

This Privacy Policy is effective as of “1 February 2025” (“Effective Date”)

Please read this Privacy Policy before browsing this website or using our Services. Your continued use of this website indicates that you have both read and agree to the terms of this Privacy Policy. Unfortunately, you cannot use this website if you do not accept this Privacy Policy.

1. INTRODUCTION

1.1. This Privacy Policy is to be read as specifically incorporated into the Terms of Service, in terms of which ZencoServe NPC (“ZENCOSERVE”) provides services to you (“Services”) as amended from time to time.

1.2. This Privacy Policy applies to your use of ZENCOSERVE. For the purposes of this Privacy Policy, references to a “Website” will be a reference to this URL / website and will also include any and all associated mobile applications as offered or downloadable from the requisite application stores, together with any Application Programming Interface/s.

1.3. This Privacy Policy is to be read in conjunction with any data processing agreement or operator agreement entered into between you and ZENCOSERVE. In the event of any conflict between this Privacy Policy and a binding data processing agreement, the data processing agreement will be preferred to the extent of such inconsistency.

1.4. This Privacy Policy does not apply to the information practices of third-party companies that ZENCOSERVE may engage with in relation to its business operations (including, without limitation, their websites, platforms and/or applications) and which ZENCOSERVE does not own or control; or individuals that ZENCOSERVE does not manage or employ. These third-party sites may have their own privacy policies and terms and conditions, and ZENCOSERVE encourages you to read them before making use of their services.

1.5. It is important that you understand how ZENCOSERVE uses your information. You should read this Privacy Policy in full, but below are the key highlights relating to this Privacy Policy:

1.5.1. Our goal is to streamline and simplify your banking experience. If you don’t want the information you share with us to be collected, processed or disclosed as described in this Privacy Policy, or if you are under the prescribed legal age of majority or do not have the capacity to be bound by this Privacy Policy, you should immediately stop accessing the services.

1.5.2. We collect and process your personal information in accordance with clause 2 below.

1.5.3. We may share your personal information with trusted third parties and service providers, in order to offer the services to you, as well as meet legal requirements.

1.5.4. We offer ways for you to request access to, deletion or correction of information we hold about you.

1.5.5. We offer support to you via our customer support desk, should you require any information or have any questions.

2. PRIVACY POLICY

2.1. For the purposes of this section, personal information will be understood under the definition provided in the applicable data protection laws. ZENCOSERVE also subscribes to the principles applicable to electronically collecting personal information outlined in applicable data protection laws. The applicable data protection laws generally do not apply in situations where personal

information has been De-Identified. The following list of definitions (though not exhaustive) will apply to this Privacy Policy. Capitalised terms not defined herein will bear the meaning contained in ZENCOSERVE's Terms of Service:

2.1.1. "**Account Holder**" means the individual or entity holding a ZENCOSERVE Account on the Website;

2.1.2. "**Biometric Information**" means a technique of personal identification that is based on physical, physiological or behavioural characterisation including fingerprinting, retinal scanning and/or voice recognition;

2.1.3. "**Consent/ed**" means any voluntary, specific and informed expression of will in terms of which permission is given for the Processing of Personal information;

2.1.4. "**Data Breach**" means any incident in terms of which reasonable grounds exist to believe that your Personal information has been accessed or acquired by an unauthorised person;

2.1.5. "**De-Identify/ied**" means to delete any information that identifies you, or which can be used by a reasonably foreseeable method to identify, or when linked to other information, that identifies you;

2.1.6. "**Direct Marketing**" means when you are approached, either in person or by mail or electronic communication, for the direct or indirect purpose of promoting or offering to supply, in the ordinary course of business, any goods or services to you;

2.1.7. "**Process/Processed/Processing**" means the act of processing information which includes any activity or any set of operations, whether or not by automatic means, concerning personal information and includes:

2.1.7.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use; and/or

2.1.7.2. dissemination by means of transmission, distribution or making available in any other form; and/or

2.1.7.3. merging, linking, as well as any restriction, degradation, erasure, or destruction of information;

2.1.8 "**Record/s**" means any recorded information, regardless of medium, including information produced, recorded or stored by means of computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored.

