

## PRIVACY POLICY

NETPDV - PAYMENT SOLUTIONS, LDA, enrolled with the portuguese taxpayer register (“NIPC”) under No. 515048941, headquartered at Avenida Barbosa du Bocage, nº 113, Lisboa, Portugal, Zip Code 1050-031 (“ZIG”), aligned with the best practices of transparency in the market, comes to present you, User of the technologies available on the website [www.zigpay.com.br](http://www.zigpay.com.br), APP, electronic or similar applications, owned by ZIG, for the use of Consumption Management Services (“ZIG Platform”), its Privacy Policy.

### 1. Introduction and objectives

1.1. ZIG intends to provide its Users with the best possible use and consumption experience, bringing through its services speed and security in making payments at entertainment events and places (e.g. nightclubs, pub and restaurants). For this, ZIG needs to carry out the treatment (such as the collection, reception, storage and use) of personal data that are made available by Users when using the ZIG Platform.

1.2. The privacy and security of the personal data of each User is of great importance to ZIG and, for this reason, ZIG has developed this Privacy Policy - part of the Terms and Conditions of Use of the ZIG System - which will enable you, ZIG User, know what is done with your information that is received and processed by ZIG.

1.3. ZIG guarantees its Users transparency about their rights, as well as an understanding of what personal data is collected, the reasons why they are collected and with whom they can be shared.

1.4. If you do not agree with this Privacy Policy, you must not use the ZIG Platform. Therefore, read carefully what is established in this document and, in case of doubt, contact us. It will be a pleasure to offer any further clarification.

### 2. Personal data collected

2.1. Personal data or information is considered to be any data that allows the User's personal identification.

2.2. In order to use the services provided by the ZIG Platform, the User may provide ZIG with personal registration data, such as full name, personal document register nº, gender, date of birth, e-mail, telephone number and payment data. In addition, it is possible for the User to register in the ZIG Platform through third-party services, such as Facebook.

2.2.1. Consumption data, amounts spent, as well as other information related to the User's consumption also comprise data subject to collection by ZIG.

2.2.2. It is important that Users keep their personal registration information updated so that the data present in the ZIG Platform remain correct and true.

2.2.3. ZIG is in no way responsible for the veracity of the data provided by the User, whether this provision is made directly or through third-party tools.

2.3. In addition to the information that is provided directly by the User, ZIG uses technologies that allow the collection of certain technical information that may eventually be considered personal data, such as the operating system of the device used by the User, its Internet protocol address or URI address. (Uniform Resource Identifier), consumption or location data.

### 3. Use and purposes of processing personal data

3.1. ZIG uses personal data of its Users only for the purposes set out in this Privacy Policy and in accordance with the conditions set forth herein.

3.2. In order to perform the services offered by ZIG to its Users, ZIG needs to process the data collected by it. Personal data may, for example, be used to:

(i) enable the management of Users' consumption;

- (ii) the operationalization of payments;
- (iii) offering a better performance and experience to Users;
- (iv) developing new functionalities or monitoring the use of the ZIG Platform; or
- (v) compliance with the Terms and Conditions of Use of the ZIG System.

3.3. ZIG may also process the personal data of its Users for:

- (i) compliance with legal or regulatory obligations, court orders or acts of competent authorities;
- (ii) for the regular exercise of its rights or defense of its interests (including here the interests of its administrators, directors, employees, agents, contractors and partners); or
- (iii) due to other cases provided for by law that waive any consent on the part of the holder of the personal data.

3.4. ZIG may contact Users by sending them emails or notifications with alerts, advertisements or communications, in order to assist in the use of ZIG's functionalities, forward usage reminders or information that may be of interest to the User, share information related to the ZIG, among others. If the User no longer wishes to receive certain e-mails, he/she may inform ZIG, including by e-mail (opt-out), in which case the latter will interrupt such services as quickly as possible. To unsubscribe, the User must forward the request to the email address [privacy@zigpay.com.br](mailto:privacy@zigpay.com.br).

3.5. ZIG may process Users' personal data in order to generate statistical information (individual or general), identify specific needs of each User, as well as develop or offer certain products or services that fit their profiles.

3.6. All use of personal data carried out by ZIG respects the provisions of GDPR or other Applicable Laws. In this sense, the holder of personal data is assured:

- (i) confirmation of the existence of processing of his/her data by ZIG;
- (ii) access to his/her personal data;
- (iii) correction of incomplete, inaccurate or outdated data, observing the provisions of items 2.2.1 and 2.2.2 of this Policy;
- (iv) the anonymization, blocking or elimination of data that are unnecessary, excessive or treated in violation of said law;
- (v) data portability to another service or product provider, upon express request from the data subject, in accordance with any regulation by the national authority, observing commercial and industrial secrets;
- (vi) the elimination of personal data processed with the consent of the holder, except in the cases provided for by law;
- (vii) be informed about the public and private entities with which ZIG has shared data;
- (viii) be informed about the possibility of not providing consent and the consequences of not providing consent; and
- (ix) the revocation of his/her consent, in cases where the processing of data is justified by the consent.

3.7. In cases where it is not possible for the User to perform a certain right, he/she may request ZIG directly through the communication channel indicated by this Privacy Policy.

