

ZUBR — PRIVACY POLICY

Set forth below is the Privacy Policy of 4Step Inc. (“**4Step Inc.**”) effective as of 25 December 2019.

4Step Inc. is committed to protecting the privacy of our customers, employees and shareholders, and we take our data protection responsibilities with the utmost seriousness.

This Privacy Policy sets out what Personal Data we collect, how we process it and how long we generally retain it, along with details of your rights as a data subject.

To the extent that you are a customer or user of our services, this Privacy Policy applies together with any Terms of Service and other contractual documents, including but not limited to any agreements we may have with you. We reserve our right to issue separate policies in respect of other relevant stakeholders and, specifically, our employees, affiliates and/or our business partners.

This Privacy Policy applies to you together with our Cookie Policy; when you visit and use our website www.zubr.io if you do not accept these policies, you should immediately discontinue your use of our website.

We have designed our website so that you may navigate and use our website without having to provide Personal Data, subject only to certain data that may be collected via the use of cookies. This Policy should therefore be read together with our [Cookie Policy](#), which provides further details on our use of cookies on this website.

In this Policy, “we”, “us” and “our” refers to 4Step Inc. (“**4Step Inc.**”), a company incorporated and registered in St. Vincent and Grenadines under No. 25193 IBC 2018, having its registered address at First Floor, First St. Vincent Bank Ltd Building, P.O Box 1574, James Street, Kingstown, St. Vincent and Grenadines.

In this Policy, “**Personal Data**” means any information relating to you as an identified or identifiable natural person (“**Data Subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

For the avoidance of doubt, Personal Data does not include data from which you cannot be identified (which is referred to simply as data, non-personal data, anonymous data, or de-identified data).

In this Policy, “**processing**” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

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1. Your Information and the Blockchain

Blockchain technology, also known as distributed ledger technology (or simply 'DLT'), is at the core of our business. Blockchains are decentralized and made up of digitally recorded data in a chain of packages called 'blocks'. The manner, in which these blocks are linked is chronological, meaning that the data is very difficult to alter once recorded. Since the ledger may be distributed all over the world (across several 'nodes' which usually replicate the ledger) this means there is no single person making decisions or otherwise administering the system (such as an operator of a cloud computing system), and that there is no centralized place where it is located either.

Accordingly, by design, a blockchain's records cannot be changed or deleted and is said to be 'immutable'. This may affect your ability to exercise your rights such as your right to erasure (this being your 'right to be forgotten'), the right to rectification of your data or your rights to object or restrict processing of your personal data. Data on the blockchain cannot generally be erased or changed, although some smart contracts may be able to revoke certain access rights, and some content may be made invisible to others; however, it is not deleted.

In certain circumstances, in order to comply with our contractual obligations to you it may be necessary to write certain Personal Data, such as your cryptographic wallet address, onto one or more blockchains; this is sometimes done but not limited to smart contract and may or may not require you to execute such transactions using your cryptographic wallet's private key.

In most cases, ultimate decisions to (i) transact on the blockchain using your Bitcoin or any other cryptocurrency wallet address, as well as (ii) share the public key relating to your Bitcoin or any other cryptocurrency wallet address with anyone (including us) rests on you.

IF YOU WANT TO ENSURE YOUR PRIVACY RIGHTS ARE NOT AFFECTED IN ANY WAY, YOU SHOULD NOT TRANSACT ON BLOCKCHAINS AS CERTAIN RIGHTS WILL NOT BE FULLY AVAILABLE OR EXERCISABLE BY YOU OR US.

IN PARTICULAR THE BLOCKCHAIN IS AVAILABLE TO THE PUBLIC AND ANY PERSONAL DATA SHARED ON THE BLOCKCHAIN WILL BECOME PUBLICLY AVAILABLE.

The information about deposit and withdrawal transactions for your Account (as defined in our Terms of Service) can be written on cryptocurrency blockchain for the cryptocurrency you use for deposits and withdrawals.

2. How we collect information from you

We collect information about you when you:

- visit or use our Applications (which includes our web and mobile applications);
- contact us either through the Applications, or through other direct means of electronic communication;
- interact with us or our Services;
- enter into a contract with us (such as to use our Services);
- provide us instructions to us in relation to your Account with us; and/or
- enter into any other relationship with us or interact with us or our Services.

3. The type of information we collect

The Personal Data we collect may include your:

- name;
- address;
- email address;
- telephone number;
- date of birth;
- nationality;
- identification cards or passport details (e.g. number, date of issue) and images of these documents;
- photos of face to verify identity;
- tax identification number and/or any other identification number issued by a government;
- employment, occupation or business activity details;
- financial details including salary, income and employer details;
- source of income;
- location;
- device information;

- cryptocurrency wallet address;
- electronic signature;
- any public key that you share with us;
- two-factor authentication (2FA) reset codes;
- names of family beneficiaries; and/or
- information about how you use our website or any other information that might be required by applicable laws.

