

Privacy Policy of www.myzone.org

Www.myzone.org collects some Personal Data from its Users.

Owner and Data Controller

Myzone Limited, Level 3, Gordon House, 10a Prospect Hill, Douglas, Isle of Man IM1 1EJ, British Isles

Owner contact email: dpo@myzone.org

Types of Data collected

Among the types of Personal Data that www.myzone.org collects, by itself or through third parties, there are: first name; last name; city; email address; phone number; username; gender; physical address; date of birth; profession; purchase history; Trackers; Usage Data; device information; Data communicated while using the service; IP address; Current City; company name; country; number of Users; session statistics; latitude (of city); browser information; password; geographic position; VAT Number; Tax ID; state; number of employees; website; various types of Data; county; ZIP/Postal code; field of activity; User ID; payment info; shipping address; billing address; financial information; in-app purchases; invoicing information; user subscriptions; Calendar permission; Contacts permission; Camera permission; Approximate location permission (continuous); Bluetooth sharing permission; Biometric Data access permission; Call permission; Camera permission, without saving or recording; general activity data; body measurements & indexes; movement activity; sleeping activity; heart rate and other vital data; screenshots; workplace; language; name; calendar information.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using www.myzone.org.

Unless specified otherwise, all Data requested by www.myzone.org is mandatory and failure to provide this Data may make it impossible for www.myzone.org to provide its services. In cases where www.myzone.org specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by www.myzone.org or by the owners of third-party services used by www.myzone.org serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through www.myzone.org.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of www.myzone.org (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: User database management, Commercial affiliation, Data transfer outside of the UK, Advertising, Analytics, Tag Management, Traffic optimization and distribution, Interaction with external social networks and platforms, Managing data collection and online surveys, Interaction with data collection platforms and other third parties, Interaction with online survey platforms, Heat mapping and session recording, Access to third-party accounts, Remarketing and behavioral targeting, Contacting the User, Handling payments, Selling goods and services online, Device permissions for Personal Data access, Handling activity data, Handling activities related to productivity, Hosting and backend infrastructure, Infrastructure monitoring, Location-based interactions, Managing contacts and sending messages, Managing support and contact requests and Displaying content from external platforms.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Device permissions for Personal Data access

Depending on the User's specific device, www.myzone.org may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document. The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of www.myzone.org.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by www.myzone.org.

Approximate location permission (continuous)

Used for accessing the User's approximate device location. Wwww.myzone.org may collect, use, and share User location Data in order to provide location-based services.

Biometric Data access permission

Used for accessing the User's biometrical Data and/or authentication systems, such as for instance, FaceID.

Bluetooth sharing permission

Used for accessing Bluetooth related functions such as scanning for devices, connecting with devices, and allowing data transfer between devices.

Calendar permission

Used for accessing the calendar on the User's device, including the reading, adding and removing of entries.

Call permission

Used for accessing a host of typical features associated with telephony.

Camera permission

Used for accessing the camera or capturing images and video from the device.

Camera permission, without saving or recording

Used for accessing the camera or capturing images and video from the device. Wwww.myzone.org does not save or record the camera output.

Contacts permission

Used for accessing contacts and profiles on the User's device, including the changing of entries.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Access to third-party accounts

This type of service allows www.myzone.org to access Data from your account on a third-party service and perform actions with it.

These services are not activated automatically, but require explicit authorization by the User.

Linkedin account access (LinkedIn Corporation)

This service allows www.myzone.org to connect with the User's account on LinkedIn, provided by LinkedIn Corporation.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Twitter account access (X Corp.)

This service allows www.myzone.org to connect with the User's account on the Twitter social network, provided by X Corp.

Personal Data processed: Data communicated while using the service; device information; email address; first name; last name; password; Trackers; Usage Data; username.

Place of processing: United States – [Privacy Policy](#).