2.1.9. "**ZENCOSERVE Account**" means the ZENCOSERVE Account with the corresponding profile, opened on the website by an Account Holder utilising the Services as offered by ZENCOSERVE; and

2.1.10. "**User**" means an individual or entity which accesses or receives information from the website, and includes an Account Holder.

2.2. In adopting this Privacy Policy, we wish to balance our legitimate business interests and your reasonable expectation of privacy. Accordingly, we will take all reasonable steps to prevent unauthorised access to or disclosure of your personal information.

2.3. We may collect the following types of Personal information from you:

2.3.1. **Administrative and financial information** such as bank account information, credit and/or debit card information, source of funds / wealth, transaction history, tax identification and related documents;

2.3.2. **Automatically collected information** such as information obtained from cookies (see clause 5 Cookies below), information about the device, browser, operating system, IP address and other device identifiers and characteristics, activity information (how you use our Services), troubleshooting and diagnostic information;

2.3.3. **Biometric information** such as the liveness test you perform with a selfie/video you provide when creating your ZENCOSERVE account, video/audio recording, or other evidence of yourself with your identification documentation;

2.3.4. **Correspondence-related information** such as email addresses, phone numbers and information provided to us that is implicitly or explicitly of a private or confidential nature, when engaging with our customer support team;

2.3.5. **Device, data and location information** such as cookies and other tracking technologies, log data, web browser information, IP address information, device identifiers and fingerprint data, and/or authentication data;

2.3.6. **Identification information** such as your full name, date of birth, nationality, cellphone number, email address, country of residence (and/or proof of residence), employment status and/or national identification number for the purpose of assigning a unique identifier to you;

2.3.7. **Information obtained from third parties**, public databases or affiliates such as transaction and product use information, information obtained from public databases, including sanctions or screening lists, blockchain data, information from marketing, advertising or information analytics providers;

2.3.8. **Institutional information** if you are a juristic person, such as proof of legal formation, registration with regulatory bodies, and personal information for all material beneficial owners of the institution;

2.3.9. **Legally obtained information from third parties** to supplement information provided by you, by any third-party service provider appointed to help us provide our Services;

2.3.10. **National identity information** such as a copy of your government-issued national identity document, drivers' license or passport (including any relevant visa information);

2.3.11. **Preference information** such as information about the digital assets you choose to trade and any preferences you select on our website; and/or

2.3.12. **Transaction information** such as transaction data on the transactions you make or intend to make using our services, information on the recipient of any of your transaction(s), and amount(s), payment methods, date or timestamps information.

2.4. Information we collect when you register a ZENCOSERVE Account

2.4.1. Users will be prompted to register an account with ZENCOSERVE. In so doing, users may be asked, or will otherwise be required to provide, *inter alia*, the following information:

A. NATURAL PERSONS

Identifiable Information	Biometric Information	Financial Information	Documentation
First name/Surname	Personal image	Bank Account details	Identity Documents;(which may be collected through our third-party processor)
Identity Number	Personal Audio/Voice recording	Bank Statements	Proof of address
Physical Address	Personal Video recording	Credit Card details and Credit Card Information (which may be collected through our third-party payment processor)	From time to time, what may be required under your local territory's KYC (Know Your Customer) processes.
Email Address	IP Address	Credit history information for credit product purposes (which may be collected through a third-party)	
Cell Phone Number	Device fingerprint data	Financial Information (Source of funds) / Financial Information (Source of wealth)	
Date of Birth	Social login account login details, (i.e Facebook, LinkedIn, Twitter)	Income Tax Information	

B. JURISTIC ENTITIES

Identifiable Information	Financial Information	Documentation
---------------------------------	------------------------------	----------------------

First name/Surname of company-related parties	Company bank account details	Company registration documents (including associated Memoranda or Articles of Association)
Identity numbers of related parties	Company income tax information	Proof of address for Business
Email Address	Financial Information (Source of funds)	Proof of VAT registration (or equivalent)
Contact Number	Financial Information (Source of wealth)	Identity documents for director, UBO and Authorised trader
IP Address		Proof of address for related parties
		Shareholder agreements
		From time to time, what may be required under your local territory's KYC (Know Your Customer) processes.

