ZENNNN PRIVACY POLICY
Last updated: March 20, 2020

How we protect your privacy on zennnn.com and when you use our services

ZENNNN and its affiliates offer many services to help you run your business, including a platform to host your own ZENNNN database. As part of running those services we collect data about you and your business. This data is not only essential to run our services, but also critical for the safety of our services and all our users.
This policy explains what information is collected, why it is collected, and how we use it.

Information we collect

Most of the personal data we collect is directly provided by our users when they register and use our services. Other data is collected by recording interactions with our services.

Account & Contact Data
When you register on our website to use or download one of our products, or to subscribe to one of our services, or fill in one of our contact forms, you voluntarily give us certain information. This typically includes your name, company name, email address, and sometimes your phone number, postal address (when an invoice or delivery is required), business sector and interest in ZENNNN, as well as a personal password.
We never record or store credit card information from our customers, and always rely on trusted third-party PCI-DSS-compliant payment processors for credit card processing, including for recurring payment processing.

Job Application Data
When you apply for a job on our website or via an employment agency, we usually collect your contact information (name, email, phone), and any information you choose to share with us, in your introduction letter and Curriculum Vitae. If we decide to send you a job proposition, we will also ask you to provide extra personal details, as required to fulfill our legal obligations and personnel management requirements.
We will not ask you to provide information that is not necessary for the recruitment process. In particular, we will never collect any information about your racial or ethnic origin, political opinions, religious beliefs, trade union membership or sexual life.

Browser Data
When you visit our website and access our online services, we detect and store your browser language and geolocation, in order to customize your experience according to your country and preferred language. Our servers also passively record a summary of the information sent by your browser, for

statistical, security and legal purposes: your IP address, the time and date of your visit, your browser version and platform, and the web page that referred you to our website.

Form protection: some forms on our website may be protected by Google reCAPTCHA. This technology relies on heuristics that based on technical characteristics of your browser and device, and may also use specific Google cookies. See also Google Privacy Policy.

Customer Database
When you subscribe to an ZENNNN Cloud service and create your own ZENNNN database (for example by starting a Free Trial), any information or content you submit or upload into your database is your own, and you control it fully.
Similarly, when you upload an on-premises database to the ZENNNN Upgrade website, you own the data in it.
This data will often include personal information, for example: your list of employees, your list of suppliers, your contacts and customers, your messages, pictures, videos, text files etc. We only ever collect this information on your behalf, and you always retain ownership and full control on this data.

Github.com Account Data
When you subscribe to the Github.com/uuuuez platform and create your project, the platform requires authorization to access your Github.com account, which includes an OAuth token granting access to your account, and later, the contents of your project repository.

In-App Purchase (IAP) Transaction Data
When you use ZENNNN on the ZENNNN Cloud or on your own self-hosted deployments, some optional "In-App Purchase" services may be active by default. This typically includes auto-completion features to help you quickly input client and supplier info, as well as integration with third-party service providers for sending and receiving SMS, emails, paper letters, etc.
When you use these services, with our without payment, some necessary transaction data is transmitted to ZENNNN Cloud services and have to be communicated to third-party services for the purpose of executing the service.
You can find the detailed privacy policy for each service on the IAP Privacy Policy page.
The IAP services are always optional, even when enabled by default, and the IAP Privacy Policy also explains how you can opt-out of those services.

How we use this information

Account & Contact Data
We use your contact information in order to provide our services, to answer your requests, and for billing and account management reasons. We may also use this information for marketing and communication purposes (our marketing messages always come with a way for you to opt-out at any time).

We also use this data in aggregated/anonymized form in order to analyze service trends.

If you have registered to participate in an event published on our website, we may transfer your name, email address, phone number and company name to our local organizer and to the sponsors of the event, for both direct marketing purposes and in order to facilitate the preparations and booking for the event.

If you have expressed interest in using ZENNNN or otherwise asked to be contacted by an ZENNNN service provider, we may also transfer your name, email address, phone number and company name to one of our official Partners in your country or region, for the purpose of contacting you to offer their local assistance and services.

Job Application Data

We will only process this information for our recruitment process, in order to evaluate and follow-up with your application, and in the course of preparing your contract, if we decide to send you a job proposition. You may contact us at any time to request the deletion of your information.

