Privacy Policy

Last Updated November 24, 2019

Intro

Your privacy is extremely important to zaplatite.bg. In order to try to protect your privacy, zaplatite.bg has developed and complies with this zaplatite.bg Privacy Policy (this "Privacy Policy") in relation to zaplatite.bg's collection, processing, and usage of data and information you share with zaplatite.bg as part of your use of zaplatite.bg.

This Privacy Policy also describes your choices regarding use, access and correction of your personal information. In relation to the Personal Data collected and processed through the Website, zaplatite.bg processes Personal Data as a data controller. In relation to Personal Data provided to and processed by zaplatite.bg for zaplatite.bg's customers, zaplatite.bg processes Personal Data as a data processor.

By accessing and using the website, you agree to this Privacy Policy and consent to the data practices set forth in this agreement.

Summary

This summary is intended to provide a high-level overview of zaplatite.bg's privacy and data collection practices – for more details, please refer to the relevant sections below. The type of data zaplatite.bg collects and processes falls into two broad categories: information and data zaplatite.bg collects for its own purposes through its Website and other means ("zaplatite.bg Collected Data") and information and data zaplatite.bg's Customer's provided to it for processing in connection with zaplatite.bg's Service(s) ("Customer Data"). Zaplatite.bg Collected Data consists of data a Website visitor shares with zaplatite.bg through the Website, including, but not limited to, Personal Information such as your name, contact information, and/or employment and compensation information and other data and information zaplatite.bg collects through the use of cookies and similar technologies. zaplatite.bg uses the zaplatite.bg Collected Data to provide Website functionality, analyze traffic and usage, and to send you services, support, and/or marketing emails or other communications concerning the Website. If you have any questions or concerns about any zaplatite.bg Collected Data related to you, please reach out to zaplatite.bg at support@zaplatite.bg Customer Data consists of data provided to zaplatite.bg by zaplatite.bg's Customers including, but not limited to, Personal Information about the Customer's employees. zaplatite.bg only uses Customer Data to provide the Service(s) to the applicable Customer, in an aggregated and anonymous format to enrich its market data and compensation databases, and as permitted by the agreement between the Customer and zaplatite.bg.

Contact Us

Please contact zaplatite.bg at <u>support@zaplatite.bg</u> with any privacy questions or comments you may have or to request or exercise any rights you have under applicable law to access, rectify, delete, restrict, retain, or reuse any of your Personal Information.

Changes to PP

zaplatite.bg reserves the right to change, modify, add, or remove portions of this Privacy Policy at any time. All changes will be posted on zaplatite.bg and, in such event, zaplatite.bg will update the "Last updated" date above. Please be sure to review any changes made to the Privacy Policy by occasionally checking this page for updates. Your continued use of the Website and Service(s) will constitute your agreement to such updated Privacy Policy.

Customer Data

In the course of zaplatite.bg's Customers' use of any Service(s), Customer may load Personal Information concerning their personal information, employees, contractors, and/or other individuals into the Service(s) and use the Service(s) to process, handle, or store such information. Customers control and are responsible for correcting, deleting, or updating information they process, handle, store, or otherwise use concerning you, including any data about you that they may load into the Service(s). If you request that zaplatite.bg removes your Personal Data, zaplatite.bg's will respond within a reasonable timeframe. Though zaplatite.bg's agreements with Customers prohibit Customers from loading or using the Service(s) to process, handle, or store Prohibited Data, zaplatite.bg has no direct control over or responsibility for the data Customers choose to load into or use with the Service(s). Zaplatite.bg is not responsible for the data Customers load into or process, handle, or store within the Service(s).

Information Collected

Personally Identifiable Information Policy

Personally, identifiable information (PII) is described as any electronic data that can be used to disclose the identity of an individual. This includes but is not limited to personal, address, phone number, email address, or name.

In an effort to maintain data security in all realms of data collection zaplatite.bg requires that all online data collection programs conform to the following information security regulations:

- All personally identifiable information will be stored on securely controlled central database servers that conform to all access control and authentication regulations set forth by designated data/cyber security officers in Administrative Computing Services.
- All online data collection, data retrieval, and application requests involving
 personally identifiable information will be reviewed by designated data/cyber
 security officers in Administrative Computing Services. Prior to production or
 implementation, the designated data/cyber security officer(s) will ensure that all
 security principles, programming standards, data storage, and that all data elements
 are being collected securely and appropriately.
- Programs and methods that do not conform to information collection and security policies will be removed and taken out of production. The administrator/requestor of the program will be notified. Once security violations are corrected the program will be placed back into a production environment. Online data collection programs

are defined as any Web form, application, or survey tool that is made available to the public and stores some or all of the personally identifiable information elements.

