

PRIVACY AND DATA PROTECTION STATEMENT

This privacy notice (Privacy Statement) applies to Personal Information or Data held by Zebacus or/and our partners or the organization responsible for personal information under our control, as described below. It explains what information we collect about you, how we'll use that information, who we'll share it with, the circumstances when we'll share it and what steps we'll take to make sure it stays private and secure. It continues to apply even if your use of our services comes to an end.

The information we collect from you (as described below) is required to provide you with access to our services and to enable us to fulfil our legal and regulatory compliances. Failure to provide your information, (or if all personal data submitted to us is not complete, accurate, true and correct) may mean it is not possible to provide you with access to certain products or services which you or the entity you are acting on behalf of have requested.

By accessing and using our website and the associated application program used in various devices such as desktop, laptop and mobile you indicate acceptance to the terms of this Privacy Policy.

1. Collection of Information.

Zebacus can collect, process and store Personal Data collected through various sources such as website, software, mobile application and other applicable technologies in process of using our services from you will be regarded as given consent. We'll only collect your information in line with relevant regulations and laws of the land. The information we collect may include:

- 1.1 Personal Identification Information: Full name, date of birth, nationality, gender, signature, utility bills, photographs, phone number, home address, and/or email.
- 1.2 Formal Identification Information: Government issued identity document such as Passport, Driver's License, National Identity Card, Visa information, and/or any other information deemed necessary to comply with our legal obligations under financial or anti-money laundering laws.
- 1.3 Institutional Information: Employer Identification number (or comparable number issued by a government), proof of legal formation (e.g. Articles of Incorporation), personal identification information for all material beneficial owners.
- 1.4 Financial Information: Bank account information, payment card primary account number (PAN), transaction history, trading data, and/or tax identification.
- 1.5 Employment Information: Office location, job title, and/or description of role.
- 1.6 other information about you that you give us by filling in forms, surveys, or by communicating with us, whether face-to-face, by phone, email, online, or otherwise.
- 1.7 cookies and similar technologies we use to recognize you, remember your preferences and tailor the content we provide to you.

- 1.8 investigations data, e.g. due diligence checks, sanctions and anti-money laundering checks, external intelligence reports, content and metadata related to relevant exchanges of information between and among individuals, organizations, including emails, voicemail, live chat;
- 1.9 records of correspondence and other communications between us, including email, telephone conversations, live chat, instant messages and social media communications;
- 1.10 information that we need to support our regulatory obligations, e.g. information about transaction details, purpose of payment, ordering customer information, counterparty/beneficiary information, identification documents, detection of any suspicious and unusual activity and information about parties connected to you or these activities.
- 1.11 information from third party providers, e.g. client user information collected through 3rd party application service providers that we have a mutual relationship with and you have separately agreed with can share information with.

2. How we'll use your information:

Our primary purpose in collecting personal information is to provide you a secure, smooth, efficient, and customized experience based on your individual usage habits, improve our marketing and promotional efforts, analyze site usage and disclose aggregated statistics, improve our content and service offerings, aid in our monetization efforts and customize our Platform's content, layout and services. We'll only use your information where we have your consent or we have another lawful reason for using it. We may use the information in the following ways:

- 2.1 Legal and Regulatory compliance: The services provided by Zebacus are subjects to legal and regulatory compliances which require us to collect, use, and store your personal information. This may include using it to help, detect or prevent crime (including terrorism financing, money laundering and other financial crimes). We'll only do this on the basis that it's needed to comply with a legal obligation or it's in our legitimate interests and that of others.
- 2.2 Enforcement of terms of Zebacus: Zebacus is handling sensitive information of the customer and therefore it is highly necessary to monitor, investigate, prevent and mitigate any potentially prohibited or illegal activities with third parties and/or prevent and detect violations of any of our terms and conditions for other Services. In addition, we may need to collect fees based on your use of our Services. We collect information about your account usage and closely monitor your interactions with our Services. We may use any of your personal information collected for these purposes. The consequences of not processing your personal information for such purposes is the termination of your account.

