

tZERO CRYPTO PRIVACY POLICY

The tZERO Crypto Platform (as defined below) is operated by Bitsy, Inc., a Utah corporation, dba tZERO Crypto (for purposes of this Policy, “**tZERO Crypto**”, “**our**”, “**we**” or “**us**,”), a 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**” includes the tZERO Crypto mobile application (also referred to as “**tZERO Crypto**”, “**tZERO Wallet**”, “**tZERO Crypto Wallet**”, “**tZERO Crypto App (Beta)**”, “**tZERO Crypto App**”, “**tWallet**”, or “**tCrypto**”) and website, as well as the services provided through the tZERO Crypto mobile application and website and the communications you exchange through the tZERO Crypto mobile application and website.

If you are using 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, this Policy does not apply to you. 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 and mobile applications.

This Policy includes the following Sections (you can jump to particular topics by clicking the headings below):

- What Information We Collect.
- Why We Collect Information.
- How We Collect Information.
- How We Protect the Information We Collect.
- How We Share the Information We Collect.
- How We Retain Information.
- What Choices and Rights You Have Regarding Your Information.
- 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:

- Your name
- Your e-mail address
- Your mailing and physical address
- Your phone (or mobile) number
- Your zip code
- Your date of birth
- A copy of government-issued ID
- Images of you, which may include a ‘selfie’ photo
- Your social security number (optional)
- Your account information, including your crypto address
- Your transaction data, including payment history, transaction or loss history, purchase history, and account transactions through the tZERO Crypto Platform
- Your credit card information
- Your banking information and other payment processing information
- Other information we may request to provide the tZERO Crypto Platform to you

In addition, we may collect and store non-personal information from you through the tZERO Crypto Platform. Non-personal information may include tracking of usage of our applications, website pages, videos, articles and presentations viewed, the amount of time spent using certain features of the tZERO Crypto Platform, demographic data such as server location, frequency of visits, search criteria used and results, date, time, the last website you visited prior to visiting the tZERO Crypto Platform, location of services, connection speed and other information which does not specifically identify you.

WHY WE COLLECT INFORMATION

Purposes for Processing

We process your information for the following purposes to: (1) provide access to the functionality and services of our tZERO Crypto Platform to you; (2) respond to your communications with us; (3) market our products and services to you; (4) analyze data to send more targeted messages to you, third parties or other users of our tZERO Crypto Platform; (5) conduct research and analyze data to improve our tZERO Crypto Platform; (6) deliver messages like special offers, updates, newsletters, customer service, and service announcements; (7) verify your information and your identity; (8) ensure legal compliance and exercise our legal rights, such as enforcing our agreements with you; (9) protect you and other users of our tZERO Crypto Platform and third parties; and (10) market third-party products and services and allow third parties to market tZERO Crypto Platform products and services.

We may also process your information to help us carry out certain internal functions such as information management, account processing, client services, or other data collection relevant to our business; to investigate and help prevent potentially unlawful activity or activities that threaten the integrity of the tZERO Crypto Platform; to protect and defend our rights or property or the rights or property of others; as required by courts or administrative agencies; and in connection with a financing, sale, merger, or reorganization of our business or assets.

Legal Bases for Processing

We process your information based on the following legal bases.

- Your consent, for example, sending you our marketing communications and responding to your queries.
- On the basis of the performance of a contract with you, for example, providing you the services that you request from us.
- On the basis of our legitimate interest to better target our communications, for example, the processing activities involving the analysis of your interests and preferences and serving you ads related thereto.
- On the basis of our legitimate interest to monitor and improve our tZERO Crypto Platform, for example, the processing activities relating thereto.
- On the basis of the compliance with a legal obligation.
- On the basis of our legitimate interest to ensure the security of the use of our tZERO Crypto Platform and protection of our tZERO Crypto Platform and users, for example processing activities relating to the verification of user information.
- On the basis of our legitimate interest to conduct and further develop our business, for example, processing activities required by business management and reorganization needs.

- Compliance with a legal obligation, to the extent required for our legal compliance.
- Our legitimate interest to protect our rights or property, or the rights or property of our affiliates, users, or third parties, including processing activities necessary to protect and defend us and/or enforce our legal rights.

In many situations we have more than one legal basis for processing your information. For example, if you use services through our tZERO Crypto Platform, we may collect your information to perform under our contract with you, but we also collect your information as we have a legitimate interest in maintaining your information for record keeping purposes. As a result, our collection and processing of your information is based in different contexts upon different of these legal bases. 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.

HOW WE COLLECT INFORMATION

We Collect Information Through Our Interactions With You

We collect information from you when you:

- You interact with our tZERO Crypto Platform.
- You request information about our tZERO Crypto Platform.
- You sign-in or visit our tZERO Crypto Platform or use the services and functionality available through our tZERO Crypto Platform.
- You use a social media service, for example, our Facebook page or YouTube channel.
- You sign up for e-mails, mobile messages, social media, or other communications or notifications from us.
- You enter a contest or sweepstakes, respond to one of our surveys, or participate in a focus group.
- You provide us with comments, suggestions, or other input.

We Collect Information Using Cookies and Other Technologies

In addition to collecting data directly from you, we may use cookies, tracking pixels/web beacons and or other technologies to receive and store certain types of information. “**Cookies**” are pieces of information that may be placed on your computer, tablet, or device for the purpose of facilitating and enhancing your communication and interaction with our tZERO Crypto Platform.

