

Zotlo

Privacy Notice

We will collect personal data when you use Zotlo Services and the associated services and as part of the normal course of business. This Policy Notice explains how Z3P LLP (“Zotlo”) processes the personal data you provide when using our website or that are provided by third parties.

Please read this privacy notice carefully before using our website because it will help you understand what data we collect, how we use and share the data, and what your choices are in that respect.

By using Zotlo Services, you accept the terms of this Privacy Policy. If you have questions or concerns about the Privacy Policy, please contact us at support@zotlo.com

Last Updated: March 25, 2026

I. Information that we collect from you

Zotlo requires each customer to provide us with personal data to access and use Zotlo products and services. Personal data is collected when a visitor accesses Zotlo Services, or speaks on the phone with or emails an Zotlo employee, and willingly discloses that information. This disclosure may occur when a visitor registers with an online service, engages in transactions, contacts customer service, or participates in contests, promotions, surveys, forums, content submissions, requests for suggestions, or other aspects of services offered by Zotlo.

We may process various types of personal data about you, including but not limited to:

Identity Data: Name, username, preferred name.

Demographic information: gender, date of birth/age, nationality, salutation, title, and language preferences.

Contact Data/Inventory Data: correspondence address, contract data such as billing address, delivery address, email address, phone numbers.

Financial Data: Payment details, bank account details.

Transaction Data: Details of payments to and from you, and details of products and services you have purchased from us, KYC information (ID/passport copy, address and company registration documents and other info that may be requested by authorities or payment service providers).

Technical Data: IP address, browser type and version, operating system, device information.

Profile Data: Username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.

Usage Data: Information about how you use our website, products, and services.

Marketing and Communication Data: Your preferences for receiving marketing communications from us and your communication preferences.

II. How We Process Your Data

We process your data in various ways, including but not limited to:

Direct Interactions: You give us your data when you create an account, order products or services, fill out forms, visit our website, contact us, or provide feedback

Automated Technologies or Interactions: We collect data about your devices, browsing actions, and patterns when you use our website, through cookies and similar technologies.

Third parties or publicly available sources: We may receive personal data about you from various third parties such as business partners and publicly available sources.

III. How We Use Your Data

We use your personal data for the following purposes:

Provision and management of our products and services	We process your personal data to fulfill our contractual obligations and to ensure smooth use of our offers. This includes, among other things, the collection of inventory data, payment information, and usage data. This data is used to manage your orders, provide technical support, and continuously improve our services, as well as to implement any changes you make in the customer area.
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<p>Access to partner programs</p>	<p>If you intend to become our business partner, we generally process your contact information, company data, and contract-specific information. We use this information to manage participation in our programs, to fulfill contracts, to facilitate communication, and to optimise collaboration.</p>
<p>Processing of orders and payments</p>	<p>For this purpose, we process your personal data such as your name, contact details, and payment information. This data is necessary to process your orders, secure the payment process, and ensure a smooth purchase transaction. In addition, we also use this data to provide you with invoices.</p>
<p>Customer support</p>	<p>We process your personal data such as name, contact details, communication history, and the content of your inquiry to customer support. This information is necessary to efficiently process your request and to ensure the desired support.</p>
<p>To manage your account and authenticate you</p>	<p>To manage and authenticate your account, we process personal data such as your name, email address, and login information. This data is necessary to secure access to your account, verify your identity, and enable you to use our services in a personalised way.</p>
<p>To improve and personalise our website</p>	<p>To improve and personalise our website, we process data such as usage behavior, IP addresses, and cookies. This information helps us to optimise the functionality of our website, adapt content to your interests, and offer you a personal user experience.</p>
<p>To send you marketing communications or for telephone advertising</p>	<p>To send you marketing communications or for telephone advertising, we process your inventory data and your usage data. We use this information to inform you about our products, services, and offers that might be of interest to you.</p>