Disclosure of Personally Identifiable Information to Parties outside zaplatite.bg

zaplatite.bg does not sell, rent, give away, or loan any personally identifiable information about companies, customers and employees to any third party.

Sensitive Personal Information (SPI)

Sensitive Personal Information (SPI) refers to information that does not identify an individual, but is related to an individual, and communicates information that is private or could potentially harm an individual should it be made public. This includes things like biometric data, genetic information, sex, sexual orientation, etc.

Zaplatite.bg does not store any Sensitive Personal Information

Visiting the Website and using the Service

By accessing and using the Websites and by providing any Collected Information (as defined below), you represent and certify that you have all necessary and sufficient rights to provide the Collected Information to zaplatite.bg and that you consent to the processing of the Collected Information for the purposes stated herein, including, but not limited to, providing Website functionality, providing zaplatite.bg's service(s) and/or support for such services. As part of your use and access to the Websites and/or Service, you may share data or information, including, but not limited to, information that identifies your personally such as your name, your contact information, or your employment and compensation information ("Personal Information"). You may also provide information about third parties, such as your employer, your employees, or your employer's employees ("Third Party Information") (together with Personal Information, the "Collected Information"). For example, you may share your name and contact information with zaplatite.bg to allow zaplatite.bg communicate with you, to access or download certain content or materials, to register for a service.

zaplatite.bg may also collection information about you in the course of your use or access of the Website or Service including, but not limited to, your IP address, geographical location, browser type, referral source, length of visit and pages viewed, actions taken and pages viewed on the Websites or in the Service, next URL visited (regardless of whether it is a zaplatite.bg Website), and other similar information collected as part of your use or access to the Website or Service and all such information along with any information zaplatite.bg collects through its use of cookies, and log files shall also be considered Personal Information.

The Collected Information allows zaplatite.bg to provide the Website and Service to you, to collect statistics about the usage and effectiveness of its Websites, its Service, and other services, to determine whether you've opened an email or clicked on a link contained in an email.

Cookies

Zaplatite.bg may use various tracking technologies such as cookies or other similar technologies in connection with the Website or Services. Zaplatite.bg may also use third party service providers (who may also use cookies or other tracking technologies) to allow Zaplatite.bg to analyze a visitors behavior on the Website and in the Service. Zaplatite.bg uses both per-session and persistent cookies in conjunction with the Website and the Service.

Cookies are small bits of data stored locally by a browser that saves information and helps the hosting website identify the user upon subsequent visits. Cookies are uniquely assigned to the users' computer and may only be read by a web server located within the domain that originally issued the cookie. Cookies generally assist users by performing certain functions such as saving passwords and personal preferences for a website. Persistent cookies are stored for a set length of time determined by the web server when it passes the cookie on to the browser and are used to store information between visits to a site. Persession cookies are used to store information only within a single session and are only cached while a user is visiting the web server that issues the per-session cookie. Per-session cookies are deleted from the cache when the user closes the session. Most browsers allow users to specify whether they would like to accept or decline cookies. Declining use of cookies in conjunction with the Websites or the Service may hinder performance and negatively impact the user experience. Use of cookies or similar technologies by Zaplatite.bg 's advertisers is not covered by this Privacy Policy and Zaplatite.bg does not have access or control over any such cookies or similar technologies.

Log Files

Zaplatite.bg gathers certain information about a visitor's visit, access, and use of the Website and/or Service and stores such information in log files. This information includes referring/exit pages, date/time stamp, user action, and click stream data. Zaplatite.bg may use this information troubleshooting and support purposes.

Salary Info

Zaplatite.bg may collect your salary information, including billing information of customer employees.

Children

The Website and Service are intended for us by adults and are not intended for or targeted at children under 16 years of age. Zaplatite.bg does not knowingly or intentionally collect information or data on children under 16 years of age. Please contact Zaplatite.bg at support@zaplatite.bg if you believe that Zaplatite.bg has collected information about a child under 16 years of age.

