

ZZ Liquidity

PRIVACY POLICY

Last Revised on October 21, 2022

This Privacy Policy for ZZ Liquidity Inc., a British Virgin Islands company (“**Company**”, “**we**”, “**us**” “**our**”) describes how we collect, use and disclose information about users of the Company’s website <https://app.zerozero.markets> including the front-end interface accessible via the website which allows users to interface with a set of decentralized smart contracts that facilitate the exchange of tokens between end users on a decentralized exchange (the “**Interface**”), and any related content, tools, features and functionality (collectively, the “**Services**”). For the purposes of this Privacy Policy, “**you**” and “**your**” means you as the user of the Services.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. If you do not want information about you used as described in this Privacy Policy, please do not access or use the Services.

1. UPDATING THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time in which case we will update the “Last Revised” date at the top of this Privacy Policy. If we make material changes to the way in which we use information we collect, we will use reasonable efforts to notify you (such as by emailing you at the last email address you provided us, by posting notice of such changes on the Services, or by other means consistent with applicable law) and will take additional steps as required by applicable law. If you do not agree to any updates to this Privacy Policy please do not access or continue to use the services.

2. COMPANY’S COLLECTION AND USE OF INFORMATION

When you access or use the Services, we may collect certain categories of information about you from a variety of sources.

Some features of the Services may require you to directly enter certain information about yourself. You may elect not to provide this information, but doing so may prevent you from using or accessing these features. Information that you directly submit through our Services may include:

- Contact information. Name, email address, address. We collect basic contact details to communicate with you, provide you with the Services, administer your relationship with us, and respond to your queries (including to provide grants).
- Account information. Username, password, security questions. We collect this information to create, maintain and secure your account. We collect account information to maintain and secure your account with us, provide you with the Services (including providing assistance, consulting services, and support), connect your wallet, and administer your relationship with us.

- Identification information. We, or a third party service provider, collect your contact information as above, data and place of birth, source of funds, proof of address, government identification (e.g., driver's license, passport, etc.), and your transaction history. We, or a third party service provider, collect this information to comply with our legal obligations, including our obligations under financial or anti-money laundering laws, detect and prevent fraud, and provide you with the Services.
- Transaction information. Information related to transactions that you conduct through the Services, such as, your wallet address, tokens transferred and received, and transactions requested and completed. We use this information to enable you to purchase and sell tokens using the DEX, and for other legal and compliance purposes.
- Information about your use of the Services. Information related to your activity on and your other uses of the Services. We collect this information to facilitate your engagement with the Services, personalize your experience, monitor and analyze trends in connection with the Services and conduct internal research and development.
- Any other information you choose to provide. This includes any information that you choose to include in communications with us, for example, when sending us an email, or post on the discussion forum. We use this information to facilitate your engagement with the Services, including to enable you to post on the discussion forum, post on social media, communicate with you about our Services, approve your proposal, monitor and analyze trends in connection with the Services and conduct internal research and development.

We also automatically collect certain information about your interaction with the Services ("**Usage Data**"). To do this, we may use cookies, web beacons/clear gifs, and other tracking technologies ("**Tracking Technologies**"). Usage Data may include:

- Device type, such as your phone, computer, or tablet;
- IP address;
- Screen resolution;
- Browser type;
- Date and time stamps, such as the date and time you first accessed the Services;
- Operating system;
- Log data;
- Number of visits;
- Language of device;
- Geolocation; and
- Other information regarding your interaction with the Services, such as clickstream data.

We use the Usage Data we collect automatically to:

- Improve and provide the Services;
- Offer promotions;
- Run analytics; and
- Better understand user interaction with the Services.

In addition to the foregoing, we may use all of the above information to:

- Create anonymized and aggregated data sets that we may use for a variety of functions,

- including research, internal analysis, analytics, and other functions;
- Comply with any applicable legal obligations;
- Detect, investigate, and prevent activities that may violate our policies or be illegal;
- Enforce any applicable terms of use; and
- Protect or defend the Services, our rights, the rights of our users or others.

We may obtain any of the above information about you from outside sources, such as Chainalysis.

Any information we receive from outside sources will be treated in accordance with this Privacy Policy. We are not responsible or liable for the accuracy of the information provided to us by third parties and are not responsible for any third party's policies or practices. See Section 6 below for more information.

In addition to the foregoing, we may use any of the above information to comply with any applicable legal obligations, to enforce any applicable terms of service, and to protect or defend the Services, our rights, and the rights of our users or others.

3. HOW THE COMPANY SHARES YOUR INFORMATION

In certain circumstances, the Company may share your information with third parties for legitimate purposes subject to this Privacy Policy. Such circumstances may include:

- With vendors or other service providers, such as:
 - Compliance providers, such as know-your customer services;
 - Providers of website services such as moderation services;
 - Data analytics vendors;
 - Data storage providers;
 - Email vendors;
 - Google analytics; and
 - Survey and marketing vendors.
- With our affiliates or otherwise within our corporate group
- When you request us to share certain information with third parties, such as through your use of social media widgets or login integrations
- To comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries
- In connection with an asset sale, merger, bankruptcy, or other business transaction
- To enforce any applicable terms of service
- To ensure the safety and security of the Company and/or its users
- When you request us to share certain information with third parties, such as through your use of social media widgets or login integrations

- With professional advisors, such as auditors, law firms, or accounting firms

4. COOKIES AND OTHER TRACKING TECHNOLOGIES

Do Not Track Signals

Your browser settings may allow you to transmit a “Do Not Track” signal when you visit various websites. Like many websites, our website is not designed to respond to “Do Not Track” signals received from browsers. To learn more about “Do Not Track” signals, you can visit <http://www.allaboutdnt.com/>.

