

PRIVACY POLICY

Last updated: 05/29/2019

Protecting your privacy is very important to us.

This Privacy Policy (the "Policy") makes provisions on the process of personal data provided by users when browsing, accessing and/or using our webpages [www.zencapzrewards.com and www.mycapz.com]("Platform"), proprietary of ZenCAP, in the context of CAPZ's ICO (Initial Coin Offering), a Utility Token commercialized via Smart Contract on the Ethereum network.

Understand how ZenCAP stores, uses, and protects your personal information when you browse and use the Platform.

1. Our commitment to your privacy

1.1. ZenCAP protects the privacy of users who register or, in any way, browse, access or use the Platform, in accordance with the applicable laws and pursuant to the provisions of this Policy.

1.2. ZenCAP is committed to ensuring Platform users will browse our Platform in a secure and private manner. Therefore, a user's information (as defined below) is kept in strict secrecy and are not sold to, exchanged with, or disclosed to anyone, except as expressly established in this Policy.

1.3. We do not collect or knowingly ask for Information from individuals under 18. Users under 18 should not attempt to register to access or send us any Information. If we note that Information was inadvertently collected from an underage individual, we will cancel the account created on the Platform.

2. Changes in this Policy

2.1. ZenCAP reserves the right to change this Policy at any time. In the event of change in the Policy, ZenCAP agrees to communicate Platform users of such change by post on our webpage, or otherwise, and invite Platform users to check the latest version available of the Policy.

2.2. If they do not agree with the new Policy, Platform users may reject it. Rejecting the new version of the Policy, however, means that you unfortunately will no longer be able to use the Services. Using the Services in any way after this Policy is changed means that you agree to all changes.

3. What Information is collected when a user visits and browses the Platform?

3.1. Even if you are not registered, when you visit and browse our Platform, we may receive location information from your device (computer, tablet, smartphone, etc.), collect Internet Protocol (IP) addresses, and other information usually made available by Internet browsers, such as the type of browser, pages visited, and date and time of requests in the Platform.

3.2. By accepting the terms of this Policy, you expressly agree to provide only true, current, and accurate information and not to misrepresent yourself or provide inaccurate information in accessing and using the Platform.

4. What do we collect when you register and use our Platform and Services?

4.1. When you register and/or access the Platform and use the Services, we may collect the following "Information", as described below:

- PERSONAL INFORMATION: The information we collect are those you previously provided as you registered with the

Platform - such as full name, e-mail address, landline and cell phone numbers.

5. Where do we store users' information?

5.1. Information collected from users when accessing or using the Platform may be transferred to and stored at a location out of Brazil, to the extent permitted by law, including via service providers using the cloud technology (AWS). By accessing and using the Platform and sending us your personal data, you agree to the transfer, storage, and processing of your Information as set forth in this Policy. We take all reasonable care to ensure that your information is processed securely and in accordance with this Policy.

6. What do we do with the Information we collect?

6.1. We will not collect, store, process or use your Information for purposes other than those described in this Policy.

6.2. Access and use of the Platform: Platform users' Information will be used as set forth in this Policy, including, but not limited to:

- TO REGISTER WITH AND IDENTIFY USERS TO THE PLATFORM DURING CAPZ's ICO (Initial Coin Offering) AND BOUNTY CAMPAING, BY USING AUTHENTICATION METHODS (FOR INSTANCE, WITHOUT LIMITATION, VIA TEXT MESSAGE (SMS) OR E-MAIL);
- TO VERIFY AUTHENTICITY OF INFORMATION PROVIDED, INCLUDING BY USING PROCESSING AND CROSS-VERIFICATION;
- TO SEND PROMOTIONAL AND MARKETING MATERIALS VIA E-MAIL, WHATSAPP, OR MAIL, INCLUDING PROMOTING SERVICES OFFERED BY ZENCAP AND THIRD PARTY THAT MAY INTEREST THE USERS;
- TO TAKE STEPS ZENCAP DEEMS NECESSARY OR ADVISABLE TO IMPROVE THE PLATFORM FUNCTIONALITIES CONTINUOUSLY AND ACTIONS CARRIED OUT FOR SERVICES OFFER VIA THE PLATFORM, AS WELL AS TO BETTER UNDERSTAND USERS'

NEEDS, WHICH MAY INCLUDE CONTACTING USERS FOR MARKET AND SATISFACTION RESEARCH PURPOSES, THE USE OF PROVIDED INFORMATION FOR CUSTOMIZING ZENCAP'S PLATFORM BASED ON THE INTEREST OF EACH USER;

- TO NOTIFY USERS OF CHANGES IN THE PLATFORM AND/OR SERVICES, AND COMPLY WITH LEGAL AND CONTRACTUAL OBLIGATIONS RELATED TO THE SERVICE AND/OR ACCESS TO AND USE OF ZENCAP PLATFORM;
- TO REPORT TRANSACTIONS, STORAGE OF INFORMATION, DATA, COMMUNICATIONS, AND OTHER MATERIAL RELATED TO THE ACCESS AND USE OF THE PLATFORM, AS WELL AS TO COMPLY WITH OTHER LEGAL AND REGULATORY OBLIGATIONS IMPOSED ON ZENCAP PLATFORM IN ITS OWN OPERATIONS; AND
- SEND COMMUNICATIONS VIA E-MAIL AND TELEPHONE TO ANSWER YOUR QUESTIONS ABOUT OUR PLATFORM AND ICO.

