

Privacy Policy

ZOGOEX LTD, Reg. No: 16773541, 71-75, Shelton Street, Covent Garden, London, WC2H 9JQ, UNITED KINGDOM
Effective Date: 09-Oct-2025

1. General Provisions

1.1. ZOGOEX LTD (“Company,” “ZOGOEX,” “we,” “us,” or “our”) operates a digital asset and financial exchange platform. We recognize the importance of privacy and are committed to protecting your personal data and ensuring lawful, fair, and transparent processing.

1.2. This Privacy Policy explains how we collect, use, disclose, and protect your information when you use our website, mobile applications, APIs, or any other service platform (collectively “Services”).

1.3. We comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1.4. By using our Services or signing up for a ZOGOEX account, you acknowledge that you have read, understood, and agreed to the terms of this Policy.

2. Types of Information Collected

2.1. Personal Information

2.1.1. Registration Information: Full name, email address, contact number, date of birth, nationality, residential address, and password.

2.1.2. Verification Data (KYC/AML): Identity verification documents such as passport, national ID, driver’s license, utility bills, or proof of residence.

2.1.3. Financial Data: Bank account details, wallet addresses, transaction data, and payment history for regulatory compliance.

2.1.4. Device and Log Information: IP address, browser type, device identifiers, operating system, geolocation data, and access timestamps.

2.1.5. Communication Data: Records of interactions with customer support, marketing communications, and feedback.

2.2. Non-Personal / Technical Information

2.2.1. Usage analytics, cookies, referral data, and aggregated statistical data to improve user experience and service optimization.

2.2.2. Technical logs and performance data collected for platform security and reliability.

3. Use of Information

3.1. We process your personal data for the following lawful purposes:

- To create, maintain, and secure your ZOGOEX account.
- To perform KYC/AML identity verification and risk assessments.
- To facilitate deposits, withdrawals, and trading transactions.
- To ensure compliance with applicable financial and anti-money laundering laws.
- To prevent, detect, and investigate fraud or other illegal activity.
- To provide customer support and respond to your inquiries.
- To enhance platform security and performance.
- To send important service updates, legal notices, or account information.
- To provide promotional or marketing communications (with your consent).
- To perform analytics and improve products and services.

3.2. We process your information only when we have a legal basis, including contractual necessity, consent, legal obligation, and legitimate interest.

3.3. We never sell or rent personal data to third parties.

Addition to 3.2:

- **Contractual Necessity** – for account management, deposits, withdrawals, and transactions.
 - **Legal Obligation** – for AML/KYC checks and regulatory reporting.
 - **Legitimate Interest** – for fraud prevention, analytics, and platform improvement.
 - **Consent** – for marketing and non-essential cookies.
-

4. Data Sharing and Disclosure

4.1. We may share data with trusted third parties, including:

- Regulatory authorities and law enforcement where legally required.
- Payment processors, banks, and custodians to complete transactions.
- Compliance and identity verification providers (KYC/AML partners).
- Technology and security partners maintaining platform infrastructure.

4.2. All third-party partners are contractually bound to maintain confidentiality and comply with data protection standards.

4.3. Data may be transferred outside the UK only where adequate safeguards are in place, such as Standard Contractual Clauses (SCCs) or equivalent protections.

Addition to 4.3:

Where data is transferred outside the UK to jurisdictions not recognized as providing adequate protection, such transfers are governed by **Standard Contractual Clauses (SCCs)** approved by the **UK Information Commissioner's Office (ICO)** or equivalent safeguards.

5. Data Retention

5.1. We retain personal data only as long as necessary for the purposes set out in this Policy or as required by law.

5.2. Data related to financial transactions and KYC verification may be stored for a minimum of 5 years to comply with the UK Money Laundering Regulations 2017.

5.3. Upon expiry of the retention period, data is securely deleted or anonymized.

6. Data Protection and Security

6.1. We use industry-standard security measures including encryption, firewalls, intrusion detection, and access control protocols.

6.2. Employees and contractors have restricted access to data on a need-to-know basis.

6.3. While we strive for maximum protection, no digital transmission is 100% secure; users are encouraged to maintain strong passwords and device protection.

6.4. In the event of a personal data breach, we will notify affected individuals and the UK Information Commissioner's Office (ICO) in accordance with UK GDPR.

Addition to Section 6:

ZOGOEX conducts **Data Protection Impact Assessments (DPIAs)** for processing operations likely to pose high risks to individual rights and freedoms.

7. Cookies and Tracking Technologies

7.1. ZOGOEX uses cookies, pixels, and similar technologies to improve user experience, analyze trends, and provide personalized content.

7.2. You may disable cookies through browser settings, but some platform functions may not operate properly.

7.3. Types of cookies used include essential, performance, functional, and analytical cookies.

8. Marketing and Communication

8.1. With your consent, we may send you updates, newsletters, or promotional offers.

8.2. You may opt out at any time by clicking the “unsubscribe” link in emails or contacting us directly.

8.3. We do not use automated decision-making or profiling without consent.

9. Your Rights (Under UK GDPR)

You have the following rights regarding your personal data:

- **Access:** Request a copy of your personal data.
- **Rectification:** Correct inaccurate or incomplete information.
- **Erasure:** Request deletion where data is no longer needed.
- **Restriction:** Limit processing in certain circumstances.
- **Data Portability:** Receive data in a structured, commonly used format.
- **Objection:** Object to processing for marketing or legitimate interests.
- **Withdraw Consent:** Withdraw any previously given consent.

Requests can be made via email to: connect@zogoex.com

Addition to 9:

If you believe your data rights have been violated, you may lodge a complaint with the **UK Information Commissioner's Office (ICO)** via www.ico.org.uk.

10. Corporate Actions and Business Transfers

In the event of a merger, acquisition, restructuring, or asset sale, personal data may be transferred to relevant entities, subject to the same level of protection as under this Policy.

11. Children's Privacy

Our Services are not intended for individuals under 18 years of age. We do not knowingly collect data from minors.

12. Policy Updates

12.1. We may update this Policy periodically to reflect regulatory, technical, or business changes.

12.2. The latest version will always be available on www.zogoex.com. Continued use of our Services constitutes acceptance of changes.

Addition to Section 12:

This Privacy Policy will be **reviewed annually** or as required by changes in law or operations. Updated versions will include an **effective date and version number**.

13. Legal Definitions

"Personal Data" means any information relating to an identified or identifiable natural person as defined under Article 4(1) of the UK GDPR.

"Processing" means any operation or set of operations performed on personal data, such as collection, storage, use, disclosure, or deletion.

"Data Controller" refers to **ZOGOEX LTD**, which determines the purposes and means of processing personal data.

19. Contact Information

Data Protection Officer: connect@zogoex.com

Company: ZOGOEX LTD

Address: 71-75, Shelton Street, Covent Garden, London, WC2H 9JQ, UNITED KINGDOM