

## Zinrai Website Privacy Policy

Last modified: June 10, 2025

### **Introduction**

Zinrai LLC ("**Zinrai**", "**Company**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website, zinrai.com (our "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or through the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### **Children Under the Age of 18**

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Website or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 18 we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at [privacy@zinrai.com](mailto:privacy@zinrai.com).

### **Information We Collect About You and How We Collect It**

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, email address, telephone number, social security number, date of birth or equivalent national government ID number or any other identifier by which you may be contacted online or offline ("**personal information**");
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us for example by joining us as a brand promoter or purchasing goods or services from us as a customer or when you contact us through communications channels provided on the “Contact Us” webpage of the Website.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners.

### ***Information You Provide to Us***

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our services, posting material, requesting further services or purchasing goods. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Your search queries on the Website.

### ***Information We Collect Through Automatic Data Collection Technologies***

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Click [www.zinrai.com/customer-consent-preferences](http://www.zinrai.com/customer-consent-preferences) for information on how you can opt out of behavioral tracking on this website and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information we collect automatically does/may/is only statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you

select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website. For information about managing your privacy and security settings for cookies, see Choices About How We Use and Disclose Your Information.

- **Web Beacons.** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie non-personal information collected automatically to personal information about you that we collect from other sources or that you provide to us.

The table below provides an overview of the cookies we use and why we use them.

- The following cookies are essential for our website to function.

Name	Duration	Purpose
SS-SERVER-ID	Session	To provide load balancing functionality

- The following cookies are required to gather statistics and analyze website functionality

Name	Duration	Purpose
dtCookie	Session	To track across multiple requests

The following cookies are used for analytic purpose, for services which we are using: [name services e.g. Qualtrics survey, Microsoft Clarity];

Name	Duration	Purpose
_hp2_id.*	1 year 1 month	User cookie (stores user_id, identity, other ids)

- The following cookies are used for sharing the site content on social media.

Name	Duration	Purpose
__stid	11 months	These cookies are associated with the Share This social sharing widget which is commonly embedded in websites to enable visitors to share content with a range of networking and sharing platforms
_ga	1 year	
_conv_*	5 months	
ajs_user_id	11 months	
ajs_anonymous_id	11 months	
osano_consentmanager_*	11 months	
_fbp	2 months	
pxcelBcnLcy	Session	
pxcelPage_default_*	1 month	
_zitok	1 year 3 months	
_ga_*	1 year 3 months	

Name	Duration	Purpose
__stidv	11 months	

- The following cookie is used for spam and abuse protection.

Name	Duration	Purpose
_GRECAPTCHA	6 months	SPAM protection service provided by Google that helps protect websites from spam and abuse. It may analyze traffic, (potentially containing Users' Personal Data) with the purpose of filtering the parts of traffic recognized as Bots or SPAM and "keeping automated software from engaging in abusive activities on your site".

You may disable cookies in your browser's settings (e.g., under the "Preferences" or "Internet Options" features of your browser). Note, however, that some features of the Website may not function properly if you disable the use of cookies. For detailed information on how to manage or delete cookies, visit <https://www.aboutcookies.com/>.

### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see Choices About How We Use and Disclose Your Information.

### **How We Use Your Information**

We only process your personal data to the extent it is necessary:

**(i) For the performance of an agreement with us or in order to take steps at your request prior to entering into an agreement with us;**

**(ii) To comply with our legal obligations, including to:**

- Comply with laws which require us to retain records; and
- Comply with any other laws which may be applicable to us.

**(iii) For the purpose of our legitimate interests, including to:**

- Address your comments or inquiries;
- Communicate with you;
- Operate, evaluate, and improve our products, business, and services, including by:

- Tracking and analyzing your use of our services;
- De-identifying your personal data in order to carry out analysis on information which does not identify you; and
- Improving our services;
- Prevent and protect you, us, and others against fraud, unauthorized transactions, claims, and other liabilities;
- Ensure compliance with company policies and industry standards; and
- Process personal data for internal administrative purposes.

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your [account/subscription], including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- As required per regulatory and compliance laws.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. For more information, see Choices About How We Use and Disclose Your Information.

#### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Zinrai's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Zinrai about our Website users is among the assets transferred.
- To third parties to market their products or services to you if you have consented to these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the

purposes for which we disclose it to them. For more information, see Choices About How We Use and Disclose Your Information.

- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our [terms of use](http://www.zinrai.com/terms-of-use), [www.zinrai.com/terms-of-use](http://www.zinrai.com/terms-of-use), [brand promoter agreement](http://www.zinrai.com/ibo-terms), [www.zinrai.com/ibo-terms](http://www.zinrai.com/ibo-terms) or [member terms](http://www.zinrai.com/terms-conditions) [www.zinrai.com/terms-conditions](http://www.zinrai.com/terms-conditions) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Zinrai, our brand promoters, customers, or others. [This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.]

### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by checking the relevant box located on the form on which we collect your data (the order form/registration form). You can also always opt-out by logging into the Website and adjusting your user preferences in your account profile, checking or unchecking the relevant boxes or sending us an email with your request to [privacy@zinrai.com](mailto:privacy@zinrai.com).
- **[Promotional Offers from the Company.** If you do not wish to have your email address/contact information to be used by the Company to promote our own or third parties' products or services, you can opt-out by checking the relevant box located on the form on which we collect your data (the order form/registration form) or at any other time by logging into the Website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to [privacy@zinrai.com](mailto:privacy@zinrai.com). If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way.