2.4.2. The above-mentioned Personal information may be processed to manage and administer your ZENCOSERVE Account, including onboarding, KYC and Anti-Money Laundering ("AML") processes, and fraud security process, or as otherwise set out in this Privacy Policy.

2.5. Our stance on collecting information from minors or those who lack capacity. ZENCOSERVE will not intentionally or knowingly collect personal information directly from individuals under the age of 18 (eighteen) years, without the required consent of their legal guardian. We do not accept any users, or representatives of users, under the age of majority or who otherwise do not have the relevant capacity ("**Incapacitated**") to be bound by this Privacy Policy, unless you are a user who is a minor or is otherwise incapable of being bound by this Privacy Policy, and you warrant that you have obtained the consent of your legal guardian / or you are the legal guardian providing such consent to this Privacy Policy. If you are incapacitated, please do not provide any personal information through our website or services.

2.6. Your Consent. We take our users' privacy seriously. We will attempt to limit the types of personal information we process to only that to which you consent (for example, in the context of online registration, newsletters, message boards, surveys, polls, professional announcements, SMS, MMS, and other mobile services), but, to the extent necessary, your agreement to this Privacy Policy constitutes your consent as contemplated in applicable data protection laws. Where necessary, we will seek to obtain your specific consent in future instances should we deem the same required by law and where your support herein might not be lawfully sufficient. We will only share your personal information if:

2.6.1. you agreed that we may share your personal information; and/or

2.6.2. the law requires it; and/or

2.6.3. our or your legitimate interests require us to share the personal information; and/or

2.6.4. we have a public duty to share personal information; and/or

2.6.5. it is necessary to perform or conclude in terms of an agreement between you and us.

2.7. By accepting this Privacy Policy, you consent further that we may process your personal information for one or more of the following purposes:

2.7.1. to comply with KYC and AML requirements by verifying your identity accordingly;

2.7.2. to create a user profile and manage and maintain your account with us;

2.7.3. to provide access to certain functionalities and features of our services, depending on your verification level;

2.7.4. to respond to your enquiries and to resolve disputes/complaints;

2.7.5. to enforce our terms and policies and comply with applicable laws;

2.7.6. to detect and prevent fraudulent, malicious, deceptive or unauthorised use of our products and services, and report those responsible for such activities to the relevant regulatory authority/ies;

2.7.7. to ensure internal quality control and assess the performance and functionality of our services, and continue to provide you with accurate information, products and Services;

2.7.8. to measure interest and engagement in our services and use this information to improve our products and services, and to develop new products and services;

2.7.9. where indicated (for example in application forms or account opening forms), and it is obligatory to provide your personal information to us, to enable us to process your application for our products or services. Should you decline to provide such personal information, we may not be able to process your application/request or provide you with our products or Services;

2.7.10. to notify you about benefits and changes to the features of our products and services or our website, and provide you with personalised web content, marketing and interest-based advertising;

2.7.11. to obtain insight into market trends and practices, to improve our services to you; and/or

2.7.12. for security, legal and administrative purposes.

2.8. The personal information Processed in 2.7 above, will be compiled and retained in aggregate form but will not be used in any way that may compromise your identity.

2.9. You expressly consent to the collection, use and storage of personal information obtained about you in relation to the processing of any biometric information, criminal history information and any other type of special personal information about you in connection with any of the purposes listed above. You may choose to withdraw your consent in this instance, and if you choose to do so, you are to notify ZENCOSERVE of such withdrawal in writing. Upon receipt of such withdrawal, ZENCOSERVE may no longer make the ZENCOSERVE products and services available to you.

