#### **DEFIMARKETCAP**

# **Privacy Policy**

Effective Date: September 7, 2020.

Your privacy is important to us. This Privacy Policy ("Policy") applies to the Site operated by us and explains what information we collect from you, including information that may be used to personally identify you ("Personal Information") and how we use it. We encourage you to read the details below. All capitalized terms not herein defined will have the meaning set forth in our <u>Terms of Service</u>. This Policy applies to any visitor to our Site. We will be the controller of your personal data provided to, or collected by or for, or processed in connection with, our Site.

We reserve the right to change this Policy and our Terms of Service at any time. We will notify you of any changes to this Policy by sending notice to the primary email address specified in your account, by a prominent notice on the Site, or by some other means determined by us. You acknowledge that your continued use of our Site after we publish or send a notice about our changes to this Policy means that the collection, use and sharing of your personal data is subject to the updated Policy.

#### What information do we collect?

We collect information, including Personal Information, to operate effectively and provide you the best experiences with the Site. You provide some of this information directly, such as when you create an account or contact us for support. We get some of it by recording how you interact with the Site by, for example, using technologies like cookies, and receiving error reports or usage data from software running on your device.

We collect, store, and use the following information, which includes Personal Information:

### Information you give us:

- Your email address, language preference, and any other information you share when you communicate with us via email or through the Site.
- Your responses to surveys that we may ask you to complete for research purposes or to help direct Company activities.
- Other Personal Information you voluntarily submit, which may include your profession, gender, date of birth, political party affiliation, your profile picture, etc.
- Any information you share when you contact us.

# Information we get from your use of the Site:

- Details of how you use the Site, such as what pages you access or visit.
- Your internet protocol address (i.e., IP address) and, if you access the Services from a mobile application, your unique mobile device ID number and non-email authentication.
- Your social media account IDs and information shared with us via your social media accounts.
- Browser and device information and information collected through cookies, pixel tags, and other technologies.

• If you use our Site from a mobile device, that device will send us data about your location based on your phone settings. We will ask you to opt-in before we use GPS or other *tools* to identify your precise location.

### How do we use the information we collect?

We use the information we collect to improve the Site, optimize our technology, refine the experience of our Users, and innovate ways to forward our mission.

Namely, we use the information we collect to:

- Email, text, SMS, message via social media platforms and phone you to provide you with information and updates about us, our work, and our community, to make it easier for you to share such information about us with your social networks, and to answer your queries.
- Administer the Site, enable you to use its features, and improve your overall user experience.
- To send information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages.
- To respond to comments and questions and provide customer service.
- Analyze how Users use the Site using tools like Google Analytics and other tools to help us understand traffic patterns and know if there are problems with the Site.
- To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.
- To link or combine user information with other personal information.
- To compare information for accuracy, update our records, and verify it with third parties.
- To provide and deliver products and services requested by customers.

## Do we share your Personal Information?

We do not rent, sell, or share your Personal Information with other people or non-affiliated third parties except with your consent or as necessary to complete any transaction or provide any service you have requested or authorized. We currently do not share personal data with third parties for their direct marketing purposes without your consent, but we do use Google Analytics which includes their AdSense product and which does collect certain personal data automatically. Please read more about Google's activities and ways to opt out of their data collection in the links we have included in this Policy.

To help us do our work, we may provide limited access to some of your Personal Information to the following third parties:

- **Affiliated Third Parties:** We may share email addresses, social media IDs, comments, and other information you have voluntarily provided, with our affiliates and/or subsidiaries.
- **Service providers:** We work with a wide range of third party providers, notably our database administrators, cloud computing services, advertising services, data analysts, application service providers, bulk SMS services, and other non-governmental organizations. We do not authorize them to use or disclose your Personal Information except in connection with providing their services.