We may also ask you to provide evidence of your identity such as asking for a copy of your passport, driving license, proof of residence or income or any relevant identification card issued by a non-Prohibited Jurisdiction. We are required to ask for this information to comply with anti-money laundering (AML) legislation, to ensure we safeguard against and report any suspicious activity.

We may also automatically collect the following information when you use our Applications:

- type of domain with which the User connects to the Internet;
- IP address assigned;
- your location;
- your login information;
- date and time of access to the Applications and other data related to traffic;
- API'S;
- pages visited;
- unique device identifiers;
- type of browser used;
- operating system and/or platform used;
- search engine as well as the keywords used to find the Applications;
- and other similar identifying information for communication with the Applications.

4. Information written on the blockchain

When you enter into a contract with us for deposits/withdrawals for your Account the following information is written onto the blockchain:

- the cryptographic wallet address from which you send us deposit;
- the amount of the virtual currencies which you send us as deposit;
- the cryptographic wallet address to which we will send you virtual currencies for your withdrawal and/or;
- the amount of virtual currencies we will send you.

5. How we use your Personal Data

We use Personal Data about you in connection with the following purposes:

5.1 Provision of services and management:

- to provide you with the information, Products and Services that you have requested from us;

- to complete any Transaction, which you are undertaking with us;
- to collect any outstanding debt that you may have with us;
- to perform a contractual obligation, we have to you; and/or
- to meet a legal or regulatory obligation.

5.2 Service improvements:

- to ensure that content from our Applications is presented in the most effective manner for you;
- to administer our Applications and for internal business administration and operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to get in contact with you for customer support purposes or any other reason that we may consider;
- to notify you about changes to our service; and/or
- as part of our efforts to keep our Applications safe and secure.

5.3 Direct Marketing:

- to provide you with information about other services we offer that are similar to those that you already have or have enquired about;
- to provide you with other marketing material such as our newsletters; and/or
- to reach you for marketing purposes such as promotions and contests.

If you do not want your Personal Data to be used for marketing purposes, please contact us on the details below.

6. How we share your Information

Why and when we share your information

We may share your Personal Data with third parties (including entities of the wider group of companies to which we belong) if we believe that sharing your Personal Data is in accordance with, or required by, any contractual relationship with you or us, applicable law, regulation or legal process.

We may also be required by law or by a Court to disclose certain information about you or any engagement we may have with you to relevant regulatory, law enforcement and/or other competent authorities. We may also need to share your information in order to enforce or apply our legal rights.

In addition, your Personal Data may also be shared and processed by us and/or other members subsidiaries or affiliates of the wider group of companies to which we belong, agents, vendors, consultants or suppliers, as well as any other third party service providers who are performing certain services on our behalf (for example, outsourced service providers, external Counsel, financial institutions, etc.). Such third parties will have access to your Personal Data solely for the purposes of performing the services specified in the applicable engagement, or to comply with applicable laws and not for any other purpose. These third parties are not permitted to use your Personal Data for their own purposes, and rather can only process in accordance with our instructions. We require these third parties to undertake security measures consistent with the protections specified in this Privacy Policy and applicable law.

In addition, we may transfer your Personal Data to a third party as part of a sale of some, or all, of our business and assets or as part of any business restructuring or reorganisation, or if we are under a duty to disclose or share your personal data in order to comply with any legal

obligation. However, we will take steps to ensure that your privacy rights continue to be protected.

Transferring your information outside of the European Economic Area

Sometimes our business partners, third party service providers, agents, subsidiaries, affiliates, subcontractors and other associated organisations may be located outside of the European Economic Area (**EEA**). The EEA includes the European Union countries as well as Iceland, Liechtenstein and Norway. Transfers outside of the EEA are sometimes referred to as 'third country transfers'.

We share your Personal Data with these third parties outside of the EEA where we have a legal basis for doing so, such as to provide you with our services or because we ourselves use service providers outside of the EEA in order to operate our business. If we transfer your information outside of the EEA to third parties, we will take steps to ensure that your privacy rights continue to be protected as outlined in this Policy. This may require us to take certain additional steps to ensure that appropriate safeguards are in place if that third country is not deemed by the European Commission to offer an adequate level of protection for your privacy rights, which may include use of contractual safeguards to allow you to be able to enforce your rights and ensure these are preserved. In certain circumstances, we may need to ask you for your explicit consent to such third country transfers and will always do so in writing and giving you full information about why we need your consent and your right to withdraw that consent at any time (together with the consequences of withdrawal).

However, when interacting with the blockchain, as explained above in this Policy, the blockchain is a global decentralized public network and accordingly any personal data written onto the blockchain may be transferred and stored across the globe.

7. How long do we keep your information?

We retain your information only for as long as is necessary for the purposes for which we process the information as set out in this Policy. Records can be held on a variety of media (physical or electronic) formats.