2.10. Other reasons we may have to process your information. In order to effectively render our services to you, we may share your personal information, where necessary, with KYC partners, payment gateways, bulk email marketing service providers, regulators and/or other regulatory authorities as required by law, as well as other service providers required to render our services to you. We may also share your personal information with:

2.10.1. financial, advertising and other third-party service providers who may assist us to provide our products and services;

2.10.2. any entity that forms part of the ZENCOSERVE group of companies, including where relevant the ZENCOSERVE operating entity in the country or region in which you live;

2.10.3. any person who works for us or for one of our group companies;

2.10.4. subject to applicable laws, any applicable regulatory or supervisory authority and/or law enforcement agency, upon receipt of a court order/subpoena or any other analogous official document requesting your personal information, and/or to assist with an investigation or prosecution of suspected or actual illegal activity.

2.11. We may use your personal information to provide you with support. In order to address and attempt to resolve your queries we may require that you share certain personal information such as your basic customer information, transaction information, location information and other communications information.

2.12. We may also process your personal information to promote the security and integrity of our services and website. Your information may be used by us to investigate suspicious activity, detect fraudulent behaviour, verify accounts and related activity and maintain the integrity of our services.

2.13. Your personal information may also be used for our research and innovation. At times, we may carry out surveys of your experience using our services and website, in order to enhance your user experience.

2.14. By accepting this Privacy Policy, and then submitting your personal information, you expressly consent to the transfer, storing or processing of your personal information by any third-party service provider as listed in 2.10 to 2.14. above.

2.15. Specific Consent to the processing of personal information by certain third-party service providers.

2.15.1. Certain companies have been appointed / will be appointed by ZENCOSERVE to provide services to ZENCOSERVE. These include:

2.15.1.1. Certain automated authentication messaging services including one-time pins (OTP), verification codes and other related messages ("**Automated Messages**").

2.15.2. By signing up as Account Holder with ZENCOSERVE, you agree that:

2.15.2.1. You consent to the processing of your personal information with third-party service providers.

2.15.2.2. You consent to ZENCOSERVE sharing your cell phone number with third-party service providers for the purposes of sending verification messages to you.

2.16. Storage of payment/transaction information. All payment/transaction information will be conducted by electronic funds transfer (EFT), alternatively, specific credit and debit cards permitted by ZENCOSERVE from time to time. ZENCOSERVE shall retain a user's designated bank account details for utilization regarding the user's withdrawals as and when required. We do not store your full credit and debit card data. This data is securely transferred and stored off-site by an authorised payment vendor in compliance with Payment Card Industry Data Security Standards (PCI DSS). This

information is not accessible to ZENCOSERVE or ZENCOSERVE's employees or any agent acting for or on behalf of ZENCOSERVE.

2.17. We will not collect, use or disclose sensitive/special personal information (such as information about racial or ethnic origins or political or religious beliefs, where relevant) except with your specific Consent or in the circumstances permitted by law.

3. CROSS-BORDER TRANSFERS

3.1. In order for ZENCOSERVE to properly perform its services, it may be required for ZENCOSERVE to transfer personal information to a third party which is situated outside of the jurisdiction in which you reside, and the laws of those countries may differ from the laws applicable in your own country. By accepting this Privacy Policy, and then submitting your personal information, you expressly consent to the transfer, storing or processing of such personal information outside of your jurisdiction.

3.2. ZENCOSERVE undertakes to use reasonable endeavours to:

3.2.1. ensure the third party's compliance with this Privacy Policy insofar as the processing of personal information is concerned;

3.2.2. prevent such third party from further transferring the personal information to another unauthorised third party;

3.2.3. ensure that the third party has implemented reasonable and appropriate technical and organisational security measures to safeguard the personal information in such jurisdiction; and

3.2.4. ensure that the third party maintains compliance with the relevant applicable data privacy laws.

