

Privacy Policy Pledge Zero

This privacy policy (the "**Privacy Policy**") applies to the use of the website hosted at pledgezero.com (the "**Website**"), and with **Neutral Ways LLC, a Florida limited liability company** ("**Pledge Zero**"). Pledge Zero may complement this Privacy Policy with the information and definitions used in the Terms and Conditions that apply to the Service, as defined in those Terms and Conditions available at [[Link to Terms and Conditions](#)], if required.

By accessing the website, participants will be considered Pledge Zero users for the scope of this Privacy Policy ("**Users**" or the "**User**" individually and together with Pledge Zero, the "**Parties**").

Pledge Zero may update this Privacy Policy at any time. The new versions will be available here [[Link Privacy Policy](#)] and may be emailed to the accounts provided by the User. The User will be considered notified of the changes after the updated Privacy Policy is posted on the Website.

USER SHOULD READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THE WEBSITE AND/OR THE SERVICES. IF USER DOES NOT AGREE WITH THIS PRIVACY POLICY, USER SHOULD REFRAIN FROM USING THE WEBSITE AND/OR SERVICES.

1. DATA CONTROLLER IN CHARGE OF THE PROCESSING OF PERSONAL DATA

1.1. The responsible for processing the User's personal data will be Pledge Zero's, the contact information details are specified in the header of this document. For Pledge Zero the privacy of the User's personal data is extremely important. In case the User has any questions about this Privacy Policy, or its application, the User should contact Pledge Zero sending an e-mail to legal@pledgezero.com.

2. USER INFORMATION COLLECTED. COLLECTING PURPOSES

2.1. Through the Website Pledge Zero may request the following personal data from the User: (i) first name and last name; (ii) email; (iii) company name; (iii) job title; (iv) company industry; (v) location; and others (the "**Personal Data**" or the "**Personal Information**", as appropriate).

2.2. The User undertakes to guarantee and respond for the veracity, accuracy, validity and authenticity of their Personal Data and any other information shared through the Website.

2.3. Pledge Zero will process Personal Data only with the express consent given by the User by accepting this Privacy Policy. In this regard, the User agrees that Pledge Zero may collect their information by using cookies and/or tags or any other automatic information detection method provided by the tools located on the Website. The information Pledge Zero collects may include navigational patterns, IP address, logs and other types of information.

2.4. In addition, Pledge Zero may collect and/or store the IP (Internet Protocol) number or address of Users for the sole purpose of improving the quality of the Service and the operation of the Website. Through the IP number, Pledge Zero will be able to diagnose any connection problems that may exist between the Website and the Users, improving the quality of the Service.

2.5. Pledge Zero may collect and store comments and messages that the User may have made on or via the Website, as well as the content of communications and conversations maintained with Pledge Zero through the Website, via email and/or any other communication channel implemented in the future.

3. USE OF THE COLLECTED INFORMATION

3.1. Pledge Zero will use and store the information provided by Users and collected by Pledge Zero in order to provide the Services and offer constant improvements to the Website. For this purpose, Pledge Zero will store the information for the term established by the applicable law.

3.2. Pledge Zero may use the information provided by Users and collected by Pledge Zero for several purposes, including but not limited to:

- (i) For the User's registration on the Website. In order to use the Services, Pledge Zero will request the User's Personal Data to store them and generate a database;
- (ii) To provide the Pledge Zero Services, as well as to develop and implement additional services and functionalities inside the Website;
- (iii) Contact Users to provide information in regards to the Service, as for example but not limited to: notifications, news and updates of interest to the User related to institutional or legal issues, the User may at any time request to stop receiving such notifications by

sending an email to the address legal@pledgezero.com. User understands and agrees that Pledge Zero may notify the User in regards to any notice, event or promotion in regards to the Service through its email or through social media communications;

- (iv) To share the achievements and goals achieved by the Users on Pledge Zero's social networks and other communication media, only if the User has given the corresponding authorization in the Website;
- (v) To implement a mechanism for managing inquiries, suggestions and complaints submitted from Users through the Website;
- (vi) Protect the rights of the Users and ensure the compliance of the Terms and Conditions of the Website.

3.3. Pledge Zero may share information with other companies or websites or similar services in order to improve the quality of the Service. Generally, these companies or websites have their own privacy policies that are designed to protect the privacy of Users information. However, Pledge Zero will use its best efforts to ensure that the privacy of the information shared is protected in the best possible way. Pledge Zero will use its reasonable efforts to enter into specific data protection and privacy agreements.

3.4. Pledge Zero shall not be responsible in any case for any damages caused by the companies and/or websites mentioned in the previous paragraph with respect to their obligation of protection, confidentiality and privacy of the data they manage.

3.5. The User understands and accepts that the Website may contain links that redirect to other sites, the owners of those sites are in no way affiliated with Pledge Zero. In such cases, Pledge Zero shall not be responsible for the actions of such sites, to which this Privacy Policy shall not apply. Therefore, Pledge Zero recommends that you carefully check the privacy policy applicable to those sites to understand the procedures for collecting and protecting your information.

3.6. However, Pledge Zero will share the Personal Information requested by the courts or similar governmental, domestic or international entities, without giving rise to any claims by the User.