6.3. Offering, and providing of information about CAPZ's ICO (Initial Coin Offering) and bounty campaign: ZENCAP may use user Information directly or transfer it to our outsourced service providers in its efforts to offer and send users information about CAPZ's ICO (Initial Coin Offering) and bounty campaign that may be of interest to them, doing so by any means available, including electronic media, mail, or telephone (SMS and others), except where there is express indication that user does not wish to be contacted.

7. How will your data be shared?

7.1. By expressly agreeing to the terms of this Policy, you also explicitly and unequivocally agree and authorize ZenCAP, and other selected parties listed below, to access and share your Information for the purposes set forth in this Policy:

- ZENCAP'S EMPLOYEES AND COMPANIES OF THE GROUP; BUSINESS PARTNERS; AGENTS AND/OR SERVICE PROVIDERS, IN BRAZIL OR ABROAD;

- GOVERNMENTAL AUTHORITIES AND/OR JUDICIAL COURTS THAT MAY REQUIRE US TO DISCLOSE, UNDER LAW OR BY JUDICIAL ORDER, ALL OR ANY PART OF THE INFORMATION;
- ZENCAP'S PARTNERS THAT MAY OFFER PRODUCTS OR SERVICES, ON OR OUTSIDE THE PLATFORM, BY REFERENCE TO ZENCAP, ACCORDING TO YOUR CLIENT PROFILE; AND
- ANY THIRD PARTIES WITH WHICH WE ARE REQUIRED TO SHARE YOUR INFORMATION DUE TO LEGAL AND REGULATORY OBLIGATIONS AND/OR TO WHICH THE DISCLOSURE OF INFORMATION IS NECESSARY OR ADVISABLE FOR THE PROPER, EFFECTIVE, AND EFFICIENT OPERATION OF THE PLATFORM AND ITS FUNCTIONS.

We may also share your Information with others that will assist us in detecting, preventing, or otherwise handling fraud, technical or security issues.

7.2. Agents: We retain other firms and individuals ("Agents") to perform tasks on our behalf and, therefore, we need to share user information with those Agents so that we can allow users to access and use the Platform. Except as otherwise indicated, the Agents are not authorized to use the Information we share for purpose other than to assist them in their tasks on our behalf and/or for the proper, effective, and efficient operation of the Platform and its functions, as well as to offer their own services.

8. Understanding the mechanisms available to protect your rights

8.1. Under applicable law, you have a wide range of rights and assurances in connection with your personal information. We provide mechanisms, as detailed below, so that our users will have clarity and transparency in exercising their rights. **Whenever necessary, our team will be ready to address any of your concerns.**

- ***Confirm and access your Information***: Any user may request details about his or her Information stored. If you wish a copy of the information we have about you, please send an e-mail to capz@zencapzrewards.com.

•**Change your Information:** If you want to change your Information or have any reason to believe or suspect that any information we have about you is inaccurate, or incomplete, please contact our customer support service or send an e-mail as soon as possible to our team at: capz@zencapzrewards.com.

•**Correct your information:** if you have any reason to suspect that any Information we have about you is outdated, inaccurate, or incomplete, please contact us using any of the mechanisms available on our Platform or write an e-mail to our team at: capz@zencapzrewards.com.

•**If you wish, you may revoke your consent; erasure, block, or request anonymization of your data:** you may request erasure of data or deactivate your account at any time, and may further revoke your consent. Deactivating an account entails erasure of all non-anonymous personal data. If you request deletion of your personal data from the Platform, ZenCAP is entitled to save them for judicial, arbitral, or administrative defense purposes, and for compliance with legal and regulatory obligations. In addition, ZenCAP may save your data anonymously for data analysis and product development purposes, provided that such data cannot identify you specifically. If you wish to have all your data deleted from a third party's system, including our partners, you must contact them directly.

•**Understand whom is your data shared with:** you may request information about the governmental and private companies whom the Platform shares data with, using the mechanisms indicated in the Platform, and the Platform may share such Information insofar as it does not violate trade secrets and confidentiality duties.

•**Your history will be saved:** You may contact the Platform administrators, and we may contact you, for access to certain features of our Services, to ask questions about the Platform or

make complaints or suggestions via email [capz@zencapzrewards.com], phone numbers you provide or Whatsapp (or other instant messaging applications). We will save the conversations which content may be used as evidence in court, in the provision our Services, or in other events provided by law.

