

## **ZEON VPN Policy**

*Last Updated: May, 2020*

In the following policy, ZEON VPN refers to the service offered by ZEON Network Limited (the "Company" or "We") through the website and the software provided through it (the "Service"). This Privacy Policy explains (i) what information we collect through your access and use of our Service, (ii) the use we make of such information, and (iii) the security level we provide for protecting such information.

By visiting the website and using the Service, you agree to the terms outlined in this Privacy Policy.

Our Company is committed to protecting and respecting your privacy. It is our overriding policy to collect as little user information as possible to ensure a private and anonymous user experience when using the Service. Below is a summary of the way we deal with information when you use the Service.

ZEON VPN is a No-Logs VPN service

When you use the Service, we do NOT do any of the following:

- Log users' traffic or the content of any communications
- Discriminate against devices, protocols, or applications
- Throttle your Internet connection

Data we collect and why we collect it

Personal data (related to your account):

Account creation: To create an account, in order to use our Service, we do not ask your name or surname. All you need to do is select your username, then provide the email address and choose your password. You can also use the service without registration.

We do store the email address you have entered when creating an account for communication and anti-abuse purposes. If you are referred to the Service by a friend or some other third-party who is participating in our referral

program, we may associate your account with the referrer to appropriately credit the referrer.

**Support:** When you submit support requests or bug reports, we will collect the data that you choose to share with us about the issue being reported. Bug reports sometimes rely on third parties, such as Zendesk.

**Payment:** The Company relies on third parties to process credit card and PayPal transactions, and we do not save your full credit card details. For example, if you make a payment with a credit card, your name and the last 4 digits of the credit card number will become part of the invoice and saved by us. Anonymous cash or Bitcoin payments and donations are also accepted.

**How we use this personal data:** Your email address is not shared with any third parties. We mainly use it for account-related questions, communication, and recovery. By signing up to our Service, you agree to receive communications from us, which may include promotional emails too. You can stop receiving emails from us by following the unsubscribe instructions included in every email we send.

We might also use your data for payment-related matters. This includes sending you emails, invoices, receipts, notices of delinquency, and alerting you if you need to update payment details. We use third parties for secure credit card transaction processing, and we send billing information to those third parties to process your credit card payments.

The information you provide when you contact our support team is processed for analytics purposes (such as to obtain aggregate statistics on the number of Android complaints), but they are not combined with any personal data. We do not do any targeted advertising or any profiling.

If your account has been suspended for a breach of our terms and conditions, and you would like to exercise the rights related to your personal data, you can make a request to our support team.

In case of violation of your rights, you have the right to lodge a complaint to the competent supervisory authority.

Data retention: We retain essential data (such as username, email, billing information) on active accounts in order to provide services. This data is deleted when your account is deleted.

Visiting our website: We only use analytics software to collect non-identifying information, such as: title of the page being viewed, screen resolution, outlinks, referrers, and page and website speed. This data cannot be used to personally identify users or visitors as we do not log IP addresses and connect them to specific user accounts.

When you use our native apps, we may collect certain information in addition to the information mentioned elsewhere in this Policy. We may use mobile analytics software (such as fabric.io app statistics and crash reporting, Play Store app statistics, Hockeyapp crash reporting, or self-hosted Sentry crash reporting) to send crash information to our developers so that we can fix bugs rapidly. Some platforms (such as the Google Play Store or the Apple App Store) may also collect aggregate, anonymous statistics, such as which type of devices and operating systems are most commonly used (e.g. percentage of Android 6.x vs Android 7.x), the total number of installs, total number of uninstalls, and the total number of active users, and may be governed by the privacy policy and terms and conditions of Google Play Store or Apple App Store.

None of the software on our apps will ever access or track any location-based information from your device at any time.

Public Information and Third-Party Websites

Social media: We are active on Facebook, Twitter, and Reddit. Any information, communication, or material you submit to us via social media platforms is done at your own risk without any guarantee of privacy.

#### Data security

We take data security very seriously. Only our employees have physical or other access to our infrastructure and Secure Core servers. Data is usually stored in encrypted format on our servers. Offline backups may be stored periodically, but these are also secured.

#### Third Party Networks

A third party could enable to record your IP address or see that you are using ZEON apps (the same information that your Internet Service Provider is able to see). These third parties cannot see your actual data, which remains encrypted. By default, alternative routing is not used for ZEON apps unless they detect that censorship measures are active on your network. Alternative routing can also be completely disabled in the Settings panel of all of our mobile and desktop applications.

We will only disclose the limited user data we possess when compelled by law for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security.

#### Changes to our Privacy Policy

The Company reserves the right to periodically review and change this Policy, and will notify users who have enabled the notification preference about any change. Continued use of the Service will be deemed as acceptance of such changes.