

## PRIVACY POLICY

The following Privacy Policy describes the manner in which Zironex LLC (hereinafter Zironex LLC or us), collects, preserves and discloses information obtained from its Users (both individually and collectively considered, "User") through the website [www.zironex.io](http://www.zironex.io) ("web site" or "platform") or by any of the applications through which the Zironex LLC Services are provided.

By accessing or making use of any of the services offered by Zironex LLC through our website or by any other application, you expressly acknowledge having had access to this privacy policy, knowing its contents and, consequently, accept the manner and form in which the information provided by you is processed by us.

This privacy policy may change without prior notice in order to adapt it to new regulations or technological advances, as well as for any other cause from which the need to modify it may arise. These changes will be published directly on the website, indicating in the header the date of its last update, being from that moment applicable the new version that will repeal the previous one.

We recommend that you review the Privacy Policy each time you access our Services or interact with us to stay informed about our information processing practices and the ways in which we protect your information.

Please note that this Policy does not cover the information Zironex LLC receives about you from other sources or channels external to this company.

### 1.- WHAT INFORMATION WE COLLECT:

1.1.- Information that you provide to us: It refers mainly to personal information and any other information that you provide to us through different channels, including, but not limited to when you create your account, use our services, or when you upload some documentation or request a new service. The type of information collected includes, but is not limited to your first and last name, email, bank accounts, postal address, ID number, as well as any other information that you may provide us or that we may require for the proper compliance of the

applicable regulations and, in particular, those related to the Prevention of Money Laundering, Terrorist Financing and fraud prevention policies.

1.2.- Information obtained automatically when you access or use our services: from the moment you access or use our services, we automatically collect information about you, all in order to give and improve the quality of our service and, likewise, to be able to comply with current regulations and, above all, with those related to the Prevention of Money Laundering, Financing of Terrorism and fraud prevention policies. Such information includes, but is not limited to:

- Information related to the uses of our services: for example: the browser you use to access our website, the times that your accesses last, the pages you visit, your IP address and the page you visited before accessing our services.

- Information regarding the device (computer or mobile device) from which you access our services: such as: the hardware model, the operating system and the version, the unique identifiers of the device and the information of the mobile network.

- Information regarding the Exchange / exchange transactions that you make through our website: for example: the amount of virtual currency associated with an exchange transaction, the types of exchange executed and other transaction information.

1.3.- Information collected through cookies or other tracking technologies: We and / or our service providers may use various technologies to collect information, including cookies and web beacons or web beacons:

Cookies are data files that are downloaded automatically and stored on the hard drive of the user's computer or in the memory of your device when browsing a specific Internet page, which allow the Internet server to remember some information about the actions and preferences of a user (such as login, language, display preferences, name and password, etc.) for a certain period of time, so

that the user does not have to enter them again on the website each time they want to navigate in this one or on another web page.

They help us to improve our Services and the users experience, see what areas and features of our Services are popular and count visits, manage the account registration process, remember the preferences of your site, retain certain information to process orders for transactions exchange and retain information to provide support.

In most browsers cookies are automatically accepted by virtue of their default settings, however the user can adjust their browser preferences to accept or reject cookies. Disabling cookies may disable various functions of the website/API or may cause them not to display correctly.

Web beacons are electronic images inserted in an Internet page or e-mail, which can be used in our Services or e-mails and help us, among other things, store information about the user's IP address, duration of interaction time on the page, count visits, etc.

For further information about cookies and how to disable them, see our Cookies Policy [www.zironex.io/legal/cookies-privacy.pdf](http://www.zironex.io/legal/cookies-privacy.pdf).

1.4.- Information collected from other sources or channels: these are the cases in which information is obtained through other sources or channels, to contrast it with the one you have provided and verify its authenticity and truthfulness. For example: We may collect information about you from third parties, including, among others, social media platforms and publicly available sources.

2.- WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR DATA: The person responsible for the processing of your data is Zironex LLC (Zironex), which is the owner of the website [www.zironex.io](http://www.zironex.io) and the commercial name and trademark Zironex .

The address of said merchant is located in Marjanishvili Street 4 Space 19 Floor 1, Didube District, Tbilisi Georgia, Company Number: 402082287.

Contact information is: info@zironex.io

### 3.- WHAT YOUR INFORMATION IS USED FOR:

3.1.- We use your information to analyze, process, manage, improve and personalize our services and respond to the demands of our users, so that they can enjoy our services in a safe and adequate way to their needs and expectations, and keep and adequate communication. Thus, we can use your personal information among other things to: Facilitate the creation and secure your account; Send you administrative notifications, such as activity of your account, transactions made or their processing, maintenance notices, etc.; Identify, prevent and report potentially suspicious, fraudulent or illegal activities from your account; Notify you of important changes to our terms; answer your questions; Provide a better management of our services and website; Process payments, etc.

