



## Privacy policy

1. Information about the Company:

Name: ZEN E-WAY LLC;

Registration number: №2334 LLC 2022;

Address (legal): Suite 305, Griffith Corporate Centre, Beachmont, Kingstown  
St. Vincent and the Grenadines

Address (actual): Suite 305, Griffith Corporate Centre, Beachmont, Kingstown  
St. Vincent and the Grenadines

Company email: info@binolla.com

2. The present Privacy Policy (hereinafter referred to as the Policy) is an annex to the User Agreement, and its integral part, and reflects the procedure for collecting, processing and storing information about the Client, operations on the Company's trading platform, the Company's website, and any other actions of the Client related to the services provided by the Company.

3. By registering on the Company's website, the Client thereby guarantees that he has read the provisions of the User Agreement and its annexes, accepted them, and undertakes to follow them when using Company's services in the future. The Client expresses full agreement with all the provisions of the Policy, in addition, confirms that all his actions are performed in accordance with these provisions. The Company, in turn, understands and accepts, that information about the Client, his personal data, as well as any information about the Client and his actions under the User Agreement, is confidential and is not subject to disclosure, except as provided by law and this Policy.

4. The Client guarantees that he has carefully read all the provisions of the Policy. All updates, changes to this Policy are made by the Company unilaterally, without notifying the Client. The Client hereby confirms, that he undertakes to independently monitor all changes made on the Company's web resources, and in other possible sources.

5. In case the Company makes a decision on reorganization, merger, acquisition, sale of its assets, conclusion of a succession agreement, assignment of rights and obligations, etc., the Company has the right to transfer information about the Client to interested third parties. The created (new) company adopts and accepts the provisions of this Policy.

6. The Client agrees that by registering on the Company's website, the Company has the right to collect, process and store information about the Client, his operations and actions in general, as well as transfer it to third parties in the manner described in this Policy.

7. The information that is inextricably linked with the identity of the Client (personal information), and information that is not related to the identity of the Client, is distinguished by the Company.

8. Personal information about the Client (personal data).

8.1. Personal information includes (but is not limited to):

- data provided by the Client during the registration process (name, place of residence, location, contact details, Account currency selected by the Client, etc. – i.e., personal data of the Client);
- additional data, for example, requested by the Company as part of the Client's verification procedure (documents confirming the Client's identity, the Client's place of residence, his actual location, the Client's financial status, the legal origin of the funds used by him; documents confirming the Client's experience in trading operations, etc.);
- data from the devices used by the Client (IP-addresses, identifiers, etc.).

8.2. The Company does not use personal information about the Client, and does not sell such information, does not rent, or use it for similar purposes, except as required by law and the provisions of this Policy.

8.3. Trustees of the Company are related individuals or legal entities, incl. partners, subsidiaries, service providers of the Company, etc. Personal data may be provided to such trustees of the Company in the following cases:

- when correcting errors in the operation of the Company's software, server, correcting technical failures, etc.;
- during the procedures of identification and / or verification of the Client;
- when taking measures to improve the quality of the services provided by the Company;
- for marketing purposes;
- other cases that the Company deems appropriate.

8.4. Personal information is used by the Company if the Company needs to:

- execute a decision (instruction, request) of state bodies in relation to the Client and / or operations carried out by him, incl. regulatory state bodies;
- make an advertising mailing or inform the Client about updates to the software, the Company's server (general or in part), as well as about possible errors in the system;
- carry out activities related to improving the operation of the Company's server in general;
- take measures to identify signs of fraud, as well as compliance with the provisions of the law, regulations;
- prevent financial terrorism and other illegal operations;
- process the Client's request by providing a response and / or conclusion;
- provide services to the Client (create a personal account, verify the Client, provide trading services, etc.).
- assess the involvement of the Client;
- other operations in which the Company may consider it reasonable and necessary to use the Client's personal data.

8.5. The Company has the right to disclose confidential information about the Client in certain cases, which, in the opinion of the Company, are exceptional, necessary and appropriate. Incl. in order to check the Client's operations for compliance with the law, the Company's policy, compliance with the requirements of regulatory authorities, in order to counteract fraudulent transactions, protect the interests of the Company, prevent losses, damage, etc. At the same time, the Company guarantees that in all cases of disclosure of information it is guided by the principles of reasonableness, discretion and fairness.