#### 4. Personal data sharing

4.1. For the viability of consumption management services, personal data may be shared by ZIG. In this sense, ZIG may share personal data to operationalize the User's consumption or the eventual payment or credit control of the User, as well as it may share personal data with Establishments (people who sell products and/or services directly to the User, and who, because they are registered with the ZIG System, they are qualified to provide Consumption Management Services or, if contracted, receive payment for Transactions).

4.2. The Establishment will have access to the User's consumption information through the website [www.zigpay.com.br](http://www.zigpay.com.br) and will be able to view the balance and extract of transactions stored in the ZIG Platform. As the Establishment is a legal entity different from ZIG, the latter has no responsibility for the processing of personal data carried out by the Establishments. If the User wishes to have more information regarding the data processing activities carried out by the Establishment, the latter must apply directly to the same.

4.3. ZIG does not provide printed information, although the Establishment has the possibility to save and print the information contained in the ZIG website.

4.4. ZIG does not provide its Users' personal data to third parties without their proper authorization, except in cases in which this sharing is necessary:

- (i) for the execution of the services object of the ZIG Platform;
- (ii) for the development of its commercial activities;
- (iii) for the fulfillment of a legal or regulatory obligation, court order or act of competent authority;
- (iv) for the regular exercise of its rights or defense of its interests (including here the interests of its officers, directors, employees, agents, contractors and partners); or
- (v) due to other cases provided for by law that waive any consent by the holder of the personal data.

4.5. ZIG may also share or receive personal data with the User's consent or under his/her guidance. In this sense, for example, an exchange of information may occur through a connection with a third-party platform.

4.5.1. In cases of sharing with partners with the due consent of the holder, the partner must adopt at least the same level of security used and guaranteed by ZIG to its Users.

4.6. ZIG may also share Users' personal data with outsourced service providers even without the holder's consent. This sharing may occur to the extent that such personal information is necessary for the provision of the service, and the treatment will be carried out under the guidance and on behalf of ZIG. These providers may, for example, provide some assistance to the User, perform information checks or be companies that provide technological or operational infrastructure.

4.7. Attachment I of this Privacy Policy indicates the main commercial partners of ZIG that may eventually receive personal data from Users, as well as indicates the access link to their respective privacy policies.

## 5. Data Security and Storage

5.1. The security of processed data is a priority for ZIG.

5.2. ZIG takes all reasonable technical and administrative measures to prevent unauthorized access or misuse of the personal information it processes, all with the aim of guaranteeing the best experience for its Users, as well as minimize the risks related to its activity.

5.3. In all operations carried out through the ZIG Platform, reasonable and appropriate security and precautionary measures are used, in order to protect the data present there, the integrity of the transactions carried out, as well as the occurrence of possible damages due to the processing of personal data.

5.4. ZIG will keep the Users' personal data stored in its databases for the period necessary for their treatment.

## 6. Deletion of personal data

6.1. If the User wishes to delete his/her personal data that are in the custody of ZIG, they must directly request the company through the service channel indicated by this Privacy Policy.

6.1.1. The User acknowledges that the eventual uninstall of the ZIG application is not enough for the deletion of his personal information.

6.1.2. ZIG will be able to refuse to delete certain personal information in cases where the storage of information is permitted or required by law (such as the provisions of the GDPR or other Applicable Laws)

6.1.3. In this sense, ZIG may, for example, keep certain data in its banks due to the mandatory custody of certain data, as well as it may refuse to delete personal data of Users who have any pending obligation to fulfill, including unpaid amounts.

6.1.4. At the end of the processing of personal data, they will be deleted by ZIG within the scope and technical limits of its activities. However, ZIG is authorized to keep personal data even after the end of its treatment for the purposes of:

- (i) compliance with legal or regulatory obligations;

- (ii) transfer to a third party, provided that the data processing requirements set out in the GDPR or other Applicable Laws are complied with; or
- (iii) exclusive use of ZIG, its access by a third party being prohibited, and provided that the data is anonymized.

## 7. Privacy Policy changes

7.1. ZIG reserves the right to make changes to this Privacy Policy at any time, the new version becoming effective immediately after its posting on the website owned by it (<http://www.zigpay.com.br>). ZIG undertakes to inform Users with registered e-mail about the update of the same.

7.1.1. If the User does not agree with any of the changes to the Privacy Policy, he/she must stop using the ZIG Platform services and may request the deletion of his/her personal data within the contractual and legally possible limits. Unless otherwise specified, the current Privacy Policy applies to all personal data of users that the data controller has.

7.2. The User's communication with ZIG due to an aspect related to their personal data, or in any way related to this Privacy Policy, must be carried out electronically, through the address [privacy@zigpay.com.br](mailto:privacy@zigpay.com.br).

## 8. Law, interpretation and jurisdiction

8.1. All matters arising out of or relating to this Privacy Policy shall be interpreted and construed in accordance with the Laws of Lisboa, Portugal.

8.2. Any legal action or proceeding arising out of or relating to this Privacy Policy shall be brought exclusively in the Courts of the Province of Lisboa, Portugal. Both parties irrevocably submit and attorn to the sole and exclusive jurisdiction of those courts to adjudicate such disputes. The parties waive their right to a jury trial in any action or proceeding arising out of or related to this Privacy Policy.

Lisboa, Portugal, July 15th, 2022.

**NETPDV - PAYMENT SOLUTIONS, LDA**