4. LOG FILES

As with all websites, when you visit our website, even if you do not create a ZENCOSERVE account, we may collect information, such as your IP address, the name of your ISP (Internet Service Provider), your browser, the website from which you visit us, the pages on our website that you visit and in what sequence, the date and length of your visit, and other information concerning your computer's operating system, language settings, and broad demographic information. This information is aggregated and anonymous data and does not identify you specifically. However, you acknowledge that this data may be able to identify you if it is aggregated with other personal information that you supply to us. In this regard, however, and as recorded, only with a user's consent and subject strictly to the terms of this Privacy Policy will a User's Personal information be transferred and/or shared, and currently the same is only being used within ZENCOSERVE on a need-to-know basis. Furthermore, any individually identifiable information related to this data will never be used in any way different to that stated within this Privacy Policy without your explicit consent.

5. COOKIES

5.1. ZENCOSERVE and our website analytics partners use cookies. A cookie is a small piece of information stored on your computer or smartphone by the web browser. When you return to the website, or visit other websites that use the same cookies, the website or other websites recognises these cookies and your browsing device. The types of cookies used on the website are described below:

5.1.1. **"Session cookies"**: These are used to maintain a so-called 'session state' and only lasts for the duration of your use of the Website. A session cookie expires when you close your browser or if you have not visited the server for a certain period. Session cookies are required for the website to function optimally but are not used in any way to identify you personally.

5.1.2. **"Permanent cookies"**: These cookies permanently store a unique code on your computer or smart device hard drive in order to identify you as an individual user. No personal information is stored in permanent cookies. You can view permanent cookies by looking in the cookie's directory of your browser installation. These permanent cookies are not required for the website to work, but may enhance your browsing experience.

5.1.3. **"Advertising/Targeting Cookies"**: ZENCOSERVE may display advertising on its website or other relevant third-party sites. These advertising/targeted cookies help ZENCOSERVE to measure the efficacy of advertisements and tailor advertisements to you both on the website and on other websites. No personal information can be identified through these cookies.

5.1.4. **"Strictly Necessary Cookies"**: These cookies are, as the name suggests, strictly necessary for the website to function and unfortunately cannot be switched off.

5.1.5. **"Functionality Cookies"**: These cookies remember your username or your preferences and allow ZENCOSERVE to tailor its services to you by remembering choices you make on the website.

5.1.6. **"Analytics/Performance Cookies"**: These cookies allow ZENCOSERVE to monitor and improve the performance of the website. They enable monitoring of customer behaviour on the website (such as least and most visited website pages). The information collected via these cookies is anonymous and aggregated.

5.2. Cookies set by the website operator are called "first-party cookies". Cookies set by parties other than the website operator are called "third-party cookies". We may use authorised third-party providers to help us with various aspects of our business, such as website operations, services, applications, advertising, support tools and to serve you relevant content.

5.3. The authorised third-party providers we use may place cookies on your device (third-party cookies) or make use of similar tracking technologies such as web beacons. No personally identifiable information is stored in third-party cookies. The information reported to us is aggregated and anonymous. We use this information to understand, for example, the effectiveness of our advertising and marketing. Web beacons are small graphic images (also known as "pixel tags" or "clear GIFs") which may be used to collect and store information about visits to our website (such as which pages you viewed and how long you spent on the website) and communication efficiency (such as the email delivery and open rates). Where necessary, the information gathered by web beacons may be tied to your Personal information strictly for the purposes set out in this Privacy Policy.

5.4. We may also use cookies from our authorised third-party providers who may use information about your visits to other websites to target advertisements for products and services available from ZENCOSERVE. We do not control the types of information collected and stored by these third-party cookies. You should check the third-party's website for more information on how they use cookies.

5.5. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of our website. If you accept cookies or fail to deny the use of cookies, you agree that we may use your personal information collected using cookies (subject to the provisions of this Privacy

Policy). Where you either reject or decline cookies, you are informed that you may not be able to fully experience the interactive features of the website.

