

PRIVACY POLICY

Your privacy is important to us, and so is being transparent about how we collect, use, and share personal data and other information about you in compliance with the applicable regulations of the European Union and Estonia regarding the processing of personal data, including in particular the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of personal data (the "General Data Protection Regulation" or "GDPR").

This data privacy policy ("privacy policy") is intended to help you understand:

- WHAT INFORMATION WE COLLECT ABOUT YOU
- HOW WE USE THE INFORMATION WE COLLECT
- HOW WE SHARE THE INFORMATION WE COLLECT
- HOW WE STORE AND SECURE THE INFORMATION WE COLLECT
- HOW TO ACCESS AND CONTROL YOUR INFORMATION
- OTHER IMPORTANT PRIVACY INFORMATION

This privacy policy covers the personal data we collect about you when you visit our website, download information, request information from us, use our services. This Privacy Policy also explains your choices regarding the use of your information and the purposes of the processing we may make in respect of the data we collect about you. Your choices include:

- how you can object to certain uses of information about you and
- how you can access and update certain information about you.

"BaGuk Finance" "we," or "us" in this Privacy Policy means BaGuk Finance OÜ (reg. 14432499, registered in the Republic of Estonia), which controls the information BaGuk Finance collects when you use our services. We refer to our website www.zichange.io, domain and subdomains in this policy. Service is the process of performing account opening, maintenance, closing and execution of client orders/requests under agreements by BaGuk Finance for the clients.

Data controller/processor of personal data

Name: BaGuk Finance OÜ

Registration code: 14432499

Address: Narva mnt 13, 10151 Tallinn, Estonia

Contact: info@zichange.io

1. What information we collect about you

We collect certain personal data as defined in the GDPR of clients, business contacts (including the personnel of clients, prospects and partners) and other Website users, as described below:

- Information you provide to us:

We collect information about you when you input it into the Website or in the services provided through Website or otherwise provide it directly to us.

- Account and profile information:

We collect information about you, such as user names and passwords, when you register for an account, create or modify your profile, set preferences, sign-in through the Websites. We keep track of your preferences when you select settings within the Website. Personal details: full name, personal identification code, date and place of birth, place of residence, address, identity document data or copies, sphere of activity, provided selfie photos, legal documents, due diligence data and other information necessary to provide services for you.

- Contact information:

We collect information such as email and phone when you access the user zone or the customer platform through the Website.

➤ Information about transactions:

We collect details of transactions made through the Website.

➤ Customer support:

We collect information received during the communication between you and BaGuk Finance through customer support (e-mails, calls, requests through Website).

➤ Information we collect automatically when you use the Websites:

We collect information about you when you use, browse take certain actions on our Website.

➤ Connection information:

We collect information about standard information from your web browser (such as browser type and browser language) and your Internet Protocol ("IP") address Services.

➤ Cookies and other tracking technologies:

BaGuk Finance may use cookies to provide functionality and to recognize you on Website. For more information, please see our Cookies and Tracking Notice, which includes information on how to control or opt out of these cookies and tracking technologies.

➤ Other data:

Other data not listed in this document, which is generated as a result of using our Website or services.

2. How we use the information we collect

How we use the information we collect depends in part on which services you use, how you use them, and any preferences you have communicated to us.

We collect and process information about you only where such processing is lawful under the GDPR and other applicable EU and national laws. The legal basis for the processing of your data depends on the services you use and how you use them. This means that we collect and process your information only where:

- You give us consent to do so for a specific purpose;
- The processing satisfies a legitimate interest as defined in the GDPR (which is not overridden by your data protection rights or interests) to improve our services, to market and promote our products and services, or to protect our legal rights and interests;
- We need to process your data to comply with a legal obligation; or
- The processing of your data is necessary to enable us to take certain necessary steps at your request prior to entering into a contract or for the performance of a contract and agreements with you.

Below are the specific purposes for which we use the information we collect about you, either with your consent or based on the legitimate interest described above, as applicable:

➤ To provide the services and personalize your experience on the Website:

We use information about you to provide the services to you, including, authenticate you when you log in, provide customer support, and access to information about your transactions and account details.

➤ To improve our services:

We are always looking for ways to make our services smarter, faster, secure, integrated and useful to you. We use collective learnings about how people interact with our websites, to identify trends, usage, activity patterns and areas for integration and improvement of the Website. We also test and analyse certain new features with some users before rolling the feature out to all users.

➤ To communicate with you about the services:

We use your contact information to send communications via email and within the services, including responding to your comments, questions and requests for information, and sending you technical notices, updates, and administrative messages. If you object to the processing of your

personal data, we might not be able to fulfil your requests or to inform you about changes regarding the services.

