

Zircuit Privacy Notice

Last Updated: July 26, 2024

This Privacy Notice applies to the processing of personal information by Pantheon ZK Labs (“**Zircuit**,” “**we**,” “**us**,” or “**our**”) on the website available at <https://www.zircuit.com> (the “**Site**”).

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1. UPDATES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time in our sole discretion. If we do, we'll let you know by posting the updated Privacy Notice on our website, and/or we may also send other communications.

2. PERSONAL INFORMATION WE COLLECT

We collect personal information that you provide to us, personal information we collect automatically when you use the Site, and personal information from third-party sources, as described below.

A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

- **Account Information and Other Information You Provide to Us.** We may collect your personal information in connection with the creation or administration of your account. This personal information will include, but is not limited to, your digital wallet address. In addition, if you sign up for our newsletter or contact us, we will collect your email address. We may also collect your Telegram handle if you reach out to us via Telegram.
- **Wallet and Transaction Information:** To engage in transactions on the Site, you may need to provide us or our third-party payment processors with access to or information about your digital wallet. Once you connect your digital wallet, the associated wallet address will function as your identity when you use the Site. We do not consider the wallet address, standing alone, to be information that identifies you. However, a wallet address may become associated with you, your user ID or information we collect about you when you use the Site.
- **Other Transactions.** We may collect personal information and details associated with your activities on the Site, including to deliver you your rewards associated with your participation in the Zircuit Rewards Program (as further described in Zircuit [Terms of Service](#)).

- **Your Communications with Us.** We may collect your name and email when you contact us as well as other information that you choose to communicate to us, e.g., when you submit feedback, comments, ideas, proposals and suggestions for improvements to the Site (the “**Feedback**”), participate in our Bug Bounty and Zircuit Rewards Programs, subscribe to receive updates, or submit press and media inquiries.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features.** We and others who use the Site may collect personal information that you submit or make available through our interactive features (e.g., forums, blogs, and social media pages). Any information you provide using the public sharing features of the Site will be considered “public.”
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** If you apply for a job with us, we will collect any personal information you provide in connection with your application, such as your contact information and CV.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use the Site.

- **Device Information.** We may collect personal information about your device, such as your Internet protocol (IP) address, user settings, cookie identifiers, other unique identifiers, browser or device information, Internet service provider, and location information (including, as applicable, approximate location derived from IP address and precise geo-location information). Zircuit and our geo-location control service providers may use your IP address and device information to detect your location for purposes of determining whether you are in a Restricted Territory (as defined in our Terms of Service).
- **Usage Information.** We may collect personal information about your use of the Site, such as the pages that you visit, items that you search for, the types of content you interact with, information about the links you click, the frequency and duration of your activities, and other information about how you use the Site.
- **Cookie Notice (and Other Technologies).** We, as well as third parties, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect personal information through your use of the Site.
 - **Cookies.** Cookies are small text files stored in device browsers.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in the Site that collects personal information about use of or engagement with the Site. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

See [“Your Privacy Choices”](#) below to understand your choices regarding these Technologies.

C. Personal Information Collected from Third Parties

- **Third-Party Services and Sources.** We may collect personal information about you from third parties. For example, if you access the Site using a Third-Party Service (defined below), we may collect personal information about you from that Third-Party Service that you have made available via your privacy settings. In addition, users of the Site may upload or otherwise provide personal information about others.
- **Referrals and Sharing Features.** Our Site may offer tools and functionalities that allow us to collect personal information about your friends through our referral service. For example, if you participate in the Zircuit Rewards Program, you can refer friends and earn 15% of all points your friends earn when they join through your referral code. Please only share with us contact information of people with whom you have a relationship (e.g., relative, friend, neighbor, or co-worker).

3. HOW WE USE PERSONAL INFORMATION

We use personal information for a variety of business purposes, including to provide the Site, for administrative purposes, and to provide you with marketing materials, as described below.

