Introduction

Welcome to the Ziga’s privacy policy.

Ziga Technology Inc (“Ziga”) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit Ziga’s website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here: [LINK]. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

Purpose of this privacy policy

As a Customer, you accept this privacy policy when you sign up for, access, or use our products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services.

This privacy policy aims to give you information on how Ziga collects and processes your personal data through your use of Ziga on this website or its app, including any data you may provide through this website when you sign up to our newsletter. This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Ziga Technology Solutions Limited is the controller and responsible for your personal data (collectively referred to as Ziga, "we", "us" or "our" in this privacy policy). We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise, including your legal rights, please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO via email address: tobe@zigah.co

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review and would communicate any changes to you through our communication channels. This version was last updated on [DATE].

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

* Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
* Contact Data includes billing address, delivery address, email address and telephone numbers.
* Financial Data includes bank account, payment card and blockchain wallet details.
* Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
* Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
* Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
* Usage Data includes information about how you use our website, products and services.
* Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

1. How is your personal data collected?

We use different methods to collect data from and about you including through:

* when you register an account on Ziga through our website;
* through your relationship with us, for example information provided by you when using our products or services, when taking part in customer surveys, competitions and promotions;
* from an analysis of the way you use and manage your account with us, from the transactions you make and from the payments which are made to/from your account;
* when you contact Ziga through various methods such as application forms, email, letters and telephone calls. If you contact us or we contact you using telephone, we may monitor or record the phone call for quality assurance, training and security purposes;
* when we obtain any data and information from third parties;
* from such other sources in respect of which you have given your consent to disclose information relating to you and/or where not otherwise restricted.

1. Cookies

Cookies help us give you the best experience of using our site. In this policy we use the term "cookies" to refer to cookies and other similar technologies.

Cookies are small data files that we or companies we work with may place on your computer or other device when you visit our website. They allow us to remember your actions or preferences over time.

We use cookies to collect data that helps us to:

* track site usage and browsing behaviour;
* allow you to log-in to your account and navigate through the website;
* monitor the effectiveness of our promotions and advertising; and
* mitigate risk, enhance security and help prevent fraud.

We use both session and persistent cookies. Session cookies are deleted when you close down your browser, while persistent cookies remain on your device until they expire or you delete them. Persistent cookies allow us to remember things about you when you visit our website again.

To help us monitor the effectiveness of our promotions and advertising, we may provide site usage data obtained through the use of cookies to select third-party service providers. Any data provided by us to these third parties will be non-personally identifiable.

By signing-up for an account with Ziga, or continuing to use our website, you agree to our use of cookies as set out in this policy. You may decline our cookies if your browser or browser add-on permits, but doing so may interfere with your use of Ziga's services. For information on how to delete or reject cookies, you can consult the "help" function within your browser, or visit www.allaboutcookies.org, where you will also find more information about cookies generally.

1. How we use your personal data

We will only use your personal data based on your consent and when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

* Where we need to perform the contract we are about to enter into or have entered into with you.
* Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
* Where we need to comply with a legal obligation
* For any other purpose that is required or permitted by any law, regulations, guidelines or relevant regulatory authorities.

Click here [LINK TO GLOSSARY, LAWFUL BASIS] to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

1. Disclosures of your personal data

We may share your personal data with the parties set out below:

* Companies and organisations that act as our agents, affiliates and/or professional advisers;
* Companies and organisations that assist us in processing or otherwise fulfilling transactions that you have requested;
* Law enforcement, regulatory and governmental agencies;
* Your advisers (including but not limited to accountants, auditors, lawyers, financial advisers or other professional advisers) where authorised by you;
* Any other person notified by you as authorised to give instructions or to use the accounts, facilities, products or services on your behalf.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

1. International transfers

The personal data we collect from you may be transferred to, stored and processed outside of the jurisdiction in which you reside, and the laws of those countries may differ from the laws applicable in your own country. We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. By submitting your personal data, you agree to the transfer, storing or processing of it outside of your jurisdiction.

Whenever we transfer your personal data, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

1. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

However, please note that although we take reasonable steps to protect your information, no website, Internet transmission, computer system, or wireless connection is completely secure. We have therefore put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

1. Data retention

How long will you use my personal data for? We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

1. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

* *Request access to your personal data*.
* *Request correction of your personal data*.
* *Request erasure of your personal data*.
* *Object to processing of your personal data*.
* *Request restriction of processing your personal data*.
* *Request transfer of your personal data*.
* *Right to withdraw consent*.

If you wish to exercise any of the rights set out above, please contact our DPO.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to acknowledge all legitimate requests within 24hrs and resolve any queries within three (3) to five (5) business days. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

1. Miscellaneous
   1. The privacy policies of other websites

This privacy policy applies to only Ziga and not any other brands, though mentioned on our websites. Neither does it apply to our Merchants, Vendors, or other related partners.

* 1. Customer Consent

Your consent to personal data collection and processing may be revoked by notifying us via our contact page. Please note, in case you choose to not provide us with the consent or withdraw the consent at any given point in time, we shall not be able to provide the services contemplated by this notice.

1. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

Request accessto your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correctionof the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasureof your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processingof your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processingof your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

* If you want us to establish the data's accuracy.
* Where our use of the data is unlawful but you do not want us to erase it.
* Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
* You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transferof your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any timewhere we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.