

Effective Date: June 23, 2021

tZERO CRYPTO PRIVACY POLICY

The tZERO Crypto Platform (as defined below) is operated by tZERO Crypto, Inc., a Utah corporation (for purposes of this Policy, “tZERO Crypto”, “our”, “we” or “us,”) and subsidiary of tZERO Group, Inc. This Privacy Policy (“Policy”) describes how we collect, use, and share your personal data in connection with your use of the “tZERO Crypto Platform”, which includes the tZERO Crypto mobile application (also referred to as “tZERO Crypto”) and related services, including when you create a tZERO Crypto account (“Account”).

This Policy governs the collection, use, disclosure, and your rights concerning personal information that we collect, except financial information that is collected pursuant to the Gramm-Leach-Bliley Act. For more information about our collection of financial information, please click [here](#).

This Policy does not apply to the other websites or mobile applications of tZERO Group, Inc. or any of its other affiliates, or any of the services provided through those other websites or mobile applications, or any services operated by third parties. Please refer to the privacy policies for those other websites and mobile applications for the data collection, use, and sharing practices applicable to those websites, mobile applications and services.

This Policy includes the following Sections:

- [What Information We Collect.](#)
- [How We Protect the Information We Collect.](#)
- [How We Share the Information We Collect.](#)
- [What Choices and Rights You Have Regarding Your Information.](#)
- [Your California Privacy Rights.](#)
- [Additional Information.](#)
- [How to Contact Us Regarding this Policy.](#)

WHAT INFORMATION WE COLLECT

The list below includes examples of the types of personal information we may collect from you through the tZERO Crypto Platform:

Context	Types of Data	Primary Purpose for Collection and Use of Data
Account Registration and Information	We collect your name and contact information when you create and use your account. This information also includes Social Security number or tax identification number; crypto virtual currency digital wallet addresses; a copy of government-issued ID; and images of you, which may include a ‘selfie’ photo. We also collect information relating to the actions that you perform while logged into your account.	We use this information to provide account related functionalities to our users, verify your identity, and comply with legal obligations. Accounts can be used for easy checkout and to save your preferences and transaction history.
Commercial Information	In order to operate your account, we may collect commercial information such as your payment history; transaction or loss history; purchase history; banking information; transactions through the tZERO Crypto Platform; and other payment processing information.	We use this information to place your transactions and the actions taken on the Tzero Crypto Platform and for regulatory compliance purposes.
Demographic Information	We collect personal information, such as your age or location.	We use this information to understand our users and provide tailored services and for regulatory reporting purposes.
Email Interconnectivity	If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases.	We use this information to understand how you interact with our communications to you and for marketing purposes.
Employment	If you apply for a job posting, or become an employee, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your Social Security Number, date of birth, contact information and information about your dependents for benefits purposes.	We use information to process your employment application or to facilitate the employment relationship. We may also use this information to offer benefits to you and your dependents. In some contexts, we are also required by law to collect information about our employees.
Feedback/Support	If you provide us feedback or contact us for support, we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply.	We use this information to receive and acting upon your feedback or issues.

Mailing List	When you sign up for one of our mailing lists, we collect your email address or postal address.	We share information about our products and services with individuals who may be interested in receiving such information.
Mobile Devices	We collect information from your mobile device such as unique identifying information broadcast from your device when visiting our website.	We use this information to identify unique visitors, and to understand how users interact with us on their mobile devices.

In many situations we have more than one purpose for processing your information. For example, if you use services through our tZERO Crypto Platform, we may collect your information to perform our services, but we also collect and maintain your information for record keeping and regulatory reporting purposes. As a result, our collection and processing of your information is based in different contexts upon different of these purposes. Please contact us by using the contact information provided at the end of this Policy to learn more about the purposes for which we use any specific types of your information.

We Collect Information from Other Sources

We may also obtain your personal information from third parties, including business partners, affiliates, and publicly available sources that can enhance and add to our information about you (e.g., adding address information). This may improve our ability to contact you and improve the relevancy of our marketing by providing better recommendations or special offers that we think will interest you.

Mobile Privacy

Although you do not have to provide your location information to us to use our tZERO Crypto Platform, our services require your address to function. If you request that we confirm your location or IP address, we may use your geolocation information to do so. Our tZERO Crypto Platform may also tell us the region of the world in which you are located when you use the tZERO Crypto Platform. If you have questions about location and notification privacy, please contact your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

HOW WE PROTECT THE INFORMATION WE COLLECT

No method of transmission over the Internet, or method of electronic processing or storage, is fully secure. While we maintain reasonable security measures to protect the confidentiality and security of information we hold, we cannot guarantee the security of your personal information. If we are required by law to inform you of a breach of your personal information, we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

If you register for an Account, you will be asked to select a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your Account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or Account.

