

Introduction

Welcome to Zien's privacy policy.

Zien respects your privacy and is committed to protecting your personal data. This privacy policy applies to all of Zien's operations. It will inform you as to how we collect, use and disclose your personal data and our reasons for doing so, and tell you about your privacy rights.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here. Please also refer to the Glossary to understand the meaning of the defined terms used in this privacy policy.

For all questions or inquiries related to privacy please email us [office@zien.io].

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1. Important information and who we are

Purpose of this privacy policy

This privacy policy **aims to give you information on how Zien collects and processes** your personal data.

It is important that you **read this privacy policy together with any other privacy policy** or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Zien X Limited (referred to in this policy as **Zien**), a company registered in England & Wales under company number 12438908, **is the controller** and responsible for your personal data (also referred to as "we", "us" or "our" in this privacy policy).

Contact details

If you have **any questions** about this privacy policy or our privacy practices, or **any requests** to exercise your legal rights, **please contact us** in the following ways:

Email address: office@zien.io

Postal address: 7 Bell Yard, London, WC2A 2JR

[WhatsApp number: +44 7476 560489]

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator for data protection issues (www.ico.org.uk). We would, however, **appreciate the chance to deal with your concerns** before you approach the ICO so **please contact us** in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under **regular review**. This version was last updated on 26 July 2022.

It is important that the personal data we hold about you is accurate and current. **Please keep us informed** if your personal data changes during your relationship with us.

Third-party links

This website may include **links to third-party websites, plug-ins and applications**. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. **We do not control these third-party websites and are not responsible for their privacy statements**. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information, means **any information about an individual from which that person can be identified**. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier.
- **Contact Data** includes your WhatsApp phone number, billing address, delivery address, email address, digital wallet address, social media handles and other phone numbers.
- **Financial Data** includes bank account, digital wallet and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, operating system and platform, and other technology on the devices you use to access this website or our services.
- **Profile Data** includes purchases or orders made by you, your preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data

to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, **we may not be able to perform the contract** we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, **we may have to cancel a product or service you have with us** but **we will notify you** if this is the case at the time.

3. How is your personal data collected?

We use **different methods to collect** data from and about you including through:

- **Direct interactions.** You may give us your Contact Data and Financial Data by corresponding with us by Whatsapp, or our website, post, email or otherwise. This includes personal data you provide when you:
 - subscribe to our service or publications;
 - mint or redeem an Expanded NFT via Whatsapp or our website;
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out:

Technical Data from the following parties:

- (a) analytics providers such as Google, which is based outside the UK;
- (b) Contact Data, Financial Data and Transaction Data from providers of technical, payment and delivery services such as Meta (which owns WhatsApp), Stripe and Coinbase, which are based outside the UK.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need **to perform the contract** we are about to enter into or have entered into with you.
- Where it is necessary **for our legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need **to comply with a legal obligation**

- See the glossary at the end of this policy to find out more about the types of lawful basis that we will rely on to process your personal data.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of **all the ways we plan to use** your personal data, and **which of the legal bases we rely on** to do so. We have also **identified what our legitimate interests are** where appropriate.

Note that **we may process your personal data for more than one lawful ground** depending on the specific purpose for which we are using your data. **Please contact us if you need details** about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new subscriber to Zien	(b) Contact	Performance of a contract with you
To process and deliver your Zien subscription/Zien NFT purchase or redemption including: (a) Manage payments, fees and charges (b) Collect and recover money or cryptocurrency owed to us, the Artist or the fabricator (c) Manage the fabrication of redeemed Zien NFTs	(a) Contact (b) Financial (c) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Contact (b) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
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Marketing

Promotional offers from us

We may use your Identity Data, Contact Data, Technical Data, Usage Data and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this **marketing**).

You may receive marketing communications from us if you have **requested information from us** or **purchased goods or services from us** and you have not opted out of receiving that marketing or it is otherwise lawful for us to send you marketing communications (including where we have your prior consent).

Third-party marketing

We will get your **express opt-in consent** before we share your personal data with any third party for marketing purposes.

Opting out

You can **ask us to stop sending you marketing messages at any time** by following the opt-out links on any marketing message sent to you **OR** by contacting us at any time.

Where you opt out of receiving our marketing messages, this will not include us sending you messages relating to your Expanded NFT purchase or redemption or other transactions.

Cookies

You can **set your browser to refuse all or some browser cookies**, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that **some parts of this website may become inaccessible** or not function properly.

Change of purpose

We will **only use your personal data for the purposes for which we collected it**, unless we **reasonably consider** that we need to use it for **another reason** and that reason **is compatible with the original purpose**. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to **use your personal data for an unrelated purpose**, we will **notify you** and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data **without your knowledge or consent**, in compliance with the above rules, **where this is required or permitted by law**.

5. Disclosures of your personal data

We **may share your personal data with the parties set out below** for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

- **Third Parties** as set out in the *Glossary*.
- Third parties to whom we may choose to **sell, transfer or merge** parts of **our business** or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We expect all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We work with the following organisations to provide services which may not be located in the UK: Meta (which owns WhatsApp), Google, Coinbase and Stripe.

Please contact us if you want further information on the specific mechanisms used by us when transferring your personal data out of the UK.

7. Data security

We have put in place **appropriate security measures** to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

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.

8. Data retention

How long will you use my personal data for?

By law we have to **keep basic information** about our customers (including Contact Data, Identity Data, Financial Data and Transaction Data) for six years, plus the current year, after they cease being customers for [tax] purposes

In some circumstances **you can ask us to delete your data**: see [your legal rights] below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, **you have rights under data protection laws** in relation to your personal data. Please refer to the glossary below in this policy to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*

- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us at office@zien.io.

No fee usually required

You will **not have to pay a fee to access your personal data** (or to exercise any of the other rights). However, **we may charge a reasonable fee** if your request is **clearly unfounded, repetitive or excessive**. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request **specific information** from you **to help us confirm your identity and ensure your right to access** your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within **one month**. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

DIGITAL WALLET:

A cryptocurrency wallet is an application that functions as a wallet for your cryptocurrency. The wallet stores the passkeys you use to sign your cryptocurrency transactions and provides the interface that lets you access your crypto. Wallets are used to send, receive, purchase, sell, store and display digital assets

DIGITAL WALLET ADDRESS:

A wallet address is a string of letters and numbers from which cryptocurrencies or NFTs can be sent to and from. Every wallet has its own unique address associated with it.

EXPANDED NFT:

Zien invites select artists (Zien Artists) to use the ERC-721 Non-Fungible Token Standard on Ethereum to create Expanded NFTs. Leveraging the Zora open source contract repository, Zien extends the ERC-721 Non-Fungible Token Standard to include artist resale royalties, which are built into Zien's smart contracts. The metadata which the Zien smart contracts link to includes a URL link to the original digital artwork, which is stored on IPFS. All of our code is open source on GitHub and the Zien smart contracts will be available to view on mainnet [here](#).

MINT:

Minting an NFT is converting, verifying, and registering the ownership of crypto assets using a smart contract on the blockchain. The process turns a digital file into a type of digital certificate that is stored on a blockchain, such as a digital asset on the Ethereum blockchain, so that it can be purchased, sold, traded, sent, and received.

TYPES OF LAWFUL BASIS:

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

TYPES OF THIRD PARTIES:

- Service providers acting as processors such as Meta (which owns WhatsApp), Google, Coinbase and Stripe based in the US who provide IT and system administration services
- Professional advisers acting as processors or joint controllers including lawyers, bankers, accountants, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.