

ZENLEDGER PRIVACY POLICY

Date of Last Update: April 10, 2018

At ZenLedger, Inc. (“ZenLedger” or “we” or “us”), we value the privacy of our users. We understand that our users (“You”) may have concerns about how Your data is collected and used. In this ZenLedger Privacy Policy (the “Policy”) we have made the effort to use simple, concise language to describe the ways in which we may collect or receive information or data about You, how that data or information may be used, and other information about Your rights related to Personal Data.

Subject to the terms of this Privacy Policy, it is important to note that we will NEVER share any of Your Personal Data with any third party without first obtaining Your explicit consent.

We encourage You to carefully read this Policy to understand these processes and Your related rights. As used in this Policy, the term “ZenLedger Services” includes all websites, pages that are associated or within each website and all devices, applications or services that ZenLedger operates or makes available to You. When we use the term “Personal Data” in this Policy we mean any information relating to a natural person who can be identified, directly or indirectly, by using such information. Personal Data includes, but is not limited to, Your name, email address, mailing address, cryptocurrency wallet information, or tax-related information.

Please note that this Policy does not cover any Personal Data that we may receive about you through sources other than ZenLedger Services.

By accessing and continuing to use the ZenLedger Services, You acknowledge that You have had the chance to review and consider this Policy, and You acknowledge that You agree to all of it. This means that You also consent to the use of your Personal Data and the methods of disclosure as described in this Policy. If You do not understand the Policy or do not agree to one or more provisions of this Policy, please immediately cease your use of ZenLedger Services.

This Policy specifically incorporates by reference the entirety of our Terms of Use.

1. Overview; Consent to Processing

Through your use of the ZenLedger Services, You will be subject to different methods of collection of your Personal Data. We will collect and process Your Personal Data in a lawful, fair, and transparent manner and, where appropriate, with Your knowledge or consent. By using the ZenLedger Services, You are consenting to our processing of Your Personal Data as set forth in this Policy. The term “processing” includes collecting, storing, deleting, using, and disclosing Personal Data.

2. Data Minimization Practices; Types of Information We May Collect

At ZenLedger we aim to utilize “data minimization” practices in the operations of our business. This means that we will only collect and process the minimal amount of Personal Data that is necessary to operate the ZenLedger Services and for the operation of our business. The following types of information may be collected by us through Your use of the ZenLedger Services:

- a. Registration Information: You will be asked to register an account to use the ZenLedger Services. During the process of your registration, you will be asked to provide your email address and a password. You may also be requested to provide information about any cryptocurrency wallets that you would like to disclose. We will use this information to provide the ZenLedger Services to You and ensure the security of the ZenLedger Services.
- b. Billing Information: If You elect to use any of our paid services, You will be asked to provide billing information such as Your credit card number and billing address. This Personal Data will be used specifically for providing You with the services you have purchased. The payment and billing information may be stored for the time period as required by applicable law for lawful purposes (e.g., accounting records).
- c. Cryptocurrency and Financial Information: Depending on how You choose to use the ZenLedger Services, You may be asked to provide your cryptocurrency wallet and general portfolio information and other information that will assist us in providing the ZenLedger Services to you. This may be through Your upload of a CSV file containing wallet information, or it may be through some other means.
- d. Information about Your Use: Through Your use of the ZenLedger Services, You may be asked questions about how to improve ZenLedger Services or You may, at some point, communicate with representatives of ZenLedger (e.g., for customer support). We will receive Your email address, as well as the contents of your communications, answers to questions and any other form of contact between you and ZenLedger. We will use Personal Data contained in such communications only for the purposes of providing you with the requested information and for improving the ZenLedger Services.
- e. Information Obtained via Automatic Collection: We may collect information from You through automatic tracking systems on Your device, or other web and mobile analysis software. We may also receive certain usage data, such as your IP address and referral source. We may use this information for the operation of our business, including analyzing usage of the ZenLedger Services.

3. Collection of Non-Personal Data

We may collect non-Personal Data, such as browser types, operating systems, and the URL addresses of websites clicked to and from the ZenLedger Services, including links or other technology that we may embed within the ZenLedger Services in order to analyze what kind of users visit our Site, how they find it, how long they stay, from which other websites they come

to use ZenLedger Services, what pages they look at, and to which other websites they go from the ZenLedger Services.

4. How We May Use Information that We Collect

Subject to the terms of this Policy, we will never share Your Personal Data with any third-party without first obtaining your prior explicit consent.

A. General Uses of the Information We Collect

We primarily use the information we collect to enable Your use of ZenLedger Services and supply the services requested by You. We may also use Your Personal Data for the following purposes:

- i. Asking You about Your experience using the ZenLedger Services;
- ii. Communicating with You about Your user account with us;
- iii. Analyzing our aggregate user data;
- iv. Enforcing our Terms of Use;
- v. Providing customer services to You;
- vi. Advising You about updates to the ZenLedger Services or related items;
- vii. Other legitimate or lawful purposes related to the ongoing operation of our business; or
- viii. Providing You with information about services that are similar to the services used by You.