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on www.myzone.org, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside www.myzone.org. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Microsoft Advertising (Microsoft Corporation)

Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on www.myzone.org. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

LinkedIn conversion tracking (LinkedIn Insight Tag) (LinkedIn Corporation)

LinkedIn conversion tracking (LinkedIn Insight Tag) is an analytics and behavioral targeting service provided by LinkedIn Corporation that connects data from the LinkedIn advertising network with actions performed on www.myzone.org. The

LinkedIn Insight Tag tracks conversions that can be attributed to LinkedIn ads and enables to target groups of Users on the base of their past use of www.myzone.org.

Users may opt out of behavioral targeting features through their device settings, [their LinkedIn account settings](#) or by visiting the [AdChoices opt-out page](#).

Personal Data processed: device information; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

LinkedIn Ads (LinkedIn Corporation)

LinkedIn Ads is an advertising service provided by LinkedIn Corporation.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

X Ads conversion tracking (X Corp.)

X Ads conversion tracking is an analytics service provided by X Corp. that connects data from the X advertising network with actions performed on www.myzone.org.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Hotjar Form Analysis & Conversion Funnels (Hotjar Ltd.)

Hotjar is an analytics service provided by Hotjar Ltd.

Hotjar honors generic Do Not Track headers. This means your browser can tell its script not to collect any of your data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Trackers; Usage Data.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Cavai (Cavai AS & UK)

Cavai is an advertising service provided by Cavai AS & UK .

Personal Data processed: Trackers; Usage Data.

Place of processing: Norway – [Privacy Policy](#).

Avalanche (Velocity Made Good LLC)

Avalanche is an advertising service provided by Velocity Made Good LLC.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Havas Media (Havas Media (Artemis Alliance S.L.U.))

Havas Media is an advertising service provided by Havas Media (Artemis Alliance S.L.U.).

Personal Data processed: Trackers; Usage Data.

Place of processing: European Union – [Privacy Policy](#) – [Opt out](#).

Better Ads (d3sv.net) (Better Ads GmbH)

Better Ads (d3sv.net) is an advertising service provided by Better Ads GmbH.

Personal Data processed: Trackers; Usage Data.

Place of processing: Germany – [Privacy Policy](#) – [Opt out](#).

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Matomo (www.myzone.org)

Matomo is an analytics software used by www.myzone.org to analyze data directly without the help of third parties.

Personal Data processed: IP address; Trackers; Usage Data.

Meta Events Manager (Meta Platforms, Inc.)

Meta Events Manager is an analytics service provided by Meta Platforms, Inc. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on www.myzone.org.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Google Analytics 4 (Google LLC)

Google Analytics 4 is a web analysis service provided by Google LLC (“Google”). Google utilizes the Data collected to track and examine the use of www.myzone.org, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google’s official documentation](#).

Personal Data processed: browser information; city; device information; latitude (of city); number of Users; session statistics; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Commercial affiliation

This type of service allows www.myzone.org to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with www.myzone.org.

For details of which data are collected, please refer to the privacy policy of each service.

Group Companies

We may share your information with group companies (Myzone Group Companies) that are a fellow subsidiary undertaking of Myzone Holdings Limited, namely:

Myzone Inc, incorporated in Illinois, USA, number 70161893. Registered Office: 311 S Wacker Dr. Suite 480, Chicago, Illinois 60606;

Myzone Group Ltd, incorporated in England and Wales, number 9634208. Registered Office: European House, 93 Wellington Road, Leeds, LS12 1DZ UK;

Myzone (APAC) Pty Ltd, ACN 606 655 887. Registered Office: 18 Sangiorgio Court, Osborne Park, WA 6017, Australia;

Myzone (Europe) GmbH, De-Saint-Exupéry-Straße 10, 60549 Frankfurt am Main, Registered office: Frankfurt am Main, Germany, Court of Registration: AG Frankfurt am Main, HRB 115303;

Myzone Tech (Asia) Pte. Ltd, incorporated in Singapore, number 202011967G. Registered office: 6 Eu Tong Sen Street #11-20 The Central, Singapore 059817;

Myzone Iberia SL, incorporated in Spain, NIF B56597214. Registered office: C/ Roc Boronat, 147, Pl.10, 08018 Barcelona, Spain;

Myzone Holdings Ltd, Myzone (Worldwide) Ltd and Myzone (UK) Ltd, all incorporated in IOM, British Isles, numbers 017376V, 0006611V, and 006010V. Registered address: Level 3, Gordon House, 10a Prospect Hill, Douglas, IOM, IM1 1EJ, British Isles.