<p>To send you contractual information</p>	<p>We process your contact data, such as your email address or postal address. This data is used to ensure that you receive important information about your contracts and our services. For example, we send you information about the function and use of your products, contract extensions, or price adjustments.</p>
<p>Compliance with legal obligations</p>	<p>We process your personal data to comply with legal obligations, including, but not limited to, fulfilling tax, accounting, and record-keeping obligations, as well as complying with regulations for combating money laundering and terrorist financing, know-your-customer rules and, if necessary, responding to official orders issued under the relevant telecommunications laws. In addition, in certain cases, we are obliged to address complaints about customer pages. Where we act as a processor, we may also process and share personal data relating to data-subject complaints with the relevant controller, insofar as this is necessary to fulfil our legal obligations under applicable data protection laws.</p>
<p>Fulfillment and enforcement of contractual obligations</p>	<p>In this context, we process your personal data, including, but not limited to, contact details and contract information. This data is necessary to fulfil our contractual obligations, ensure contract execution, and enforce our claims in the event of payment defaults. Where we act as a processor, we may also process and share personal data relating to data-subject complaints with the relevant controller, insofar as this is necessary to fulfil our contractual obligations under applicable data protection laws.</p>
<p>Fraud prevention and prevention of payment defaults</p>	<p>For fraud prevention and prevention of payment defaults, we process certain personal data, including transaction and payment information. This data processing helps us to detect suspicious activities, minimise risks, and ensure financial security for both</p>

	<p>you and us. We check whether there are indications of misuse of our web service or attempted fraud by means of the terminal device you are using during your online order. In addition, your device data is compared with data from devices from which fraudulent acts have been carried out in the past or where there was a corresponding suspicion.</p>
<p>Business Intelligence Analyses</p>	<p>For business intelligence analyses, we process data to gain insights that help us optimise our business processes and make strategic decisions. We use aggregated and anonymised data whenever possible to identify trends and improve the efficiency of our services.</p>
<p>Improvement of our products and services</p>	<p>To improve our products and services, we process information such as feedback, usage data, and market analyses. This data helps us to optimise our offers, develop new functions, and continuously improve your customer experience.</p>
<p>Conducting product tests</p>	<p>We process your personal data for the purpose of conducting product tests. We use your registration data, such as your name, contact details, and other login information, to enable you to access the product test and to send you advertisements for the same or similar products via email.</p>
<p>Conducting webinars and product demos</p>	<p>To provide you with optimal support in selecting the right product, we offer free product presentations in the form of webinars or product demos. To conduct webinars and product demos, we process your registration data such as your name, contact details, and other login information. This data is necessary to enable you to access our events.</p>

<p>Troubleshooting errors in products and services</p>	<p>To troubleshoot errors in our products and services, we process relevant data such as technical logs, error messages, and usage data. This data is necessary to quickly identify and resolve technical problems to ensure your smooth use of our offers.</p>
<p>Use and training of Artificial Intelligence ("AI")</p>	<p>In the context of the use and training of AI, we process data to provide you with AI applications and to improve the performance and efficiency of our AI applications. This applies to applications in the areas of products and services, fraud prevention, customer support, and marketing. We generally process aggregated data here. However, if we process personal data, corresponding deletion routines have been implemented.</p>
<p>Recording and storing telephone conversations for quality and verification purposes</p>	<p>For the recording and storage of telephone conversations for quality and verification purposes, we process call data to improve service quality and, if necessary, to provide communication records.</p>
<p>Checking against sanctions lists</p>	<p>To check against sanctions lists, we process your personal data to ensure that we comply with our legal obligations and conduct business in accordance with international regulations. This check serves to identify potential risks and ensure compliance with trade restrictions.</p>
<p>Webcrawling</p>	<p>As part of web crawling activities, we collect public data from the internet to analyse trends, improve our services, and conduct market research. In doing so, we ensure that we only process publicly accessible information to comply with data protection regulations.</p>

Provisioning of Social Media Presences	We also process your personal data when you visit one of our social media presences. This includes, in particular, the information that you provide yourself.
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IV. Data Processing for Marketing Purposes

We also use your personal data for marketing purposes to provide you with individualised offers and information about our products and services. In doing so, we are guided by our legitimate interests in strengthening our customer relationships and continuously improving our services and products. We also use machine learning to calculate individual product recommendations.

V. Legal Bases for Processing

Article 6(1)(a) of the GDPR serves as the legal basis for processing operations for which we obtain consent for a processing purpose. If the processing of personal data is necessary for the performance of a contract to which you are a party, as is the case, for example, when processing operations are necessary to provide a service, the processing is based on Article 6(1)(b). The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. If our company is subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1)(c). If the processing of personal data may be necessary to protect your vital interests or of another natural person, then the processing is based on Art. 6(1)(d). Finally, processing operations could be based on Article 6(1)(f), if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by your fundamental rights and freedoms under the GDPR.

