

Privacy Policy for token.zortrax.com

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By accessing the token.zortrax.com website (hereinafter "**Platform**"), using its features such as connecting a cryptocurrency wallet, participating in the Initial Coin Offering (ICO) of the ZRXT token, subscribing to the newsletter, or using the referral program, you entrust us with your data, including personal data. This document serves to help you understand what data we collect and for what purpose, and exactly how we use it.

For the purposes of this Privacy Policy, "**personal data**" means information that can directly or indirectly identify a user, such as, but not limited to, email address, IP address, location data, and cryptocurrency wallet addresses. User means a person visiting the Platform, participating in the ICO, using the referral program, or subscribing to the newsletter.

1. General Information

Zortrax S.A. in restructuring, with its registered office in Olsztyn, at Lubelska 43a Str., 10-410 Olsztyn, Poland (hereinafter "**Zortrax**" and accordingly, depending on the context, "**we**", "**our**" or "**us**"), makes every effort to ensure the protection and respect for the privacy of Platform users. The purpose of this document is to provide users with information regarding Zortrax's practices concerning the collection, use and dissemination of information that users may provide to Zortrax through the Platform or our electronic services related to the ZRXT token.

This document, together with the ZRXT token sale terms and conditions (ICO), any other documents mentioned therein, and our cookie policy, sets out the principles according to which Zortrax collects and processes personal data entrusted by Platform users. Please read this document carefully to familiarize yourself with the Privacy Policy and Zortrax's practices regarding users' personal data and its processing.

In accordance with Article 13(1) and (2) of the General Data Protection Regulation of 27 April 2016 (hereinafter "**GDPR**"), we inform you that:

- **The controller** of your personal data is Zortrax S.A. in restructuring with its registered office in Olsztyn, at Lubelska 43a Str., 10-410 Olsztyn, Poland, entered in the register of entrepreneurs of the National Court Register by the District Court in Olsztyn under number 0000499608;
- You can contact the personal data controller through the contact form at <https://zortrax.com/contact/>, by phone at +48 89 672 40 01 or in writing to the controller's registered office address;
- Your personal data will be processed for the purposes indicated in point 3 below;
- Your personal data may be transferred to entities processing personal data on behalf of the controller, i.e. IT service providers (including cloud infrastructure providers, analytical service providers, newsletter software providers, e.g. Mailchimp), legal services, accounting services, as well as entities handling cryptocurrency payments (e.g. wallet providers, exchanges within on-ramp processes) and partners supporting

the referral program operation. Transaction data will also be publicly available on the relevant blockchains.

- You have the right to:
 - access the content of your data, i.e. you have the right to request information about our processing of your personal data and obtain a copy of this personal data,
 - rectify personal data, i.e. you have the right to request the rectification of inaccurate personal data and the completion of any incomplete personal data,
 - erase personal data, i.e. you have the right to request the erasure of your personal data (under the conditions specified in law, with the reservation that data recorded on the blockchain cannot be deleted),
 - restrict processing, i.e. in cases specified in law, you have the right to request that we restrict the processing of your personal data,
 - data portability (applies to data processed in an automated manner based on consent or contract), i.e. you have the right to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format and to transmit this data in certain circumstances to another organization,
 - object, i.e. you have the right to object to the processing of your personal data when the processing of personal data is based on our legitimate interests,
 - withdraw consent, i.e. if the processing of your personal data is based on your consent, you have the right to withdraw consent to the processing of your personal data at any time, whereby the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal,
 - lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, your place of work or the place of the alleged infringement, if you believe that the processing of your personal data violates the GDPR.

2. Information that Zortrax collects from users and the period for which it is stored

a. Information provided to us directly by users

- i. Users may submit to Zortrax information that enables their identification ("personal data") when using our services on the Platform, such as:
 1. connecting a cryptocurrency wallet (e.g. MetaMask, through WalletConnect): we collect your wallet address to enable interaction with the Platform and participation in the ICO,
 2. participation in the ZRXT ICO: we collect transaction information, including wallet address, amount and type of cryptocurrency sent, and amount of ZRXT tokens purchased,
 3. using the referral program: we collect your wallet address to generate a unique referral code and for the purpose of settling any commissions. The referred person's wallet address may be associated with the referral code,
 4. filling out forms (e.g. contact form, newsletter subscription): email address,
 5. any correspondence with us by phone, email or in any other way, concerning the Platform or the ZRXT token,

6. reporting problems with our services on the Platform,
7. geolocation information from your browser to set content language.

b. Information collected by us automatically

- i. With respect to user visits to our Platform, we may collect – in accordance with applicable law and –where required, only with user consent – information about the devices and networks used by the user to access our services. This may include the following information: user's IP address, login data, type and version of web browser, types and versions of browser plugins used, operating system and platform, advertising identifier, visit information, including the URL of the site where the link to the Platform was clicked, content searched for or viewed on the Platform, data download errors, time spent on specific pages, interactions with other pages, and any phone numbers used to connect with our telephone customer service department. Zortrax obtains this information through various technologies, including cookies (detailed information is provided in point 8 of this document).

c. Data storage

- i. Zortrax does not store user personal data longer than necessary for the purposes for which this information was collected. This means that personal data collected by Zortrax will be destroyed or deleted from our systems (except for data recorded on the blockchain) when it is no longer needed.
- ii. The processing of user personal data takes place in accordance with the following principles:
 1. processing of user personal data lasts at least for the period in which the data is used to provide a service to the user (e.g. ICO handling, referral program, newsletter dispatch),
 2. processing and storage of user personal data takes place in accordance with legal requirements (e.g. tax regulations, anti-money laundering), contract or having regard to Zortrax's statutory obligations,
 3. data processing takes place only for the time required for the purpose for which such information was collected or is being processed, or longer if required by any contract, applicable law, or for statistical purposes, with appropriate safeguards.

