
ZEITGEIST.PM PRIVACY POLICY

Effective Date: 9 November 2021

1. ABOUT THIS POLICY

- 1.1. This is the Privacy Policy for Zeitgeist PM LLC, a company limited by shares incorporated in Saint Vincent and the Grenadines with the company registration number 858 LLC 2021 (collectively referred to herein as “**Zeitgeist**”, “**us**”, “**we**” or “**our**”).
- 1.2. This Privacy Policy describes how we may collect, use, disclose and process your personal data when you:
 - 1.2.1. access or use our websites and applications (including mobile and web-based applications) (collectively, “**Applications**”), and services; and/or
 - 1.2.2. provide us with your personal data.
- 1.3. We will only use your personal data where you have given us your consent or where we have other lawful basis for doing so, and in the manner set out in this Privacy Policy.
- 1.4. By providing us with personal data, you acknowledge that our collection, use, disclosure and processing of personal data will be in accordance with this Policy, including, for the avoidance of doubt, the cross-jurisdictional transfer of your data. DO NOT provide any personal data to us if you do not accept this Privacy Policy.
- 1.5. This Privacy Policy supplements but does not supersede or replace any consents you may have provided to us, or any other agreements or arrangements that you may have with us, in respect of your personal data.
- 1.6. Our Applications may contain links to other websites that are not owned or maintained by us. These links are provided only for your convenience. You may also be accessing our Applications through third party websites and/or platforms. This Privacy Policy only applies to our Applications. When visiting these third party websites, their privacy policies apply.
- 1.7. If you have any feedback or issues in relation to your personal data, or about this Privacy Policy, or wish to make a complaint to us, you may contact our Data Protection Officer at :

Email : dpo@zeitgeist.pm

This does not affect your statutory rights. For example, if the GDPR applies to you, you may also have a right to lodge a complaint with a European supervisory authority, in particular in the Member State in the European Union where you are habitually resident, where you work or where an alleged infringement of Data Protection law has taken place.

When you contact us, we may require that you submit certain forms or provide certain information, including verification of your identity, before we are able to respond.

2. AMENDMENTS TO THIS PRIVACY POLICY

- 2.1. We may amend this Privacy Policy from time to time without notice to you, in compliance with applicable laws or as we update our data usage and handling processes. The updated policy will supersede earlier versions and will apply to personal data provided to us previously. The updated Privacy Policy will take effect when made available on <https://zeitgeist.pm/privacy>. If we make a change that significantly affects your rights or, to the extent we are permitted to do so, significantly changes how or why we use personal data, we will notify you by way of a prominent notice on our website or, if we have your email address, by email.

3. WHAT PERSONAL DATA WE COLLECT

3.1. **What is personal data.** “Personal data” is data that can be used to identify a natural person. Examples of personal data include name, address, contact details, identification numbers, financial information, transactional information based on your activities on our websites, applications and platforms, telephone numbers, email address, images, and any other information of a personal nature.

3.2. **Voluntary provision of personal data.** We may collect personal data (1) that you voluntarily provide to us; or (2) from third parties; or (3) through your use of our (or our services provider's) digital technologies and services (*Please see Section 4 How We Collect Personal Data for further details*). What personal data we collect depends on the purposes for which the personal data is collected and what you have chosen to provide.

When our collection is based on consent, you can choose not to provide us with personal data. You also have the right to withdraw your consent for us to continue collecting, using, disclosing and processing your personal data, by contacting us in accordance with paragraph 1.7. However, if you do so, it may not be possible for us to fulfil the purposes for which we require the personal data, including processing your transactions or providing you with the products and services that you require.

3.3. **Providing personal data belonging to others.** In certain circumstances, you may also provide us with personal data of persons other than yourself (such as your family members and next-of-kin). If you do so, you represent and warrant that you have brought this Privacy Policy to his/her attention, informed him/her of the purposes for which we are collecting his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes and accepts this Privacy Policy. You agree to indemnify and hold us harmless from and against any and all claims by such individuals relating to our collection, use and disclosure of such personal data in accordance with the terms of this Privacy Policy.

3.4. **Accuracy and completeness of personal data.** You are responsible for ensuring that all personal data that you provide to us is true, accurate and complete. You are responsible for informing us of any changes to your personal data.

3.5. **Minors.** Our Applications and/or services are not intended to be accessed or used by children, minors or persons who are not of legal age. If you are a parent or guardian and you have reason to believe your child or ward has provided us with their personal data without your consent, please contact us.