Browser Data

This automatically recorded data is anonymously analyzed in order to maintain and improve our services. Google reCAPTCHA may also be used for security purposes, in order to prevent abuse of our services. In that case we only process the anonymous score that reCAPTCHA determines based on your browser and device.

We will only correlate this data with your personal data when required by law or for security purposes, if you have violated our [Acceptable Use Policy](#).

Customer Database

We only collect and process this data on your behalf, in order to perform the services, you have subscribed to, and based on the instructions you explicitly gave when you registered or configured your service and your ZENNNN database.

Our Helpdesk staff and engineers may access this information in a limited and reasonable manner in order to solve any issue with our services, or at your explicit request for support reasons, or as required by law, or to ensure the security of our services in case of violation of our [Acceptable Use Policy](#), in order to keep our services secure.

Github.com Account Data

During the configuration phase of your Github.com/uuuuez project, the platform uses your OAuth token to setup the Github.com project you will use for ZENNNN, including the necessary web hooks and deployment key to allow ZENNNN to detect every commit you push to your project repository. The OAuth token is not stored and is deleted as soon as you close your ZENNNN session, or after 2 days.

The contents of your project repository is stored as long as your ZENNNN subscription is active, in order to provide the service itself.

Our Helpdesk staff and engineers may access this information in a limited and reasonable manner in order to solve any issue with our services, or at your explicit request for support reasons, or as required by law, or to ensure

the security of our services in case of violation of our [Acceptable Use Policy](#), in order to keep our services secure.

In-App Purchase (IAP) Transaction Data
You can find the detailed privacy policy for each service on the [IAP Privacy Policy](#) page.

Accessing, Updating or Deleting Your Personal Information

Account & Contact Data
You have the right to access and update personal data you have previously provided to us. You can do so at any time by connecting to your personal account on zennnn.com. If you wish to permanently delete your account or personal information for a legitimate purpose, please contact our support@zennnn.com to request so. We will take all reasonable steps to permanently delete your personal information, except when we are required to keep it for legal reasons (typically, for administration, billing and tax reporting reasons).

Job Application Data
You may contact us at any time to request access, updates or deletion of your application information. The easiest way to do it is to reply to the last message you exchanged with our Human Resource personnel.

Customer Database
You can manage any data collected in your databases hosted on zennnn.com at any time, using your administration credentials, including modifying or deleting any personal data stored therein.
At any time you can export a complete backup of your database via our control panel, in order to transfer it, or to manage your own backups/archive. You are responsible for processing this data in compliance with all privacy regulations.
You may also request the deletion of your entire database via your control panel, at any time.
When you use the ZENNNN Database Upgrade service, your data is automatically deleted after your upgrade was successfully completed, and may also be deleted upon request from you.

Github.com Account Data
You can view and manage the project repository data collected from your Github.com account directly on Github.com/uuuuez.
You may request the deletion of this information via your control panel on ZENNNN, at any time.
You can also request the deletion of your Github.com OAuth token by simply logging out from ZENNNN.

In-App Purchase (IAP) Transaction Data
You can find the detailed privacy policy for each service on the [IAP Privacy Policy](#) page.

<u>Safety Retention Period</u>
We retain a copy of your data in our backups for safety reasons, even after they are destroyed from our live systems. See "Data Retention" for more details.

Security

We realize how important and sensitive your personal data is, and we take a great number of measures to ensure that this information is securely processed, stored and preserved from data loss and unauthorized access. Our technical, administrative and organizational security measures are described in details in our [Security Policy](#).

Third Party Service Providers

In order to support our operations, we rely on several Service Providers. They help us with various services such as payment processing, web audience analysis, cloud hosting, marketing and communication, etc.
Whenever we share data with these Service Providers, we make sure that they use it in compliance with Data Protection legislation, and that the processing they carry out for us is limited to our specific purpose and covered by a specific data processing contract.

Data Retention

<u>Account & Contact Data</u>
We will only retain such data as long as necessary for the purpose for which it was collected, as laid out in this policy, including any legal retention period, or as long as necessary to carry out a legitimate and reasonable promotion of our products and services.