In general, we process your personal data on the following legal bases:

Contract Fulfillment and Pre-Contractual Business Relationships	The processing is necessary for the performance of a contract with you or for the implementation of pre-contractual measures.
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Consent	You have given your consent to the processing of your personal data for specific purposes.
Legitimate Interests	The processing is necessary for our legitimate interests, as long as your interests or fundamental rights and freedoms do not prevail. The legitimate interests we pursue include, in particular: financial interests, direct marketing, fraud prevention, use and training of AI, data transmission to affiliated companies, improvement of our technical infrastructure, improvement of our products/services and web presence, cost savings and process optimisation.
Legal Obligation	The processing is necessary for the fulfillment of a legal obligation to which we are subject.
Exercise of a legal right	The processing is necessary for the fulfillment of a legal right.
Substantial public interest	The processing is necessary for processing special categories of personal data, as defined by the GDPR, when such processing is necessary for reasons of substantial public interest and consistent with applicable law, such as when we conduct politically-exposed person checks; also processing personal data related to criminal convictions and offenses when such processing is authorized by applicable law, such as when we conduct sanctions screening to comply with AML and KYC obligations.

VI. Sharing of Personal Data

We may disclose your personal data to the following categories of recipients if necessary:

Technology and Functionality Service Providers	Your data may also be shared with technology providers that offer various technical services to support and optimise the online offerings. This category includes providers of
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	cookies and other tracking technologies, anti-fraud software, and fraud detection tools, as well as companies that operate social media platforms.
Marketing and Analytics Tools	This includes partners that assist in implementing digital marketing strategies, user data analytics, and audience analysis.
Product and Service Partners	To offer a comprehensive service range, data is also shared as part of partnerships for product development and marketing purposes; to comply with applicable law; to abide by rules imposed by financial partners in connection with the use of their payment method; to enforce our contractual rights; to secure and protect the services, rights, privacy, safety, and property of Zotlo, you, and others, including against malicious or fraudulent activity; and to respond to valid legal requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.
Authorities	In compliance with legal obligations, data may be shared with government authorities, judicial bodies, or other official entities, both for meeting legal requirements and protecting the company's rights.
Corporate partners	If we enter or intend to enter a transaction that modifies the structure of our business, such as a reorganization, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or part of our business, assets, or stock, we may share personal data with third parties in

	connection with such transaction. Any other entity that buys us or part of our business will have the right to continue to use your personal data, subject to the terms of this privacy notice.
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VII. International Data Transfer

We may transfer your personal data to countries outside the European Union (EU) and the European Economic Area (EEA). As a global business, it's sometimes necessary for us to transfer your personal data to countries other than your own, including the United States. These countries might have data protection regulations that are different from those in your country. When transferring data across borders, we take measures to comply with applicable data protection laws related to such transfer. In certain situations, we may be required to disclose personal data in response to lawful requests from officials, such as law enforcement or security authorities. In such cases, we will ensure that appropriate safeguards are in place to protect your data in accordance with legal requirements, unless you have given us your consent for the data transfer in individual cases.

VIII. Data Security

We have implemented appropriate technical and organizational security measures designed to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of processing, from the point of collection to the point of destruction, in accordance with applicable law.

IX. Data Retention

We retain your personal data only for as long as is necessary for the purposes described in this Privacy Notice, or for as long as we are required or permitted to do so under applicable law, regulatory requirements, contractual obligations, fraud prevention requirements, dispute handling needs and legal defence considerations. Retention periods vary depending on the data category, the applicable Service Model, the purpose of processing, and applicable legal, regulatory, tax, accounting, fraud-prevention and contractual requirements. While certain contractual, tax, invoicing, KYC and

transaction records may be retained for longer periods where required, other categories of personal data are retained for materially shorter periods, as described below.

We retain your personal data for as long as we continue to provide services to you, or for a period in which we reasonably foresee continuing to provide our services. Even after we stop providing services directly to you that you're doing business with, and even after you close your Zotlo account, we may continue to retain your personal data to comply with our legal and regulatory obligations; enable fraud monitoring, detection, and prevention activities; and comply with our tax, accounting, and financial reporting obligations, including when such retention is required by our contractual agreements with our financial partners, and where data retention is mandated by the payment methods you've used.

