitted to disclose personal information when we have good reason to believe that this is legally required.

## **13. Children Under Thirteen**

13.1. The Company does not knowingly collect personally identifiable information from children under the age of thirteen. If you are under the age of thirteen, you must ask your parent or guardian for permission to use this website.

## **14. Updates and changes**

14.1. Our Privacy Policy may change from time to time. We will not significantly reduce your rights under this Privacy Policy without informing you. We will post any Privacy Policy changes on this page and, prior to implementing such changes, we will provide a more prominent notice. Where required by law, we will seek your prior consent to any change.

## **15. Contact us**

15.1. If you have any further questions regarding the data we collect, or how we use it, then please feel free to contact us at the address or email address designated at the bottom of the website.