

PRIVACY POLICY

THIS PRIVACY POLICY WAS LAST UPDATED ON 25TH OF OCTOBER, 2019.



THIS PRIVACY POLICY IS INCORPORATED AND MADE A PART OF ZELWIN TERMS OF SERVICE. ZELWIN HAS CREATED THIS PRIVACY STATEMENT IN ORDER TO DISCLOSE OUR INFORMATION GATHERING AND DISSEMINATION PRACTICES FOR ZELWIN WEBSITE. PLEASE READ THIS DOCUMENT CAREFULLY. IT CONTAINS IMPORTANT INFORMATION THAT YOU SHOULD KNOW BEFORE CONTINUING TO USE OUR WEBSITE OR SERVICES (AS SUCH TERM DEFINED IN THE TERMS OF SERVICES). BY CONTINUING TO USE ZELWIN WEBSITE AND SERVICES YOU WILL BE DEEMED TO HAVE ACCEPTED THIS PRIVACY POLICY.



INTRODUCTION

1. This Privacy Policy (hereinafter referred to as the “Policy”) sets forth the general rules of collection, processing, distribution, use and storage of Website user’s Personal data including any dispute concerning privacy under current General Data Protection Regulation (GDPR), and in accordance with the data protection regulations applicable to the ZELWIN (hereinafter the “ZELWIN”, “Company”, “Us”, “We”).
2. It is understood and presumed that by the fact of use of the Website and its services or by clicking “REGISTER” button the User gives Consent, that he/she/it has fully read, understood and accepted this Policy. If any User does not agree with this Policy in general or any part of it, such User should withhold from using the Website and its services.



DEFINITIONS

3. The following definitions and rules of interpretation apply in this Privacy policy:

a) Personal data

Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is an individual that can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, address or other identification data.

b) Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

c) Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d) Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

e) Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

f) Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

g) Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Curaçao legislation.

h) Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

i) Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

j)Third party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

k) Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

l)Website

A group of interrelated websites owned and operated by ZELWIN, available in the Internet via address: ZELWIN.com.

m) Cookies

A cookie is a text file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies. For more information on managing cookies, please go to www.allaboutcookies.org, or visit www.youronlinechoices.com.

n) Sensitive personal information

An information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation. ZELWIN does not collect or store such information.



MODIFICATIONS

4. This Privacy Policy may be modified, changed, supplemented, updated at any time with prior written notice from ZELWIN. Your continued use of the Website and its services after any amendments or alterations of this Privacy Policy without

notification of ZELWIN shall constitute your consent hereto and acceptance hereof of an updated version of this Privacy Policy. At any case, the date of the most recent amendments and alterations will be indicated at the top of this web page. If the User does not agree to such revised terms of the Privacy Policy or Terms of Use he/she/it must stop using this Website and his account and may withdraw from his/her/its obligations under this Privacy Policy.



INFORMATION ABOUT THE DATA CONTROLLER

5. The data controller of this Website is ZELWIN. Contact details can be received at: info@ZELWIN.com or via <https://ZELWIN.com/contact>.

LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

All personal data of data subject is processed with aim of compliance with a legal obligation under Art. 6(1) lit. of GDPR under which data controller is obliged to receive consent of data subject for specific processing operations with personal data.



COLLECTION OF PERSONAL DATA AND INFORMATION

6. The Website of the ZELWIN collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files.

7. The following information may be collected for general purposes:

- (1) the browser type and its version;
- (2) the operating system used by the accessing system,
- (3) the website from which an accessing system reaches the website;
- (4) the sub-websites;
- (5) the date and time of access to the Internet site;
- (6) an Internet protocol address (IP address);
- (7) the Internet service provider of the accessing system; and
- (8) any other similar data and information that may be used in the event of attacks on our information technology systems.



8. When using these general data and information, the ZELWIN does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information

technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, the ZELWIN analyzes anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

9. The following information can be collected for services purposes:

- (1) Contact information, such as name, home address, and email address;
- (2) Account information, such as username and password;
- (3) Information related to you virtual wallets public addresses;
- (4) Financial information, such as bank account numbers, bank statement, and trading information;
- (5) Identity verification information, such as images of your government issued ID, passport, national ID card, or driving license.
- (6) Residence verification information, such as Utility bill details or similar information.