HOW WE SHARE THE INFORMATION WE COLLECT

On the tZERO Crypto Platform

Any information you submit in a public forum on the tZERO Crypto Platform (e.g., a blog, chat room, or social network) can be read, collected, or used by us under this Policy (e.g., to personalize your experience).

It may also be read and used by other users of the tZERO Crypto Platform. You are responsible for the information you choose to submit in these instances.

Our Affiliates

We may share your information with our corporate affiliates and associates (*e.g.*, parent company, sister companies, subsidiaries, joint ventures, or other companies under common control), for example, for them to assist in providing services to you, develop their own products or market to you.

Service Providers

We may share your information with third parties that provide services to us. Among other things, these third parties help us with the administration, operation, and marketing of the tZERO Crypto Platform. This includes hosting, communications, printing, marketing, data enhancement, technical support, payment or transaction processing and fulfilment of services. Our service providers may only process your personal information for the purposes of providing services to us.

Other Third Parties

In the event you choose to utilize services of third-parties integrated in the tZERO Crypto Platform, for instance, virtual currency custodial services provided by third-parties, we will share information you provide in order to allow them to provide such services to you.

Legal Requirements

We may disclose information when we believe disclosure is appropriate to comply with the law, to enforce or apply applicable terms and conditions and other agreements, or to protect our rights, property or safety or the rights, property or safety of our affiliates, users, or third parties. For example, we may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.

When You Direct Us

We may share your information at your direction or request, through the tZERO Crypto Platform or otherwise.

With Your Consent

We may ask if you consent to share your information with other unaffiliated third parties who are not described elsewhere in this Policy and may share your information with your consent.

Business Transfers

If another entity acquires, or plans to acquire, our company, business, or our assets, we will also share information with that company, including at the negotiation stage. We also may retain a copy of that information.

WHAT CHOICES AND RIGHTS YOU HAVE REGARDING YOUR INFORMATION

If your information was collected by another party under their privacy policy, we may refer you to that party in order to exercise the choices regarding your data. If your data was collected by us under this Policy, depending on your jurisdiction, you may be able to make the following choices regarding your data. In

order to exercise any of these rights, you can contact us by using the contact information provided at the end of this Policy.

Access to Your Personal Information

You may request access to your information by contacting us using the contact information provided at the end of this Policy. If permitted and required by law, we will grant you reasonable access to the data that we have about you

Deletion of Your Personal Information.

You may request that we delete your personal information by contacting us using the contact information provided at the end of this Policy. If required by law, we may grant a request to delete information, but you should note that in many situations we are required to keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes. If we grant your request to delete your information, you should note that in many situations we may no longer be able to provide you with access to the functionality and services of the tZERO Crypto Platform.

Objection to Certain Processing.

You may object to our use of your information by contacting us using the contact information provided at the end of this Policy. In the event you object to our use for a specific purpose, we may be unable to provide certain services to you which depend on such use.

Rectify Your Information.

We rely on you to update and correct your information. Note that we may keep historical information in our backup files as permitted by law. If you encounter trouble updating or correcting certain information using the tZERO Crypto Platform, contact us at cryptosupport@tzero.com to ask us to correct the information that you think is inaccurate or incomplete.

E-mail Marketing

When we send you promotional emails based on your consent or as permitted by applicable laws, you have the right to unsubscribe. You also can unsubscribe to promotional e-mails by following the unsubscribe instructions in e-mails. Please allow us up to 10 business days to implement your request to unsubscribe. Note that even if you decide not to receive promotional emails, we may still send you service-related communications.

Important Notices and Transactional E-mail

From time to time, we may send non-commercial electronic email messages with important information about us or the tZERO Crypto Platform to your email address. Please note that any opt-out will not apply to other communications that will be provided to you in relation to your transactions with us, in agreement with us, or where required by law.

Revocation of Consent

If you revoke your consent for the processing of your information, then we may no longer be able to provide you with access to the functionality and services of the tZERO Crypto Platform. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) by contacting us using the contact information provided at the end of this Policy.

Appeal

If you believe that we have incorrectly denied you a right listed herein, you can appeal this decision by contacting us.

YOUR CALIFORNIA PRIVACY RIGHTS

California law indicates that organizations should disclose whether certain categories of information are collected, “sold” or transferred for an organization’s “business purpose”(as those terms are defined under California law). You can find a list of the categories of information that we collect and share [here](#).

You may exercise your right to know and your right to deletion twice a year free of charge. To exercise your right to know or your right to deletion, California residents may contact us at (855) 334-8608 or complete our “California Consumer Request” form available [here](#).

We will take steps to verify your identity before processing your request to know or request to delete. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify you are the individual about whom we collected personal information. If you have an Account with us, we will use our existing Account authentication practices to verify your identity. If you do not have an Account with us, we may request additional information about you to verify your identity. We will only use the personal information provided in the verification process to verify your identity or authority to make a request and to track and document request responses, unless you initially provided the information for another purpose.