Subcontractors and Partners

From time to time we may share information with subcontractors that provide us with services and also partners which we work with so as to provide you with Myzone Services. These services include, among other things, assisting us in operating our

website, conducting our business, or servicing you. Our subcontractors and partners are required to keep the personal data that they receive confidential. These subcontractors include the subcontractors that are listed in the Third Party Sites and Service Providers section. These partners include the facilities that are listed in the Facility sections of this privacy policy.

Facilities and Challenges

You can register your Myzone device for use at a facility (health club, community hub, social hub, school or employer etc.) by selecting their facility code in your Myzone device user account. The data shared with the facility depends upon the level of agreement that the facility has entered into with us, as follows:

Level 1. As you are a member of the facility, they will have your name in their records. They are able to see that you are a Myzone device user connected to their facility, but we do not share any data about you that Myzone obtains via your use of a Myzone device with them.

IMPORTANT INFORMATION REGARDING THE SHARING OF INFORMATION WITH YOUR FACILITY

Your facility may upgrade its facility agreement by entering into a data-sharing agreement with us. If they have entered into a data-sharing agreement, they are responsible directly to you for the data that they receive and, if applicable, that they share with other third parties. You are advised of the access level that your facility operates under and you must give explicit consent in the Myzone App to your facility accessing data in accordance with its agreement level. If you do not give explicit consent, your data will not be shared with the facility and this may impact on the services that they can provide to you. The additional agreement levels are:

Level 2. The facility has advised us that they are based outside of the EU and that it has no EU citizens as members. They can transfer personal data from the Myzone platform to their systems. They can retain personal data on their systems if you were to terminate your Myzone Device user account and are responsible directly to you for the data that they hold.

Level 3. The facility cannot transfer personal data from the Myzone platform to their systems. If you were to terminate your Myzone device user account, they will not have access to any personal data.

Level 4. The facility can transfer personal data from the Myzone platform to their systems. They can retain personal data on their systems if you were to terminate your Myzone device user account and are responsible directly to you for the data that they hold. Individuals connected with facilities are not our employees or agents and you should satisfy yourself that the facility has procedures in place to protect your privacy (and, if applicable, the privacy of any child).

Any data shared with facilities includes inter alia your first name, last name, nickname, Myzone device ID, phone number, email address, date of birth, gender, resting heart rate, and maximum heart rate.

Your facility can also access data showing when you have participated in any class activity, the duration of such activity, and the number of calories burnt. In addition, facilities can access the names of your social connections linked with their facility and access the number of “likes” and the number of comments you have made against activities of other Myzone Device users. If you do not explicitly consent to facilities having access to such information you should either not proceed with your Myzone Device registration or should request and use a generic Myzone facility code. The facilities do not have access to any personal biometric data unless you permit them to have such access.

If your facility is a franchise we include both franchisor and franchisee as the facility and if you do not explicitly consent to information being shared with both parties you should either not proceed with your Myzone Device registration or should request and use a generic Myzone facility code.

If you wear your Myzone device and choose to join a Myzone class or are within range (approx. 20 metres) of a Myzone receiver your information may display on a screen used by the facility and be visible to other participants and parties.

If you choose to join a challenge your information may be shared with any other parties connected with that challenge. If you do not explicitly consent to sharing information do not join the challenge.

Distributors

Our products are sold to facilities through third party distributors. If you decide to purchase a product, in order for you to enter into an agreement with the distributor, and for the distributor to fulfil the agreement for a facility, we may transfer any information that you (a facility) provide to us to the distributor.

