

# myZentral – Global Privacy Policy

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## TERMS AND CONDITIONS

By using myZentral you are fully agreeing on the following terms and conditions.

I understand that myZentral may collect, use, transfer and disclose personal information, as described in the myZentral Global Privacy Policy including both within and outside of the country in which I am based. I acknowledge that countries to which my personal information may be transferred, such as the United States, may have different levels of data protection. By selecting "Create Account", I confirm my consent to this collection, use, transfer and disclosure of my personal information.

ACCEPT AND CONTINUE.

If you do not agree, CANCEL AND EXIT myZentral now.

## myZentral Global Privacy Policy

myZentral is a Portuguese company based in Portugal, Lisbon

Contacts: [info@myzentral.com](mailto:info@myzentral.com)

## ILLEGAL CONTENT

In the event you find illegal content in our platforms please immediately advice [illegalcontent@myzentral.com](mailto:illegalcontent@myzentral.com). We want to make sure no illegal content is present so it will be immediately remove without further notice.

## COOKIES

myZentral platforms uses cookies with the purpose to better serve our clients. We use cookies to simplify the login process and to have a better tracking of the users and usage. If you decide to use our platforms you agree on our cookies policies and you agree on the placement of small pieces of information (cookies) on your computer/browsers cache. Each cookie has a unique identifier, site name, session and expiration date. Cookies will remain on the users device until the browser is turned off or the expiration date is reached.

If you do not agree on using cookies, please do not use the platforms.

## ALTERNATE CONFLICT RESOLUTION

myZentral provides a list of entities for alternate conflict resolution for consumers in the EU:

<http://ec.europa.eu/consumers/odr/> (<http://ec.europa.eu/consumers/odr/>)

Please use the address [conflict@myzentral.com](mailto:conflict@myzentral.com) if you wish to contact us about any conflict that may arise on the usage of our platforms.

## PLATFORMS

myZentral platforms are provided as SaaS (Software as a Service) and are hosted in servers currently in GoDaddy. We rely on their knowledge and experience to host our solutions and to keep our information safe.

myZentral as a big concern about our users / clients security and are always improving our solutions to make it even more safe, updated and up-to-date to the latest security breaches. Please use [security@myzentral.com](mailto:security@myzentral.com) if you think there is a security breach or you think your data has been misused.

## MYZENTRAL

myZentral, is an online platform designed for companies and for their employees. It features world-wide top-class management tools for SMEs (small and medium enterprises) at a low cost.

myZentral as features like, users directory, invoices workflow, absence & leave, objectives, incentives, training, etc. myZentral is a ever-growing platform so it is likely that this features are always evolving and new ones will be added. Our aim is to provide tools for SMEs to manage their standard business processes.

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myZentral takes the security of your information seriously and wants you to be familiar with how we collect, use and disclose information about you. This Privacy Policy (the “Policy”) describes our privacy practices regarding the collection, use and worldwide transfer of personal information collected by myZentral, including information collected online via <http://myzentral.com> or <http://myzentral.pt>, offline, our social media pages and apps to which the Site links, as well as through HTML-formatted email messages that we send to you that link to this Privacy Policy.

By using our services, you signify your agreement with this Policy. If you do not agree to this Policy, do not use myZentral.

## **PERSONAL INFORMATION WE COLLECT.**

myZentral collects personal information about companies and their employees. Each user must register individually and is invited to agree with this Global Privacy Policy. If a user does not what to agree then it must not be registered in our platform and may not use the site.

We collect information such as name, e-mail address, for registering purposes. As an addition, the user can post a picture, mobile number, role in the company, age, preferred language, country of origin and gender. This information is kept in our databases for the purpose of myZentral services for as long as the user decides.

myZentral is able to provide user information to partners and logistics partners for the purpose of fulfilling users request such as subscription to services or buying products.