- 2.3 To prevent fraudulent activities: We will use your personal information to detect, prevent and mitigate fraud and abuse of our services and to protect you against account compromise or funds loss.
- 2.4 We process your personal information when you contact us to resolve any questions, disputes, collect fees or to troubleshoot problems. We also process it for quality control and staff training to make sure we continue to provide you with accurate information.
- 2.5 To provide Zebacus Services: We process your personal information to provide you our Services. Third parties such as identity verification service providers may also access and/or collect your personal information when providing identity verification and/or fraud prevention services. As a part of our Services, we send administrative or account-related information to you to keep you updated about our Services, inform you of relevant security issues or updates, or provide other transaction-related information. Without such communications, you may not be aware of important developments relating to your account that may affect how you can use our Services.
- 2.6 We process your information to enhance security, monitor and verify identity or service access, combat spam or other malware or security risks, and comply with applicable security laws and regulations.
- 2.7 We process your personal information to better understand the way you use and interact with our Services. In addition, we use such information to customize, measure and improve our Services and the content and layout of our website and applications and to develop new services.
- 2.8 Based on your usage of our Services, we may send you marketing communications via, sms, emails etc... to inform you about our events or our partner events, to deliver targeted marketing and to provide you with promotional offers. Our marketing will be conducted in accordance with your advertising marketing preferences and as permitted by applicable law.
- 2.9 We may share your information with third party partners or third parties hired by us to perform functions and provide services to us subject to confidentiality obligations consistent with this Privacy Policy and on the condition that the third parties use your information only on our behalf and pursuant to our instructions.
- 2.10 We may disclose any information in response to a legal request such as a subpoena, court order, or government demand, to investigate or report illegal activity, or to enforce our rights or defend claims. We may also transfer your information to another company in connection with a partnership or a corporate restructuring, such as a sale or merger.
- 2.11 For any purpose that you provide your consent: We will not use your personal information for purposes other than those purposes we have disclosed to you, without your permission. From time to time, and as required under the applicable law, we may request your permission to allow us to share your personal information with third parties. In such instances, you may opt out of having your personal information shared with third parties, or allowing us to use your personal information for any purpose that is

incompatible with the purposes for which we originally collected it or subsequently obtained your authorization. If you choose to limit the use of your personal information, certain features or Services of Zebacus may not be available to you.

3. Sharing of Information with Third Parties:

Your personal information's are accessed only by those parties who require access to perform their tasks and duties and to share only with third parties who have a legitimate purpose for accessing it. We will never sell or rent your personal information to third parties without your explicit consent. We will only share your information in the following circumstances:

- 3.1 With third party identity verification service providers for preventing any fraudulent activities. These services are used by Zebacus to confirm your identity by comparing the information you provide us to public records and other third-party databases. These service providers may create derivative data based on your personal information that can be used in connection with the provision of identity verification and fraud prevention services.
- 3.2 With financial institutions with which we partner to process payments you have authorized.
- 3.3 With service providers under contract who help with parts of our business operations. Our contracts require these service providers to only use your information in connection with the services they perform for us, and prohibit them from selling your information to anyone else.
- 3.4 With companies or other entities that we plan to merge with or be acquired by. You will receive prior notice of any change in applicable policies.
- 3.5 With our professional advisors who provide banking, legal, compliance, insurance, accounting, or other consulting services.
- 3.6 With law enforcement, officials, or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedures.
- 3.7 We share personal information about you with our Affiliates as a normal part of conducting business and offering Services to you.

4. Children's Privacy:

Zebacus does not allow persons under 18 to register for any service and we do not knowingly collect any personally identifiable information from persons under the age of 18. If you are aware of someone under the age of 18 using our Platform, please contact us immediately.

5. Third Party Websites:

Our Platform may contain links to other websites that we believe may be of interest or use to you. These third-party websites are not screened for privacy or security issues by Zebacus. Please note

that our Privacy Policy and information collection, use and sharing procedures do not apply to other websites and we take no responsibility for and incur no liability for other websites' collection, use or sharing of information. The Customers are advised to use their discretion while clicking on any such links.