To determine the appropriate retention periods for different categories of personal data, we consider various criteria such as the jurisdiction you are located in, the nature of our relationship with you, the types of products or services being offered or provided to you, the nature and sensitivity of your personal data, retention requirements under applicable laws and regulations, and other legitimate interests we may pursue through retaining your personal data, including detecting and preventing fraud and financial crimes, enforcing and defending our legal rights, complying with valid legal process requests from courts or competent authorities, improving the quality of our services, and promoting our products and services as appropriate and as permitted by applicable law and agreements. For most jurisdictions, Zotlo will generally keep personal data we obtain from you for a period of 10 years from the end of the business relationship with you as of the statutory limitation period, or the date of the last transaction, whichever is later.

Further information on case-specific retention periods is listed below as examples.

Contract fulfillment and legal obligations	Contract data: Stored for the duration of the contractual relationship and beyond, provided that legal retention obligations exist. Invoice data: Until the termination of the contract and beyond, to comply with legal obligations. Chat, communication and telephone recording data: Chat or conversation histories are generally retained for 24 months. If a chat or telephone call leads to a contract or is relevant to a complaint, dispute,
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	<p>compliance issue or legal claim, the relevant parts may be retained for the duration of the contract and for the applicable legal or compliance retention period thereafter.</p> <p>Information requests: If data subjects assert their right to information against us, we store the data for the duration until the complete information is provided and beyond for up to 5 years.</p> <p>Contact forms/contact points: Data processed within the framework of inquiries via contact forms or contact points is generally stored until the inquiry is fully processed, unless there are further legal retention periods.</p>
<p>Legitimate interests</p>	<p>Analysis and tracking data: Data used to improve services is generally stored for a short time, e.g., for the duration of the cookie lifespan.</p> <p>Security and fraud prevention data: "Security logs and related technical security data are generally retained for up to 24 months. Fraud, chargeback, risk and compliance-related records may be retained for longer, including for up to 10 years from the relevant event where necessary for fraud prevention, dispute handling, compliance or legal defence purposes.</p> <p>Marketing data: Is generally stored until an objection is raised.</p> <p>AI-based data: Generally, this is aggregated data. If personal reference cannot be excluded, the data is stored until the purpose is achieved and then deleted.</p>
<p>Consent-based processing</p>	<p>Marketing and newsletter data: Stored until the withdrawal of consent or fulfillment of the purpose.</p> <p>Evaluation and survey data: Until the termination of the contract or fulfillment of the purpose, such as at the latest 24 months after a survey for its improvement.</p>

Special services	<p>Webinars and demos/product tests: Data is stored until the webinar/demo or product test is conducted and may be used for follow-up communication.</p> <p>Cloud data and IT services: Storage until deleted by the user or at the end of the contract</p> <p>CDN and web services: Data is stored until the termination of the service or by the user's deletion request.</p>
Short-term storage and log data	<p>Logfiles and temporary storage data: Often between a few days and a maximum of 36 months, depending on the specific security or operational needs</p>

X. Automated Decision-Making/Profiling

No automated decision-making including profiling, takes place that has legal effect on you or significantly impairs you, unless this is permitted by law.

XI. Your Rights

You have the following rights regarding your personal data:

Right to Access: You have the right to request information about your stored data.

Right to Rectification: You have the right to correct inaccurate data.

Right to Erasure: You have the right to request the deletion of your data.

Right to Restriction of Processing: You have the right to restrict the processing of your data.

Right to Data Portability: You have the right to receive your data in a portable format.

Right to Object: You have the right to object to the processing of your data.

Right to Withdraw Consent: You have the right to withdraw a previously given consent at any time.

Right to Lodge a Complaint with a Supervisory Authority or with Zotlo: You also have the right to lodge a complaint with a competent data protection supervisory authority at any time or with Zotlo as the data controller.

XII. Cookies and Similar Technologies

We use cookies and similar technologies to improve and personalise your experience on our website, as well as to display targeted advertising. For more information, please refer to our [Merchant Cookie Policy](#) and/or [End User Cookie Policy](#).

XIII. Third-Party Websites

Zotlo may maintain links to other websites and other websites may maintain links to the online services. This Privacy Policy applies only to Zotlo and not to other websites accessible from Zotlo or that you use to access Zotlo, each of which may have privacy policies materially different from this privacy policy. If you visit other websites, Zotlo is not responsible for the privacy practices or content of those sites. It is your responsibility to review the privacy policies of non-Zotlo websites to confirm that you understand and agree with them.

XIV. Changes to Privacy Notices

We may update this privacy notice from time to time. The current version will be published on our website and will take effect as soon as it has been updated. We encourage you to periodically review this page for the latest information on our privacy practices.