



# DATA PROTECTION POLICY

## Introduction

This Data Protection Policy (hereinafter: "Policy") describes how the company Zetly OÜ (hereinafter: "We" ) collects, stores, uses and manages Personal Data and Anonymous Data (hereinafter: "Information") provided to it or collected in connection with the process of selling utility Token ZET described and reflected in our websites on which this Policy appears (hereinafter: the Site).

By using the Site the user agrees to this Data Protection Policy and the processing of users' data ( including personal information ) in the manner provided in this Policy. If the user does not agree to the terms of this Policy, we recommend that you cease using the Site.

## Personal Data

For purposes that will be mentioned further in this Policy we may process and/or collect the following information that can be used to identify the user (hereinafter: "Personal Data").

### Email address

The user may explicitly decline to submit Personal Data through the Site, in which case we will not be able to provide to the user newsletters and other updates via email.

## Anonymous Data Collected Automatically

We collect non-personally identifiable information that alone or in combination with similar information can not be used to identify the user (hereinafter: "Anonymous Data") from computer, mobile device or browser when the user uses the Site as a logged in user.

The Site automatically collects usage information, such as:

- a.** IP address
- b.** the type of device used
- c.** browser type, version and language
- d.** type and version of an operating system
- e.** user's activity on the Site
- f.** the number and frequency of visitors to the Site.

We may collect Anonymous Data or use third-party services for that, for example, web analytics services. This Anonymous Data is not linked to Personal Data.

## Tracking Technologies We Use

We do use cookies and other tracking technologies.

## Third-Parties Tracking Technologies

This Policy does not cover the use of cookies and other similar technologies by third parties. We may use third-party services to collect Information . The Site may contain links leading to other sites. We do not control when or how third parties place cookies on the user's computer. These cookies or other similar technologies may be used to track the user's behavior on other websites. We have no control over this.

## Why We Collect Information

The Information is used for:

- a.** delivering the Site and its functionality
- b.** interaction with the Site
- c.** analytical and statistical purposes
- d.** understanding interaction with the Site
- e.** improvement and development of the Site
- f.** enforcement of this Policy and the Terms of Use
- g.** sending necessary information, including newsletters, special offers, confirmations, updates and security alerts.

## Duration of the Information

We will keep Information for no longer than is reasonably necessary for reporting and reconciliation purposes pursuant to legal requirements.

## The Consent

The user expressly consents to our processing, collection, transfer, storage, disclosure and other uses of Information as described in this Policy and the Terms of Use at instance when the user provides information to us through the Site and/or accepts this Policy. In addition, through this use and interactions with the Site the user specifically consents to:

- a. our collection of information by automated means and to our subsequent processing and using of information in accordance with this Policy
- b. the storage and transfer of information to locations wherever we and our service providers have their facilities.

The site and users accept the data protection policy with the allowance for the personal data and anonymous data according to the full users declaration statement:

*"I hereby grant my consent for my personal data (e-mail address, name, surname and index number) in connection with Article 6(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (RoD). I can withdraw my consent at any time by unsubscribing from the newsletter."*

The administrator of personal data is Zetly OÜ, Harju maakond, Tallinn, Lasnamäe linnaosa, Löötsa tn 5, 11415.

Contact details available on the website [www.zetly.io](http://www.zetly.io)

Personal data is processed for the purpose of providing the newsletter, commercial purposes and in order to grant tokens, pursuant to Article 6(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council and is not transferred to other recipients, international organisation or third countries. Personal data shall be stored for the duration of subscriptions. The applicant has the right to access, rectify and lodge a complaint with the President of the Personal Data Protection Office. The provision of personal data is voluntary, it does not result from the regulations, and failure to provide it will result in the impossibility of ordering. No automated decisions are made on the basis of personal data, including profiling.

## Disclosure of Information

We may release the Information concerning the use of the Site:

- a.** to provide the user with the services and functionality of the Site
- b.** in case it is set out in the Terms of Use
- c.** when we believe in good faith that such release is appropriate to comply with the applicable law, regulations, legal process or governmental request
- d.** to enforce this Policy and/or the Terms of Use, or any agreement between the user and us
- e.** to detect, prevent, or otherwise address fraud, security or technical issues
- f.** to protect against abusive or unlawful use of the Site
- g.** to protect the rights, safety, or property of users, or any other third parties
- h.** in other ways described in this Policy and the Terms of Use.

## With Whom We Share Personal Data

We may share Personal Data only under any of the circumstances mentioned in this Policy and/or the Terms of Use. We will not share any Personal Data provided by the user except with service providers under contract who help with our business operations, such as providers of marketing automation, information management and analytics services and products.

## Business or Asset Transfer

In the event that we, a line of our business, or substantially all our assets are transferred, sold or merged with another business, Information may be one of the transferred assets.

## Security of Personal Data

We will take commercially reasonable precautions to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction. We process all Information using industry-standard techniques. We implement the following measures for the protection of Personal Data:

- a. access to the user's Personal Data is limited to authorized personnel who have a legitimate need to access it based on their job descriptions. In case third-party contractors process Personal Data on our behalf, similar requirements are imposed
- b. Personal Data is transmitted in encrypted format using SSL technology. We use up-to-date firewall protection and high-quality antivirus and anti-malware software
- c. we store Personal Data on our own servers, and third party can have access to this data.

However, we do not guarantee or warrant that such techniques will prevent unauthorized access to Information, including Personal Data that we store.

## Modifications

We may modify or revise this Policy at any time by posting the amended Policy on the Site. Please check the most current Policy.

## Changing or Updating Personal Data

The user is required to advise us about any changes to the user's Personal Data. The user should contact us as soon as possible if there are any changes to Personal Data or if the Personal Data we hold about the user is not accurate, complete or up-to-date so that we can update our records accordingly.

## Privacy Related Inquiries

If the user is concerned with the way that we use Personal Data or has any questions about the privacy aspects of the Site, we recommend contacting us at: [support@zetly.io](mailto:support@zetly.io)





## Zetly OÜ

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