

Zeeves Privacy Policy

Effective Date: May 9, 2019

Welcome to Zeeves (hereinafter “**Zeeves**”, “**we**” or “**us**”) including our website at <https://zeeves.com> (including all content under the “zeeves.com” domain name, and referred to herein as the “**Website**”). This notice (“**Privacy Policy**”) is included with and supplements our [Terms of Service](#). The services and all functionality that we may provide to you via the Website, or via our web robots (each, a “**bot**”) and our mobile applications (altogether, “**Apps**”) are referred to herein and in the Terms of Service document as the “**Services**.” This Privacy Policy explains our online information collection and use practices, and the choices you can make about the way we use such information. It is important that you take the time to read and understand this Privacy Policy so that you can appreciate how we may use your information. REMEMBER IF YOU USE OR ACCESS THE SERVICES, YOU AGREE TO THIS PRIVACY POLICY. AS WE UPDATE OR EXPAND OUR SERVICES, WE MAY CHANGE THIS PRIVACY POLICY UPON NOTICE TO YOU, HOWEVER, PLEASE REVIEW IT FROM TIME TO TIME.

For users that are citizens of the European Union ("EU"), this Privacy Policy is subject to the provisions of the General Data Protection Regulation ("GDPR") and other applicable privacy laws. In such case, we agree that under the GDPR, if and to the extent that we collect any "Personal Data" about you, we are a data "Controller" and you are a "Data Subject" with certain protected privacy rights concerning your Personal Data. We will take commercially reasonable steps to maintain compliance with GDPR requirements. Your Personal Data may identify you as a person, and thus is often referred to as Personally Identifiable Information ("PII").

1. Who Collects Your Information On Our Website?

We do. Under the GDPR, we are known as the "Controller" of the Personal Data that you provide to us. We collect information from you on the Website, and we are responsible for protection of your information.

2. What Information Do We Collect?

A. Requested Information From Our Website. On our Website, we may request specific PII about you in order to register you for an account to use our Services, add you to our email list, or fulfill your requests for information. You may choose not to provide your PII, but then you might not be able to take advantage of some of the features of our Website. The types of Personal Data we collect and save via our Website include:

- Account registration information to include name and email address;
- Information you may provide such as feedback, comments or other messages;
- Technical information collected in our logs (to include your transaction information, and standard web log entries such as your IP address and timestamp); and
- Device information such as browser and mobile phone provider associated with the device you are using to access the Website, your device's unique identifier, the type of device and its operating system, the pages or features accessed most frequently, and analytics about use of the Website.

B. Requested Information From Our Services. We do not collect any Personal Data from you when you use our Services. All transactions into which you may enter using our Services are executed without verification of individual identities. Presently, when you use our Services, we only request anonymous UserID, password, public/private encryption keys and language preference information from you in order to facilitate your transactions using the Services, and fulfill your requests for information. These data items are not traceable to your actual personal identity and are thus not comprised of Personal Data. We collect neither basic nor Special Types of Personal Data (e.g., health-related) as defined in the GDPR. We also collect:

- Cryptocurrency account public addresses (e.g., for Ethereum, Bitcoin, Bitcoin Cash, Waves, Litecoin);
- Your assigned PKI public key, and association of such public key with your UserID;
- Information that you provide in using our Services, such as the UserIDs of the individuals with whom you engage in financial transactions;
- The history of your transactions and payments using the Services;
- Information you provide such as feedback, comments or other messages to our support bot;
- Technical information collected in our logs (to include your transaction information); and
- Device information such as browser and mobile phone provider associated with the device you are using to access the Services, your device's unique identifier, the type of device and its operating system, and analytics about use of the Services.

C. Aggregate Information. We may also collect additional anonymous, non-identifying and aggregate information such as the type of browser or app you are using, device type, operating system, and the domain name of your Internet service provider.

3. Why Is My Information Being Collected?

A. We process the data you provide to further our legitimate interests to (1) provide effective and innovative services to our users; (2) respond to your requests for information and demonstrations; (3) add you to our emailing lists; and (4) to detect, prevent or otherwise address fraud or security issues in respect of our provision of Services.

B. We use your email address and/or anonymous UserID and other information so that we can respond to your requests for information, process your transactions using the Services, and process your requests for access to our Services.

C. We also collect aggregate information to help us better design the Website and Services. We collect log information for monitoring purposes to help us to diagnose problems with our servers, administer the Website and Services, calculate usage levels, and otherwise provide services to you.

4. How Do We Use the Information We Collect?

A. We use the data you provide for the purposes for which you have submitted it including:

- **Responding To Your Inquiries and Fulfilling Your Requests.** We may use your email address or UserID to respond to your inquiries and to fulfill your requests for information.

- **Creating and Maintaining Your User Account.** We use your name/email address and/or UserID to create and maintain an account for you to allow you to use the Services that we make accessible.
- **Communicating With You About Our Services.** We may use your email address or UserID to send you information about new services and other items that may be of interest to you.
- **Improving Our Services.** We may use your information to make our platform more stable and user-friendly, to analyze Services issues, and to develop new marketing programs relating to the Services.
- **Sending Administrative Messages.** We may use your email address or UserID to send you messages or emails to: (a) confirm your account, (b) process your requests to enter into transactions using our Services, (c) provide you with information regarding your transactions using the Services, or (d) inform you of changes to this Privacy Policy, our Terms of Service, or our other policies.

B. We may use anonymous information that we collect to improve the design and content of our Services, and to enable us to personalize your Internet experience. We also may use this information in the aggregate to analyze how our Services are used, analyze industry trends, as well as to offer you programs or services.