6. LINKS FROM THE WEBSITE

6.1. The website, and the services available through the Website, may contain links to other third-party websites ("Third Party Websites"). If you select a link to any third-party website, you may be subject to such third-party website's terms and conditions and/or other policies, which are not under the control, nor responsibility, of ZENCOSERVE.

6.2. Hyperlinks to Third Party Websites are provided "as is", and ZENCOSERVE does not necessarily agree with, edit or sponsor the content on third-party websites.

6.3. ZENCOSERVE does not monitor or review the content of any third-party website. Opinions expressed or material appearing on such websites are not necessarily shared or endorsed by us and we should not be regarded as the publisher of such opinions or material. Please be aware that we are not responsible for the privacy practices, or content, of third-party websites, either.

6.4. Users should evaluate the security and trustworthiness of any third-party website before disclosing any personal information to them. ZENCOSERVE does not accept any responsibility for any loss or damage in whatever manner, howsoever caused, resulting from your disclosure to third parties of personal information.

7. YOUR RIGHTS

Subject to data protection laws applicable to you, you may have the following rights concerning the processing of your personal information. If any of the rights listed below are not provided under applicable data protection laws in your jurisdiction, ZENCOSERVE has the absolute discretion in providing you with such rights. In order to protect your privacy and security, ZENCOSERVE may take steps to verify your identity prior to complying with any of your requests to exercise your rights listed below. If we are unable to verify your identity, we may decline your request or request additional verification information. You can make privacy rights requests relating to your personal information by contacting our support team.

7.1. Right to access

7.1.1. The right to request from ZENCOSERVE confirmation as to whether or not we hold personal information about you, and request the Record itself.

7.1.2. The right to ask ZENCOSERVE to provide you with a description of the personal information held by us or by a third party for a prescribed fee that will not be excessive.

7.2. Right to withdraw Consent / Object to Processing

7.2.1. To the extent that the processing of your personal information is based on your consent, the right to withdraw your consent at any time, provided that such withdrawal does not affect processing necessary for the conclusion or performance of our Service. The lawfulness of ZENCOSERVE's processing before you withdraw your consent will not be affected by such consent withdrawal.

7.2.2. The right to restrict or object to us processing or transferring your personal information based on our legitimate interests or the public interests. We may continue to process your personal information where permitted or required by applicable law.

7.3. Right to reasonable data protection measures

The right to require ZENCOSERVE to implement reasonable data security measures to protect personal information.

7.4. Right to challenge the accuracy of the personal information

The right to request ZENCOSERVE to correct/rectify personal information about you under our control if the personal information is inaccurate, out of date, incomplete or misleading.

7.5. Right to object to direct marketing

7.5.1. The right to object to the processing of personal information for direct marketing purposes.

7.5.2. Where you have opted-in to receive marketing communications and news, we may share information about our products, services, news and promotions with you. If you have opted-in to receive marketing communications, you may always opt-out at a later stage by clicking on the 'Unsubscribe' option included in every marketing communication sent to you. Please note that unsubscribing from marketing content will not stop you from receiving important communications in relation to the security or operation of your ZENCOSERVE account or any ZENCOSERVE product.

7.6. Right to be forgotten and request data erasure

7.6.1. The right to request that ZENCOSERVE deletes the personal information about you in our possession or under our control which is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.

7.6.2. The right to request ZENCOSERVE to destroy or delete a record of personal information about you which ZENCOSERVE is no longer authorised to retain. For the avoidance of doubt, there may be obligations under applicable data protection laws which require ZENCOSERVE to retain certain information for certain periods of time.

7.7. Right to lodge a complaint

Depending on your jurisdiction, the right, if we breach any of the terms of this Privacy Policy, to lodge a complaint with the requisite data protection authority in your territory.

7.8. Right to non-discrimination

The right to not be discriminated against by ZENCOSERVE for you exercising any of the rights above.

8. APPLICATION OF THE ELECTRONIC COMMUNICATIONS AND TRANSACTIONS ACT 25 OF 2002 ("ECT ACT")

8.1. Data Messages (as defined in the ECT Act) will be deemed to have been received by ZENCOSERVE if and when ZENCOSERVE responds to the Data Messages.