3.2.- It can also be used for additional purposes, such as the sending of notices, notices, promotional messages or communications for marketing purposes or advertising or telemarketing on new or existing products and services, whether they are their own or from commercial partners; conduct surveys; statistics; market studies, records on consumer habits through automatic data capture tools, interests and behaviors.

If you do not want your information to be used for these additional purposes, you can oppose it through the means at your disposal to exercise your ARCO rights, as will be explained below.

3.3.- The information collected is also used to comply with the regulations in force and, especially, everything related to the Prevention of Money Laundering, Financing of Terrorism and Fraud Prevention, for which it may be assigned, where appropriate, to the Compliance Officer, whether physical or legal person, with whom Zironex LLC has hired the provision of the service.

### 4.- HOW WE SHARE AND STORE YOUR INFORMATION:

4.1- The data that you provide us or that we obtain, either now or in the future, as a result of our business relationship, will be incorporated into a file whose responsible party, as stated above, will be the commercial Zironex LLC, which is based Marjanishvili Street 4 Space 19 Floor 1, Didube District, Tbilisi Georgia

4.2.- Your personal data may be transferred and processed inside and outside the country by persons other than Zironex LLC. In this way, your information can be shared with the following recipients (natural or legal persons with whom the personal information is shared):

- External services providers or other entities with which Zironex LLC contracts to provide its services, improve the quality of the service, perform quality controls, facilitate account creation, comply with applicable regulations and, in particular, to those relative to money laundry, terrorits financing and fraud prevention, etc. The agreements signed with the data recipients will necessarily include the obligation of these to maintain the confidentiality of the personal data provided and to respect the content of this privacy policy, as well as any regulations on the protection of personal data applicable, both to Zironex LLC and to the data recipient.

- Any company affiliated to Zironex LLC , belonging to the same business group or its subsidiaries, with the same data processing purposes set forth in this Notice.

- Government or judicial authorities as required by law, a court order or be necessary for the defense, investigation claim or take legal action against illegal activities or against those that are suspected of being so, enforce our terms and conditions or protect the rights of Zironex LLC , its users or the general public.

4.3.- Some or all of your personal data may also be shared on the occasion of or during the negotiation of any merger, financing, acquisition or dissolution transaction or proceeding related to the sale, transfer, divestment or disclosure of all or part of our business or assets. In case of insolvency, bankruptcy or judicial administration, personal data can also be transferred as a commercial asset. If another company acquires our company, our business or our assets, that company will own the Personal Data we collect and will assume the rights and obligations with respect to your Personal Data as described in this Privacy Policy.

4.4.- At the same time, this information may be sent for marketing, advertising or commercial prospection purposes.

4.5.- Zironex LLC may contain links to other third party websites that are regulated by their own privacy policies. Zironex LLC is not responsible for the privacy policies of these third-party websites, even if they are accessed through the links on our site.

#### 5.- HOW WE PROTECT YOUR INFORMATION:

Zironex LLC informs you that they have implemented the security measures of technical and organizational nature necessary to ensure the security of your personal data and prevent their alteration, loss and treatment and / or unauthorized access, taking into account the state of the technology, the nature of the stored data and the risks to which they are exposed, whether they come from human action or from the physical, technical or natural environment.

#### 6.- PROCEDURE TO EXERCISE ARCO RIGHTS AND REVOCATION OF CONSENT:

You, the data Holder, have the right at any time to know what personal data we have about you, what they are used for and the conditions of use we give to them (Access). At the same time, it is your right to request the correction of your personal information in case it is outdated, inaccurate or incomplete (Rectification); that we remove it from our records or databases when you it is considered that it is not being used in accordance with the principles, duties and obligations set forth in the regulations (Cancellation); as well as oppose the use of your personal data for specific purposes (Opposition). These rights are known as ARCO.

To exercise any of the ARCO rights, you must submit the respective application in which you must include the following information and documentation, sending it to the contact email or contact customer service indicated below:

- Name of the Holder and address or other means to communicate the response to your request;
  
- The valid documents that prove your identity (notarized or electronic notarized statement of your ID or passport);
  
- Clear and precise description of the data with respect to which it seeks to exercise any of the ARCO rights, and
  
- Any other element or document that facilitates the location of the Holder's personal data.

In case of requests for rectification of personal data, the Holder must also indicate the modifications that must be made and provide the documentation supporting their request. In order to comply with the obligation to give the Holder access to their personal data, prior to this, the identity of the Holder must be accredited, after which the information will be available to them at the responsible party's address. There might be another means for the latter agreed between the Holder and the Responsible, provided that the information requested permits so.

The contact details of the department that will process applications for the exercise of ARCO rights, as well as address any questions you may have regarding the processing of your information are the following:

Zironex's Department of Protection of Personal Data

Address: Marjanishvili Street 4 Space 19 Floor 1, Didube District, Tbilisi Georgia

Company Number: 402082287 (COMPANIES REGISTRATION OFFICE –CRO-).

Email: [info@zironex.io](mailto:info@zironex.io)