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1. INTRODUCTION

The following Privacy Policy describes the way in which **LESCOVEX, S.R.L.** (hereinafter “**Lescovex**” or “us”, which refers not only to the company but also to its shareholders, directors, employees, investors or other related parties), collects, processes, preserves and uses the Personal Data obtained from you (“User” or “Customer”) either through the website www.zironex.io (“website” or “platform”) or through any of the applications by which **Lescovex**’s Services might be provided.

By “Personal Data” we are referring to any information by which we can identify you directly or indirectly or by which we can contact you, such as name, address, email, trading information, etc. This privacy policy covers all the personal data that you voluntarily provide us with and the data we obtain from any of our partners or public sources. Information by means of which the customer cannot be identified will not be considered Personal Data.

This privacy policy may change without prior notice in order to adapt it to new regulations or technological advances, as well as due to any other cause which may create a need to modify it. These changes will be published directly on the website, indicating in the header of the privacy policy the date of its last update, being from that moment applicable the new version that will repeal the previous one. When required by law, we will send you the new version so that you can be aware of the modifications introduced.

2. WHAT PERSONAL DATA WE COLLECT AND HOW WE DO IT

To provide our services we need to obtain some personal information and documentation from you, as required by law (i.e. to create an account, make a transaction, add a payment method, etc.). If you do not provide us with that information and documentation we will not be able to allow you to use our services. When the information required is not asked for to comply with any legal obligation, we will ask you for permission before getting this information (i.e. when subscribing to get marketing and any other advertising communications). We collect the following personal data, among others:

- A. Information that you provide us with:** We collect Personal Data that you directly provide us with when you create and verify your **ZIRONEX** account, carry out a transaction on our platform or use any other of the Services provided by **ZIRONEX**. This data includes:
 - Personal Identification information: first and last names, date of birth, home address, email, city, nationality, phone number, etc.;
 - Usage data: username and password, authentication data, security questions, information provided to **ZIRONEX** support team, etc.;
 - Formal identification information and documentation: ID or Passport pictures, audio and video recordings, pictures taken during the audio and video recordings, pictures uploaded by users, etc.;
 - Financial information: bank account numbers and statements, incomes, trading information, etc.;
 - Residence verification: postal delivery, utility bills, etc.;
 - Employment information: Office location, wages, employment contract, job title, occupation, etc.
- B. Information obtained automatically when you access or use our services:** When you access or use our services, we automatically collect information related to your device, computer or browser, such as the name and type of the browser you use, computer and mobile device, IP address, operating system, website usage information, etc.

Information collected through cookies: We use our own cookies on our website to collect some information about our users in order to ensure the effectiveness our Website and platform and to manage them.

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 website, which allow the Internet server to remember certain 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 each time he or she wants to navigate on the website.

We use Cookies to help us recognize you as a customer, manage the account registration process, remember the preferences of your site, collect information about your use of **ZIRONEX** services so as to better customize our services and content for you, process your transactions in the exchange, and collect information about your computer or other access devices so as to ensure our compliance with our AML & CFT obligations, as well as to ensure that your account security has not been compromised by detecting irregular or suspicious account activities.

We only use our own cookies. In particular, we use both **session cookies and persistent cookies**. Session cookies expire when you log out. Persistent cookies remain on your computer or mobile device until deleted or until they expire. Some examples of this information would be: language, username, password, orders on the exchange platform, purchases, sales, IP, etc.

In most browsers, cookies are automatically accepted by virtue of their default settings. However, the user can adjust his or her browser preferences in order to accept or reject cookies. You can disable the use of our cookies, but it will interfere with the use and functionalities of our Exchange Services.

You can disable or delete cookies which have already been stored on your computer by accessing the tools provided to that effect by your browser. Further information can be obtained through the following links:

Firefox:

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Internet Explorer:

<http://support.microsoft.com/ph/807/es-es>

Safari:

http://support.apple.com/kb/HT1677?viewlocale=es_ES

Chrome:

<https://support.google.com/accounts/answer/32050?co=GENIE.Platform%3DDesktop&hl=en>

For further information about cookies and how to disable them, see our **Cookies Policy**

www.zironex.io/legal/cookies-privacy.pdf

- C. **Information collected from other sources or channels:** We may also collect information obtained through other publicly available sources or channels, so that we can check the information you have provided us with and verify its authenticity and truthfulness. For example: we may collect information about users from third parties, including, among others, social networks or official registers, etc.

3. WHO IS RESPONSIBLE (CONTROLLER) FOR THE PROCESSING OF YOUR PERSONALDATA

The person responsible for the processing of your data (hereinafter “controller”) is **LESCOVEX, S.R.L.**, which is the owner of the website www.zironex.io and of the commercial name and trademark ZIRONEX.

The address of the aforesaid company is located in Sat Hinchiriș, Comuna Lazuri de Beiuș, Nr. 126A, Judet Bihor. Company Number: B-3457082.