3. For what purposes does Zortrax use information collected from users

a. Zortrax uses information collected from users for the following purposes:

- i. fulfilling obligations arising from transactions carried out for the purchase of ZRXT token and providing all information and services related to the ICO. Processing data in this way is necessary for the performance of mutual contractual obligations,

- ii. enabling users to connect a wallet, participate in the ZRXT ICO and use the referral program. Processing data in this way is necessary for the performance of mutual contractual obligations,
- iii. sending users information about Platform services, ICO status, ZRXT token updates through Zortrax communication channels. Processing data in this way is necessary for the performance of mutual obligations or takes place with user consent,
- iv. handling cryptocurrency payments for ZRXT tokens. Processing data in this way is necessary for the performance of mutual contractual obligations,
- v. managing the referral program, including generating codes, tracking referrals and any commission payments. Processing data in this way is necessary for the performance of the referral program agreement,
- vi. ensuring compliance with (i) applicable law and this Privacy Policy. In case of violation of certain provisions, user access to certain features may be restricted. Processing data in this way is necessary for the performance of mutual contractual obligations, necessary for Zortrax to comply with a legal obligation or necessary for the establishment, exercise or defense of claims,
- vii. sending users - in accordance with applicable law and - where required, with user consent - marketing materials (e.g. newsletter),
- viii. sending users information about modifications to our Platform services. Processing data in this way is (i) necessary for the performance of mutual contractual obligations, (ii) necessary for Zortrax to comply with a legal obligation or (iii) necessary for the establishment, exercise or defense of claims,
- ix. managing the Platform and for internal activities, including for troubleshooting, data analysis, testing, and conducting research, analytical and supervisory work. Processing data in this way is based on Zortrax's legitimate interest (e.g. to ensure Platform security and improve its features),
- x. improving the Platform to ensure that its content is always presented in the most appropriate way for the user and their devices. Processing data in this way is conducted in Zortrax's legitimate interest (e.g. to provide users with the most relevant content),
- xi. enabling users to use the interactive features of our Platform services (e.g. token purchase, generating referral link), if they decide to do so. Processing data in this way is necessary for the performance of mutual contractual obligations or takes place with user consent,
- xii. as part of actions taken by us to ensure Platform security. Processing data in this way is (i) conducted in Zortrax's legitimate interest (to ensure Platform security), (ii) carried out for the establishment, exercise or defense of claims or (iii) to ensure compliance with applicable law.

b. Forms and their associated purposes

- i. "CONTACT" form or other forms of contact: The purpose is to respond to the user's/customer's initial contact regarding a specific matter concerning the Platform or ZRXT token.

- ii. "SUBSCRIBE TO NEWSLETTER" form: The purpose is to send the newsletter, i.e. information about news regarding the ZRXT token, ICO progress, press information, information related to Zortrax and our blockchain activities.
- iii. Token purchase interface (BuyToken): The purpose is to enable the purchase of ZRXT tokens, which involves processing wallet address and transaction data.
- iv. Referral program interface (Referral): The purpose is to generate unique referral links associated with the user's wallet address and manage the program.

4. Who are the recipients of information we collect from users and for what purposes is it transferred to these recipients

When a user uses our services, some information about them (e.g. wallet address in the context of transactions) will be publicly visible on the appropriate blockchain.

In addition, Zortrax works closely with third parties who may be recipients of user personal data, such as:

- our business partners who may support the promotion of the ZRXT token or offer related services (e.g. cryptocurrency exchanges in the future),
- our service providers for technical matters (e.g. hosting, analytics, WebSocket providers like QuickNode), payment processing (e.g. on-ramp service providers), identity verification (if applicable),
- marketing service providers (e.g. Mailchimp for newsletter management, social media platforms for advertising purposes).

Zortrax transfers information obtained from users, including their personal data, to any third parties mentioned above only in the following cases:

- if it is necessary in connection with the use of third-party services (e.g. payment processing, newsletter dispatch),
- for the performance of any contracts that may be concluded with the user,
- to facilitate or extend the delivery of our services on the Platform.

Zortrax may also disclose user information if required to do so by law or when it believes in good faith that the disclosure or release of information is reasonably necessary to (i) defend against any lawsuit filed against Zortrax, (ii) in connection with ongoing proceedings, (iii) enforce any contracts with our users, such as this Privacy Policy, (iv) in any emergencies posing threats to human health, which may cause death or injury to people, (v) as part of an investigation or inquiry or (vi) to protect the rights, property or safety of Zortrax, users or others.

