

## PRIVACY NOTICE

Last updated: 5<sup>th</sup> May 2026

This Privacy Notice (“Notice”) describes how ZENCHMARK LTD, incorporated under the laws of England and Wales, Company number: 15631273, having its registered address at Second Floor, 55 Riding House Street, London, England, W1W 7EE (“Company,” “we,” or “us”), collects, uses, discloses, and protects your personal data in accordance with the UK General Data Protection Regulation (UK GDPR), General Data Protection Regulation (GDPR) and other applicable data protection laws in the United Kingdom.

By accessing or using our services, you acknowledge that you have read and understood this Privacy Notice.

We may update this Notice from time to time to reflect changes to our data processing practices or changes in applicable legal requirements. Substantial changes will be communicated clearly, such as via our website or by direct notification. By continuing to use our services after changes are published, you consent to the updated Notice.

### 1. Data Controller

The Company is the “data controller,” meaning we determine the purposes and means of processing your personal data and ensure that all processing activities comply with applicable data protection laws and related regulations.

### 2. Contact Details

Company Name: ZENCHMARK LTD

Registered Address: Second Floor, 55 Riding House Street, London, England, W1W 7EE

For all privacy and data protection matters, please contact us at [support@genesys3d.com](mailto:support@genesys3d.com).

### 3. Our Principles of Data Processing

We are committed to the following principles when processing your personal data:

- a. **Lawfulness, Fairness, and Transparency:** We process your personal data in compliance with applicable laws and regulations. We are committed to transparency and strive to clearly explain how your data is used and, where required, to identify the applicable legal basis for such processing;
- b. **Purpose Limitation:** We collect and process your personal data solely for specific, explicit, and legitimate purposes. Your information is not used in a manner incompatible with those purposes, and where required by applicable law, we will inform you of any intended change in purpose prior to further processing;
- c. **Data Minimization:** We only collect and process personal data that is necessary for the stated purposes. We limit access to your data to those who need it for their work and avoid collecting more data than we reasonably need;
- d. **Accuracy:** We take reasonable measures to ensure that the personal data we process is accurate and, where appropriate, kept up to date;

- e. **Storage Limitation:** We keep your personal data only for as long as necessary for the purposes for which it was collected. We have defined retention periods for different types of data, and we regularly review and securely delete or anonymize data that is no longer needed, unless we are required or permitted to keep it for legal, regulatory, tax, accounting, or dispute-resolution purposes;
- f. **Integrity and Confidentiality (Security):** We implement appropriate technical and organizational measures to protect the security, integrity, and confidentiality of your personal data, taking into account the nature of the data and the risks of processing;
- g. **Accountability:** We are responsible for complying with these principles. We regularly review our processing activities to meet our compliance obligations. Where appropriate, this includes maintaining records of processing activities, completing data protection impact assessments, using appropriate contracts with service providers acting as processors, and managing personal data breaches in line with legal requirements.

#### 4. Your Rights

You have the following rights regarding your personal data:

- **Access:** You can request access to your data and obtain a copy of it.
- **Rectification:** If your data is inaccurate or incomplete, you have the right to correct it.
- **Erasure:** Under certain conditions, you may request the deletion of your data.
- **Restriction:** You can request that we limit the processing of your data in specific situations.
- **Objection:** You have the right to object to certain types of processing, such as direct marketing.
- **Portability:** You can receive your data in a commonly used and machine-readable format and transfer it to another controller.
- **Withdrawal of Consent:** If you have given consent for the processing of your data, you can withdraw it at any time.
- **Automated Decision-Making and Profiling.** We do not make decisions producing legal or similarly significant effects based solely on automated processing (including profiling). If this changes, we will notify you and provide a way to exercise your rights, including the right to obtain human intervention, to express your view, and to contest a decision.

Please note that these rights are not absolute and may be subject to legal preconditions. Additionally, to ensure the protection of your privacy and security, we may require verification of your identity before processing your request.

#### 5. How to Exercise Your Rights:

Please following the procedure below:

- (a) Submit requests at [support@genesys3d.com](mailto:support@genesys3d.com);

- (b) We may request information necessary to verify your identity and to locate the data (for security and fraud prevention);
- (c) We will explain any exemptions or limitations that apply (e.g., where honoring a request would adversely affect the rights and freedoms of others, conflict with legal obligations, or undermine fraud prevention or security);
- (d) We will respond within the period required by law and inform you if additional time is needed due to request complexity or volume;
- (e) Requests are typically free of charge. We may charge a reasonable fee or refuse manifestly unfounded or excessive requests as permitted by law.
- (f) Depending on your location, you may have additional rights under local law. You also have the right to lodge a complaint with your data protection authority.

## 6. Types of Personal Data We Process

We may collect, use, store, and transfer the following categories of personal data:

- **Account Data:** Information associated with your account, such as full name, place of residence, date of birth, passwords, account preferences, activity logs, referral links.
- **Contact Information:** Your name, email address, telephone number, and home or business address.
- **Technical Data:** Information about your device and technologies used to access our Platform, including IP address, device type, browser type and version, operating system, and unique device identifiers.
- **Transaction Data:** Records of orders, purchases, transaction amounts, and payment history.
- **Payment Data:** Bank account numbers, payment card details, billing addresses, and related payment records.
- **Marketing Data:** Your marketing and communication preferences, participation in campaigns, and involvement in loyalty or promotional programs.
- **User Content:** Any data, documents, communications, files, or materials submitted, uploaded, or created by you through your Account or our Services.
- **Compliance Data:** Information we are required to collect for legal or regulatory compliance, including but not limited to anti-money laundering (AML), counter-terrorist financing (CFT), and Know Your Customer (KYC) obligations.
- **User Support Data:** Details generated through customer service or support interactions, including support queries, communications, and status or outcomes of your requests.