8.6. The Client is responsible for the relevance and correctness of the personal data provided by him, and has the right to make changes to them at any time by sending a corresponding notification to the Company's e-mail: [info@binolla.com](mailto:info@binolla.com). The Client also has the right to send a request for the deletion of the data provided by him, except for the data reflecting information about the operations carried out by him when conducting trades, about his payments, transactions, as well as other cases established by law.

8.7. The Company in all its activities is guided by the security standards of the Client's confidential information, using specialized algorithms and technologies to protect it, incl. from unauthorized (unauthorized) access by third parties.

8.8. In case the Client notices an attempt to hack his confidential information, or finds evidence of disclosure, unauthorized access to information, incl. on the part of third parties, the Client undertakes to notify the Company as soon as possible from the date of discovery of such actions (intentions), in the manner specified by clause 6.6. of the Policy. At the same time, the Client understands that the Company is not responsible for illegal actions of third parties in the context of gaining access to the Client's confidential information on illegal grounds. The Company also does not guarantee the Client to eliminate unauthorized access, prevent the consequences of such access, and exclude his losses due to access (hacking attempts).

8.9. The Company has the right to unilaterally make changes to the Client's information in order to update it, adjust its format to ensure correctness and accuracy.

8.10. The Company has the right to independently establish the period of storage of the Client's information, except for cases regulated by law.

9. Information not related to the identity of the Client.

Information not related to the identity of the Client includes (but is not limited to):

- statistical data - data accumulating the actions of the Client, analyzed by the Company without identifying his personality (the asset the Client is using more often, the most frequent time to open / close a trade, etc.). The Company has the right to process and provide such information to other Clients.
- analytical data - data related to the Client's actions on the trading platform and assessing the Client's activity (number of transitions between pages, the Client's clicks, the most "clickable" links on the Company's website, etc.). The Company collects such information for the purpose of correcting possible software errors, operational deficiencies, etc. Such information is not related to the identity of the Client and does not allow him to be identified.
- technical data - all collected information about the software products used by customers, their components, types, etc. Such information is collected by the Company in order to improve the performance of its services, to search and develop means of the most proficient interaction with the Client.

9.1. The Company has the right to classify depersonalized information, incl. summarizing the data on all Clients. In this case, the Company reserves the right to publish, use and provide such information to other users of the trading platform and / or Clients, without violating the provisions of the Policy.

9.2. The Client understands that the Company has the right to publish information of an advertising nature, involving third parties for this purpose. In order to analyze the profitability, success of a particular advertising campaign, the Company has the right to provide these third parties with information from Section 6 of the present Policy.

10. Cookie-files - files that do not allow to identify the Client. At the same time, the information obtained from such files is associated with the personal data of the Client, which is stored by the Company.

With their help, the Company's website becomes the most useful for the Client, remembering information about his visits and thereby forming the most effective interface with a set of Client preferences.

Cookies are stored on the Client's device and help to authenticate the Client (anonymously), prevent fraud and protect the Client while interacting with the service.

The Company uses cookies such as - *persistent* (used by the Company's website for a certain time, allows you to identify the Client, reflecting his interests; are not deleted when the browser is closed); *session* (stored for a certain period of time only when the browser is open, they are

deleted when the browser is closed); *third-party cookies* (installed by third-party services for the purpose of monitoring your access).

The client has the right to allow or block all cookie-files.

11. The Client understands that the Company's website may contain links from third-party companies, while the Company is not responsible for such links, the consequences of following such links, and the information published on such resources. The present Policy does not apply to third-party Internet resources, and the Company makes no recommendations to use such resources, or not to use them. Responsibility for following links to third-party organizations, and subsequent actions in the context of these organizations lies entirely with the Client.

12. The Company reserves the right to use information about the Client (personal or depersonalized) in order to develop, provide promotional materials about the Company's services, products, features, etc. Such information can be used independently by the Company or within the framework of agreements concluded by it with third parties and authorized persons involved in the provision of services to the Company.

13. The Company reserves the right to use information about the Client (personal or depersonalized) in order to familiarize the Client with various kinds of offers that, in the opinion of the Company, may be of interest to the Client.

14. The Client has the right to refuse to receive mailings (clauses 8-9 of the present Policy) by sending a corresponding notification to the Company's e-mail: [info@binolla.com](mailto:info@binolla.com). At the same time, the Company does not guarantee that the Client will stop receiving advertising mailings from third parties of the Company, trusted and dependent persons. The Client undertakes to independently unsubscribe from mailings from third parties, contacting such parties directly.