Users provide information to us, including, for example, when register to use our online platforms, answer online assessment questions, provide information about himself or contact us via e-mail or postal mail.

myZentral may also collect personal information about users from third parties, including, for example, co-workers or co-employees that need the user to approve invoices or approve holidays. They may ask the user to register and to be a part of myZentral.

We may also collect information from public databases, joint marketing partners and social media platforms.

In certain cases, we may request sensitive information in connection with our Services. For example, gender, age, or country of origin.

As permitted by applicable laws, we may obtain background verification information. We may also use photos of you that you provide to us or that you make publicly available on the Internet (e.g., LinkedIn) for internal reference purposes only.

Except in these limited cases, we encourage you not to provide any other sensitive information to us, such as Social Security numbers, payment card numbers, information related to racial or ethnic origin, political opinions, religious or other beliefs, health, criminal background, or trade union membership. We may use one or more third-party vendor(s) to handle sales, assessments and other physical products featured on our platforms. If you wish to purchase a product or register for an event, you may be directed to a webpage that is hosted by the vendor (or its service providers) and not by myZentral. Any personal information that you provide through the vendor page will be collected by the vendor and not by myZentral, and will be subject to the vendor’s privacy policy, rather than this Policy. myZentral has no control over, and shall not be responsible for, the vendor’s use of information collected through the vendor page. Please note that this Policy does not address the collection and use of information through the vendor page or the privacy or information practices of the vendor.

## **HOW WE USE THE INFORMATION WE COLLECT.**

myZentral uses the collected information in support of our Services. The following paragraphs describe some of the ways in which we may use personal and other information:

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Fulfilling your requests. We may use personal information to respond to your inquiries and fulfill your requests. If you contact us, we may keep a record of your contact information and correspondence, and we may use any information you provide in your message to respond to your inquiry.

**Business purposes.** We may use personal information for our business purposes, such as audits, internal communication regarding companies and employees, administering our products and services, maintaining and securing our infrastructure, and for procurement and financial transactions.

**Informational communications.** MyZentral may from time to time send informational e-mails, articles, white papers, proposals, engagement letters, and other information regarding the Services. Occasionally, and with your consent, we may use your personal information in press releases and direct marketing materials. We also may use personal information such as e-mail or postal addresses to conduct surveys.

**Administrative information.** We may from time to time use personal information to send you important information regarding our platforms, changes to our terms, conditions, and policies and/or other administrative information. We may also contact you from time to time to verify that the personal information we have collected about you is accurate and current.

**Analytics.** We may retain and use information about our users, which may include, for example, personal information, for research, publication, development, benchmarking and norms, validation, longitudinal studies, trend analysis and to improve and enhance our services or develop and market new services. For these purposes we may also use your name and other personal identifiers to associate and combine information about users that is collected from one service with information about users collected through other services. Any published end product will refer only to larger aggregations of individuals and will not identify users personally or include any results attributable to specific user.

**Key-coded data.** We may key-code your personal information, meaning that such information is stripped of all information that may identify users (direct identifiers) and replaced by a key-code to minimize unwanted or unintended identification. Such key-coded information can be de-coded by the use of the key so that it identifies the user again. We may use such information for the purposes described in the paragraph above entitled “Analytics” and as permitted by applicable law. Any published end product will refer only to larger aggregations of individuals and will not identify users personally or include any results attributable to a specific user.

**De-identified data.** Additionally, we may aggregate (anonymize) or de-identify personal information in such a manner that the end-product does not personally identify a user or any other individual, for example, to generate norms by industry, geography, level, etc., enable us to conduct ongoing validation studies, compile reports, and publish journal articles to further the knowledge base of organizational and leadership science. Such aggregate or de-identified information is not considered personal information for purposes of this Policy and we may use it for any purpose.

## **DISCLOSURE TO CLIENTS, AFFILIATES, SERVICE PROVIDERS AND OTHERS.**

**Disclosure to service providers.** MyZentral works with third parties who provide services that may include, but are not necessarily limited to, assessment services, including assessment validation services; website hosting and IT consulting services; data analysis; public relations services; attorneys, accountants, and other administrative and back-up and security services. As part of providing those services, such third parties will be provided with access to personal information. In addition, our software development partners may use personal information for purposes of modifying, improving, refining and validating their technology and research and development.