Email contact: support@zironex.io

4. HOW WE USE YOUR PERSONAL DATA

- A. To verify a customer's identity:** As required by the enforceable law, we collect and use your personal information to identify you in accordance with the Romanian Federal Act on Combating Money Laundering and Terrorism Financing (AMLA) and our Manual for the Prevention of Money Laundering and Countering the Financing of Terrorism (AML and CFT policy), as well as all the European regulation related to the Prevention of Money Laundering and Countering the Financing of Terrorism. The procedure to do so is set out in our AML and CFT policy, which is based mainly on the Romanian Financial Market Supervisory Circular.

We may also share your information with financial institutions, especially the FINMA, or any other government or judicial authorities, when we are required to do so and when we have any suspicions about the activity you are carrying out on our platform.

- B. To provide our services and to process transactions:** We will use your personal data to provide you with ZIRONEX Services and to carry out all the transactions you do on the Exchange platform. To comply with the AMLA and the AML and CFT policy, we will perform behavioral analysis regarding our customers' activities, to be sure that nobody is using our platform to carry out any illegal activity. We will inform the Reporting Office of the FINMA if we have any suspicions or find any indication that any of our customers are performing unlawful activities.
- C. To enhance the customers' website experience:** We use your information to analyse, process, manage, improve and personalize our services and to respond to the demands of our users, so that they can enjoy our services in a safe and adequate way in consonance with their needs and expectations.
- D. To ensure network and information security:** The use of your personal data is also of service to identify, prevent and report potentially suspicious, fraudulent or illegal activities stemming from your account and to facilitate the creation and secure management of your account, amongst other things.
- E. To contact users:** We will use your email address to keep in touch with you, so that we can send you administrative notifications, such as those regarding the activity of your account, transactions made and their processing (i.e.: asking for confirmation and so on), maintenance notifications, any change to our terms and conditions, privacy, cookies or AML and CFT policy, answers to enquiries, processing of payments, etc.
- F. Marketing Purposes:** We may also use your email address to send you company news, promotions, updates and any other information related to similar products or services provided by ZIRONEX.

For this purpose, we use a commercial automation platform whereby we collectively send all the marketing or updates emails to our customers, being necessary to that end that your email be transferred to that platform for that specific purpose. This platform is the website www.mailchimp.com, owned by the company whose legal name is The Rocket Science Group LLC and the commercial name MailChimp (the "Processor"). This company fully complies with the European Data Protection Regulation, which has come into force on the 25th of May 2018.

You can find further information about how MailChimp processes all the data we provide them with in order to use their services by clicking the following links:

Terms and conditions: <https://mailchimp.com/legal/terms/>

Privacy Policy: <https://mailchimp.com/legal/privacy/>

If you do not want to receive this type of communications, you can opt out of our marketing communications at any time by going to “email configuration” in your personal account and opting out of it or by sending an email to support@zironex.io.

- G. To facilitate corporate acquisitions, mergers or transactions:** We may process any information regarding your account and use of our Services as necessary in the context of corporate acquisitions, mergers or other corporate transactions. You have the option of closing your account if you do not wish to have your personal information processed for such purposes.

5. HOW WE SHARE AND STORE YOUR INFORMATION

Lescovex may disclose your personal data to third parties, legal and regulatory authorities, as well as transfer your personal data:

A. Disclosure to third parties:

We may share some of your personal data with third-party service providers who may be of help to our business operations. **ZIRONEX** third party service providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. We ensure that such third parties will be bound by terms no less protective than those described in this Privacy Policy or those we are subject to under applicable data protection laws.

Some or all of your personal data may also be shared upon 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. If another company acquires our company, our business, **ZIRONEX** project or our assets, that company will own the Personal Data we collect and will assume the rights and obligations with regards to your Personal Data as described in this Privacy Policy.

B. Disclosure to legal and regulatory authorities:

We may also share your Personal Data with financial authorities, such as the FINMA, government officials, data protection authorities or any other authorities when:

- Compelled by subpoena, court order or any other legal procedure;
- We have any suspicions of you carrying out any unlawful activity through our platform;
- Acting to prevent physical harm or financial loss;
- Acting to investigate any violations of our Privacy Policy.

C. International transfers of Personal Data:

We store and process your Personal Information in data centres around the world, wherever **ZIRONEX** facilities or service providers are located. As such, we may transfer your Personal Data outside of the Economic European Area (EEA). Such transfers are undertaken in accordance with our legal and regulatory obligations.

6. HOW WE PROTECT YOUR INFORMATION

Lescovex has implemented the technical and organizational security measures necessary to ensure the security of your personal data and to protect it from loss, theft, unauthorised access, alteration, misuse or destruction, taking into account the state of technology, the nature of the stored data and the risks to which it is exposed, whether due to human action or in relation to the physical, technical or natural environment. These security measures include, but are not limited to:

- Restricting the access to your personal data only to **Zironex** personnel who need that information in relation to the tasks they perform;
- Password and encrypted protected directories and databases, and, if the information has to be transferred in any way, it will also be done in an encrypted format;
- Secure Sockets Layered (SSL) technology to ensure that your information is fully encrypted and sent across the Internet securely;
- PCI Scanning to actively protect our server from hackers and other vulnerabilities.

