



Effective Date: 07/01/2024

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INTRODUCTION

Zalow, Inc. ("Zalow," "we," "our," or "us") operates a curated marketplace connecting businesses ("Clients") with independent professionals and consultants ("Experts"). We are committed to protecting your privacy and being transparent about how personal data is handled across the lifecycle of marketplace engagement.

This Privacy Policy explains how we collect, use, disclose, and safeguard personal information when you access or use the Zalow platform, applications, communications tools, and related services (collectively, the "Platform"). This policy applies to Clients, Experts, prospective users, and visitors.

This Privacy Policy should be read together with Zalow's Terms of Service and Payments Terms.

ELIGIBILITY AND CHILDREN

Zalow's Platform is intended solely for business use and individuals who are at least eighteen (18) years of age. Individuals under 18 are not permitted to access or use the Platform under any circumstances.

Accounts created in violation of this requirement will be terminated, and any associated personal data will be deleted.

CATEGORIES OF USERS AND DATA CONTEXT

Zalow processes personal data differently depending on your relationship with the Platform, including:

- Clients and prospective Clients
- Experts and prospective Experts
- Platform visitors
- Event participants and referrals

Zalow does not intentionally collect consumer financial information, precise geolocation data, health data, or other sensitive personal data beyond what is required for compliance, identity verification, and marketplace trust.



INFORMATION WE COLLECT DIRECTLY

Personal, professional, and business information you provide directly:

- Name, email address, phone number
- Business, professional, and profile information
- Company affiliation and role
- Account credentials and authentication data
- Communications with Zalow or other users
- Billing and payment metadata

Automatically collected information:

- IP address, device identifiers, and browser data
- Platform usage metrics and logs
- Security and fraud signals
- Verification and trust signals (e.g., verification status, completion indicators, and risk flags, but not underlying identity documents)

PLATFORM COMMUNICATIONS

Zalow provides secure messaging and collaboration tools to facilitate Client-Expert interactions.

We process communications data (including message content, timestamps, and participant identifiers) solely to:

- Deliver messages
- Support collaboration and dispute resolution
- Enforce platform policies
- Prevent fraud, abuse, or misconduct
- Comply with legal obligations

Zalow does not use platform communications for advertising and does not sell message content.

IDENTITY VERIFICATION, PAYMENTS & COMPLIANCE PROVIDERS

Stripe Identity Verification & Payments

Zalow uses Stripe, Inc. ("Stripe") for payment processing, identity verification, fraud prevention, and regulatory compliance.



Stripe acts as an independent data controller. Payment and verification activities are governed by Zalow's Payments Terms.

Zalow may view identity verification materials within Stripe's systems solely for validation and compliance purposes. Zalow does not download, store, or retain identity documents, biometric data, or financial credentials.

Zalow has limited visibility into:

- Transaction records and payment status
- Connected account status
- Partial financial institution identifiers

Zalow does not have access to full account numbers or authentication credentials.

Stripe Privacy Policy: <https://stripe.com/privacy>

Checkr Background Screening

Zalow may use Checkr, Inc. ("Checkr") to conduct background checks for certain Experts or roles, subject to applicable law and user consent.

Checkr operates as an independent data controller. Zalow receives only eligibility or status-level results and does not store full background reports.

Checkr Privacy Policy: <https://checkr.com/privacy>

PROJECT DATA & WORK PRODUCT

"Project Data" includes files, deliverables, documents, and work product exchanged between Clients and Experts.

Zalow does not use, analyze, sell, or share Project Data for any purpose unrelated to operating the Platform.

Zalow retains only minimal Project Data metadata (e.g., timestamps, project identifiers) for reporting, billing, and compliance.



All detailed Project Data is permanently deleted or irreversibly destroyed within ninety (90) days of project completion or closure, unless retention is required by law.

HOW WE USE INFORMATION

Zalow uses personal, professional, and business data to:

- Operate and maintain the Platform
- Facilitate Client-Expert matching and engagement
- Enable payments through third-party processors
- Conduct identity verification and background screening
- Enforce policies and trust standards
- Prevent fraud and ensure platform security
- Comply with legal and regulatory obligations
- Improve platform functionality and user experience

Zalow does not engage in automated decision-making that produces legal or similarly significant effects. Zalow does not use personal data, communications, or Project Data to train artificial intelligence or machine learning models.