**Business transfers.** MyZentral reserves the right to disclose or transfer any and all personal information that we collect from visitors, or that we otherwise collect in connection with our Services, to a third party in connection with a strategic alliance with such third party, or in the event of a sale of our company or one of our affiliates, or a merger or consolidation involving our company or one of our affiliates, or a sale or transfer of assets or of any portion of our business or the business of one or more of our affiliates.

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**Other disclosures.** myZentral may also use or disclose personal information in order to: (i) comply with applicable laws; (ii) respond to inquiries or requests from public or government authorities, including those outside of your country of residence; (iii) comply with valid legal process; (iv) protect the rights, privacy, safety or property of myZentral, users of the Online Systems or the public; (v) permit us to pursue available remedies or limit the damages that we may sustain; (vi) enforce our Terms of Use; or (vii) respond to an emergency. We cannot and do not assume any responsibility for the actions or omissions of third parties, such as clients, including the manner in which they use personal information received either from myZentral or from other independent sources.

## **OTHER INFORMATION WE COLLECT.**

myZentral collects other information that does not reveal your specific identity (“Other Information”), such as: Information collected through cookies, pixel tags and other technologies; App usage data; Demographic information and other information provided by you; and Aggregated information. Since Other Information does not reveal your specific identity, we may use it for any purpose. If we combine any Other Information with personal information (such as combining your name with your location), we will treat the combined information as personal information as long as it is combined. We and our third-party service providers may collect Other Information in a variety of ways, including:

**Using cookies.** we use “cookies” — that is, small text files placed on a visitor’s computer hard drive — and other technologies to help us determine information such as the type of content to which a visitor to the Site links, and the length of time each visitor spends at any particular area of the Site. myZentral cookies are only read by myZentral servers and are unable to execute any code or virus. We and our service providers use the information for security purposes, to facilitate navigation, display information more effectively, and to personalize your experience while using our platform, as well as for tracking purposes. We also gather statistical information about the usage of our platform in order to continually improve the design and functionality, understand how our platforms are used and to assist us with resolving questions regarding myZentral.

You can configure your browser settings to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. However, if you do not accept these cookies, you may experience some inconvenience in your use of our platform. For example, we may not be able to recognize your computer and you may need to log in every time you visit our platforms. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

Using pixel tags, web beacons, clear GIFs or other similar technologies. These may be used in connection with some site pages and HTML-formatted email messages to, among other things, track the actions of site users and email recipients, measure the success of our communications and compile statistics about Site usage and response rates.

**Tracking data.** myZentral monitors visitor traffic patterns throughout the site by logging tracking data which is collected automatically from each site visitor. Tracking data may include your “IP Address” which is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP), as well as your browser type and operating system, the referring website, which pages of the Site were visited, the order in which they were visited and which hyperlinks were “clicked.”

MyZentral uses tracking data in aggregate form to perform statistical analyses of the collective characteristics and behavior of our visitors, and by measuring demographics and interests regarding specific areas of the site.

**Physical location.** We may collect the physical location of your device by, for example, using satellite, cellphone tower or WiFi signals. We may use your device’s physical location to provide you with location-based services and content. In some instances, you may be able to allow or deny collection of your device’s location, but if you choose to deny such collection, we may not be able to provide you with the applicable location-based services and content.

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**From you.** Information such as your preferred means of communication is collected when you voluntarily provide this information. Unless combined with personal information, this information does not personally identify you or any other user of the Online Systems.

**By aggregating information.** Aggregated personal information does not personally identify you or any other user of the Online Systems. For example, we may aggregate information to calculate the geographic distribution of participants in our Services.