We may also transfer your Personal Information to a third party as a result of a merger, acquisition, reorganization or similar transaction; when required by law or to respond to legal process; to protect our customers; to protect lives; to maintain the security of the Site; and to protect the rights or property of

Company. In such event, and to the extent legally permitted, we will notify you and, if there are material changes in relation to the processing of your Personal Information, give you an opportunity to consent to such changes.

# **Protection of Company and Others**

We will share Personal Information with companies, organizations or individuals outside of Company if we have a good-faith belief that access, use, preservation, or disclosure of your Personal Information is reasonably necessary to (1) detect or protect against fraud or security issues, to enforce our Terms of Service, (2) meet any enforceable government request, (3) defend against legal claims, or protect against harm our legal rights or safety, or that of our staff and/or Users.

#### What are Cookies and Web Beacons and How Do We Use Them?

A "cookie" is a small file placed on your hard drive by some of our web pages. We, or third parties we do business with, may use cookies to help us analyze our web page flow, customize our services, content and advertising, measure promotional effectiveness and promote trust and safety. Cookies are commonly used at most major transactional websites in much the same way we use them here at our Site.

You may delete and block all cookies from our Site, but parts of the Site will not work. We want to be open about our cookie use.

Even if you are only browsing the Site, certain information (including computer and connection information, browser type and version, operating system and platform details, and the time of accessing the Site) is automatically collected about you. This information will be collected every time you access the Site and it will be used for the purposes outlined in this Privacy Policy.

You can reduce the information cookies collected from your device. An easy way of doing this is often to change the settings in your browser. If you do that you should know that (a) your use of the Site may be adversely affected (and possibly entirely prevented), (b) your experience of this and other sites that use cookies to enhance or personalize your experience may be adversely affected, and (c) you may not be presented with advertising that reflects the way that you use our and other sites. You find out how to make these changes to your browser at this site: www.allaboutcookies.org/manage-cookies/. Unless you have adjusted your browser settings so that it will refuse cookies, our system will send cookies as soon as you visit our Site. By using the Site, you consent to this, unless you change your browser settings.

We currently use Google Analytics for data collection that involves Cookies. You can read more about opting-out of Google Analytics data collection <u>here</u>.

Web beacons may be used to track the traffic patterns of users from one page to another in order to maximize web traffic flow. Our third-party advertising service providers may also use web beacons to recognize you when you visit the Site and to help determine how you found the Site. If you would like more information about this and to know your choices about not having this information used by these companies, please visit: the Digital Advertising Alliance's website, <a href="http://www.aboutads.info/">http://www.aboutads.info/</a>, or the Network Advertising Initiative's website, <a href="http://networkadvertising.org/consumer/opt\_out.asp">http://networkadvertising.org/consumer/opt\_out.asp</a>.

#### **How Do We Secure Your Personal Information?**

We take reasonable steps to protect your Personal Information against unauthorized access, alteration, disclosure, misuse, or destruction. Unfortunately, no data transmission or storage system can be

guaranteed to be 100% secure. The safety and security of your Personal Information also depends on you. If you have an account with us, you are responsible for keeping your membership details confidential. Any account you may have is protected by your account password and we urge you to take steps to keep your Personal Information safe by not disclosing your password and by logging out of your account after each use. We further protect your Personal Information from potential security breaches by implementing certain technological security measures including encryption, firewalls and secure socket layer technology. However, these measures do not guarantee that your Personal Information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. By using the Site, you acknowledge that you understand and agree to assume these risks.

We retain your personal data while your account is in existence (if applicable) or as needed to provide you Site. This includes data you or others provided to us and data generated or inferred from your use of our Site.