5. Targeted advertising on social media and messages sent via email

In accordance with applicable law and where required, after obtaining user consent, Zortrax may use information provided by users through the Platform for direct marketing purposes using electronic communication means (e.g. (i) sending our newsletters, invitations to ZRXT

token-related events or other messages that we believe may be of interest to the user or (ii) sending targeted advertisements to specific users via social media platforms or third-party websites). Regarding marketing messages sent via electronic communication means: the user may withdraw/modify their consent at any time by (i) clicking the unsubscribe link included in each message sent to the user from Zortrax or (ii) contacting us using the contact details provided in point 12 below.

Targeted advertising materials and content:

- on social media (e.g. Facebook, Twitter, Instagram or LinkedIn): users can prevent their delivery at any time by changing their account settings on the relevant social media platform regarding receiving advertising materials;
- on external websites: information about withdrawing consent is provided in point 8 of this document.

6. Is user information transferred outside the European Economic Area (EEA)?

All user Personal Data is stored by default within the European Union (hereinafter "**EU**").

Given that Zortrax operates internationally and uses global service providers (e.g. Mailchimp, cloud infrastructure providers, QuickNode), we may transfer certain user Personal Data to countries outside the European Economic Area (EEA), where less stringent personal data protection regulations may apply than in the user's country.

This may occur if a company whose services we use for data processing (e.g. newsletter provider, analytics service provider) has its headquarters or servers in a country that does not provide an "adequate" level of data protection according to the relevant European Commission decision.

In case of data transfer in this manner, Zortrax ensures that it will be carried out in accordance with the GDPR provisions, e.g. based on standard contractual clauses approved by the European Commission as providing an adequate level of protection for data subjects, or other appropriate safeguards.

For more detailed information about the security measures used, please contact us using the contact details provided at the end of this Privacy Policy.

7. Blockchain transactions and public data

Please note that transactions made on the blockchain (e.g. ZRXT token purchase, receiving commissions from the referral program) are inherently public and permanent. Wallet addresses, transaction details (amounts, dates, associated tokens) are recorded on a publicly accessible and immutable blockchain ledger. Zortrax does not control this data after it is recorded on the blockchain and cannot delete or modify it. By using the Platform's blockchain-based features, you accept the public nature of this information.

8. Cookies and similar technologies

The Zortrax Platform uses cookies to ensure users a high level of use of the resources available on it. Where necessary, we use a cookie control system to ensure users can express

or refuse consent to the use of cookies on their computers or other devices. The implementation of this solution meets the legal requirement to obtain explicit user consent for placing cookies on their device (apart from cookies necessary for the Platform's functioning).

Cookies are small files saved on the user's computer hard drive that monitor, save and store information about user activity on the site. Thanks to this, the Platform, through the server, can provide users with personalized information or remember their preferences (e.g. language, wallet session state).

If the user does not consent to saving and storing cookies (other than necessary ones) on their hard drive, it is recommended to set security settings in the browser that block the use of cookies by the given site and its external partners, or not to consent within the consent management mechanism on the Platform.

The Platform may use user monitoring software (e.g. Google Analytics) to better understand their preferences. The provider of the mentioned software is e.g. Google Analytics, which uses cookies to analyze how the site is used. The software saves cookies on the user's computer hard drive to monitor how users use the site, but as a rule does not collect or store personal data allowing direct identification (e.g. through IP anonymization). Google's privacy policy is available at the following address: [<http://www.google.com/privacy.html>].

Other cookies may be stored on the user's hard drive by external providers (e.g. cryptocurrency wallet service providers, social media platforms, if integrated) when the Platform uses their programs, sponsored links or advertisements. Such cookies are used to monitor user behavior. Their storage time varies. We recommend reviewing the relevant privacy policies of these providers.

9. Links to other websites and social media

The Platform may contain links to websites of our partner networks, advertisers or affiliated companies (e.g. Zortrax.com pages, social media profiles). When using links to these sites, please note that the privacy policy principles of the companies that own them apply to them, and Zortrax bears no responsibility for them. You should familiarize yourself with the provisions of these policies before submitting any of your personal data to these sites.

10. Cryptocurrency wallet security

The user is solely responsible for the security of their cryptocurrency wallet, private keys, seed phrases and passwords. Zortrax will never ask you to provide private keys or seed phrases. Special caution should be exercised against phishing attempts and scams.

11. Modifications to our Privacy Policy Information

Any modifications to our Privacy Policy Information will be posted on this page. In justified cases, Zortrax may inform the user about these modifications (e.g. via email, if the user has provided an address and consented to communication by this means) or seek their consent if the changes significantly affect the way data is processed. You should systematically check for any updates or modifications to our Privacy Policy Information.

12. Contact

To contact us to provide any suggestions or inquiries regarding our privacy practices, the user should use our contact page (<https://zortrax.com/contact/>) or send a letter to the address indicated at the beginning of this document (Zortrax S.A. in restructuring, Lubelska 43a Str., 10-410 Olsztyn, Poland).