## **ADDITIONAL GUIDELINES.**

MyZentral may from time to time sponsor special features or promotions on the platforms and additional privacy information may be posted. That privacy information, to the extent it conflicts with this Policy, will govern that particular feature or promotion.

## **CHOICE AND ACCESS.**

Your provision of personal information to us is voluntary, although if you do not provide certain personal information you may not be able to participate in all our services.

You may contact us at [info@myzentral.com](mailto:info@myzentral.com) if you wish to receive certain information as to whether or not personal information relating to you is held by us and to obtain a copy of such information.

If you would like to: (i) ask questions about how we handle personal information; (ii) review, correct or update your personal information; or (iii) request that your personal information be removed from myZentral's database, please contact us at [privacy@myzentral.com](mailto:privacy@myzentral.com).

You may request to be removed from myZentral's database by putting "Remove User" in the subject line of the e-mail, and including your full name, User ID and telephone number in the body of the e-mail message.

We will aim to comply with your request as soon as reasonably practical and may need to contact you in order to be sure that we are deleting the appropriate information. Please note that we cannot be responsible for removing your information from our database if that information is part of an active service for your company. In that case, your request may need to be directed to your company's management. We will, however, forward your request to the appropriate person at your company.

We also may need to retain certain information about you, such as your e-mail address, in order to honor opt-out or similar requests. Please keep in mind that this residual information will remain within myZentral databases, access logs and other records, which may or may not contain personal information about you. The residual information will not be used for commercial purposes. However, myZentral reserves the right, from time to time, to recontact former users of its platforms.

## **LOCATION OF PERSONAL INFORMATION COLLECTED AND MAINTAINED.**

Your personal information may be collected, used, processed, disclosed and transferred to and within the European Union and the United States and other countries where we have facilities or in which we engage service providers. By using our Services or Online Systems, you consent to the transfer of information to countries outside of your country of residence, which may have different data protection rules than in your country.

## **SECURITY.**

myZentral has reasonable organizational, technical and administrative measures in place to protect against the loss, misuse and alteration of personal information about users of the platforms which is under our control. Unfortunately, however, no security system, or system of transmitting personal information over the Internet can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at [security@myzentral.com](mailto:security@myzentral.com).

## **RETENTION PERIOD.**

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We will retain your personal information for the period necessary to fulfill the purposes outlined in this policy unless a longer retention period is required or allowed by law.

## **LINKS TO OTHER WEBSITES.**

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of our vendors or of any other third parties. On myZentral platforms, you may have the opportunity to follow a link from or to other websites maintained by myZentral affiliates, vendors, or other third parties. The inclusion of a link on our platforms does not imply our endorsement of the linked site. Because these other websites may not be hosted or controlled by myZentral, this Policy does not address the privacy practices of those websites. We encourage you to review the privacy policies of each of those websites.

Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as LinkedIn, Facebook, Apple, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any personal information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

## **UPDATES TO THIS POLICY.**

myZentral reviews its privacy practices from time to time, and those practices are subject to change. We ask that you bookmark and periodically review this page to ensure continuing familiarity with the most current version of this Policy. You can determine when this Policy was last revised by checking the “Revised Date” legend at the bottom of the Policy. Any changes to the Policy will become effective upon posting of the revised Policy on the Internet, accessible through the Site. Use of the Online Systems following such changes constitutes your acceptance of the revised Policy then in effect.

## **USE OF ONLINE SYSTEMS BY MINORS.**

myZentral platforms are not directed to individuals under the age of fourteen (13), and we request that these individuals do not provide personal information through the Online Systems.

## **SUMMARIES OF POLICY.**

This Policy is the sole authorized statement of myZentral’s practices with respect to the online collection of personal information through the platforms and the usage of such personal information. Any summaries of this Policy generated by third party software or otherwise shall have no legal effect, are in no way binding upon myZentral, shall not be relied upon in substitute for this Policy, and neither supersede nor modify this Policy.

## **QUESTIONS.**

Any question about this Policy may be address to [policy@myzentral.com](mailto:policy@myzentral.com).