➤ To market, promote, and drive engagement with the Services:

We use your contact information to send communications that may be of specific interest to you. These communications are aimed at driving engagement and maximizing the value of our services for our clients, prospects and business partners, including information about new features, survey requests, news, and events we think may be of interest. We communicate with you about new product offers.

➤ Customer services:

We use your information to resolve issues you encounter, to respond to your requests for assistance, to analyse log files, to enhance your user experience and to improve the services.

➤ To protect our legitimate business interests and legal rights:

Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions.

3. How we share information we collect

We are not in the business of selling information about you and we will not sell your information with advertisers or other third parties for commercial purposes.

➤ Relevance:

Only the relevant personnel of BaGuk Finance who needs to be given access to the information for the purposes mentioned above will be given access to your information.

➤ International transfers of information we collect:

The information that we collect is stored in Estonia. For the purpose of the services, we may share your information with other offices of BaGuk Finance located outside the European Union, including in countries that may not have equivalent privacy and data protection laws to E.U. regulations on data protection. In this case, we process your information in accordance with standard contractual clauses on data protection, whose terms have been approved by the European Commission, to safeguard the transfer of information we collect from the European Economic Area. We can provide further information upon request (see 'Contact us' below).

➤ Links to Third-Party sites:

The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one. You should review carefully the privacy policy of such third parties.

➤ Compliance with enforcement requests and applicable laws; enforcement of our rights:

In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to:

- comply with any applicable law, regulation, legal process or governmental request
- enforce our agreements, policies and terms of service,
- protect the security or integrity of our products and services,
- protect BaGuk Finance, our customers or the public from harm or illegal activities.

4. How we store and secure information we collect

BaGuk Finance is committed to the protection of the personal data that you have provided us with in order to preserve their confidentiality and prevent any unauthorized access, use, alteration or destruction of your personal data.

➤ Information storage and security:

The personnel of BaGuk Finance who is given access to your personal data for the purposes set out above in this privacy policy is bound by a strict confidentiality obligation, whose breach can be sanctioned by disciplinary action and/or other sanctions in accordance with applicable labour laws.

As part of the information security policy implemented by BaGuk Finance for the protection of its own sensitive information and its clients' information, BaGuk Finance applies organizational and technical measures to ensure appropriate security of the personal data we collect, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, and to ensure that such personal data can only be accessed by the authorized personnel of BaGuk Finance, and only for the purposes described in this privacy policy.

Though BaGuk Finance considers that it applies sophisticated measures, in particular, for the protection of the information system environment on which the data we collect are stored, it remains that no transfer of data via the Internet can be fully protected from unlawful access by third parties. Communications via the Internet may potentially be intercepted, lost or modified and such risks remain beyond BaGuk Finance's reasonable control.

Accordingly, you acknowledge and accept that BaGuk Finance may not be held liable, for any reason whatsoever, for any damage of whatever nature resulting from the transmission of personal data, and that all communication to the Website is at your own risk.

➤ How long we keep information:

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information from any further use until deletion is possible. By default we store your information 7 years after your account is closed.

➤ Account information:

We retain your account information until you delete your account. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations and to continue to develop and improve our services.

➤ Information you share on the services/transactions:

If your account is deactivated or disabled, some of your information, information about transactions and the content you have provided will remain to allow us to fulfil the obligations arisen from the contracts/agreements and your team members or other users in your organization to make full use of the services.

5. How to access and control your information

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations. We will respond to requests about this within a reasonable timeframe.

➤ Control of your information and withdrawal of your consent

Here are the choices you have to control your information or where you want to withdraw your consent to the processing of your information:

- Opt-out of communications: You may opt out of receiving communications from us about news, events and product and services by using the unsubscribe link within each email. Even after you opt out from receiving these messages from us, you will continue to receive operational messages from us regarding our services.
- Withdrawal for processing personal data: The consent for the processing of the personal data can be withdrawn at any time, by sending an email with request to delete personal data to info@zichange.io. Please note that, in this case your account may be closed as BaGuk Finance needs to collect and process personal data in order to provide services to you.

6. Other important privacy information

In case you have inquiries, request or complaints regarding the processing of your personal data, you may forward them to

info@zichange.io.

In case you have complaints regarding the processing of your personal data, you may file them with the Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon, www.aki.ee).

Our policy towards children:

The services provided by BaGuk Finance are not directed to individuals under 18 (eighteen).

Changes to our privacy policy:

We may change this privacy policy from time to time. We encourage you to review our privacy policy whenever you use the services to stay informed about our data privacy practices.

Last Update: 6 September 2018.