### **Your Choices Regarding Information**

If you are a member of the European Economic Area, United Kingdom, or Switzerland ("GDPR Visitors"), you have several choices regarding the use of Personal Information on our Site:

- 1. Access, Delete or Correct Personal Information. You may access, correct, amend, or delete Personal Information we have about you by logging into your account and navigating to your account page (if applicable) or by emailing us at privacy@zerion.io. For your protection, we may only share and update the Personal Information associated with the specific email address that you use to send us your request, and we may need to verify your identity before doing so. We will try to comply with such requests in a reasonably timely manner. If you wish to cancel your account, you may do so through your account page. If you do, personally identifiable information associated with your account will be deleted as soon as is reasonably practical or as required by applicable law. Please note that we may retain information that is otherwise deleted in anonymized and aggregated form, in archived or backup copies as required pursuant to records retention obligations, or otherwise as required by law.
- 2. **Download or Access Personal Information.** You can ask us for a copy of your Personal Information and can ask for a copy of Personal Information you provided in machine readable form by emailing us at privacy@zerion.io.
- 3. **Withdrawal of Consent.** If we are processing your Personal Information based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Information, if such use or disclosure is necessary to enable you to utilize some or all of our Site.
- 4. **Objection.** You can contact us at privacy@zerion.io to let us know that you object to the further use or disclosure of your Personal Data for certain purposes.
- 5. **Restriction of processing.** You can ask us to restrict further processing of your Personal Information.
- 6. **Right to file complaint.** You have the right to lodge a complaint about our practices with respect to your Personal Information with the supervisory authority of your country or European Union Member State.

If you are a GDPR Visitor, we will only collect and process Personal Information about you where we have lawful bases. Lawful bases include *consent* (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g. to deliver the Site you have requested) and "legitimate interests".

### **Links to Third Party Websites**

We may provide links to other websites. We have no control over these websites and they are subject to their own terms of use and privacy policies. As such, we do not endorse and are not responsible for the availability of, or for any content, advertising, products, or other materials on or available from, these third party websites.

By using the Site, you agree that we will not be liable for any damage or loss caused by your use of or reliance on any content, advertising, products, or other materials on or available from these third party websites.

# How We Respond to Do Not Track Signals

Your browser settings may allow you to automatically transmit a Do Not Track signal to websites and other online services you visit. We do not alter our practices when we receive a Do Not Track signal from a visitor's browser because we do not track our visitors to provide targeted advertising. To find out more about Do Not Track, please visit <a href="http://www.allaboutdnt.com">http://www.allaboutdnt.com</a>.

#### Children Under 13

The Services are not directed to individuals who are under 13 and we do not solicit nor knowingly collect Personal Information from children under the age of 13. If you believe that we have unknowingly collected any Personal Information from someone under the age of 13, please contact us immediately at privacy@zerion.io and the information will be deleted.

# **Your California Privacy Rights**

If you are a California resident, you have the right to request information from us regarding the manner in which we share certain categories of your personal information with third parties for the third parties' direct marketing purposes. California law provides that you have the right to submit a request to us at our designated address and receive the following information: (a) the categories of information we disclosed to third parties for the third parties' direct marketing purposes during the preceding calendar year; and (b) the names and addresses of third parties that received such information, or if the nature of their business cannot be determined from the name, then examples of the products or services marketed. You are entitled to receive a copy of this information in a standardized format and the information will not be specific to you individually. To make such a request, please use the contact information below.

In addition, if you are a resident of California, you may have certain additional rights under the California Consumer Privacy Act ("CCPA"). The CCPA requires that we inform you that, in the last twelve months, the Company may have collected, used, and shared, for business purposes, personal information about you as described in this Privacy Policy. Each category of data may be used by us or shared with third parties also as described in this Privacy Policy. Residents of California have the right to request access to and deletion of the information we hold about them. Such requests may be submitted by email to

privacy@zerion.io. We do not sell your personal information without your consent and in the past 12 months have not sold any of your Personal information. We will not discriminate against you for exercising your rights under CCPA. Specifically, we will not:

- Deny access to our Services;
- Charge a different rate for the use of our Services; or
- Provide a different quality of service.

### **Contact Us**

If you have any questions about this Policy, your Personal Information, or the Site, you can contact privacy@zerion.io