

## **Zotlo**

### **Privacy Policy**

Last updated – 05.02.2026

Zotlo (referred to herein as “**Zotlo**”, “**we**” or “**us**”) gives utmost importance to your (referred to herein as “**User**” or “**you**”) privacy and the protection of your personal data. We prepared this Privacy Policy to inform you on which personal data we collect, how and why we process personal data and how can you practice your rights pertaining to your personal data.

#### **1. Data controller**

Zotlo is the data controller with respect to your personal data we process over Zotlo website, related features and services, and other linked channels, mobile websites or applications (“**Platform**”). You can find our contact details below:

Z3P LLP

E-mail: support@zotlo.com

#### **2. Categories of data subjects and categories of personal data**

Zotlo provides applications, games, content and other digital products and other in-app services and related services over the Platform (“**Services**”).

**If you are a merchant registered on the Platform**, we process your personal data below in order to be able to provide the Services:

- **ID information (name, surname, tax registration number)**
- **Contact information (e-mail address, phone number, address)**
- **Profession**
- **Photo (if you sign up with Google)**
- **Financial information (bank account info)**
- **KYC information (ID/passport copy, address and company registration documents and other info that may be requested by authorities or payment service providers)**
- **Transactional information (application/product flows shared over Zotlo, sales information, commissions, support tickets)**
- **Third party application and social media information (account names, app ID, client ID, token, private key)**
- **Information security data (password, IP address, logs)**
- **Marketing information (cookie records)**

**If you are an end-user on the Platform**, we process your personal data below in order to be able to provide the Services:

- **ID information (name, surname)**
- **Contact information (e-mail address, phone number, address)**
- **Financial information (credit card or other payment info)**

- Transactional information (purchase information, subscriptions, support tickets)
- Information security data (password, IP address, logs, device, browser, operating system)
- Marketing information (cookie records)

**If you contact us over the Platform**, we process your personal data below in order to be able to answer your queries or requests or for marketing purposes:

- ID information (name, surname)
- Contact information (e-mail address)
- Information security data (IP address, logs)
- Marketing information (cookie records)

**If you visit the Platform**, we process your personal data below in order to be able to track your visit:

- Information security data (IP address, logs)
- Marketing information (cookie records)

### **3. Purposes of the processing**

**If you are a merchant on the Platform**, we process your personal data:

- to provide the Services
- to enable transactions with respect to Services
- to perform onboarding to the Platform
- to perform onboarding to the relevant payment service provider(s)
- to ensure compliance with applicable laws

based on the legal grounds that *the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract and processing is necessary for compliance with a legal obligation to which the controller is subject.*

**If you are an end-user on the Platform**, we process your personal data:

- to provide the Services
- to enable transactions with respect to Services
- to enable you to track your transactions

based on the legal grounds that *the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract and processing is necessary for compliance with a legal obligation to which the controller is subject.*

**If you contact us over the Platform**, we process your personal data:

- to answer your queries and requests
- for marketing purposes

based on *your consent for the specific purpose* and based on the legal ground that *the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.*

**If you visit the Platform**, we process your personal data:

- to fulfill our information security obligations
- to maintain functionality of and to optimize the Platform and the Services

- to analyze your personal preferences and your use of Services based on the legal grounds that *the processing is necessary for the performance of a task carried out in the public interest, being ensuring the information security* and that *the processing is necessary for the purposes of our legitimate interests, being maintaining the functionality of and optimizing the Platform*; and based on *your consent for analysis and targeted advertisement*.

#### **4. How do we collect your personal data?**

We collect your personal data directly from you over the Platform if you use our Platform or Services or contact us. We also automatically collect your data as you access and use our Platform or Services.

We use cookies and other technologies that collect your personal data on our Platform. Browsers often automatically permit the use of cookies. You can change your browser settings to manage the use of cookies. You can disable and delete cookies that are not necessary and change your cookie preferences. Your visits to and use of our Platform will not be hindered if you change your cookie settings and disable optional cookies, however, you may not be able to fully enjoy certain functionalities of the Platform or Services. Please see our Zotlo Cookie Policy in order to learn the details about the cookies we use and check the instructions and help functions of your browser in order to find the details on how to manage your cookie settings.