Your distributor may provide support services to you and your facility in your region for which purpose the distributor will enter into a data-sharing agreement with us. If they have entered into a data-sharing agreement, they are responsible directly to you for the data that they receive and, if applicable, that they share with other third parties. You are advised if a distributor requires access and you must give explicit consent in the Myzone App to your distributor accessing data. If you do not give explicit consent, your data will not be shared with the distributor and this may impact on the support services that they can provide to you. The distributor cannot transfer personal data from the Myzone platform to their systems through an API or a data export feature offered by us. If you were to terminate your Myzone Device user account, they will not have access to any personal data. Individuals connected with distributors are not our employees or agents and you should satisfy yourself that the distributor has procedures in place to protect your privacy (and, if applicable, the privacy of any child).

Any data shared with distributors includes your first name, last name, nickname, Myzone Device ID, phone number, email address, date of birth, gender, resting heart rate, and maximum heart rate.

Your distributor can also access data showing when you have participated in any class activity, the duration of such activity, and the number of calories burnt. In addition, distributors can access the names of your social connections linked with your facility and access the number of “likes” and the number of comments you have made against activities of other Myzone Device users. If you do not explicitly consent to facilities having access to such information you should either not proceed with your Myzone Device registration or should request and use a generic Myzone facility code. Distributors do not have access to any personal biometric data.

Contacting the User

Contact form (www.myzone.org)

By filling in the contact form with their Data, the User authorizes www.myzone.org to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: city; company name; country; county; date of birth; email address; field of activity; first name; gender; last name; number of employees; phone number; physical address; profession; state; Tax ID; Trackers; Usage Data; User ID; various types of Data; VAT Number; website; ZIP/Postal code.

Data transfer outside of the UK

The Owner is allowed to transfer Personal Data collected within the UK to third countries only subject to specific legal requirements (so-called "restricted transfers"). Restricted transfers may take place according to the conditions specified below.

Users can enquire with the Owner to learn which legal basis applies to which specific service.

Data Transfers

Myzone operates internationally and transfers information to the United States and other countries for the purposes described in this policy and the reason that Myzone transfers data to other Myzone group companies above includes so that these other companies can help to support and service your requirements in your specific jurisdiction in relation to using your Myzone Device. Myzone relies on multiple legal bases to lawfully transfer personal data around the world. These include your explicit consent.

Please note that the countries where we operate may have privacy and data protection laws that differ from, and are potentially less protective than, the laws of your country. You expressly agree and explicitly consent to this risk when you create a Myzone account and click "I agree" to data transfers, irrespective of which country you live in. For a list of the locations where we have offices, please see our company information above. If you later wish to withdraw your explicit consent, you can delete your Myzone account as described in the Your Rights section below

Data transfer abroad based on consent (UK) (www.myzone.org)

If this is the legal basis, Personal Data of Users shall be transferred from the UK to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of an adequacy decision and appropriate safeguards.

In such cases, the Owner shall inform Users appropriately and collect their explicit consent via www.myzone.org.

Personal Data processed: various types of Data.

Device permissions for Personal Data access

www.myzone.org requests certain permissions from Users that allow it to access the User's device Data as described below.

Device permissions for Personal Data access (www.myzone.org)

www.myzone.org requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data processed: Approximate location permission (continuous); Biometric Data access permission; Bluetooth sharing permission; Calendar permission; Call permission; Camera permission; Camera permission, without saving or recording; Contacts permission.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of www.myzone.org and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Mapbox widget (Mapbox Inc.)

Mapbox is a maps visualization service provided by Mapbox Inc. that allows www.myzone.org to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Handling activities related to productivity

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question. These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

Asana (Asana, Inc.)

Asana is a project management service provided by Asana, Inc.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; email address; first name; gender; geographic position; language; last name; password; phone number; physical address; profession; screenshots; Trackers; Usage Data; username; VAT Number; workplace; ZIP/Postal code.

Place of processing: United States – [Privacy Policy](#).

Calendly (Calendly, LLC)

Calendly is a service provided by Calendly, LLC, that facilitates online scheduling of appointments.

Personal Data processed: calendar information; email address; geographic position; name; phone number; Trackers.

Place of processing: United States – [Privacy Policy](#).