<u>Job Application Data</u>
If we do not hire you, we may keep the information you provide for up to 2 years in order to contact you again for any new job proposition that may come up, unless you ask us not to do so. If we hire you, your personal information will be stored for the duration of your employment contract with us, and afterwards, during the applicable legal retention period that applies in the country where we employed you.

<u>Browser Data</u>
We will only retain this data for a short period of time, generally 2 months, unless we need to keep it in relation with a legitimate concern related to the security or performance of our services, or as required by law.

<u>Customer Database</u>
We will only retain this data as long as necessary for providing the services you subscribed to. For databases hosted on the ZENNNN Cloud, if you cancel the service your database is kept deactivated for 3 weeks (the grace period

during which you can change your mind), and then destroyed. For databases uploaded to the ZENNNN Database Upgrade website, your database is kept for up to 3 months after the last successful upgrade, and may be deleted earlier upon request.

Github.com Account Data
We keep this data as long as your ZENNNN subscription is active, except the OAuth token which is deleted after 7 days, or as soon as you logout from Github.com/uuuuez.

In-App Purchase (IAP) Transaction Data
You can find the detailed privacy policy for each service on the IAP Privacy Policy page.

Safety Retention Period
As part of our Security Policy, we always try to preserve your data from accidental or malicious deletion. As a result, after we delete any of your personal information (Account & Contact Data) from our database upon request from you, or after you delete any personal information from your database (Customer Database), or if you delete your entire database, it is not immediately deleted from our backup systems, which are secured and inalterable. The personal data could remain stored for up to 6 months in those backups, until they are automatically destroyed.
We commit not to use those backup copies of your deleted data for any purpose except for maintaining the integrity of our backups, unless you or the law require us to do so.

Physical Data Location / Data Transfers

Hosting Services

Hosting Locations
Customer databases are hosted in the ZENNNN data center region closest to where they are based: Germany, United States or Hong Kong. Customers can request that their data be moved to any of these data center regions.

Backup Locations
Backups are replicated on multiple continents in order to meet our Disaster Recovery objectives, and are located in the following countries, regardless of the original hosting location: United States or Hong Kong.

ZENNNN Database Upgrade Locations
Customer databases are upgraded either on their current hosting locations (see above) or in our United States data center (AWS).

In-App Purchase (IAP) Transaction Data
You can find the detailed privacy policy for each service on the IAP Privacy Policy page.

International Staff

In some cases, the personal data mentioned in this Privacy Policy may be accessed by staff members of ZENNNN subsidiaries in other countries. Such access will always be done for the same purposes and with the same privacy and security precautions as if it was done by our own local staff, so all the guarantees we provide still apply.
We use APEC CBPR System to bind our subsidiaries in a way that offers sufficient safeguards on data protection for the limited and temporary data transfers that occur for such access.

Third Party Disclosure

Except as explicitly mentioned above, we do not sell, trade, or otherwise transfer your personal data to third parties. We may share or disclose aggregated or de-identified information, for research purposes, or to discuss trends or statistics with third-parties.

Cookies

Cookies are small bits of text sent by our servers to your computer or device when you access our services. They are stored in your browser and later sent back to our servers so that we can provide contextual content. Without cookies, using the web would be a much more frustrating experience. We use them to support your activities on our website, for example your session (so you don't have to login again) or your shopping cart.
Cookies are also used to help us understand your preferences based on previous or current activity on our website (the pages you have visited), your language and country, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.
We also use third-party services such as Google Analytics, who set and use their own cookies to identify visitors and provide their own contextual services.
You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies, or look at the links below.
Chrome: https://support.google.com/chrome/answer/95647?hl=en
Explorer: https://support.microsoft.com/en-us/products/windows?os=windows-10
Safari: https://support.apple.com/kb/PH21411
Firefox: https://support.mozilla.org/products/firefox/cookies
Opera: http://www.opera.com/help/tutorials/security/cookies/
We do not currently support Do Not Track signals, as there is no industry standard for compliance.

Policy Updates

We may update this Privacy Policy from time to time, in order to clarify it, to reflect any changes to our website, or to comply with legal obligations. The "Last Updated" mention at the top of the policy indicates the last revision, which is also the effective date of those changes. We give you access to archived versions of this policy, so you can review the changes.

Contacts

If you have are any question regarding this Privacy Policy, or any enquiry about your personal data, please contact us via email at privacy@zennnn.com or by post:

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