However, we cannot guarantee that loss, misuse, unauthorized acquisition or alteration of your data will not occur. Please recognize that you play a vital role in protecting your own personal information. When registering with our Services, it is important to choose a password of sufficient length and complexity, to not reveal this password to any third parties, and to immediately notify us if you become aware of any unauthorized access to or use of your account.

Furthermore, we cannot ensure or warrant the security or confidentiality of information you transmit to us or receive from us through the Internet or wireless connection, including email, phone or SMS, since we have no way of protecting that information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us through support@zironex.io

The security measures set out above will be reviewed regularly in light of new and relevant legal and technical developments.

7. HOW LONG WE ARE GOING TO KEEP YOUR PERSONAL DATA FOR

We retain Personal Information for as long as necessary to fulfil the purposes described in this Privacy Policy, subject to our own legal and regulatory obligations. In accordance with our record-keeping obligations, we will retain Account and other Personal Information for at least ten years after an Account has been closed or a transaction has been made.

When the information is collected for marketing purposes, we will keep this information for two years after the date of your consent, unless you have asked us to erase it by executing your rights set forth in Section 9 of this Privacy Policy.

8. LEGAL BASIS

- A. We mainly collect and process your personal data in compliance with a legal duty to which **Lescovex** is subject. This is the case of the data collected to verify your identity or to provide you with our services and to process the transactions, or to contact users. The regulation and law enforceable in this sense is the Romanian Federal Act on Combating Money Laundering and Countering the Financing of Terrorism and all the European regulation about Anti-Money Laundering and Countering the Financing of Terrorism.
- B. We also collect and use your personal data to carry out our obligations arising from the contract entered with you when you become a member of our Website and when we, therefore, have to provide you with our services.
- C. We may use your personal data to satisfy our legitimate interests to protect our property, rights or the safety of **Lescovex**, our customers or others. This will be the case of when we are using your personal data to enhance your website experience or to facilitate corporate acquisitions, mergers or transactions.
- D. We will solely need your express consent to send you information related to new services, promotions, updates and commercial notifications through the MailChimp platform, as the rest of information collected and processed is, as we said, necessary to comply with legal obligations, to perform the obligations arising from the contract entered with you and to satisfy our legitimate interests.

If you have accepted to receive marketing and updates communications and want to stop receiving them, you can opt out of them at any time by going to “email configuration” in your personal account and opting out or by sending an email to support@zironex.io

9. YOUR RIGHTS

You, the data subject, will have the rights laid down below, which can be exercised at any time by contacting us through support@zironex.io after which we will consider your request under the applicable laws:

1. **Right to access:** You have the right at any time to know what personal data we have about you, what it is used for and the conditions and purpose of us using it. We may charge a CHF 15 fee per copy of the personal data undergoing processing and always for more than one copy.
2. **Right to Rectification:** You have also the right to request the correction or erasure of your personal data when it is inaccurate or to complete it when it is incomplete.
3. **Right to erasure (right to be forgotten):** You have the right to request erasure of your personal information that:
 - A. is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
 - B. was collected in relation to processing that you previously consented, but for which you later withdrew such consent; or
 - C. was collected in relation to processing activities to which you object, and there are no overriding legitimate grounds for our processing.

If we have made your personal information public and are obliged to erase the personal information, we will, taking into account available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other parties that are processing your personal information that you have requested the erasure of any links to, or copy or replication of your personal information. The above is subject to limitations by relevant data protection laws.

We will not erase your personal data when we have to keep it to comply with the enforceable law and regulations, such as the obligation to keep the trading information during 10 years after it took place or after the termination of a business relationship.

4. **Right to data portability:** If we process your personal information based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request to receive your personal information in a structured, commonly used and machine-readable format, and to have us transfer your personal information directly to another “controller”, when technically feasible, unless exercise of this right adversely affects the rights and freedoms of others. A “controller” is a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of your personal information.
5. **Right to restriction of processing:** You have the right to obtain from us restriction of processing where one of the following applies:
 - The accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;
 - The processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;

- We no longer need the personal data for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims;
 - The data subject has objected to processing, pending the verification of whether **Lescovex's** legitimate grounds override your rights.
6. **Right to object to processing:** When the processing of your personal information is based on consent, contract or legitimate interests, you may restrict or object, at any time, to the processing of your personal information as permitted by applicable law. We can continue to process your personal information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
 7. **Right to withdraw consent:** You have the right, at any time, to withdraw your consent to the processing of your personal information collected on the basis of your consent. Your withdrawal will not affect the lawfulness of **Lescovex's** processing based on consent before your withdrawal.

10. HOW TO CONTACT US

If you have any questions or concerns regarding our Privacy Policy or if you have any complaint, you should first contact us through support@zironex.io.

You can also complain about the processing of your personal data to the relevant data protection authority. You can complain in the EU member state where you live or work, or in the place where the alleged breach of data protection law has taken place.

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