8.2. Data Messages sent by ZENCOSERVE to a User will be deemed to have been received by such User in terms of the provisions specified in section 23(b) of the ECT Act.

8.3. You acknowledge that electronic signatures, encryption and/or authentication are not required for valid electronic communications between yourself and ZENCOSERVE.

8.4. You warrant that Data Messages sent to ZENCOSERVE from any electronic device, used by you, from time to time or owned by you, were sent and or authorised by you, personally.

8.5. Address for service of legal documents:

4th Floor

56 Richefond Circle

Umhlanga Ridge

Durban

South Africa

4319

ZENCOSERVE - located at <https://zencoserve.com>

Email address: admin@zencoserve.com

The website is operated and owned by ZENCOSERVE TECHNOLOGY (Pty) Ltd, registration number 2023/757613/08

9. RETENTION OF RECORDS

9.1. ZENCOSERVE may keep records of the personal information it has collected, correspondence, or comments in an electronic or hardcopy format. We retain your information as needed to provide our services, and protect our or other's interests or comply with legal obligations. While retention requirements vary by country, we maintain internal retention policies on the basis of how information needs to be used. Our retention policies include considerations such as when the information was collected or created, whether it is necessary in order to continue offering you our services, whether we are required to retain the information to comply with our legal obligations, including AML/KYC compliance or other financial regulatory obligations, or information preservation requirements. Our third-party service providers may also retain your personal information according to their respective retention policies or require us to retain your personal information in accordance with these policies. In line with the abovementioned considerations, we delete information that is no longer required for the purposes outlined above when you close your ZENCOSERVE Account, or when you request deletion of your personal information under this Privacy Policy and would notify third party service providers of this deletion (if required).

9.2. In terms of applicable data protection laws, ZENCOSERVE may not retain personal information for a period longer than is necessary to achieve the purpose for which it was collected or processed and is required to delete, destroy (in such a way that it cannot be reconstructed) or De-Identify the information as soon as reasonably practicable once the purpose has been achieved. This prohibition will not apply in the following circumstances:

9.2.1. Where the retention of the record is required or authorised by law;

9.2.2. Where ZENCOSERVE requires the record to fulfil its lawful functions or activities;

9.2.3. Retention of the record is required by a contract between the Parties;

9.2.4. You have consented to such longer retention; or

9.2.5. The record is retained for historical, research or statistical purposes provided that safeguards are put in place to prevent use for any other purpose.

9.3. Your biometric Information may be held by our third-party service providers for a period from the time when you cease to be a customer of ZENCOSERVE.

10. SECURITY AND DATA BREACHES

Your privacy is very important to us and we are committed to protecting your personal information from unauthorised access or use. We will use reasonable organisational, physical, technical and administrative measures that comply with applicable data protection laws to protect personal information within ZENCOSERVE. ZENCOSERVE will address any data breach in accordance with applicable data protection laws.

11. REVISIONS TO THIS PRIVACY POLICY

11.1. We may amend this Privacy Policy from time to time. You should visit the website regularly to check when this Privacy Policy was last updated and to review the current Privacy Policy. We will do our best to notify you of any substantive amendments to the Privacy Policy and any such notice will be posted on our application or our website, or sent by email to the address associated with your ZENCOSERVE account. Accessing and/or use of the website after the Effective Date will signify that you have read, understood, accepted, and agreed to be bound, and is bound, by this Privacy Policy in your individual capacity and/or for and on behalf of any entity for whom you utilise the website (if permitted).

11.2. We may provide additional "just-in-time" information or disclosures about how we collect or use your information in the context of specific Services. These in-product notices may supplement or clarify our privacy practices or may provide you with additional choices about how we use or process your information.

11.3. In the event that this Privacy Policy is translated into a language other than English, you acknowledge and agree that such translation is provided for your convenience only and that in the event of any inconsistency or conflict between the English version of this Privacy Policy and any translation, the English version shall prevail.