6. Storage And Security Of Personal Information:

We understand the secrecy of your personal information and therefore Zebacus maintains appropriate physical, technical and administrative safeguards to protect the security and confidentiality of the personal information you entrust to us.

We may store and process all or part of your personal and transactional information, including certain payment information, where our facilities or our service providers are located. We protect your personal information by maintaining physical, electronic and procedural safeguards in compliance with the applicable laws and regulations.

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. Whenever the Customer changes or accesses the Customer's account information, we offer the use of a secure server. Once the Personal Data is in our possession we adhere to strict security guidelines, protecting it against unauthorized access.

Furthermore, we cannot ensure or warrant the security or confidentiality of the information you transmit to us or receive from us by 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.

7. Retention Of Personal Information:

We keep your information in accordance with our data retention policy. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes such as managing your account and dealing with any disputes or concerns that may arise. We may need to retain your information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc. If we don't need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

8. International Transfers of Personal Data:

We may transfer, store and process your personal information within our Affiliates, third-party partners and service providers which may possibly in other countries. When we do this, we'll ensure it has an appropriate level of protection and that the transfer is lawful. We may need to transfer your information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests. In some countries/territories the law might compel us to share certain information, e.g. with tax authorities. Even in these cases, we'll only share your information with people who have the right to see it. By communicating electronically with Zebacus, you acknowledge and agree to your personal information being processed in this way.

9. Cookie Policy:

A "cookie" is a small piece of information stored by a web server on a web browser so it can be later read back from that browser. As you open our website or use any of our software and technology some data will be saved in your browser and devices, which is known as cookies. Such data saved on your browser and devices help us to identify our user, collect information about you which ultimately help us to enhance our product and services to better its quality and ensure the security of our product and services are not compromised. At the same time, we also ensure that such collection of personal information through cookie are in compliance with local act and regulations. You can always opt out of cookie with the help of setting in your browser and devices, however, in doing so some of the services and functions may get affected.

10. Promotional Material:

We may use your personal data and information in order to communicate any of our promotional material which may be in various forms such as news, blog, market commentary, various publication, promotional offers, information related to marketing and promotion of our product and services. Such activities can be conducted by the company and/or its affiliates and in order to facilitate such activities, we may have to share your personal information with the affiliates as well. Therefore, as you accept this privacy policy you agree to receive any promotional or marketing communication. The client can always avoid such materials by clicking unsubscribe if the materials are sent through email or in other cases can request to the company. However, in the case of communication related to product/services that you are using, the information dissemination would be mandatory and the client cannot choose to evade such information.

11. Your Privacy Rights:

Subject to applicable law, you have following rights.

- 11.1 The right to access the information we hold about you and to obtain information about how we process it.
- 11.2 Right to rectify your Data if it is inaccurate or incomplete.
- 11.3 Right to delete your data in certain circumstances, where it is no longer necessary for us to process your Personal Information to fulfill our processing purposes, or where you have exercised your right to object to the processing.
- 11.4 Right to restrict the processing of your Personal Information where, the information is inaccurate or it is no longer necessary for us to process such information or where you have exercised your right to object to our processing.
- 11.5 Right to withdraw your consent for processing your data. Exercising this right does not affect the lawfulness of the processing based on the consent given before the withdrawal of the latter;
- 11.6 You have the right to define instructions relating to the retention, deletion and communication of your Data after your death.
- 11.7 Right to lodge complaint to the relevant data protection authority.

12. Consent:

By using and/or visiting the Platform, using our Services and/or by providing the Customer's Personal Data, the Customers consent to the collection and use of the information they disclose on the Platform in accordance with this Privacy Policy, including but not limited to their consent for sharing their information as per this privacy policy.

13. Contact Us:

If you have any questions about this Privacy Policy, please contact us by sending an email to info@zebacus.com with the subject "Privacy Policy Request".

14. Updates:

Any update regarding the Privacy Policy in the future will be communicated by email or publishing in the website or the platforms used by the customer. The Website Policies and Terms & Conditions including this Privacy Policy may be changed or updated occasionally to meet the requirements and standards. Therefore, the Customers are encouraged to refer the website or notifications in order to be updated about the changes.