4. HOW WE COLLECT PERSONAL DATA

4.1. **Personal data you provide.** We collect personal data that is relevant to our relationship with you. We may collect your personal data directly or indirectly through various channels, such as when:

- 4.1.1. you register an account with us through our Applications;
- 4.1.2. you download or use our Applications and services;
- 4.1.3. you authorise us to obtain your personal data from a third party;
- 4.1.4. you register your interest for the purpose of being whitelisted as a potential acquirer of the tokens we offer for sale, whether through our Applications or other platforms (e.g. those offered by Tokensoft Inc.);
- 4.1.5. you enter into agreements with us;
- 4.1.6. you transact with us, contact us or request that we contact you through various communication channels, for example, through social media platforms, messenger platforms, face-to-face meetings, telephone calls, emails, fax and letters;
- 4.1.7. you request to be included in an e-mail or our mailing list;

- 4.1.8. you attend events or functions organised by us;
- 4.1.9. we seek information about you and receive your personal data in connection with your relationship with us; and
- 4.1.10. when you submit your personal data to us for any other reason.

4.2. **Personal data provided by others.** Depending on your relationship with us, we may also collect your personal data from third party sources, for example, from:

- 4.2.1. any third parties whom you have authorised us to obtain your personal data from;
- 4.2.2. entities in which you (or a party connected to you) have an interest;
- 4.2.3. our business partners such as third parties providing services to us;
- 4.2.4. your family members or friends who provide your personal data to us on your behalf; and/or
- 4.2.5. public agencies or other public sources.

5. WHAT WE DO WITH YOUR PERSONAL DATA

5.1. **What we do.** We collect, use, disclose and process your personal data where:

- 5.1.1. you have voluntarily provided us with your personal data;
- 5.1.2. you have given us consent;
- 5.1.3. it is necessary to comply with our legal or regulatory obligations, e.g. responding to valid requests from public authorities;
- 5.1.4. it is necessary to support our legitimate business interests, provided that this does not override your interests or rights; and
- 5.1.5. it is necessary to perform a transaction you have entered into with us, or provide a service that you have requested or require from us.

5.2. **General purposes.** We collect, use, disclose and process your personal data for purposes connected or relevant to our business, or to manage your relationship with us. Such purposes would include:

- 5.2.1. carrying out your transactions with us and our business partners, taking steps as may be directed by you, or to provide products and/or services to you;
- 5.2.2. facilitating your use of our Applications, including verifying and establishing your identity;
- 5.2.3. facilitating business asset transactions;
- 5.2.4. communicating with you, and assisting you with your queries, requests, applications, complaints, and feedback;
- 5.2.5. resolving any disputes, investigating any complaint, claim or dispute or any actual or suspected illegal or unlawful conduct;
- 5.2.6. administrative purposes, including finance, IT and HR purposes, quality assurance and staff training, and compliance with internal policies and procedures, including audit, accounting, risk management and record keeping;
- 5.2.7. carrying out research and statistical analysis, including development of new products and services or evaluation and improvement of our existing products and services;
- 5.2.8. security purposes, e.g. protecting our Applications from unauthorised access or usage and to monitor for security threats;
- 5.2.9. compliance with any legal or regulatory obligations, applicable laws, regulations, codes of practices, guidelines, or rules (including anti-money laundering and countering the financing of terrorism laws), or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- 5.2.10. performing data analytics and related technologies on data, to enable us to deliver relevant content and information to you, and to improve our websites and digital platforms;

- 5.2.11. managing and engaging third parties or data processors that provide services to us, e.g. IT services, technological services, delivery services, and other professional services;
- 5.2.12. carrying out our legitimate business interests;
- 5.2.13. such purposes that may be informed to you when your personal data is collected; and/or
- 5.2.14. any other reasonable purposes related to the aforesaid.

Where personal data is used for a new purpose and where required under applicable law, we shall obtain your consent.

5.3. **Legitimate business interests.** We may also collect, use, disclose and process your personal data for the following purposes to support our legitimate business interests, provided that this does not override your interests or rights, which include:

- 5.3.1. managing our business and relationship with you, and providing services to our customers;
- 5.3.2. assistance of carrying out corporate restructuring plans;
- 5.3.3. complying with internal policies, and procedures;
- 5.3.4. protecting our rights and interests, and those of our customers;
- 5.3.5. enforcing our terms and conditions, and obligations owed to us, or protecting ourselves from legal liability;
- 5.3.6. managing our investor and shareholder relations; and
- 5.3.7. process or share your personal data to facilitate acquisitions, mergers, or transfers of our business.

5.4. **Marketing purposes.** In order for us to market products, events and services which are of specific interest and relevance to you, we may analyse and rely on your personal data provided to us, or data collected from your interactions with us. However, no marketing, using your personal data in non-aggregated and/or identifiable form would be carried out unless you have provided us with your consent to use your personal data for such marketing purposes. If you do not want us to use your personal data for the purposes of marketing you can withdraw your consent at any time by contacting us in accordance with paragraph 1.7 above.