You may use an authorized agent to submit a request to know or a request to delete. When we verify your agent’s request, we may verify both your and your agent’s identity and request a signed document from you that authorizes your agent to make the request on your behalf. To protect your personal information, we reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on their behalf.

Shine the Light: This Policy describes how we may share your information, including for marketing purposes. California residents are entitled to request and obtain from tZERO Crypto once per calendar year information about any of your personal information shared with third parties for their own direct marketing purposes, including the categories of information and the names and addresses of those businesses with which we have shared such information. You may submit your request to cryptosupport@tzero.com and include “Shine the Light” in the subject line of your email.

ADDITIONAL INFORMATION

Third Party Websites and Services

The tZERO Crypto Platform contains links to other websites and services not maintained by us or our affiliates. In addition, other websites and services may also reference or link to the tZERO Crypto Platform. Use of such third-party websites is subject to the terms of use and privacy policies of those third parties. We do not control the privacy policies or practices of these third-party websites. We encourage you to be aware when you enter or leave our tZERO Crypto Platform, or surf the Internet, and to read the privacy statements of each website and service that you visit. We do not endorse, screen, or approve, and are not responsible for the privacy practices or the content of, other websites or services.

Compliance with State and Federal Laws

Certain regulations issued by state and/or federal government agencies may require us to maintain and

report demographic information on the collective activities of our membership. We may also be required to maintain certain of your information to be in compliance with applicable federal and state laws regarding recordkeeping, reporting and audits.

Do Not Track

We do not currently recognize automated browser signals regarding tracking mechanisms, which may include “Do Not Track” instructions.

Accessibility

This Privacy Policy may be accessed via your browser’s audio reader.

Privacy Policy Revisions

We may change this Policy and our information collection, use, and sharing practices over time. To the extent that our Policy changes in a material way, the Policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy.

HOW TO CONTACT US REGARDING THIS POLICY

Please submit your questions or comments regarding this Policy via one of the following methods:

Mail: tZERO Crypto
285 Fulton Street
58th Floor
New York, NY 10007
Email: cryptosupport@tzero.com
Phone: (866) 256-3109

If you are not satisfied with our response, and are in the European Union, you may have a right to lodge a complaint with your local supervisory authority.

This Policy was last revised and updated on June 23, 2021.

California Information Sharing Disclosure

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether the following categories of personal information are collected, transferred for “valuable consideration,” or transferred for an organization’s “business purpose” (as those terms are defined under California law). We do not “sell” your personal information. The table below indicates the categories of personal information we collect and transfer in a variety of contexts. Please note that because this list is comprehensive, it may refer to types of information that we collect and share about people other than yourself. For example, while we transfer credit card or debit card numbers for our business purpose in order to process payments for orders placed with us, we do not collect or transfer credit card or debit card numbers of individuals that submit questions through our website’s “contact us” page.

Categories of Personal Information We Collect	To Whom We Disclose Personal Information for a Business Purpose
<p>Identifiers – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, account name, social security number, driver’s license number, passport number or other similar identifiers.</p>	<ul style="list-style-type: none"> • Advertising networks • Affiliates or subsidiaries • Business partners • Data analytics providers • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms • Social networks

<p>Additional categories of personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) – this may include signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms
<p>Characteristics of protected classifications – this may include age, sex, race, ethnicity, physical or mental handicap, etc.</p>	<ul style="list-style-type: none"> • Advertising networks • Affiliates or subsidiaries • Business partners • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Professional services organizations, this may include auditors and law firms • Social networks
<p>Commercial information – this may include information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • Advertising networks • Affiliates or subsidiaries • Business partners • Data analytics providers • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms • Social networks
<p>Biometric information</p>	<p>N/A</p>
<p>Internet or other electronic network activity information – this may include browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> • Advertising networks • Affiliates or subsidiaries • Business partners • Data analytics providers • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners

	<ul style="list-style-type: none"> • Operating systems and platforms • Other Service Providers • Social networks
Geolocation data	N/A
Audio, electronic, visual, thermal, olfactory, or similar information	N/A
Professional or employment-related information	<ul style="list-style-type: none"> • Background check vendors • Benefits providers • Payroll processors/providers • Other Service Providers • Affiliates or subsidiaries Government entities, as may be needed to comply with law or prevent illegal activity • Professional services organizations, this may include auditors and law firms
Non-public education information (as defined in the Family Educational Rights and Privacy Act)	N/A
Inferences drawn from any of the information listed above	<ul style="list-style-type: none"> • Advertising networks • Affiliates or subsidiaries • Business partners • Data analytics providers • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms • Social networks