**For residents of the United States:** you can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

### **Accessing and Correcting Your Information**

You can review and change your personal information by logging into the Website and visiting your account profile page. You may also send us an email at [privacy@zinrai.com](mailto:privacy@zinrai.com) to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your

user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

### **International Data Transfers**

We transfer the personal data we collect about you to entities within the Zinrai organization, as well as to third-party service providers that process personal data on our behalf. Some of these companies and service providers are located in countries other than the country in which the personal data was originally collected. The laws of those countries may not have the same level of data protection as the country in which you initially provided the personal data. When we transfer your personal data to other countries, we will protect that personal data as described in this Privacy Notice and in accordance with applicable law.

For personal data originating from the European Economic Area (“EEA”) that are transferred to countries that have not been recognized by the European Commission as providing an adequate level of data protection, we have put in place contractual safeguards (based on the European Commission’s Standard Contractual Clauses for data transfers outside the EEA) or rely on an equivalent legal mechanism to ensure that your personal data remain protected. For more information on the safeguards we have put in place to protect your personal data when transferred outside the EEA (including how to obtain a copy or consult these safeguards), please contact us at [privacy@zinrai.com](mailto:privacy@zinrai.com).

### **For Residents of the EEA and United Kingdom:**

Subject to the relevant legislative provisions, you have the following data protection rights:

#### **The right to access**

You have the right to obtain confirmation as to whether or not your personal data are being processed and, where this is the case, access to the personal data. You also have the right to ask us for a copy of your personal data.

#### **The right to rectification**

You have the right to ask us to rectify personal data about you that you think are inaccurate. You also have the right to ask us to complete data you think are incomplete. This right always applies.

#### **The right to erasure**

This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your data where there’s no compelling reason for us to keep using the data. This is not a general right to erasure; there are exceptions, e.g. if we have a legal obligation to keep your data.

#### **The right to restriction of processing**

You have the right to ask us to restrict the processing of your personal data in certain circumstances.

#### **The right to data portability**

This right only applies to personal data you have given us. You have the right to ask that we transfer the data you gave us to another organization or give the data to you.

#### **The right to withdraw consent**

Where you have provided us with consent to process your personal data, you have the right to withdraw your consent at any time. This will not affect the lawfulness of the processing that has been carried out based on your consent prior to the withdrawal.

#### **The right to object**

When we process your personal data for purposes of pursuing our legitimate interests, you have the right to object to such processing at any time. If you object, we will stop the processing unless we have strong and legitimate reasons to continue using your data.

If you would like to learn more about any of these rights, please contact us [privacy@zinrai.com](mailto:privacy@zinrai.com).



**For Residents of Japan:**

Collection and use of social security number or equivalent national government ID number, will be carried out only with explicit prior consent of the data subject and in accordance with the Japanese Act on the Protection of Personal Information (APPI) and all other applicable laws and regulations.

Personal information will only be used for behavioral tracking, targeted advertising, or disclosed to third parties for their own marketing purposes with the prior explicit consent of the data subject, as required by the APPI.

International transfers of personal data from Japan will comply with APPI, including either transfer to jurisdictions designated by Japan as having adequate data protection or implementation of appropriate safeguards. The data subject will be informed of the transfer and provided an opportunity to consent where required."

Residents of Japan have the right to request disclosure, correction, addition, deletion (to the extent permitted by law), suspension of use, or suspension of provision to third parties of their personal data under the APPI. Such rights will be handled in accordance with applicable Japanese law. The rights described in this section shall be interpreted and implemented subject to and in compliance with the APPI.

**For Residents of the United States: Your State Privacy Rights**

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information.

California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose (excluding Iowa and Utah).
- Data portability.
- Opt-out of personal data processing for:
  - targeted advertising (excluding Iowa);
  - sales; or
  - profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- Either limit (opt-out of) or require consent to process sensitive personal data.

The exact scope of these rights may vary by state. To exercise any of these rights please email [privacy@zinrai.com](mailto:privacy@zinrai.com). To appeal a decision regarding a consumer rights request please email [privacy@zinrai.com](mailto:privacy@zinrai.com).

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: [privacy@zinrai.com](mailto:privacy@zinrai.com). However, please know we do not currently sell data triggering that statute's opt-out requirements.

**Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions and commission payment information will be encrypted will depend on the banking or merchant processing system with a minimum encryption level of 256-bit SSL

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

#### **How Long We Retain Personal Data**

We store personal data as long as necessary to fulfil the purposes for which we collect the data except if required or allowed otherwise by law. Please contact us using our contact details provided below if you have any questions with respect to our data retention practices.

#### **Links to Other Websites**

The Website may contain links to websites maintained by third parties, whose information and privacy practices are different than ours. We are not responsible or liable for the information or privacy practices employed by such third parties. We encourage you to read the privacy statements of all third party websites before using such websites or submitting any personal data or any other information on or through such websites.

#### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address specified in your account and/or through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

#### **Contact Information**

To ask questions or comment about this privacy policy or if you have concerns about the way we handle or process your personal data and our privacy practices, contact us at: [privacy@zinrai.com](mailto:privacy@zinrai.com). We will investigate any concerns and report back to you. If you are still not satisfied after our response, depending on the law of the country where you live or work, you may have the right to complain to a data-protection regulator.