A. Provide the Site

We use personal information to fulfill our contract with you and provide the Site, such as:

- Managing your information;
- Providing access to certain areas, functionalities, and features of the Site;
- Answering requests for support;
- Communicating with you;
- Sharing personal information with third parties as needed to provide the Site;
- Connecting to your wallet to allowing you to engage in staking activities or to engage in building on the Site;
- Processing applications if you apply for a job we post on the Site; and
- Allowing you to register for events.

B. Administrative Purposes

We use personal information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Carrying out analytics;
- Administering the Bug Bounty Program and Zircuit Rewards Program;
- Measuring interest and engagement in the Site;
- Improving, upgrading, or enhancing the Site;
- Developing new products and services;
- Creating de-identified and/or aggregated information. If we create or receive de-identified information, we will not attempt to reidentify such information, unless permitted by, or required to comply with, applicable laws;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities;
- Debugging to identify and repair errors with the Site;

- Auditing relating to interactions, transactions, and other compliance activities;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

C. Marketing

We may use personal information to tailor and provide you with marketing and other content. We may provide you with these materials as permitted by applicable law. If you have any questions about our marketing practices, you may contact us at any time as set forth in [“Contact Us”](#) below.

D. With Your Consent or Direction

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information, with your consent, or as otherwise directed by you.

4. HOW WE DISCLOSE PERSONAL INFORMATION

We disclose personal information to third parties for a variety of business purposes, including to provide the Site, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide the Site

We may disclose any of the personal information we collect to the categories of third parties described below.

- **Disclosures to the Blockchain.** Aspects of the Site may be hosted on or interact with the blockchain. Where you use aspects of the Site that are hosted on or interact with the blockchain, information about your interactions and/or transactions will be provided to the applicable blockchain network and may be accessible to third parties due to the nature of the blockchain protocol.
- **Service Providers.** We may disclose personal information to third-party service providers that assist us with the provision of the Site. This may include, but is not limited to, service providers that provide us with hosting, customer service, analytics, marketing services, recruiting services, IT support, digital wallets, and related services.
- **Other Users You Share or Interact With.** The Site may allow Zircuit users to share personal information or interact with other users of the Site.
- **Third-Party Services You Share or Interact With.** The Site may link to or allow you to interface, interact, share information with, direct us to share information with, access and/or use third-party websites, applications, services, products, and technology (each a **“Third-Party Service”**). For example, to use certain aspects of the Site, you must use a wallet that allows you to engage in transactions on public blockchains. If you participate in the Zircuit Rewards Program, your reward data will be public and shared with staking protocols. Any personal information shared with a Third-Party Service will be subject to the Third-Party Service’s privacy policy. We are not responsible for the processing of personal information by Third-Party Services.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services. Once your personal information is shared with our business partner, it will also be subject to our business partner’s privacy policy. We are not responsible for the processing of personal information by our business partners.
- **Affiliates.** We may share your personal information with our corporate affiliates.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing, reorganization, bankruptcy, receivership, purchase or sale of assets, transition of service to another provider, or other similar corporate transaction, your personal information may be disclosed, sold, or transferred as part of such a transaction.

5. YOUR PRIVACY CHOICES

The privacy choices you may have about your personal information are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe functionality found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails. We may also send you certain non-promotional communications regarding us and the Site, and you will not be able to opt out of those communications (e.g., communications regarding the Site or updates to this Privacy Notice).
- **“Do Not Track.”** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, the Site may not work properly.

Please note you must separately opt out in each browser and on each device.

6. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

All personal information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live.

7. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Notice for as long as you use the Site, or as necessary to fulfill the purpose(s) for which it was collected, provide the Site, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

To determine the appropriate retention period for personal information, we may consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, certain risk factors, the purposes for which we process your personal information, and whether we can achieve those purposes through other means.

D.

8. CHILDREN'S PERSONAL INFORMATION

The Site is not directed to children under 18 (or other age as required by local law outside the United States), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to the Site in violation of applicable law, you may contact us as described in "[Contact Us](#)" below.

9. THIRD-PARTY WEBSITES/APPLICATIONS

The Site may contain links to other websites/applications and other websites/applications may reference or link to the Site. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

10. CONTACT US

If you have any questions about our privacy practices or this Privacy Notice, please contact us at: hello@zircuit.com.