Retention periods are determined based on the type of record, the nature of the record and activity of the legal or regulatory requirements that apply to those records. Typically, personal data which is collected pursuant to our legal obligations (such as AML) are retained for FIVE (5) years. Where Personal Data is collected pursuant to a contract or prior to the creation of a contract, these are retained for 6 years after the termination of the contract pursuant to our legitimate interests in defending any legal claims which may be brought against us.

However, we may retain your Personal Data for a longer period of time where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person or where we have a legitimate interest to do so.

8. Security Measures

We have appropriate physical, technical and administrative security measures to prevent your information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have taken substantial precautions to ensure the security of your data. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality and a duty to comply with data protection procedures. We have put in place procedures to deal with any suspected

Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Automated decision-making

We use automated decision making only in respect of our Investor's Qualification Test, the results of which are calculated automatically, and which will decide your eligibility to use our services. However, certain third parties may use certain automated decision-making tools or software. We are not responsible for the privacy practices of others and will take reasonable steps to bring such automated decision-making to your attention, but you are encouraged to become familiar with the privacy practices of any third parties you enter into any agreements with.

10. Your Data Rights

You have certain rights under applicable legislation, and in particular under Regulation EU 2016/679 ('General Data Protection Regulation' or 'GDPR'). We explain these below. You can find out more about the GDPR and your rights by accessing the European Commission's website at the following Link https://ec.europa.eu/info/law/law-topic/data-protection_en.

10.1 *Right to information and access*

You have a right to be informed about the processing of your Personal Data (and if you did not give it to us, information as to the source) and this Policy intends to provide the information.

10.2 *Right to rectification*

You have the right to have any inaccurate Personal Data about you rectified and to have any incomplete Personal Data about you completed. You may also request that we restrict the processing of that information.

The accuracy of your information is important to us. If you do not want us to use your Personal Data in the manner set out in this Policy, or need to advise us of any changes to your personal information, or would like any more information about the way in which we collect and use your Personal Data, please contact us using the details found in this policy

10.3 *Right to erasure (right to be 'forgotten')*

You have the general right to request the erasure of your Personal Data in the following circumstances:

- the Personal Data is no longer necessary for the purpose for which it was collected;
- you withdraw your consent to consent based processing and no other legal justification for processing applies;
- you object to processing for direct marketing purposes;
- we unlawfully processed your Personal Data; and
- erasure is required to comply with a legal obligation that applies to us.

We will proceed to comply with an erasure request without delay and to such extent we are able to do so, unless continued retention is necessary for:

- exercising the right of freedom of expression and information;
- complying with a legal obligation under EU or other applicable law;
- the performance of a task carried out in the public interest;

- archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or
- the establishment, exercise, or defence of legal claims.

However, when interacting with the blockchain we may not be able to ensure that your Personal Data is deleted. This is because the blockchain is a public decentralized network and blockchain technology does not generally allow for data to be deleted and your right to erasure may not be able to be fully enforced. In these circumstances we will only be able to ensure that all personal data that is held by us is permanently deleted.

10.4 Right to restrict processing and right to object to processing

You have a right to restrict processing of your Personal Data, such as where:

- you contest the accuracy of the Personal Data;
- where processing is unlawful you may request, instead of requesting erasure, that we restrict the use of the unlawfully processed personal information;
- we no longer need to process your personal information but need to retain your information for the establishment, exercise, or defence of legal claims.

You also have the right to object to processing of your Personal Data under certain circumstances, such as where the processing is based on your consent and you withdraw that consent. This may impact the services we can provide, and we will explain this to you if you decide to exercise this right.

However, when interacting with the blockchain, as it is a public decentralized network, we will likely not be able to prevent external parties from processing any personal data which has been written onto the blockchain. In these circumstances we will use our reasonable endeavours to ensure that all processing of personal data held by us is restricted, notwithstanding this, your right to restrict to processing may not be able to be fully enforced.

10.5 Right to data portability

Where the legal basis for our processing is your consent or the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, you have a right to receive the Personal Data you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

10.6 Right to freedom from automated decision-making

If any automated decision-making takes place, you have the right in this case to express your point of view and to contest the decision, as well as request that decisions based on automated processing concerning you or significantly affecting you and based on your Personal Data are made by natural persons, not only by computers.

10.7 Right to object to direct marketing ('opting out')

You have a choice about whether or not you wish to receive information from us.

10.8 Right to request access

You also have a right to access information we hold about you. We are happy to provide you with details of your Personal Data that we hold or process. To protect your Personal Data, we follow set storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. You can exercise this right at any time by contacting us using the details found in this policy.

10.9 Right to withdraw consent

Where the legal basis for processing your Personal Data is your consent, you have the right to withdraw that consent at any time by contacting us using the details found in this policy.

10.10 Raising a complaint about how we have handled your Personal Data

If you wish to raise a complaint on how we have handled your Personal Data, you can contact us using the details found in this Policy.

11. Contact and further information

If you would like a copy of the Personal Data or wish to exercise any of your Data Subject Rights as set out in this Policy, or if you have any questions regarding this Policy or generally about the way we handle your Personal Data please contact compliance@zubr.io.