

PRIVACY POLICY

This Privacy Policy (**Privacy Policy**) describes how OTM ecosystem applications and its related websites (all part of “OTM.Zone” domain) and its related companies (**us, we** and **our**) collect, use and share Personal Data (as described below) insofar as its collection is related to our Terms and the reasons for which you are accessing our website and/or other related, company-owned or operated, platforms. Capitalized terms used in this Privacy Policy shall have the same meanings ascribed to them in our Terms, unless specifically otherwise defined in the provisions of this Privacy Policy to follow. This Privacy Policy shall govern the provision, collection and use of Personal Data, as this relates to your provision of such data when using or accessing our website or other platforms.

This Privacy Policy shall form an integral part of our Terms (as included therein by reference) and should be taken to form a part thereof (despite being separated on our website, but for which separation is required by applicable laws). By accessing our website and/or platforms, and/or otherwise having involvement with the Company and/or any project run or controlled by the Company (in lieu of separate privacy policy provisions), you are agreeing to the provisions of this Privacy Policy and consenting to our collection, use, disclosure, retention and protection of Personal Data as described in more detail herein.

We reserve the right to amend or update this Privacy Policy at any time without prior notice to you. It shall be your responsibility to review this Privacy Policy periodically and update yourself of any changes that might have been made. By continuing to use or access our website and/or platforms, you are agreeing to the terms of this Privacy Policy in full.

PERSONAL DATA DEFINITION

Personal Data includes any data which may be used to identify you and/or which could be used to identify you and includes (but is not limited to) things like: names, addresses, telephone numbers, email addresses, bank account/wallet details, usernames and/or any other data which may be necessary for the reason for which you have provided such personal data and/or for accessing our websites or platforms or for otherwise participating in any opportunity which we have made available to you. Personal Data shall not include aggregated data or data that, by itself, does not permit the identification of individual persons.

PERSONAL DATA THAT WE COLLECT

Personal Data may be collected about you, or any of the devices you use when accessing our website and/or any of our platforms, when (1) participating in an opportunity, (2) when we undertake due diligence and/or for compliance purposes, (3) before we enter into any arrangement/agreement with you, or (4) at any time during your involvement with the Company and/or any project which is supported/offered by the Company or (5) whenever you avail a service from us, our website and/or any platform under our control. Personal Data may be collected when you correspond with us under any circumstances whatsoever. We may also receive Personal Data about you from third party sources which Personal Data we may add to the data we have received through another means.

We may be required to request and/or collect additional data if required by applicable laws and regulations, to authenticate or identify you, and/or to verify the data that we have is correct and factual/still relevant as at the time that we request such additional data from you.

COOKIES

We may use Cookies to collect and store information about you to help provide you with a better, faster, and safer experience and for advertising and marketing purposes. We may receive information about you such as their IP address, hardware model and other information about the device you are accessing our website and/or other platforms from.

Cookies are small text files (typically made up of letters and numbers) placed in the memory of a browser or device when our website or platforms are accessed. Cookies allow a website to recognize a particular device or browser. They may also include web beacons, which are small graphic images (also known as "pixel tags" or "clear GIFs") that may be included on our website or with the provision of our Services to identify users and their behaviors and similar technologies that store information in a browser or device utilizing local shared objects or local storage, such as flash cookies, HTML 5 cookies, and other web application software methods.

USE OF PERSONAL DATA

We may use the Personal Data we collect for compliance and other Know Your Client (KYC) purposes, the provision of certain opportunities or services, offer a personalized experience when you access our website or platforms, for marketing purposes and/or to detect, prevent, mitigate and investigate fraudulent or illegal activities (whether we suspect these or they are actual situations).

We may use your Personal Data for a number of other commercial purposes, including operating, improving, and developing new services and/or opportunities.