Use of Personal Information

Exclusive Use and No Resale

All Personal Information is used exclusively by Zaplatite.bg unless otherwise noted in this Privacy Policy or at the time of collection. Zaplatite.bg reserves the right to use or disclose your Personal Information if required by law or if Zaplatite.bg reasonably believes that use or disclosure is necessary to protect Zaplatite.bg's rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process. Zaplatite.bg does not sell, rent, share, or otherwise provide Personal Information to third parties for direct marketing purposes.

Disclosure to Third Parties; Not for Sale

Zaplatite.bg may use other third parties, such as, for example, an email service provider to send out emails on our behalf, to help collect, manage, and process the Collected Information and you agree that Zaplatite.bg may share the Collected Information with such third parties as necessary for such purposes.

Use of Collected Information

Zaplatite.bg may use the Collected Information for a variety of purposes including, but not limited to, (i) providing the Website, Service, and related support services to you, (ii) personalizing your experience, analyzing usage and effectiveness of its Website, Service, and other services, (iii) sending you services, support, and/or marketing emails or other communications concerning the Website, Service. Zaplatite.bg may in some situations also use the Collected Information in an aggregated and anonymous manner to the help improve the Service.

Transfers of your information outside the European Economic Area

Your information will be transferred and stored outside the European Economic Area (EEA) in the circumstances set out below.

We will transfer your information outside the EEA or to an international organisation in order to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

General

Service Providers

Zaplatite.bg may employ other companies, individuals, or consultants to provide services to users, customers, and prospects. You agree that Zaplatite.bg may share the Collected Information with such service providers in order to provide information, products, and/or services to you. For example, Zaplatite.bg may use such service providers to host data and information, send and receive emails, analyze data, provide marketing assistance, and provide customer service. Zaplatite.bg will ensure that all such service providers adhere to privacy, security, and data handling practices at least as protective as Zaplatite.bg 's own privacy, security, and data handling practices.

Security

Zaplatite.bg uses reasonable physical, administrative and technical safeguards to help protect the Collected Information from unauthorized access, use and disclosure. Zaplatite.bg also requires that its suppliers protect such information from unauthorized access, use, and disclosure.

The Security Incident Management Policy

All personal information controllers and processors must implement a security incident management policy. This policy is for managing security incidents, including data breaches. Follow our Incident Management Process <u>https://www.zaplatite.bg/incident-management-process.pdf</u> for more information

Access Rights & Retention

Access Rights

Zaplatite.bg will provide you with reasonable access to your Personal Information, including in some cases employee information, as well as the ability to review and correct such information. You may access, modify, or remove your Personal Information by logging into the Website and making the applicable changes. In order to protect your privacy and security, Zaplatite.bg will take reasonable steps to verify your identity before granting you access to your Personal Information and may limit or deny access to any information where providing such access would be unreasonable, burdensome, or expensive in the circumstances.

Retention

Zaplatite.bg may retain the Collected Information for as long as you use the Service, as it may be useful in order to potentially contact you about the Service. In some cases we may retain the Collected Information in an aggregated and anonymous manner indefinitely.

Right to be forgotten

Every client and/or its employees can request "Right to be forgotten" process. After the request is received the the user can revert the process up to 24 hours by sending email to <u>support@zaplatite.bg</u>

Terminated clients

Client payroll records that contain the client employee personal information are deleted from all production systems, and also any hard copies, 13 months after a client terminates An audit log of deletion actions is maintained 13 months after a client terminates and if a client terminated employee sends "right to be forgotten" request

Compelled Disclosure

Zaplatite.bg may disclose Collected Information if and when required by law or in the good faith belief that such action is necessary in order to conform to the edicts of the law, comply with legal mandates, enforce its rights, enforce any agreement between Zaplatite.bg and its customers or to protect the rights, property, or personal safety of Zaplatite.bg, its employees and agents, its users, and the public.

Disciplinary measures

Zaplatite.bg makes reasonable efforts to guard personal data against accidental loss and from unauthorized access, use, alteration, and disclosure. Zaplatite.bg restrict access to customers personal data to those users who need to know that information to provide benefits or services other customers. In addition, zaplatite.bg train its employees and contractors about the importance of confidentiality and maintaining the privacy and security of customers information. Zaplatite.bg commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities. Every signal for privacy violation will be investigated by Zaplatite.bg DPO and appropriate measures will be taken if there are evidence for that. Signals for violations can be sent to <u>support@zaplatite.bg</u>