9. *How are cookies, pixels and other features used?*

9.1. ZenCAP Protection: We reserve the right to access, read, preserve, and disclose any information we deem necessary to comply with the law or court order, as required by applicable law and regulations, by this Policy, and by any other agreements or terms to which users have agreed, as well as protect the rights, property, or safety of the Platform.

9.2. Cookies: Cookie is a small file added to a user's device or computer to provide a customized experience when accessing the Platform. Cookies help you analyze internet traffic or allow us to know when the user has visited a particular site. A cookie does not give access to any computer or disclose information in addition to data users choose to share with us.

9.3. Advertisers - Platform partners - do not transmit cookies to users' browsers or devices when the Platform is used. However, when you click on an advertisement or link that leads to a third party's webpage or service, such third party may transfer cookies to you. Please note that this Policy does not cover the use of third-party cookies, and we are not liable for their privacy practices and policies.

9.4. Your browser may offer the option to disable cookies. If you choose to disable cookies when trying to access and/or use the Platform, you will not be able to access and/or use the Platform and, as a result, participate in CAPZ's ICO.

9.5. Google Analytics and Adwords: We use a tool named "Google Analytics" to collect information about the use of this Platform. Google Analytics collects information such as: users' ways of visiting

this Platform, what webpages they visit and when they visit such webpages, and other webpages they have used prior to coming to this Platform. We use the information we receive from Google Analytics solely to improve this Platform and the services it offers. All Google Analytics collects is the IP address assigned to you on the date you visit this Platform and not your name or other identifying information. While Google Analytics places a permanent cookie on your browser to identify you as a unique user the next time you visit this Platform, the cookie cannot be used by anyone other than Google. The use and sharing of information collected by Google Analytics about your visits to this Platform is limited by Google Analytics' terms of use and privacy policy. You can prevent Google Analytics from identifying you when you return to the Platform by disabling cookies in your browser.

10. Internet Security

10.1. User accounts on the Platform are protected by personal and nontransferable password, which protects users' privacy and safety. You will prevent unauthorized access to your account and Information by properly selecting and safeguarding your password, and by limiting access to your computer or device and browser, being your obligation to log off the Platform at the end of each access to your account and use of the Platform.

10.2. Passwords to access user accounts on the Platform are stored in our databases using the most modern encryption methods and, for security purposes, nobody has access to those databases. This means that ZENCAP WILL NEVER ASK FOR YOUR ACCESS PASSWORD TO YOUR ACCOUNT ON THE ZENCAP PLATFORM BY EMAIL OR TELEPHONE. If you are contacted by anyone asking for your access password to your user account on the Platform, including individuals identifying themselves as members of ZenCAP's or a partner financial institution's staff or an Agent, Advertisers, or any partner, employee, or service provider associated with ZenCAP, we recommend that you contact our customer service center via capz@zencapzrewards.com.

10.3. If you have any reason to believe or suspect that anyone has had access to your password, please contact our customer service department. The ZenCAP team will be ready to respond and take the necessary security and verification measures to block the existing password and issue a new one.

10.4. We will make our best efforts to protect the privacy of our users' account and other Information we keep in our records; however, we cannot fully guarantee our users will be completely secure. Unauthorized access or use, hardware or software failures, and other factors may compromise the security of users' information at any time.

10.5. THEREFORE, TRANSMITTING INFORMATION VIA THE INTERNET IS NOT A TOTALLY SECURE METHOD FOR SEVERAL REASONS, INCLUDING NETWORK AND OPERATING FACTORS, AND ZENCAP DOES NOT FULLY GUARANTEE THE PRIVACY OF DATA TRANSMITTED BY USERS TO THE ZENCAP PLATFORM. ALTHOUGH WE MAKE OUR BEST EFFORTS TO PROTECT YOUR INFORMATION, WE ARE UNABLE TO FULLY GUARANTEE PRIVACY OF DATA TRANSMITTED TO OUR WEBSITE. TRANSMISSIONS ARE AT THE SOLE RISK OF USERS, WHO, BY AGREEING TO THIS POLICY, ACKNOWLEDGE AND EXPLICITLY ASSUME SUCH RESPONSIBILITY.

10.6. Once we receive your Information through the Platform, we are committed to ensure that such Information will be safe in the Platform environment. In order to prevent unauthorized access or disclosure of your Information, we have physical, electronic, and administrative procedures in place to safeguard and protect the information we collect. We adopt the HTTPS protocol (secure communication protocol) with digital certification to ensure security of communication exchanged between users and our servers. Every communication is encrypted and sensitive data is stored in our databanks using state-of-the-art information security and protection techniques.

11. Our legal grounds for using Information

11.1. Our legal grounds for processing personal data, in addition to consent, may also include the need for collecting personal data in compliance with agreement existing between you and the Platform; compliance with legal obligations; and based on our legitimate interests (to the extent permitted by law).

11.2. The date and time of accesses to the Platform from a certain IP address are retained for at least six (6) months, pursuant to legal requirements.

12. Contact us

12.1. If you have any questions or concerns about this Privacy Policy, please contact us at capz@zencapzrewards.com or using the mechanisms available on the Platform.