**If you are a merchant on the Platform**, we may also obtain information about you from third parties such as payment service providers, especially for risk assessment purposes. If you integrate your payment service providers to your Platform account, we may also collect information from your payment service providers.

If you sign up with Google, we get your ID information and photo from your Google account. If you link your other third party application or social media accounts (Google, Facebook, Apple, Meta, TikTok, Snapchat etc.) to the Platform, we get your account information from such third party application or social media accounts (app ID, client ID, token, private key etc.).

#### **5. Third parties whom the personal data is shared with**

We may share your personal data with public authorities and institutions if we are required by laws, regulations or other legal obligations to do so.

We also share your personal data with our business partners within the context of the above purposes and legal grounds, in order to be able to provide our services over the Platform (such as IT service providers).

**If you are a merchant on the Platform**, you understand that your KYC information will be transferred to payment service providers whenever you engage in a transaction and when you have initially provided this information.

**If you are an end-user on the Platform**, you understand that your personal data will be transferred to merchants, mobile applications, web based products and websites you purchase or subscribe to.

Please note that additional information may be requested from you by applications and websites. You will be subject to relevant agreements and policies provided by the applications and websites including the end user license agreements and privacy policies. Please review such privacy policies to get informed about the processing of your personal data specifically by the relevant application or website.

**If you are an end-user on the Platform,** your credit card data is directly processed and only kept by authorized third party service providers holding required certifications. We do not access or keep your credit card information. If you consent to your credit card information being saved for your future purchases over Zotlo, it will be kept by the licensed service provider. You can manage and delete the credit card information you saved at any time over the Platform. You also understand that your credit card information will be kept by the licensed service provider and automatically charged for periodical payments in case you make purchase for a subscription.

If you forget your credentials, you may reach our support team to confirm or get the credentials, using the credit card information you previously used for purchases. In such case, confirmation is acquired over the systems of the licensed payment service provider and full credit card information will not be accessed or displayed by Zotlo. You should not share your full unmasked credit card information with our support team via e-mail or other channels.

## **6. Transfers to third countries or international organizations**

Your personal data may be transferred to and stored on servers located outside the European Economic Area, especially through our business partners in certain cases. Certain countries have been approved as providing adequate protection and therefore no additional safeguards are required with respect to transfers to these countries. For countries which have not been approved as providing an adequate protection, international transfers are carried out through providing suitable safeguards within the framework of Standard Contractual Clauses or GDPR Article 49(1) derogations.

You understand that Zotlo uses IT infrastructure and service providers in different jurisdictions and therefore your personal data will be transferred abroad if you choose to use Zotlo.

## **7. Risk Assessment and Profiling**

**If you are a merchant on the Platform,** in order to onboard you and process your transactions, we will perform credit and identity checks on you at the time of your application and periodically throughout our relationship. In this respect, we will share your personal information to third parties, including your name, your company, your contact information and other information you provide as part of your onboarding and transactions on the Platform.

We will obtain both public information and shared credit information in relation to your financial situation and financial history.

We will use this information to:

- Assess your credit worthiness;

- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, e.g., fraud and money laundering;
- Manage your account; and
- Trace and recover any debts.

We will continue to exchange information about you with third parties while you have a relationship with us. We will also inform the third party payment service providers about your accounts.

Our financial risk assessment process carried out is a partially automated data processing process. An assessment about our merchants may be produced through an automated profiling process but such assessment is reviewed by our authorized personnel. All factors are taken into account in making the final decision, it is not based solely on automated processing.

## **8. Retention periods and erasure**

We will keep your personal data during the period of your contractual relationship with us, extended by the applicable limitation periods.

In cases where we process personal data in accordance with our legal obligations, we will keep your personal data for the duration of such obligation.

On the expiry of the applicable data retention period, we will erase or irrevocably anonymize your personal data.

## **9. Technical and organizational security measures**

We give reasonable care to protect your personal data from unauthorized access, use, and disclosure using appropriate physical, technical, organizational, and administrative security measures.

## **10. Your rights**

You can use your below rights by contacting us:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

## **11. Changes**

We may change this Privacy Policy at any time. The latest version of the Privacy Policy will be published on the Platform in case of any changes. You are responsible for periodically checking the latest version on the Platform.