

1. Objectives

This Privacy Policy seems to establish the ways in which Zami, Inc. and any subsidiaries or controlled entities (collectively, "Zami") will collect, store and manage user information, as well as the user's rights in regards to Zami's collection, storage and management of that information in connection with Zami's business activities.

Zami is committed to respecting the privacy of its users and respecting the applicable legal frameworks from the countries it operates in. As such, this policy will be reviewed and updated if needed when Zami seeks to initiate operations in a new jurisdiction in order to comply with that jurisdiction's requirements.

2. User consent

By using Zami's services and technology, the user consents to this Privacy Policy and all its contents, and therefore will not be able to claim any damages or compensation as a result of Zami acting in accordance with this Privacy Policy.

3. Data collection

In the course of its business activities, such as account opening and accessing, order entry, and any other services provided by Zami, we will collect the following information:

1. Identity Data, such as your name, date of birth, marital status, social security number, biometric identifiers, and other data on government-issued identification documents;
2. Contact Data, such as your email address, mailing address, and telephone number;
3. Financial Data, such as your bank account and payment card details, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores;
4. Profile Data, such as your username and password, your knowledge assessment results, your interests, preferences, feedback, and survey responses;

5. Usage Information. We collect information about your activity on our Services, which includes device identifiers (like IP address or mobile device identifiers), pages or features you use, time and date of access, and other similar usage information.
6. Transactional Information. When you receive, submit, or complete a transaction via the Services, we collect information about the transaction, such as transaction amount, type and nature of the transaction, and time and date of the transaction.
7. Location Data. We may collect the GPS location of your mobile device in accordance with your device permissions. You can stop the collection of this precise location information at any time via your device's settings.
8. Information Collected Through Tracking Technologies. We and our service providers also use technologies, including cookies and web beacons, to automatically collect certain types of usage and device information when you use our Services or interact with our emails. The information collected through these technologies includes your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique device or account ID, usage information and other similar information. For information about how to disable cookies, please see the Your Controls section below.
9. Vendors and Business Partners. We collect information about you from companies that we do business with, such as name, contact data, inferences about your preferences and attributes, as well as inferred fraud risk, from identity verification and fraud prevention partners.
10. Publicly Available Data. includes contact information, your interactions with our social media platforms, and other information from publicly available sources, such as public websites.
11. Advertising Data. We collect information in connection with our ad campaigns that surfaced on other platforms, such as the ads you clicked on and other interactions with our ads.
12. Data from other users. If you are in another user's contact list and they choose to share that list with us, then we will collect the contact information and your association with that user.
13. Device identification information such as IP address, device identifiers, web browsers, etc.

Zami may also collect information for other purposes, which will be informed to you at the point of collection.

Zami will collect this information through your usage of Zami's services through its application and/or website.

4.Data usage and processing

Zami uses your information for the following purposes:

1. Maintain and provide Zami's services, including processing account applications through our clearing agent, authenticating your identity, support, handling billing and account management;
2. Sending you transactional or relationship information, including confirmations, invoices, technical notices, customer support responses, software updates, security alerts, support and administrative messages, and information about your transactions;
3. Communicating with you about offers and other things we think you will be interested in, such as newsletters, product announcements, partner offerings, surveys, contests or sweepstakes, events or announcements;
4. Personalizing our services, including customizing the content we show you;
5. Monitoring and improving our services, including analyzing your usage for research and development;
6. Executing contests, sweepstakes, raffles and other promotions, and processing and delivering entries and rewards;
7. Reporting the data to the necessary authorities, should Zami be under a legal obligation to do so or be compelled by a competent authority to do so;
8. Protect or exercise our legal rights or defend against legal claims, including to enforce and carry out contracts and agreement, including our agreement with you;

Zami may also use specific information for other purposes, which will be informed to you either at the point of collection or point of usage.

5. Data sharing

Zami may share your information with the following parties:

1. Authorized third-party vendors and service providers. We share information about you with third-party vendors and service providers who perform services for us, such as identification verification, fraud prevention, advertising, mailing services, contest fulfillment, web hosting, and analytics services. We use an identification verification service provider to determine whether a selfie you take matches the photo in your government-issued identification. With your consent, we may record your voice and send this data to our third-party partner to authenticate you and to help prevent fraud. The information collected from your photo and your voice by our third-party vendors may include biometric data. We will specifically share any information that is required from us by our clearing agent, as they may deem necessary in regards to your account and transactions.
2. Zami affiliates, including entities owned or controlled by Zami.
3. Substantial corporate transactions. We may share information about you in connection with a substantial corporate transaction, a merger, consolidation, reorganization, financing, change in control or acquisition of all or a portion of our business by a third party, or in the unlikely event of a bankruptcy or similar proceeding.
4. Legal purposes. We disclose information about you if we believe that disclosure is in accordance with, or required by, any applicable law or legal process or to protect and defend the rights, interests, safety, and security of Robinhood, our users, or the public.
5. With your consent. We share information about you for any other purposes disclosed to you with your consent.

We share information with others in an aggregated or otherwise de-identified form that does not reasonably identify you.

6. Links

Zami may provide links to third parties. The provision of such links does not imply that Zami endorses those third parties, or that they are subject to this Privacy Policy unless expressly indicated by Zami and/or the third party.

Zami will not provide links to authenticate your identity via social media accounts.

7. Authorized access

Your personal data may be accessed by authorized Zami employees, authorized third parties, and in general any party or person expressly authorized by Zami.

8. Data protection rights

You may request a copy of your data at any time from Zami. Zami will deliver such copy to you as soon as practically possible and through the means identified by Zami.

Zami will respect your rights concerning data and privacy as established in this Privacy Policy and any applicable laws, specifically the laws of the country where you are located. From time to time, Zami may establish complimentary documentation to this policy for any specific aspects concerning a jurisdiction.

9. Opt out options

Since the data collection, handling and processing described in this Policy is essential to Zami's business and services, users may not opt out from such data collection.

10. Contact information

For any inquiries regarding the content of this Policy, users may contact Diego Garcia, Director of Operations, Compliance and Risk at hola@zamiapp.com.

11. Potential future changes

This Policy is effective on the latest date indicated in the document version table at the beginning of the document. Zami reserves the right to change, amend or modify this policy at any time, and will notify you when a change is made. By continuing to use Zami's services, you consent to such changes, amendments and/or modifications.