We may use cookies and these other technologies to collect information as follows:

Category 1: Strictly necessary. These cookies and other technologies are strictly necessary to enable you to use the tZERO Crypto Platform, for example accessing your account and providing you the services you have requested.

Category 2: User choices. These cookies and other technologies allow us to remember the choices you have made, for example your user name, language used, or country. They may be used for user preferences purposes, for example, settings you have applied to the tZERO Crypto Platform like the layout, default views, search filters, number of search results per page and video bandwidth. They may be also used for optimizing your experience on the tZERO Crypto Platform, for example remembering recently viewed pages as well as your last search terms.

Category 3: tZERO Crypto Platform Performance. These cookies and other technologies collect information about how you use the tZERO Crypto Platform, for example which pages visitors go to most often. They are only used to improve the way the tZERO Crypto Platform

works.

Category 4: Third Party Analytics. These cookies and other technologies are placed by our third party partners for web analytics purposes. Examples of these cookies and other technologies include Google Analytics and Adobe Analytics. For Google Analytics in particular, you can opt out by following the instructions provided at <https://tools.google.com/dlpage/gaoptout>. Opting out of Google Analytics will not opt you out of any other third-party cookies and other technologies.

Category 5: Third Party Targeting and/or Advertising. These cookies and other technologies are implemented by third party advertising networks with our consent and are used to deliver you more relevant ads. They may also remember the locations on the tZERO Crypto Platform you have visited, limit the number of times an ad is displayed to you, and measure the effectiveness of an advertising campaign, promotions and e-newsletters. For Google Advertising in particular, you can opt-out by following the instructions provided at <http://www.google.com/policies/technologies/ads/>. Opting out of Google Advertising will not opt you out of any other third-party cookies and other technologies.

Generally, you may stop or restrict the placement of our cookies on your computer by adjusting your web browser preferences, but please note that this may impact your ability to access and use the functionality of our tZERO Crypto Platform.

We Collect Information from Other Sources

We may also obtain 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 a zip code 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 transmitted to us, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to 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 on the tZERO Crypto Platform, 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 information with our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control), for example, for them to develop their own products or market to you.

Service Providers

We may share 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 fulfillment of services. In some cases, we share your information with these third parties and they may in turn use your information for their own purposes, for example, to develop their own products.

Other Third Parties

We may share your information with nonaffiliated third parties, for example, for them to develop their own products or market 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

At your direction or request, through the tZERO Crypto Platform or otherwise, we may share your information.

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.

International Data Transfers

The tZERO Crypto Platform is controlled and operated from facilities within the U.S. Nonetheless, where

possible we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your data. By submitting your information to us you agree to the transfer, storage and processing of your information in the U.S. and other countries, including countries other than your country of residence. By submitting your data to us you agree to the transfer, storage and processing of your information in a country other than your country of residence including, but not necessarily limited to, the U.S. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us by using the contact information provided at the end of this policy.

HOW WE RETAIN INFORMATION

We will retain your information under this Policy in accordance with the following principles:

- Until you withdraw your consent or we chose to dispose thereof, for our marketing activities directed to you;
- For the period necessary for responding to you, when you send us a query;
- For a minimum period of 2 years, for the processing activities involving the analysis of your interests and preferences and serving you ads related thereto;
- For a minimum period of 2 years, for the processing activities necessary to improve our products, services and the tZERO Crypto Platform;
- For a minimum period of 6 months for the processing activities required for the security of the use of our products and services;
- For the minimum duration of 7 years, for the processing activities required by business management and reorganization needs;
- For the duration required pursuant to a legal obligation;
- For the period required by applicable laws and regulations, for the activities relating to the offer or sale of cryptocurrency assets through the tZERO Crypto Platform;
- For the duration of legal proceedings and the related limitation periods, for processing activities necessary to protect against legal liability and enforce our rights; or
- For any other legitimate interest for which we are legally permitted to retain your information.

WHAT CHOICES AND RIGHTS YOU HAVE REGARDING YOUR INFORMATION

If your information was collected by another party under their privacy policy, we may have to refer you to that party in order to exercise the choices regarding your data. If your data was collected by us under this Policy, you can 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.

Changes To Your Personal Information.

We rely on you to update and correct your personal information. Note that we may keep historical information in our backup files as permitted by law. If our services do not permit you to update or correct certain information, please contact us by using the contact information provided at the end of this policy.

Deletion Of Your Personal Information.

Typically, we retain your data for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law. You may, however, request information about how long we keep a specific type of data, or request that we delete your personal information by contacting us using the contact information provided at the end of this policy. If permitted 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.

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 have the ability to 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.

Mobile

We may distribute mobile coupons and text messages to your mobile device if you have requested this information via an opt-in request. You may opt out of receiving text messages and mobile coupons via the texts you receive.

Telephone

If you do not wish to receive promotional telephone communication from us, call us at (800) 843-2446 to opt out. This opt out does not apply to operational communication, for example, confirmation of delivery address.

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.

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.

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 methods:

Mail: tZERO Crypto
One World Trade Center
285 Fulton Street
58th Floor
New York, NY 10007
Email: tZEROCrypto-legal@tzero.com
Phone: (800) 843-2446

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 August 21, 2019.