## 7. Purposes and Legal Bases for Processing Personal Data

We process your personal data for the following purposes and on the following legal grounds:

Purpose	Data Type	Legal Grounds
<b>Account Management and Registration:</b> To	Account Data, Contact Information, User Support	Performance of the Agreement with you

establish and administer your user account, ensuring you have access to our services and can utilize them effectively	Data	
<b>Provision of Services:</b> To deliver the services you have requested, ensuring their efficiency and alignment with your needs.	Contact Information, Transaction Data, User Content	Performance of the Agreement with you
<b>Identity Verification:</b> To confirm your identity, your place of residence and secure your account, thereby safeguarding against fraud and unauthorized access.	Compliance Data	Compliance with legal obligations; Legitimate interests
<b>Order Fulfillment:</b> To process and complete your orders, including the efficient delivery of services.	Contact Information, Transaction Data	Performance of the Agreement with you
<b>Legal Compliance:</b> To ensure adherence to applicable laws and regulations, including those related to anti-money laundering (AML), counter-terrorist financing (CFT), know-your-customer (KYC), and other relevant legal requirements.	Contact Information, User Content	Compliance with legal obligations
<b>Transaction Management:</b> To manage and facilitate transactions, ensuring their accuracy, security, and compliance with applicable standards.	Payment Data	Performance of the Agreement with you
<b>Risk Management:</b> To assess, monitor, and manage business risks, ensuring the continued	Payment Data, User Generated and Uploaded Content	Performance of the Agreement with you; Compliance with legal obligations; Legitimate

smooth operation of our services		interests
<b>Customer Communication:</b> To engage with you regarding your account, provide customer support, and address any inquiries or issues you may have.	Account Data, User Support Data	Performance of the Agreement with you
<b>Marketing:</b> To send you marketing communications and personalized content tailored to your preferences, subject to your consent.	Account Data, Technical Data, Marketing Data	Your Consent; Legitimate interests
<b>Fraud Prevention:</b> To detect, prevent, and respond to fraud and other unlawful activities, thereby protecting both our services and your data.	Technical Data, Payment Data	Compliance with legal obligations; Legitimate interests
<b>Security:</b> To safeguard our information systems and assets from unauthorized access, ensuring the integrity and confidentiality of data.	Account Data, Technical Data, User Support Data	Performance of the Agreement with you; Compliance with legal obligations; Legitimate interests
<b>Technical Support:</b> To diagnose and resolve technical issues, maintaining the functionality, stability, and reliability of our services.	Account Data, Technical Data, User Support Data	Performance of the Agreement with you
<b>Service Improvement:</b> To enhance, refine, and develop our services based on user feedback, behavior, and usage patterns, ensuring they continue to meet your evolving needs.	Account Data, User Support Data	Performance of the Agreement with you; Legitimate interests
<b>Dispute Resolution:</b> To	Account Data, Contact	Performance of the

manage and resolve any legal claims or disputes, protecting our legal interests and ensuring compliance with our legal obligations.	Information, Transaction Data, Payment Data, User Generated and Uploaded Content, User Support Data	Agreement with you; Legitimate interests
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## 8. Sources of Personal Data

We collect personal data from the following sources:

- **Direct Interactions:** When you provide information by creating an account, completing forms, making a purchase, or contacting customer support.
- **Automated Means:** When you interact with our Website and Services, we may collect personal data automatically through cookies, analytics tools, and similar tracking technologies in accordance with our Cookie Notice.
- **Third Parties:** We may obtain personal data from payment processors, service providers, public authorities, or public records, as permitted or required by law.

## 9. Sharing and Disclosure of Personal Data

We may share your personal data with:

- **Service Providers and Partners:** Including payment processors, AI service providers, IT service providers, and analytics providers, strictly for the purposes described above and under confidentiality agreements.
- **Government Authorities and Law Enforcement:** Where required by law or to protect the rights, property, or safety of the Company, our customers, or others.

## 10. Data Retention

We retain personal data only as long as necessary to fulfill the purposes for which it was collected and to comply with legal, regulatory, tax, and accounting requirements.

We may retain personal data for:

- A minimum of 6 years for customer/account information for tax and regulatory purposes.
- Up to 5 years for AML-related compliance obligations.
- Until the expiry of relevant statutory limitation periods for potential legal claims (usually up to 10 years).

When personal data is no longer required, we securely delete or anonymize it. Data processed based on consent will be retained until consent is withdrawn.

## 11. International Data Transfers and Associated Risks

Your personal data may be transferred and processed outside the UK and/or European Economic Area (EEA) to our services providers that carry out certain functions on our behalf.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; or
- We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement or The International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers.

By interacting with us and using our services, you acknowledge that your data may be transferred, processed, and stored outside of the EEA as described above.

## **12. Essential and Optional Data**

Some personal data is mandatory to enable us to provide our services. Where data is required, it will be clearly indicated. You may choose whether to provide optional data, which may be managed via your account settings.

## **13. Children's Data**

Our services are not designed for individuals under the age of 18 (the "Minors"), and we do not knowingly collect or process their personal data. If you believe that a Minor's information has been shared with us, please contact us immediately so we can take steps to remove it. By using our services, you confirm that you are not a Minor.

## **14. Complaints**

If you have any concerns or complaints about how we process your personal data, please contact us at [support@genesys3d.com](mailto:support@genesys3d.com). You may also have the right to lodge a complaint with your local data protection supervisory authority. In England, this is the Information Commissioner's Office (ICO).

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>