5. Do We Share Your Personal Information?

We will not share your Personal Data. We may share your name, email address, UserID and other account data: (a) for the purposes for which you provided it; (b) with your consent; (c) as may be required by law (e.g., in response to a court order or subpoena, or in response to a law enforcement agency request); (d) as we think necessary to protect our organization or others from injury (e.g., when we believe that someone is causing, or is about to cause, injury to or interference with the rights or property of another); or (e) on a confidential basis with persons or organizations with whom we contract to carry out internal operations or as necessary to render the Services. We may also share aggregate information with others, including affiliated and non-affiliated organizations. Finally, we may transfer your account data to our successor-in-interest in the event of an acquisition, sale, merger or bankruptcy.

6. Are There Other Ways My Personal Data Could Be Shared?

You may elect to share your Personal Data with individuals via your use of the Apps. In this case, you will control such sharing. For example, the Apps or platform within which they operate may make it possible for you to send messages containing your Personal Data to other users of our Services. Be aware that when you choose to share information with anyone, you may be disclosing sensitive information, or information from which sensitive information can be inferred. Always use caution when sharing information through the Apps. You understand and agree that we are not responsible for any consequences of your sharing information through and beyond the Website or Apps.

7. How Can You Access and Control Your Information?

After registering for an account to use the Website or Services, you may log-in to the account and edit your account data in your profile. For further instructions on how you can access your account data, or how to correct errors in such information, please contact us via the Website, or using our Services support bot functionality. At your request at any time, you may cancel your account and we will also promptly stop using your information and remove it from our servers and database. To protect your privacy and security, we will take reasonable steps to help verify your UserID before granting access, making corrections or removing your information.

If you are an EU citizen and believe that we have accessed or misused your Personal Data, you have the right to contact the European Data Protection Supervisor (“EDPS”) to ask the EDPS for advice on how to exercise your rights or to ask the EDPS to investigate a complaint. For more information, see [EDPS Complaints](#).

8. How Do We Store and Protect Your Information?

A. After receiving or generating your account data, we will store it on our systems for future use. We have physical, electronic, and managerial procedures in place to safeguard and help prevent unauthorized access, maintain data security, and properly use such information. Unfortunately, no data transmission or data storage solution can ever be completely secure. As a result, although we take industry-standard steps to protect your information (e.g., strong encryption), we cannot ensure or warrant the security of any information you transmit to or receive from us or that we store on our or our service providers' systems. By agreeing with this Privacy Policy, you understand and agree that there are risks of loss or disclosure of data, such as your QR code, password, or other account information.

B. If you are using the Services from outside of the USA, you understand that your connection may be through and to servers located in the USA, and we will securely store the information you provide within our web servers and internal systems.

C. We store your account data for as long as reasonably required for its purpose or for any additional period required by law (if any). Account information is deleted when you or we delete your account. We may store information longer for legitimate business reasons (for example, account data may remain in backups for a reasonable period of time), or as legally required. Otherwise, we store your account data until you request us to remove it from our systems. We store our logs and other technical records indefinitely.

9. How Do We Use Cookies And Other Network Technologies?

A. To enhance your online experience with us, we may use "cookies." Cookies are text files that our Services may place on your hard disk to store your preferences. We may use session, persistent, first-party and third-party cookies. Cookies, by themselves, do not tell us your e-mail address or other PII. You can set your browser to notify you when you receive a cookie, providing you with as much control as you wish as to the decision to accept/reject the cookie, and deletion of the cookie upon leaving our Website.

B. We or our service providers may also use "pixel tags," "web beacons," "clear GIFs," "embedded links" and other commonly-used information-gathering tools in connection with some website pages. We use these tools for such purposes as compiling aggregate statistics about Website or Services usage and sign-up rates. A pixel tag is an electronic image (often a single pixel), that is ordinarily not visible to website visitors, and may be associated with cookies on visitors' hard drives. Pixel tags allow us and our service providers to count users who have visited the Website, to deliver customized Services, and to help determine the effectiveness of our Services.

C. As you use the Internet, you leave a trail of electronic information at each website you visit. This information, which is sometimes referred to as "clickstream data", can be collected and stored by a website's server. Clickstream data can reveal the type of computer and browsing software you use and the address of the website from which you linked to our Website. We may use clickstream data as a form of non-PII to determine how much time visitors spend on our Website, and how we may tailor our Website to better meet the needs of visitors.

D. At this time, the Website and Services do not specifically respond to do-not-track signals.

10. Collection of Information by Others

We may in the future provide links to certain third party websites that you may click-on from our Website. Please check the privacy policies of other websites to learn how they collect, use, store and share information that you may submit to them or that they collect.

11. Children and Young People's Information

We do not knowingly collect any information from or permit transactions by minors, and we comply with all applicable privacy laws including the GDPR, USA Children's Online Privacy Protection Act ("COPPA") and associated Federal Trade Commission ("FTC") rules for collecting Personal Data from minors. Please see the FTC's website (www.ftc.gov) for more information.

12. Changes to this Policy

Because our business needs may change over time, we reserve the right to modify this Privacy Policy. If at any time in the future we plan to use your PII in a way that differs from this Privacy Policy, we will revise this Privacy Policy as appropriate. In the event of a change to our Privacy Policy, we will contact you at your UserID via a notification within the Services and provide the updated policy to you. Your continued use of the Services following our notice of changes to this Privacy Policy means you accept such changes.

13. Our Contact Information

If you have any questions or concerns about this Privacy Policy, please contact us via postal mail at 20 Ames Street, MIT Game Lab, Room 329, Cambridge, MA 02142; via email at main@zeeves.com; telephone at +1-617-642-0635 or via our support bot.

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