Handling activity data

This type of service allows the Owner to use the activity data collected by your device in order for www.myzone.org to operate or to provide specific features. This may include movements, heartbeat, change in altitude or data about the surroundings. Depending on what is described below, third parties may be involved in the activity tracking. Most devices allow for the User to control which Data is accessed or stored.

Activity data tracked by your device (www.myzone.org)

[Www.myzone.org](http://www.myzone.org) uses some activity data tracked by your device to operate or to provide specific features.

Personal Data processed: body measurements & indexes; date of birth; gender; general activity data; heart rate and other vital data; movement activity; sleeping activity.

Apple HealthKit (Apple Inc.)

HealthKit is an activity data handling service provided by Apple Inc. that enables the Owner to access or store activity data.

Personal Data processed: body measurements & indexes; date of birth; gender; general activity data; heart rate and other vital data; movement activity.

Place of processing: United States – [Privacy Policy](#).

Handling payments

Unless otherwise specified, www.myzone.org processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. [Www.myzone.org](http://www.myzone.org) isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

GoCardless (GoCardless Limited)

GoCardless is a payment service provided by GoCardless Limited.

Personal Data processed: billing address; first name; last name; payment info; phone number; shipping address; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Payment by bank transfer (www.myzone.org)

In the event that the chosen payment method is a direct bank transfer to the current account indicated by www.myzone.org, the Owner will collect the payment details of the User, i. e. the current account number of the sender, the SWIFT code, the bank and the name of the sender. Such data will be collected and processed exclusively within the transaction and for billing purposes only.

Personal Data processed: company name; first name; payment info; physical address.

Stripe

Stripe is a payment service provided by Stripe Payments Europe, Limited, Stripe Payments UK, Ltd or by Stripe New Zealand Limited, depending on how the Owner manages the Data processing.

Personal Data processed: billing address; email address; first name; last name; payment info; purchase history; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: European Union – [Privacy Policy](#); United Kingdom – [Privacy Policy](#); United Kingdom – [Privacy Policy](#); New Zealand – [Privacy Policy](#).

Payments processed via the Apple App Store (Apple Inc.)

Www.myzone.org uses a payment service provided by Apple Inc. that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Apple, as described in the [privacy policy for the App Store](#).

Personal Data processed: billing address; device information; email address; first name; last name; password; payment info; phone number; purchase history; Trackers; Usage Data; username.

Place of processing: United States – [Privacy Policy](#).

Payments processed via the Google Play Store (Google LLC)

Www.myzone.org uses a payment service provided by Google LLC that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Google, as described in the [privacy policy for the Google Play store](#).

Personal Data processed: billing address; device information; email address; first name; last name; payment info; phone number; purchase history; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Heat mapping and session recording

Heat mapping services are used to display the areas of www.myzone.org that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.

Some of these services may record sessions and make them available for later visual playback.

Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd.

Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable www.myzone.org to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of www.myzone.org.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Amazon Web Services (AWS) (Amazon Web Services, Inc.)

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#); United Kingdom – [Privacy Policy](#).

Hosting

We store data on servers that are either owned or leased by us. We rent space for our servers from a dedicated hosting service provider that is compliant with ISO 27001 standards of security. We store our data at Domicilium, based the Isle of Man, British Isles. The Quality and Information Security Management Systems of Domicilium have been approved by Lloyd's Register Quality Assurance (LRQA) to the following Quality and Information Security Management Standards: ISO 9001:2015; ISO/IEC 27001:2013.

Infrastructure monitoring

This type of service allows www.myzone.org to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of www.myzone.org.

New Relic (New Relic)

New Relic is a monitoring service provided by New Relic Inc.

The way New Relic is integrated means that it filters all traffic of www.myzone.org, i.e., communication between the Application and the User's browser or device, while also allowing analytical data on www.myzone.org to be collected.

Personal Data processed: Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of www.myzone.org for the purpose of saving and reusing data.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Hotjar Recruit User Testers (Hotjar Ltd.)

The Hotjar Recruit User Testers widget is a service for interacting with the Hotjar data collection platform provided by Hotjar Ltd.

Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Trackers; Usage Data; various types of Data.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of www.myzone.org.

The interaction and information obtained through www.myzone.org are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on www.myzone.org isn't being connected back to the User's profile.

Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by X Corp.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Interaction with online survey platforms

This type of service allows Users to interact with third-party online survey platforms directly from the pages of www.myzone.org.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Hotjar Poll & Survey widgets (Hotjar Ltd.)

The Hotjar Poll & Survey widgets are services that enable interaction with the Hotjar platform provided by Hotjar Ltd. Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Trackers; Usage Data; various types of Data.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Location-based interactions

Geolocation (www.myzone.org)

Www.myzone.org may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by www.myzone.org.

Personal Data processed: geographic position.

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

HubSpot Email (HubSpot, Inc.)

HubSpot Email is an email address management and message sending service provided by HubSpot, Inc.

Personal Data processed: email address; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Managing data collection and online surveys

This type of service allows www.myzone.org to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

Hotjar surveys (Hotjar Ltd.)

Hotjar surveys is a survey builder and data collection platform provided by Hotjar Ltd.

Hotjar surveys may use cookies to track User behavior. Users can Opt-Out of Hotjar surveys cookie tracking by visiting this [opt-out page](#).

Hotjar surveys respects the Do Not Track option available in most modern browsers that, if activated, sends a special signal to stop tracking User activity. Users can find more information on how to enable Do Not Track for each supported browser [here](#).

Personal Data processed: company name; country; Data communicated while using the service; date of birth; email address; first name; gender; geographic position; last name; number of employees; password; phone number; physical address; profession; state; Tax ID; Trackers; Usage Data; username; VAT Number; website.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Managing support and contact requests

This type of service allows www.myzone.org to manage support and contact requests received via email or by other means, such as the contact form.

The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

Zendesk (Zendesk, Inc.)

Zendesk is a support and contact request management service provided by Zendesk Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Outsourced Support

We use the services of Partner Hero, Inc., a California corporation, and its Affiliates, with offices at PartnerHero, 250 S. 5th Street, Suite 400, Boise, ID 83702

Remarketing and behavioral targeting

This type of service allows www.myzone.org and its partners to inform, optimize and serve advertising based on past use of www.myzone.org by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Twitter Remarketing (X Corp.)

Twitter Remarketing is a remarketing and behavioral targeting service provided by X Corp. that connects the activity of www.myzone.org with the Twitter advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Twitter Tailored Audiences (X Corp.)

Twitter Tailored Audiences is a remarketing and behavioral targeting service provided by X Corp. that connects the activity of www.myzone.org with the Twitter advertising network.

Users can opt out from interest-based ads by going to: [Personalization and Data](#).

Personal Data processed: email address; Trackers.

Place of processing: United States – [Privacy Policy](#).

Selling goods and services online

This type of service helps the Owner to sell goods, provide services or monetize online content. To this end, the services listed below may for instance allow the Owner to process payments, set up subscription models, track orders, and manage deliveries.

Chargebee (Chargebee Inc.)

Chargebee is a subscription management tool provided by Chargebee Inc, which allows the Owner to manage subscriptions, invoicing, pricing models, and subscription and revenue analytics.

Personal Data processed: billing address; company name; Data communicated while using the service; email address; financial information; first name; in-app purchases; invoicing information; last name; payment info; phone number; purchase history; shipping address; Trackers; Usage Data; User ID; user subscriptions.

Place of processing: United States – [Privacy Policy](#).

If you buy products or services through our online shop or ecommerce platform

We will collect the following information about you:

1. Your name
2. Postal Address
3. Email address
4. Telephone number (including mobile number)

We may also collect information about whether or not you completed a purchase, your purchase details (including details of aborted purchases), returns and other details such as the product purchased and the amount paid.

In the course of your use of the Site or App, we may also automatically collect technical data, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location (please refer to your preference controls regarding location data), browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Site or App.

