

## Zensend Privacy Policy

Zensend is a business of Fonix Mobile Limited (“Zensend”) or “we” is committed to protecting and respecting your privacy and personal data. This Policy describes Zensend’s data practices.

We will only use personal information we collect in accordance with the laws of England and Wales including the Data Protection Act 1998 (“Act”) and the Privacy and Electronic Communications (EC Directive) Regulations 2003. We will therefore aim to ensure that all employees, contractors, agents suppliers or consultants of Zensend who have access to any personal data held by or on behalf of Zensend, are fully aware of and abide by their legal duties and responsibilities.

Please read the following carefully to understand our practices regarding personal data that we collect from you, or that you provide to us, in connection with your use of our website at [www.zensend.io](http://www.zensend.io) or [www.zensend.co](http://www.zensend.co) (“Site”) and the services provided by Zensend (“Services”) . By using the Site you are accepting and consenting to the use of your data as described in this policy.

### **1 Changes to this Data Protection and Privacy Policy**

We may revise, modify or update this Policy. Please check this policy frequently for any changes as your continued use of the Site or Services indicates your consent to such changes. For the purposes of the Act, the data controller is Fonix Mobile Limited of 23 Heddon Street, London, W1B 4BQ.

### **2 What is Personal Data?**

Personal data is any information about a specific or definable natural person which may be used to identify them. Personal data includes information such as an individual’s name, home and work addresses, email address, phone number and financial information.

### **3 Data Protection Objectives**

In order to provide the services, Zensend collects and uses personal data about people. This includes the personal data of members of the public, employees, clients and customers, suppliers and partners.

### **4 Third Party Websites**

There may be links contained in the Site or Services which redirect you to other websites. For example, when you access services of a third party when you are making a payment. This Policy does not apply to such third party websites which we do not operate and we do not accept any responsibility or liability for these policies. If you have concerns about your privacy when using such services, please review the privacy policies of those websites which are not connected to us.

## **5 Information We Collect**

We collect, process, store and use the data you provide to us in order to operate our business, including the Site and Services. You may provide such data when performing certain actions such as requesting and registering for the Services or when making an enquiry or a specific request with us. We collect data provided to us:

1. Upon registration with us.
2. Through your use of our products or the Services.
3. When provided for billing and payment purposes.
4. When an enquiry is made with us and through communication with you.
5. Automatically received and recorded on our server logs from your browser, when visiting our Site, including your log in information, browser type and version, operating system and platform, IP address, cookies, and the pages you request.

We process this data because it is necessary to fulfil our contractual obligations to you to provide the Services. We regard data provided to us as confidential and only share it with consent or if we are legally required to do so and in accordance with this Policy.

When visiting our Site, we also collect information about your website usage, to improve the website and the Services and to understand trends. We may use your data to perform certain actions such as:

1. To monitor patterns of usage, such as login dates and volumes of data, so we can understand how people are using the Site and the Services.
2. For security reasons, identification and authentication. We may obtain your IP address when you use the Site. We use your IP address, browser and session information for statistical and analytical purposes and to monitor and prevent fraud and abuse. Notwithstanding the above, visitors to our Site may browse it anonymously and no personal data will be collected unless provided to us.

**6 We do not store credit or debit card details on this website. All payment data is securely captured and stored by third-party PCI-compliant payment gateways.**

## **7 Information we receive from other sources**

We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

## **8 Use of Cookies**

Like many other web services, we use a standard technology called “cookies.” Some cookies are essential to make websites work properly, others help provide a better user experience. Our cookies do not gather any personal data and any information gathered by the use of cookies is compiled on an aggregate and anonymous basis. Please refer to our cookie policy on the website for more information.

## **9 Use, Sharing and Disclosure**

We will NEVER sell or rent your data including any of your clients data. Nor do we claim any ownership rights over any content you provide to us which shall remain 100% yours. We may use or share your data where it is necessary to complete a transaction, to operate or improve the Services, to do something that you have asked us to do, or tell you of products and services that we think may be of interest. By requesting us to provide the Services to you, you consent to us using such personal data as may be necessary to do so, including the use of mobile phone numbers provided by you to facilitate sending and receiving of text messages, and you warrant that you are authorised to share such personal data with us.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the the form on which we collect your data.

Information we collect about you: We will use this information:

1. To administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
2. To improve our Site to ensure that content is presented in the most effective manner for you and for your computer.
3. To allow you to participate in interactive features of our service, when you choose to do so.
4. As part of our efforts to keep our Site safe and secure.

5. To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
6. To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Where you are contacted with an offer or service based on information you have shared with us, we will provide you with an opportunity to opt-out of receiving such further communications at the time you are contacted, however, in connection with any Services you request (for which you have paid a fee), we reserve the right to send you certain communications relating to those Services, such as service announcements, and administrative messages, that are considered part of your Zensend account, without offering you the opportunity to opt-out of receiving them.

We may share data about you when:

1. Required by any regulatory bodies to comply with our legal and regulatory obligations.
2. Operating our business, as necessary, with our service providers, contractors and vendors.
3. Responding to court orders, or legal process, to establish or exercise our legal rights or defend against legal claims and if in our judgement in such circumstances disclosure is required or appropriate.
4. Necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, harm or threats of harm to any person or property of Zensend or violations of our Terms of Service or policies.

As we continue to develop our business, we may also buy or sell all or part of our business. In such transactions, data you have shared with us is generally one of the business assets that will be transferred, and you hereby consent to such transfer.

## **10 Data Transfer**

In order to provide the Services you request, it may be necessary for your data to be transferred to and stored by mobile network operators, telecommunications providers or other organisations in countries outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing and processing. Zensend will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. These countries may not have similar data protection laws to the EEA and we offer no assurances that your data will be protected as set out in this policy.



All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **11 Confidentiality and Security**

Security for all personally-identifiable information (including all cell phone numbers, texts, messages and other data) is our priority. However, no data transmissions can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. Once we receive your information, we take reasonable measures to secure it on our systems and do so in accordance with our Security Policy.

## **12 Zensend's Commitment & Responsibilities**

Zensend is committed to robust data protection and will ensure that:

1. There is a designated data protection officer at all times with specific responsibility for data protection.
2. Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice.
3. All Zensend personnel handling personal data are appropriately trained to do so and supervised.
4. All personal data queries are promptly and courteously dealt with.
5. Methods of and performance with handling personal data are regularly assessed and evaluated.
6. All disclosure of personal data will be in compliance with approved procedures.

## **13 Updating and Retaining your Data**

All personal data and r account information may be updated at any time. Most information provided to us is entirely optional. We shall retain data and information in our records for no longer than is necessary for us to provide the Services and to the extent necessary for our compliance with legal and with regulatory requirements. Under existing law, all persons have the legal right to see a copy of the personal data we hold



about them. This shall be subject to on payment of a fee of £10. So that we may comply with your request, you must provide us with sufficient evidence of your identity and sufficient details of the information you wish to see to enable us to locate it.

#### **14 Third Party Links**

Please contact the Zensend team ([support@zensend.io](mailto:support@zensend.io)) if you have any queries about this Data Protection and Privacy Policy and/or how we use your personal data.