5.5. **Use permitted under applicable laws.** We may also collect, use, disclose and process your personal data for other purposes, without your knowledge or consent, where this is required or permitted by law. Your personal data may be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of a legal claim. We will not delete personal data if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

5.6. **Contacting you.** When we contact or send you information for the above purposes and purposes for which you have consented, we may do so by post, e-mail, SMS, telephone or such other means provided by you. If you do not wish to receive any communication or information from us, or wish to restrict the manner by which we may contact or send you information, you may contact us in accordance with paragraph 1.7 above.

6. USE OF AUTOMATED DATA COLLECTION TECHNOLOGIES

6.1. **Cookies.** In order to improve our products or services, we collect data by way of "cookies". A cookie is a small file of letters and numbers that we store via your browser on the hard drive of your computer or mobile device. There are three main types of cookies:

6.1.1. **Session cookies:** specific to a particular visit and limited to sending session identifiers (random numbers generated by the server) so you don't have to re-enter information when you navigate to a new page or check out. Session cookies are not permanently stored on your device and are deleted when the browser closes;

- 6.1.2. **Persistent cookies:** record information about your preferences and are stored in your browser cache or mobile device; and
- 6.1.3. **Third party cookies:** placed by someone other than us which may gather data across multiple websites or sessions.

6.2. **How we use cookies.** We use cookies for the following purposes:

- 6.2.1. **Strictly necessary:** These cookies are essential for you to browse our Applications and use its features. The information collected relates to the operation of the Applications (e.g. website scripting language and security tokens) and enables us to provide you with the service you have requested.
- 6.2.2. **Functionality:** These cookies remember the choices you have made, for example the country you visit our Website from, your language and any changes you have made to text size and other parts of the web pages that you can customise to improve your user experience and to make your visits more tailored and enjoyable. The information these cookies collect may be anonymised and cannot be used to track your browsing activity on other websites.
- 6.2.3. **Performance/analytics:** These cookies collect information on how users use our Website, for example which pages you visit most often, whether you receive any error messages and how you arrived at our Applications. Information collected by these cookies is used only to improve your use of our Applications. These cookies are sometimes placed by third party providers of web traffic and analysis services. We use Google Analytics. For information on how Google processes and collects your information and how you can opt out, please click here.¹
- 6.2.4. **Social Media:** These cookies allow users to share our website content on social media such as Facebook and Twitter. These cookies are not within our control. Please refer to the respective privacy policies of the social media providers for how their cookies work.

We may also automatically collect and store certain information about your interaction with our Applications including IP address, browser type, internet service provider, referring/exit pages, operating system, date/time stamps and related data.

6.3. **Other technologies.** In addition to cookies, we use some other similar technologies as follows:

- 6.3.1. **Web Beacons:** small graphic images included on our Applications or emails or those of third parties to provide analytics information.
- 6.3.2. **Social widgets:** buttons or icons provided by third party social media networks which may collect browsing data and will be received by the third party and are controlled by the third party.
- 6.3.3. **SDKs:** these are mobile application third party software development kits used in our apps. They enable us to collect information about app activity and the device it runs on.
- 6.3.4. **Local shared objects:** these are sometimes called flash cookies and can be stored on your browser. They are used to maintain preferences and usage records.

6.4. **Refusing or deleting cookies.** Most internet browsers are set up by default to accept cookies. However if you want to refuse or delete them (or similar technologies) please refer to the help and support area on your browser for instructions on how to block or delete cookies (for example: Internet Explorer, Google Chrome, Mozilla Firefox and Safari). Please note you may not be able to take advantage of all the features of our Applications, including certain personalised features, if you delete or refuse cookies.

6.5. **Mobile Opt-out.** If you access our Applications through mobile devices, you can enable a "do not track" feature so as to control interest-based advertising on an iOS or Android mobile

¹ <https://policies.google.com/privacy?hl=en-US>

device by selecting the Limit Add Tracking option in the privacy section of your Settings on iOS or via advertising preferences on Android devices (e.g. in Google Settings). This will not prevent the display of advertisements but will mean that they will no longer be personalised to your interests.

- 6.5.1. To opt out of Google Analytics, visit <https://tools.google.com/dlpage/gaoptout>
- 6.5.2. For more information on managing cookies, please go to www.allaboutcookies.org
- 6.6. **If you are a resident in the EU.** For more information on managing cookies, please visit www.youronlinechoices.eu and www.aboutcookies.org. These links have further information about behavioural advertising and online privacy.
- 6.7. **Changes to our uses of Cookies.** If we change anything important about this Paragraph 6 on cookies, we will notify you through a pop-up on the website for a reasonable length of time prior to and following the change. You may review this Paragraph by visiting the sites and clicking on the "Privacy Policy" link.