Cookies and Other Tracking Technologies

Most browsers accept cookies automatically, but you may be able to control the way in which your devices permit the use of Tracking Technologies. If you so choose, you may block or delete our cookies from your browser; however, blocking or deleting cookies may cause some of the Services, including any portal features and general functionality, to work incorrectly.

To opt out of tracking by Google Analytics, click [here](#).

If you have questions regarding the specific information about you that we process or retain, as well as your choices regarding our collection and use practices, please contact us using the information listed below.

5. THIRD PARTY WEBSITES AND LINKS

We may provide links to websites or other online platforms operated by third parties. If you follow links to sites not affiliated or controlled by us, you should review their privacy and security policies and other terms and conditions. We do not guarantee and are not responsible for the privacy or security of these sites, including the accuracy, completeness, or reliability of information found on these sites. Information you provide on public or semi-public venues, including information you share on third-party social networking platforms (such as Facebook or Twitter) may also be viewable by other users of the Services and/or users of those third-party online platforms without limitation as to its use by us or by a third party. Our inclusion of such links does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators, except as disclosed on the Services.

6. YOUR RIGHTS

Depending on where you are located you may have certain rights in relation to your personal information:

- **Access:** You have the right to access personal information we hold about you, how we use it, and who we share it with.
- **Portability:** You have the right to receive a copy of the personal information we hold about you and to request that we transfer it to a third party, in certain circumstances and with certain exceptions.
- **Correction:** You have the right to correct any of your personal information we hold that is inaccurate.

- **Erasure:** In certain circumstance, you have the right to delete the personal information we hold about you.
- **Restriction of processing to storage only:** You have the right to require us to stop processing the personal information we hold about you, other than for storage purposes, in certain circumstances.
- **Objection:** You have the right to object to our processing of your personal information.
- **Objection to marketing:** You can object to marketing at any time by opting-out using the unsubscribe/ opt-out function displayed in our communications to you.
- **Withdrawal of consent:** Where we rely on consent to process your personal information, you have the right to withdraw this consent at any time by emailing us at support@p00l.io.

Please note that a number of these rights only apply in certain circumstances, and all of these rights may be limited by law.

7. CHILDREN'S PRIVACY

We do not seek or knowingly collect any personal information about children under 13 years of age. If we become aware that we have unknowingly collected information about a child under 13 years of age, we will make commercially reasonable efforts to delete such information from our database.

If you are the parent or guardian of a child under 13 years of age who has provided us with their personal information, you may contact us using the below information to request that it be deleted.

8. DATA SECURITY

Please be aware that, despite our reasonable efforts to protect your information, no security measures are perfect or impenetrable, and we cannot guarantee "perfect security." Please further note that any information you send to us electronically, while using the Services or otherwise interacting with us, may not be secure while in transit. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us.

9. HOW LONG DO WE STORE YOUR PERSONAL INFORMATION

We will retain your personal information as follows:

- your account data for as long as you keep your account open or as needed to provide you with our Services;
- if you contact us, we will keep your data for 26 months after you contact us;
- your technical usage information for 26 months; and
- data on your use of our Website and our Services is retained for 26 months.

We will also retain and use your personal information to the extent necessary to comply with our legal obligations, resolve disputes and enforce our terms and conditions, other applicable terms of service, and our policies. If you stop using our Services, we may store your information in an aggregated and anonymized format; we may use this information indefinitely without further

notice to you. Information regarding your activities on the Interface may additionally be stored indefinitely on the Ethereum blockchain.

10. WHERE WE STORE YOUR INFORMATION

Personal information may be exported outside of the jurisdiction in which you reside. Under those circumstances, the governments, courts, law enforcement or regulatory agencies of that country or those countries may be able to obtain access to your personal information through foreign laws. You need to be aware that the privacy standards of those countries may be lower than those of the jurisdiction in which you reside. You are not obliged to give your personal information to us, but if you choose not to do so, we may not be able to provide our services, or your access to our Services may be limited.

For any transfers of data outside the EEA or the UK, we will take appropriate measures in accordance with the GDPR to ensure that the recipient protects your personal information adequately in accordance with this Privacy Policy. These measures may include: entry into European Commission and UK Government approved standard contractual arrangements (“**Model Clauses**”). Please contact should you wish to examine a copy of the Model Clauses.

11. COMPLAINTS

If you are an EEA or UK resident and think we have infringed data protection laws, you can file a claim with the data protection supervisory authority in the EEA country in which you live or work or where you think we have infringed data protection laws, or with the UK Information Commissioner’s Office, as applicable to you.

12. HOW TO CONTACT US

Should you have any questions about our privacy practices or this Privacy Policy, please email us at support@zerozero.markets or contact us at Trinity Chambers, PO Box 4301, Road Town, Tortola, British Virgin Islands