COOKIES POLICY

10. The internet pages of this Website use cookies for the following purposes:

Purpose	Description	Type & Expiry
Performance (i.e., User's Browser)	Our web sites are built using common internet platforms. These have built-in cookies which help compatibility issues (e.g., to identify your browser type) and improve performance (e.g., quicker loading of content).	Session Deleted upon closing the browser
Security (e.g. Asp .NET) Cookies	If you register for access to a restricted area, our cookies ensure that your device is logged for the duration of your visit. You will need your username and password to access the restricted areas.	Session Deleted upon closing the browser
Site Preferences	Our cookies may also remember your site preferences (e.g., language) or seek to enhance your experience (e.g., by personalizing a greeting or content). This will apply to areas where you have registered specifically for access or create an account.	Session Deleted upon closing the browser
Analytical	We use several third party analytics tools to help us understand how site visitors use our web site. This	Persistent, but will delete automatically

	allows us to improve the quality and content on Website for our visitors. The aggregated statistical data cover items such as total visits or page views, and referrers to our web sites.	after two years if you no longer visit Website.
Site visitor feedback	We use a third party survey tool to invite a percentage of visitors to provide their feedback. Cookies are used to prevent visitors from being invited multiple times. The first cookie (1) is set if the visitor is not invited to participate in the survey, and is used to ensure visitors are not invited after their first page view. The second cookie (2) is set if the visitor is invited to participate in the survey, and is used to ensure the visitor is not invited again to participate for a period of 90 days.	1 Session Deleted upon closing the browser 2 Persistent Deleted automatically after 90 days or presenting survey invite.
Social sharing	We use third party social media widgets or buttons to provide you with additional functionality to share content from our web pages to social media websites and email. Use of these widgets or buttons may place a cookie on your device to make their service easier to use, ensure your interaction is displayed on our webpages (e.g. the social share count cache is updated) and log information about your activities across the Internet and on our web sites. We encourage you to review each provider's privacy information before using any such service.	Persistent, but will be deleted automatically after two years if you no longer visit Website.

11. The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. For example, most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (1) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (2) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (3) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (4) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (5) <https://support.apple.com/kb/PH21411> (Safari); and
- (6) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12. You also have act in the following ways:

- (1) Opting-Out

As part of our commitment to fair information practices, ZELWIN allow you to opt out of the use of information about your activities on other websites to provide you with Interest-based advertising. You can opt out of Google Analytics by installing Google's opt-out browser add-on, and out of interest-based Google ads

using Google's Ads Settings. Even if you opt out, you may still receive ZELWIN advertising. It just means that the advertising you see will not be customised for you.

(2) Refusing Cookies

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place. You can limit the collection of your information by disabling cookies on your browser. You may also be able to modify your browser settings to require your permission each time a site attempts to set a cookie. However, our website(s) (and many other websites) rely on cookies to enable certain functionality. If you choose to disable cookies, some of the services available on our website may not work properly.

(3) Non-ZELWIN Websites and Links

Our websites may contain links to non-ZELWIN websites. We are not responsible for the practices of those third party websites. Where you access other websites from our sites using the links provided, the operators of these websites may use cookies in accordance with their own cookies policy, which may differ from ours. You should read their privacy and cookie policies carefully before you provide any personal information to them.

(4) Caution regarding automatic Cookie Functionality

Browsers such as Microsoft Internet Explorer allow you to store passwords and logon IDs so you do not need to re-enter this information each time you access a web site. ZELWIN strongly urges you NOT to use this functionality to prevent unauthorized use of your online banking access code(s). This Personal Data includes:

13. The user is notified that blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all or certain features on our website.



INFORMATION COLLECTED BY REGISTRATION ON THE WEBSITE

14. The data subject has the possibility to register on the website of the controller with the indication of personal data. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject is collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors (e.g. a parcel service) that also uses personal data for an internal purpose which is attributable to the controller.

15. By registering on the website of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the data subject—date, and time of the registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offenses. Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

16. The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question. Registered persons are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller.



INFORMATION COLLECTED BY SUBSCRIPTION TO OUR NEWSLETTERS

17. On the website of the ZELWIN, users are given the opportunity to subscribe to newsletter service. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller. The newsletter may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter shipping. A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter. During the registration for the newsletter, an Website also store an IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The personal data collected as part of a registration for the newsletter will only be used to send our newsletter.