DATA SHARING

Zalow does not sell personal, professional, or business information. We may share personal, professional, or business data:

- Between Clients and Experts as required to operate the marketplace
- With service providers supporting platform operations
- With compliance and verification partners (e.g., Stripe, Checkr)
- With regulators, courts, or law enforcement as required by law
- In connection with corporate transactions

COOKIES AND TRACKING

Zalow uses limited cookies and similar technologies (such as local storage and server logs) that are **strictly necessary** to operate, secure, and improve the Platform.

Types of Technologies We Use

We use the following categories of cookies and tracking technologies:



1. Strictly Necessary Cookies

These cookies are required for the Platform to function properly and cannot be disabled. They support core features such as authentication, session management, security controls, and fraud prevention.

2. Functional and Preference Cookies

These cookies remember user preferences and settings to enhance usability and ensure consistent Platform performance.

3. Analytics and Performance Technologies

We may use limited analytics tools to understand how the Platform is used, diagnose technical issues, and improve performance. Analytics data is collected in aggregated or de-identified form where feasible.

Zalow **does not use cookies or tracking technologies for targeted advertising, cross-site tracking, behavioral profiling, or marketing purposes.**

Third-Party Cookies

Some cookies or similar technologies may be set by third-party service providers that support the operation of the Platform, such as infrastructure, security, analytics, or payment services. These providers process data in accordance with their own privacy policies and contractual obligations with Zalow.

Zalow does **not** permit third parties to use cookies on the Platform for their own advertising or marketing purposes.

Cookie Controls and Choices

Most web browsers allow you to control cookies through browser settings, including the ability to delete or block cookies. Please note that disabling certain cookies may affect the functionality or availability of the Platform.

Where required by law, Zalow will provide appropriate notice and choice mechanisms regarding the use of cookies and similar technologies.

Do Not Track Signals



Currently, the Platform does not respond to "Do Not Track" signals or similar mechanisms, as there is no consistent industry standard for such signals. Zalow does not engage in cross-site tracking regardless of browser settings.

No Expansion Without Notice

Zalow will not materially expand the use of cookies or tracking technologies beyond what is described in this section without providing notice where required by applicable law.

LEGAL BASIS FOR PROCESSING

Where applicable, we process data based on contractual necessity, legal obligations, legitimate interests, or consent.

INTERNATIONAL TRANSFERS

Data may be processed in the United States and other jurisdictions with appropriate safeguards. Where required, Zalow relies on Standard Contractual Clauses or equivalent legal mechanisms approved by applicable regulators.

DATA SECURITY

Zalow implements administrative, technical, and organizational safeguards designed to protect personal data.

DATA RETENTION

Personal data is retained only as long as necessary to fulfill operational, legal, and contractual obligations.

YOUR RIGHTS

Depending on your jurisdiction, you may have rights to access, correct, delete, or restrict processing of your personal data. Requests may be submitted to dpo@zalow.com.

AUTOMATED DECISION-MAKING

Zalow does not engage in automated decision-making with legal or similarly significant effects.



U.S. STATE PRIVACY RIGHTS ADDENDUM

California (CCPA/CPRA)

California residents may have the right to request access to, correction of, or deletion of personal information, and to opt out of certain data uses. Zalow does not sell personal information. Financial, identity verification, and KYC data collected by Stripe is governed by Stripe's privacy practices.

Colorado, Connecticut, Virginia, Utah

Residents of these states may have rights to access, correct, delete, and obtain a copy of their personal information, and to opt out of targeted advertising or profiling. Zalow does not engage in profiling that produces legal or similarly significant effects.

Nevada

Nevada residents may opt out of the sale of personal information. Zalow does not sell personal information.

Vermont

Zalow does not disclose personal information of Vermont residents to non-affiliates except as permitted by law.

Exercising Rights

Requests may be submitted to dpo@zalow.com. We may verify your identity before fulfilling requests.

CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. Where required by law, Zalow will provide notice of material changes, and continued use of the Platform after such notice indicates acceptance.

DATA CONTROLLER

Zalow, Inc.
1188 Camelot Drive
Pinckney, MI 48169
United States
Email: dpo@zalow.com