We may use and retain Personal Data as follows:

- to give access to opportunities and/or services;
- operate, maintain, and improve our website, platforms, opportunities and/or services, or to further develop these, projects and/or services;
- to send data including confirmations, invoices/receipts, technical notices, updates, security alerts, support and administrative messages and/or for other communications (whether regarding your participation in a project, the project in general and/or for other reasons relating to your involvement with the Company/project);
- to communicate about our project, platforms and/or otherwise in relation to your involvement with the Company;
- to link or combine user data with other Personal Data;
- customize, measure and improve our offerings (the meaning of which shall be construed in the widest form);
- protect you and other purchasers, the Company and other users of our website and/or platforms from fraud, malicious activity and other privacy related concerns, and thereby also investigate any misuse of any of these and/or involvement with the Company, including but not limited to, violations of our Terms, criminal activity and/or any unauthorized access of our website, platforms and/or any other digital or technological devices which are owned by us or under our control;
- provide support and respond to enquiries and/or concerns (or other communications in general);
- to provide location-based services; and
- for other purposes by first obtaining consent and/or updating this Privacy Policy (as the case may be).

TRANSFER OF PERSONAL DATA

Personal Data may be transferred to other group companies or persons/entities acting as our agents (the first and latter of which may be located in a country outside of your country of origin). We will require that any such entities and/or persons agree to keep Personal Data secure and confidential, use it only for the purposes for which Personal Data is transferred and use it only in accordance with our directions subject always to the provisions of this Privacy Policy (if not a higher requirement – determined by the country in which such parties may be based in).

Personal Data may be transferred to any government authority, agency and institution if and as required/requested or permitted by applicable laws and regulations.

NON-EXCESSIVE GATHERING

We will only gather Personal Data that is relevant for the purposes for which it will be used and will not gather excessive or unnecessary data or Personal Data. We will take reasonable steps to ensure that the data that we collect is reliable, accurate, complete, and current, always bearing in mind its intended purpose. Notwithstanding the foregoing, you shall have a responsibility to keep the data that is provided to us, updated and we will take reasonable steps to facilitate this (but it shall still be your responsibility to inform us if there has been an update to any Personal Data and provide us with supporting documents/information accordingly). Where you have a statutory right to request access or request the modification or erasure of Personal Data, we can still withhold that access or decline to modify or erase Personal Data in some cases in accordance with applicable national laws, but will give you reasons if we do so.

We take precautions to protect Personal Data. We have or may implement policies that forbid our employees or anyone having access to Personal Data from using or disclosing Personal Data in an inappropriate or unlawful manner and maintain security measures to safeguard the Personal Data that it maintains from unauthorized access, misuse, alteration, loss or destruction. We shall not collect, use, disclose or transfer Personal Data except as described in this Privacy Policy unless explicit permission has been received.

SUPPLEMENTAL PERSONAL DATA

We may supplement the Personal Data we collect with data from third parties.

SHARING PERSONAL DATA

We may disclose Personal Data to third parties. This disclosure may be required to comply with legal obligations, to enforce our Terms, to facilitate marketing activities, or to prevent, detect, mitigate and investigate fraudulent or illegal activities (as outlined in previous provisions in this Privacy Policy). We minimize the amount of Personal Data we disclose to what is directly relevant and necessary to accomplish the specified purpose. We will not disclose Personal Data to third parties, unless required by law, without your explicit consent and/or as set out in this Privacy Policy.

In addition to the applicable provisions in this Privacy Policy above, we may disclose Personal Data for the following purposes:

- For legal, protection, and safety purposes, or to comply with legal requirements, enforce our Terms, respond to claims, or protect anyone's rights, property or safety;
- To law enforcement or governmental agencies, or authorized third parties, in response to a verified request relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us and you to legal liability. We will only disclose data we deem relevant to the investigation or inquiry, such as name, city, state, postcode, telephone number, email address, User ID history, IP address, fraud complaints, bidding and listing history;
- in an emergency. This includes protecting the safety of our employees and agents, our customers, or any person; and
- With those who need it to do work with or for us.

DATA CHOICES

You may send requests about Personal Data to the email provided below. You can request to change contact choices and update your Personal Data.

You can typically remove and reject Cookies with your browser settings (where any are in use). Many browsers are set to accept cookies until you change these settings.

CONTACT

We welcome your comments or questions about this Privacy Policy. You may also contact us at our address:
help@otm.zone