INFORMATION COLLECTED BY CONTACTING US VIA THE WEBSITE

18. The website contains information that enables a quick electronic contact to ZELWIN. If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject is automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller is stored

for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.



ERASURE AND BLOCK OF PERSONAL DATA

19. The data controller process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage. If the storage purpose is not applicable, or if a storage period expires, the personal data is routinely blocked or erased.

RIGHTS OF THE DATA SUBJECT

20. Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by contacting ZELWIN, DPO or sending an email to info@ZELWIN.com:

(1) to request access to your information and information related to our use and processing of your information, including:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- f) the existence of the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.
- i) to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

(2) To request and to obtain from the controller the confirmation as to whether or not personal data concerning him/her/it is being processed.

(3) to request the correction or deletion of your information. Data subject can request to delete his personal information (the right to be forgotten) in case:

a) the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.

b) the data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.

c) the data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.

d) the personal data have been unlawfully processed.

e) the personal data must be erased for compliance with a legal obligation in Curaçao.

f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by the ZELWIN, he or she may, at any time, contact any employee of the controller. An employee of ZELWIN shall promptly ensure that the erasure request is complied with immediately.

(4) to request that company restrict the processing of your information in cases when:

a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.

b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.

c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

d) the data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by the ZELWIN, he or she

may at any time contact any employee of the controller. The employee of the ZELWIN will arrange the restriction of the processing.

(5) to receive information which data subject have provided to us in a structured, commonly used and machine-readable format and the right to have that information transferred to another data controller (including a third party data controller);

(6) to object to the processing of your information for certain purposes; and

(7) to withdraw your data protection consent to our use of your information at any time where data controller rely on your consent to use or process that information.

21. In accordance with Article 77 of the General Data Protection Regulation, data subject have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her/its habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.



DISCLOSURE OF INFORMATION

22. We may disclose any information we collect about you, whether you are a current or former customer, including nonpublic personal information and any other information we collect, to ZELWIN affiliated companies and to non-affiliated third parties, which include non-financial companies, such as email service providers and fraud verification services, and others, such as other ZELWIN users with which you engage in transactions. We may make such disclosures:

(1) to service providers that perform marketing services on our behalf; and

(2) for everyday business purposes, such as to process transactions, maintain accounts, respond to court orders and legal investigations or report to credit bureaus.

(3) if we are under a duty to disclose or share your information to comply with our legal obligations.

23. Other than in connection with a merger, sale of ZELWIN assets, financing or acquisition, we will not sell or rent any of your information to third parties for their own marketing purposes.

24. Please note that third parties that support our customer identification and anti-fraud controls may retain and use information about you to perform services on our behalf and to improve their services. By using our Services, you consent to the retention and use of such information by these providers to improve their services.

25. We may also share aggregated or de-identified information with our affiliated companies or non-affiliated third parties, which cannot reasonably be used to identify you.

26. We may disclose your Personal Information to third parties and legal and regulatory authorities, and transfer your Personal Information outside the EEA. It may be processed by a staff member operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in amongst other things, the fulfillment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

27. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site, and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

28. We will also transfer your information outside the EEA or to an international organisation in the unlikely event that we are required to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.



CHILDREN'S PRIVACY

29. The Website and any products or Services available on Website are not intended to solicit information of any kind from persons under 18 years of age.

EXISTENCE OF AUTOMATED DECISION-MAKING

30. Data controller does not use automatic decision-making or profiling to process and use data subject's personal data.

SECURITY

31. ZELWIN use relevant electronic and procedural safeguards to protect the privacy of the information the User provide to ZELWIN from loss, misuse, disclosure, alteration and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. Please note that ZELWIN are not liable for the security of any data Users are transmitting over the Internet, or third party content.

PRIVACY-RELATED INQUIRIES AND COMPLAINTS NOTICE

32. ZELWIN takes and addresses its users' privacy concerns with utmost respect and attention. If you believe that there was an instance of non-compliance with this Privacy Policy with regard to your personal information or you have other related inquiries or concerns, you may write or contact ZELWIN at email: info@ZELWIN.com. In your message, please describe in as much detail as possible the nature of your inquiry or the ways in which you believe that the Privacy Policy has not been complied with. We will investigate your inquiry or complaint promptly. Please note that if you provide ZELWIN with inconsistent privacy preferences, ZELWIN cannot guarantee that your most recent privacy preference will be honored.