

# Privacy Policy

Last Updated: February 19, 2024

## 1. Introduction

Billion Network App belongs to ZK ID Labs A.G, a company registered with VAT Number: CHE-182.634.424MWST at Baarerstrasse 98, 6300 Zug Switzerland.

This Privacy Policy describes how we collect, use, and disclose information about you in connection with your use of our pre-registration app and associated services. By using the Services, you agree to the collection and use of information as described in this Privacy Policy.

## 2. Information We Collect

### 2.1 Information You Provide

- **Account Information:** When you create an account via social login (Google or Apple), we collect your email address, name, timezone and avatar.
- **Referral Data:** If you use our referral system, we track referred users and associated rewards.
- **Ethereum Wallet Data:** If you connect an Ethereum wallet, we collect verification-related information, including balance and ENS domain registration.

### 2.2 Information Collected Automatically

- **Device and Usage Data:** We may collect device type, browser version, operating system, and IP address to enhance security and improve our services.
- **Social Login:** This cookie is used to authenticate login and manage sessions.
- **Session Cookies:** Used to maintain login state and track user interactions.
- **Analytics Data:** We collect aggregate usage data through tools like Google Analytics.
- **Referral Tracking:** If a user clicks a referral link but does not create an account immediately, we store the referral code in local storage to remember it if they return later.
- **reCAPTCHA:** Helps protect our app from spam and abuse by analyzing user behavior.

For more information on how we use and apply cookies, please refer to our [Cookies Policy](#).

## 3. On which legal basis do we process your information

We process the data mentioned in art 2.1 on the following legal basis:

- The information you provide: we collect the information you provide on the basis of your express **consent**, granted by voluntarily logging in the application, email or other means that we make available to you for this purpose.

- Essential cookies: we collect information via essential cookies on the basis of **our legitimate interest**, so that you can authenticate when logging in the application.
- Non essential cookies: we can collect information via non essential cookies on the basis of your express **consent** you gave via the cookies pop-up, after having read our [Cookies Policy](#).

#### 4. Why we use your information

We use the information collected to:

- Enable and manage user accounts.
- Send you marketing information, including your progress information.
- Track referral progress and rewards distribution.
- Improve our services and analyze user engagement.
- Enforce security measures and prevent fraud.
- Comply with legal obligations.
- Perform a contract.

#### 5. How We Share Your Information

We may share your information in the following cases:

- **Third-Party IT Services**: We use Google and Apple for authentication and may integrate social media platforms for referrals. We store data in AWS.
- **Affiliates and Business Partners**: We may share aggregated data with investors or partners to demonstrate user engagement.
- **Legal Compliance**: If required by law, we may disclose your information to regulatory authorities.
- **With Your Consent**: We may share data with third parties when explicitly authorized by you.

#### 6. International data transfer

To provide our services and ensure the proper functioning of the Application, we use services of third-party technology providers that host and store your personal data from countries located outside the European Economic Area, such as Amazon Web Services, whose privacy policy can be found here: [https://aws.amazon.com/privacy/?nc1=h\\_ls](https://aws.amazon.com/privacy/?nc1=h_ls). The services of these providers, therefore, imply the existence of an international transfer of your personal data, which could imply a lower level of protection than that provided for in the European regulations. However, your data are located in the EU-West-1 zone and in this case, the corresponding measures are applied, as well as the formalization of the standard contractual clauses approved by the European Commission. You can request an updated list of these recipients by sending an email to [hello@billions.network](mailto:hello@billions.network).

#### 7. Data Storage and Security

- We store your data in secure environments and take reasonable measures to protect it against unauthorized access.
- Your account information is only retained as long as necessary for the purposes outlined in this policy.
- If you delete your account, your data will be purged within 30 days.

## 8. GDPR & CCPA Compliance

If you are in the European Economic Area (EEA) or California, you have additional rights, including:

- The right to access, correct, or delete your personal data.
- The right to restrict or object to data processing.
- The right to data portability.
- The right to file a complaint with a data protection authority.

Please contact to [hello@billions.network](mailto:hello@billions.network) if you have any questions on this.

## 9. Consequence of the removal of your consent

When accessing the Application, you are informed of how and which data we process. In the case of not agreeing with our Privacy Policy, you won't be able to use our Application as its use requires your consent.

## 10. Cookies and Tracking Technologies

- We do **not** use advertising cookies.
- We use cookies for authentication (Google & Apple), referral tracking, and session management.
- You may manage your cookie preferences via your browser settings; if users decide to delete all cookies, they can do so via their browser.

## 11. Children's Privacy

Our services are intended for **18 years** users **or older**. We do not knowingly collect data from children.

We are not responsible for external links, nor for the content, products, or services offered on such websites. The inclusion of links on our platform does not imply an endorsement or guarantee of the security or accuracy of the information provided by third parties. Accessing and using any linked external site is at your own risk, and we recommend reviewing their terms and conditions before engaging with them.

## 12. Changes to This Policy

We may update this Privacy Policy periodically. If we make significant changes, we will notify you through our platform.

### **13. Contact Us**

If you have questions about this Privacy Policy, you can contact us at: [hello@billions.network](mailto:hello@billions.network)

**Privacy Team**