We may anonymize and aggregate Your Personal Data (i) in order to better serve You and to better enhance and update ZenLedger Services for Your and others' use; and (ii) to share with other third parties, but any aggregation would not result in the disclosure of any Personal Data of our users.

We will seek Your prior express consent for using your Personal Data for any purposes that are not indicated in this Policy.

B. Marketing or Promotional Communications

From time to time, we may send You informational communications related to the ZenLedger Services, such as announcements about updates to the ZenLedger Services. You may also receive information from us that is specifically about Your use of ZenLedger Services or about Your account with us, including information about security breaches or other privacy-related matters. Please note that such communication does not fall within the scope of direct marketing communication.

After we obtain your explicit prior consent, we may use Your Personal Data for direct marketing purposes, such as:

1. Sending You a newsletter;
2. Offering You new products, services, mobile applications, and/or recommendations;
3. Profiling; and
4. Delivering You targeted information regarding promotions related to ZenLedger Services.

If you decide at any time that you no longer wish to receive communications from us, please follow the “unsubscribe” instructions provided in the communications or contact us at support@zenledger.io.

5. How Information Is Stored And Kept Secure.

A. Protection of Personal Data

We protect Your Personal Data by using reasonable security safeguards against loss or theft, unauthorized access, disclosure, copying, use, or modification. Your Personal Data is contained behind secured networks and are only accessible by a limited number of persons who have special access rights to such systems and are required to keep the Personal Data confidential. We implement a variety of security measures when users enter, submit, or access their Personal Data to maintain the safety of Your Personal Data. Please note, however, that no system involving the transmission of information via the Internet, or the electronic storage of data, is completely secure. However, we take the protection and storage of Your Personal Data very seriously and we therefore take reasonable steps to ensure the ongoing confidentiality, integrity, and availability of your Personal Data. Nevertheless, we are not liable for any loss, theft, unauthorized access, disclosure, copying, use, or modification of your Personal Data that occurs outside our reasonable control. **You understand and acknowledge that ZenLedger will have no liability for any breach or unauthorized disclosure of your Personal Data or information that we collect about You, and you expressly waive and disclaim any claims You may have against ZenLedger related to the loss, disclosure, damage or corruption of Your Personal Data.**

B. Breach notification

Should a Personal Data breach occur, we will promptly inform the relevant authorities and take reasonable measures to mitigate the breach. We will notify You about such a breach via email as soon as possible.

C. Retention period

Your Personal Data will be kept for as long as it is necessary to provide You with the requested services. When your Personal Data are no longer necessary to deliver the requested services, we will delete your Personal Data, unless we are obliged by law to retain such Personal Data for a specific period of time, or to comply with our internal document retention policies.

6. Cookies

The ZenLedger Services use cookies. These cookies are small files stored on your computer or mobile device which collect information about your browsing behavior. These cookies do not access information which is stored on Your computer.

There are two types of cookies, namely, persistent cookies (i.e., cookies that remain valid until their expiration date, unless deleted by the user before that date) and session cookies (i.e., cookies that are stored on a web browser and remain valid until the moment when the browser is closed). We may use both persistent cookies and session cookies in the provision of the ZenLedger Services.

We use cookies to help us remember information about your account. For example, cookies are used to help us understand Your preferences based on previous or current activity on ZenLedger Services, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about ZenLedger Services traffic and interaction so that we can offer better experiences and tools in the future. Other reasons we use cookies include (but are not limited to):

- A. Understanding and saving user's preferences for future visits;
- B. Keeping track of advertisements; and
- C. Compiling aggregate data about traffic and interactions in order to offer better experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

Most Internet browsers accept cookies automatically, although You are able to change Your browser settings to control cookies, including whether or not You accept them, and how to remove them. You may also be able to set your browser to advise You if you receive a cookie, or to block or delete cookies. If you would like to set Your browser to refuse cookies, check Your browser's help information.

7. How Information May Be Shared Or Disclosed

We may disclose Your information if we believe that it is reasonable to do so in certain cases, in our sole and exclusive discretion. Such a disclosure or transfer is limited to the situations when the Personal Data is required for the purposes of (1) provisioning of the ZenLedger Services, (2) law enforcement purposes, or (3) when we have requested and you have provided your prior explicit consent. Please note that some third parties may be located outside of the jurisdiction in which you reside.

Such reasonable disclosure cases may include, but are not limited to:

- Satisfying any local, state, or federal laws or regulations;

- Responding to requests, such as discovery, criminal, civil, or administrative process, subpoenas, court orders, or writs from law enforcement or other governmental or legal bodies;
- Bringing legal action to enforce our Terms of Use;
- As may be necessary for the operation of ZenLedger Services;
- Generally cooperating with any lawful investigation about our users; or
- If we suspect any fraudulent activity on ZenLedger Services or if we have noticed any activity which may violate our Terms of Use or other applicable rules.