7. DISCLOSURE OF PERSONAL DATA

- 7.1. **Disclosure to third parties.** We may also disclose your personal data to third parties in connection with purposes described in paragraph 5, including without limitation the following circumstances:
 - 7.1.1. disclosing your personal data to third parties who provide services to us (including, but not limited to, data providers, technology providers, insurance providers, and other professional services (including accountants, lawyers and auditors));
 - 7.1.2. disclosing your personal data to third parties in order to fulfil such third party products and/or services as may be requested or directed by you;
 - 7.1.3. disclosing your personal data to third parties that we conduct marketing and cross promotions with;
 - 7.1.4. disclosing your personal data to authorities, governments, law enforcement agencies or public agencies;
 - 7.1.5. If we are discussing selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
 - 7.1.6. If we are reorganised or sold, information may be transferred to a buyer who can continue to provide continued relationship with you; and
 - 7.1.7. If we are defending a legal claim your information may be transferred as required in connection with defending such claim.
- 7.2. When disclosing personal data to third parties, we will (where appropriate and permissible) enter into contracts with these third parties to protect your personal data in a manner that is consistent with all applicable laws and/or ensure that they only process your personal data in accordance with our instructions.

8. TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES

- 8.1. **Transfers.** We may transfer your personal data to different jurisdictions in connection with the purposes described in paragraph 5:
 - 8.1.1. from the jurisdiction where it is collected (or where you are located) to any other jurisdictions that we operate in; and
 - 8.1.2. to third parties in other jurisdictions.
- 8.2. **Safeguards.** Where we transfer your personal data across jurisdictions, we will ensure that your personal data is protected in accordance with this policy and applicable laws regardless of the jurisdictions they are transferred to, but in any event to a level that is no less stringent than the jurisdiction from which the personal data is transferred. When we transfer your

personal data internationally and where required by applicable law we put in place appropriate safeguards including EU Model Clauses or rely on EU Commission adequacy decisions. You may obtain details of these safeguards by contacting us.

9. SECURITY AND RETENTION OF PERSONAL DATA

- 9.1. **Unauthorised access.** While we take reasonable precautions to safeguard your personal data in our possession or under our control, you agree not to hold us liable or responsible for any loss or damage resulting from unauthorised or unintended access that is beyond our control, such as hacking or cybercrimes.
- 9.2. **Vulnerabilities.** We do not make any warranty, guarantee, or representation that your use of our systems or applications is safe and protected from malware, and other vulnerabilities. We also do not guarantee the security of data that you choose to send us electronically. Sending such data is entirely at your own risk.
- 9.3. **Period of retention.** We retain your personal data only for as long as is necessary to fulfil the purposes we collected it for, and to satisfy our business and/or legal purposes, including data analytics, audit, accounting or reporting purposes. How long we keep your personal data depends on the nature of the data, e.g. we keep personal data for at least the duration of the limitation period for bringing claims if the personal data may be required to commence or defend legal proceedings. Some information may also be retained for longer, e.g. where we are required to do so by law.
- 9.4. **Anonymised data.** In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we are entitled to retain and use such data without restriction.

10. YOUR RIGHTS

- 10.1. **Rights you may enjoy.** Depending on the jurisdiction that you are in or where we operate, you may enjoy certain rights under applicable law in relation to our collection, use, disclosure and processing of your personal data. Such rights may include:
 - 10.1.1. **Access:** you may ask us if we hold your personal data and, if we are, you can request access to your personal data. This enables you to receive a copy of and information on the personal data we hold about you.
 - 10.1.2. **Correction:** you may request that any incomplete or inaccurate personal data we hold about you is corrected.
 - 10.1.3. **Erasure:** you may ask us to delete or remove personal data that we hold about you in certain circumstances.
 - 10.1.4. **Restriction:** you may withdraw consent for our use of your personal data, or ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy.
 - 10.1.5. **Portability:** you may request the transfer of certain of your personal data to another party under certain conditions.
 - 10.1.6. **Objection:** where we are processing your personal data based on a legitimate interest (or those of a third party) you may object to processing on this ground.

If you wish to exercise any of your rights, you may contact us in accordance with paragraph 1.7. We may require that you submit certain forms or provide certain information to process your request. Where permitted by law, we may also charge you a fee to process your request.

- 10.2. **Limitations.** We may be permitted under applicable laws to refuse a request, for example, we may refuse (a) a request for erasure where the personal data is required for in connection with claims; or (b) an objection request and continue processing your personal data based on compelling legitimate grounds for the processing.