4. THE WEBSITE

4.1. Pledge Zero will not commercialize any Personal Data with third parties. Specifically, Pledge Zero will not sell, rent, or otherwise deal with individuals or legal entities outside of Pledge Zero. It also guarantees the User the right to access, update, delete or amend their Personal Data through the Website. The User may carry out the aforementioned actions by entering into their profile on the Website.

4.2. In case such action is not possible, any User that has provided information through the Website, may send an email to legal@pledgezero.com indicating their desire to access, update, delete or amend their information as described in Clause Six of this document.

4.3. The Website may use cookies or other analytics tools such as log files and/or tags in order to record Users' patterns to improve the User's experience on the Website. At any time, the User may configure its device to accept or reject each cookie as he or she wishes.

5. CONFIDENTIALITY AND SECURITY MEASURES

5.1. Pledge Zero will take all reasonable security measures in order to protect User information and to prevent unauthorized third-party access. The information collected by Pledge Zero will be kept strictly confidential. Such access is limited to those employees and representatives of Pledge Zero that need to access to the Personal Data in order to perform their duties and/or to develop or improve the Service in accordance with the purposes for which it is collected and processed. Pledge Zero requires the same or higher levels of security and confidentiality for its suppliers.

5.2. Pledge Zero will not allow any third party external of Pledge Zero to access this information, unless there is an express authorization or request from the User.

5.3. Notwithstanding the foregoing, Pledge Zero is not able to guarantee that unauthorized third parties will not be able to overcome all security measures and exploit Users' information. In such cases, Pledge Zero shall not be liable for illegal interceptions and/or violations of its systems or databases by unauthorized persons, as well as for the improper use of information obtained by such methods.

6. USERS' RIGHTS

6.1. Pledge Zero will make its best efforts to grant the User the right to access, rectify, delete or modify its Personal Information, except that Pledge Zero may deny such requests

because it is required or entitled to retain such Personal Information in accordance with applicable law.

6.2. Users may send an email to the following address legal@pledgezero.com requesting the access, update, deletion or modification of their Personal Data. Pledge Zero may require the User to identify themselves with their National ID and a photograph in order to corroborate their identity. Pledge Zero shall respond to such email within a period of 5 (five) business days in order to finish the process.

6.3. Pledge Zero may refuse to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of other Users, or are considered impractical, or for which access to Personal Data is not necessary.

6.4. The service of access, rectification and removal of Personal Data will be provided by Pledge Zero free of charge, except in the event that it would require a disproportionate or unreasonable effort, in which case an administration fee may be charged.

6.5. In the event that the User is not satisfied with the response regarding the request made to Pledge Zero, the User may proceed to contact the enforcement authority of the relevant territory.

7. INTERNATIONAL TRANSFER OF PERSONAL DATA.

7.1. Pledge Zero may transfer the Personal Data only for the purposes set forth in this Privacy Policy and in order to provide the Service. In this regard, Pledge Zero may transfer the Personal Information to Pledge Zero authorities, Pledge Zero's partners and other third parties, such as service providers used to offer the Service.

7.2. Depending on the user's location, Pledge Zero may need to transfer the User's personal data to countries that may not have a legally approved standard in terms of personal data protection. In the event that Personal Information is transferred to countries with lower levels of protection, Pledge Zero will perform such data transfers in compliance with the appropriate safeguards and security measures, such as the standard data protection clauses approved by the applicable legal authority.

7.3. Accordingly, the User understands consents and agrees, through this Privacy Policy, that its Personal Data may be transferred to other countries, whether or not they have an adequate level of protection. The User's withdrawal of consent will not invalidate Pledge Zero's previous actions, or make Pledge Zero legally liable in any case.

8. MINORS

8.1. The Website is not intended for children under the age of 18. In the event that they access, their use must be supervised by parents, guardians or legal guardians. The Website is only allowed to those persons who are of legal age to contract and who are not legally inhibited or prohibited in any way for the exercise of legal acts, rights and/or obligations. As a consequence, persons under the age of 18 are not authorized to enter, or provide any personal data or any other information to Pledge Zero.

9. CORPORATE STRUCTURE CHANGES

9.1. Pledge Zero may transfer information collected from the Users in the event of a sale, merger or acquisition of principal assets or any other form of transfer that Pledge Zero may experience in the future. In these circumstances, Pledge Zero is committed to take all reasonable measures to ensure that such information is handled in a consistent way in accordance with this Privacy Policy.

10. EXEPTIONS

10.1. Notwithstanding the provisions hereof, Pledge Zero may disclose certain Personal Information, when it believes in good faith that such disclosure is reasonably necessary to: (i) comply with a legal requirement, such as, but not limited to, registration, citation or court order; (ii) comply with a requirement of a governmental or regulatory authority; and/or (iii) protect the rights, property or safety of Pledge Zero, the Users, or a third party.

11. MODIFICATIONS

11.1. Pledge Zero can modify this Privacy Policy in those cases where it considers appropriate. In case any changes are significant in relation to the processing of Personal Data collected as a result of the use of the Service, such changes will be notified by posting a prominent notice on the Website and by sending an e-mail to the address declared by the User in the Registration.

12. CONTACT

12.1. If the User has any questions about this Privacy Policy, or about the application of the Privacy Policy, the User should contact Pledge Zero, at any time, via email at legal@pledgezero.com.