8. Use of Third-Party Service Providers

To assist us with the provision of the ZenLedger Services for You and all of our users, we may utilize third-party service providers. Such third-party service providers may include:

1. Cloud computing service providers (e.g., Amazon Web Services and other cloud storage providers);
2. User information logistics providers (e.g., Google Analytics or other analytics companies which help us track general user information and usage);
3. Web hosting companies;
4. Newsletter providers; and
5. Other parties who assist us in operating the ZenLedger Services and conducting our business.

The third-party service providers indicated above may have access to your Personal Data as part of their provision of services to us, but only if they agree to assure an adequate level of protection of Personal Data that is consistent with this Policy. We do not sell, trade, or transfer your Personal Data to third parties not indicated in this Policy, unless we obtain your prior explicit consent.

Please note that some non-Personal Data may be provided to third parties for marketing, advertising, or other uses. We also allow third-party behavioral tracking which may include non-Personal Data.

We are not responsible for actions of third parties that are not mentioned in this Policy and with whom You share your Personal Data, and we have no authority to manage or control third party solicitations.

9. Receiving Messages from Us

From time to time, we may send You informational communications related to the ZenLedger Services, such as announcements related to the release of new product features or other information. You may also receive information from us that is specifically about Your use of ZenLedger Services or about your account with us, including information about security breaches or other privacy-related matters.

By providing any personal information to us, or by using ZenLedger Services in any manner, you have created a commercial relationship with us. As such, you agree that any email sent from us or third-party affiliates, even unsolicited email, shall specifically not be considered unsolicited “spam emails”, as that term is legally defined.

10. Third-Party Links

As part of the ZenLedger Services, we may provide you with links out to other websites or mobile applications. This Policy does not and will not apply to any of those linked websites or applications. We are not responsible in any manner for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from ZenLedger Services.

Before visiting and providing any information to any such third-party websites and applications, You should familiarize yourself with the applicable privacy practices and take reasonable steps necessary to protect your Personal Data.

11. Your Rights

You may choose to forego the provision of certain Personal Data to us, but You may then be prohibited from using the ZenLedger Services, or some or all of its functionality may be disabled or unavailable to you. The information we collect is to maintain the ZenLedger Services and to assist in the operation of our business. If you do not agree to any of the terms contained within this Policy, you must cease your use of ZenLedger Services entirely.

12. Accessing, Correcting, and Erasing Personal Data

We take reasonable steps to ensure that the Personal Data and other information collected and processed by us is accurate, complete, and up-to-date. Thus, we ask you to keep your Personal Data as current as possible and update your Personal Data through ZenLedger Services if necessary.

You may at any time review or change the Personal Data in your user account or terminate your user account by logging into it through ZenLedger Services and updating your Personal Data. Upon your request to terminate your user account, we will deactivate or delete your account and information from our active databases.

If you would like to access, modify, or delete your Personal Data that are processed through ZenLedger Services, please send us an email to support@zenledger.io. We will answer your request within a reasonable timeframe.

13. Children

We do not market the ZenLedger Services to any individual under the age of 18 years old. Individuals under 18 years of age may *not* create an account to use the ZenLedger Services. However, we cannot distinguish the age of people accessing ZenLedger Services. If a person under 18 has provided us with Personal Data without obtaining parental or guardian consent in advance, the parent or guardian may contact us requesting us to destroy or de-identify the Personal Data. Our contact details are specified in the “Contact Us” section of this Policy.

14. A Note for Residents of California.

If You are a California resident, You may request certain information regarding the types of information shared by ZenLedger with third parties for their direct marketing purposes, and the identities of those third parties. You may make one request per calendar year. If you would like to request this information please contact us at support@zenledger.io or the following address:

ZenLedger, Inc.
10400 NE 4th St, Floor #5
Bellevue, WA 98004
United States of America

15. Updates, Modifications, or Revisions

ZenLedger is committed to conducting our business in accordance with this Policy in order to ensure that the privacy of your Personal Data is protected and maintained. However, we may change this Policy from time to time at our sole and exclusive discretion.

Unless we specifically obtain your consent, any changes to the Policy will apply to the Personal Data collected on or after the “last updated” date that is indicated at the start of the Policy.

It is your responsibility to periodically check this Policy for any such modification, revision or amendment. Any changes made are assumed to have been accepted by your continued use of the ZenLedger Services.

For significant changes in the Policy, or where required by the applicable law, we may seek your explicit consent to the changes stated in the Policy.

16. Providing Feedback about our Handling of Personal Data

You have the right to submit a complaint to us about the way in which your Personal Data have been handled by using the contact details indicated in the “Contact Us” section of this Policy.

After you submit such a complaint, we will send you an email within a reasonable time period confirming that we have received your complaint. Afterwards, we will investigate your complaint and provide you with our response within a reasonable timeframe.

If you are a resident of the European Union and you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with your local data protection authority.

17. Contact Information.

If you have questions or comments about this Policy, please contact us by email at support@zenledger.io or by physical mail at:

ZenLedger, Inc.
10400 NE 4th St, Floor #5
Bellevue, WA 98004
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