In order to complete your transaction, we may refer you to a third party's website, or a third party's payment portal, by way of example only CyberSource and Till Payments that will collect information about your payment card. The information that you submit to them is not transmitted to Myzone, and you should review any privacy statements issued by the third-party provider before submitting your information. We may also collect your bank account information and transmit this to a third party, by way of example only GoCardless and you should review their privacy statement before providing information to us, that will retain your information in order collect one-off or recurring payments. The information about your payment card or bank account that you provide may be retained and accessed for use with your subsequent purchases.

In addition, our Site or App may also contain links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. It is important to note that we do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site or App, we encourage you to read the privacy notice of every website and application you visit or use.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on www.myzone.org in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Traffic optimization and distribution

This type of service allows www.myzone.org to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between www.myzone.org and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through www.myzone.org, i.e., communication between www.myzone.org and the User's browser, while also allowing analytical data from www.myzone.org to be collected.

Personal Data processed: Trackers; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to www.myzone.org, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving www.myzone.org. Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on www.myzone.org.

HubSpot Lead Management (HubSpot, Inc.)

HubSpot Lead Management is a User database management service provided by HubSpot, Inc.

Personal Data processed: city; date of birth; email address; first name; gender; last name; phone number; physical address; profession; purchase history; username.

Place of processing: United States – [Privacy Policy](#).

Pardot (Salesforce.com, Inc.)

Pardot is a User database management service provided by Salesforce.com, Inc. Pardot may use Trackers to recognize and track Users behavior, as well as, to help deliver personalized ads and content. Users may opt out of Pardot's use of Trackers for advertising purposes by visiting the [Salesforce Audience Studio Opt-Out page](#) or following the instructions provided by [YourOnlineChoices](#) and [AdChoices](#).

Personal Data processed: Data communicated while using the service; device information; email address; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

HubSpot CRM (HubSpot, Inc.)

HubSpot CRM is a User database management service provided by HubSpot, Inc.

Personal Data processed: company name; country; Current City; email address; first name; gender; last name; phone number; physical address; profession; purchase history; Trackers; Usage Data; username; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Further information about the processing of Personal Data

Personal Data collected through sources other than the User

The Owner of www.myzone.org may have legitimately collected Personal Data relating to Users without their knowledge by reusing or sourcing them from third parties on the grounds mentioned in the section specifying the legal basis of processing. Where the Owner has collected Personal Data in such a manner, Users may find specific information regarding the source within the relevant sections of this document or by contacting the Owner.

Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by www.myzone.org depends on the payment system used.

The Service is directed to children under the age of 13

www.myzone.org is directed to children under the age of 13. It doesn't require the child to disclose any more information than is reasonably necessary to participate in its activity.

Parents may review the personal information about their child collected by www.myzone.org - if any - outlined in the rest of this policy, ask for its deletion and request any further collection or use to be omitted by contacting the Owner. Parents may also

agree to the collection and use of their child's information, but still not allow disclosure to third parties, unless disclosure is integral to the Service.

Unique device identification

Www.myzone.org may track Users by storing a unique identifier of their device, for analytics purposes or for storing Users' preferences.

User identification via a universally unique identifier (UUID)

Www.myzone.org may track Users by storing a so-called universally unique identifier (or short UUID) for analytics purposes or for storing Users' preferences. This identifier is generated upon installation of this Application, it persists between Application launches and updates, but it is lost when the User deletes the Application. A reinstall generates a new UUID.

Preference Cookies

Preference Cookies store the User preferences detected on www.myzone.org in the local domain such as, for example, their timezone and region.

Cookie Policy

Www.myzone.org uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

Further Information for Users in the European Union

This section applies to all Users in the European Union, according to the General Data Protection Regulation (the "GDPR"), and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy. Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the Personal Data, if any, and further information about Personal Data can be found in **the section titled "Detailed information on the processing of Personal Data" within this document.**

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Transfer of Personal Data outside of the United Kingdom

Data transfer abroad based on consent (UK)

If this is the legal basis, Personal Data of Users shall be transferred from the UK to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of an adequacy decision and appropriate safeguards.

In such cases, the Owner shall inform Users appropriately and collect their explicit consent via www.myzone.org.

Further information for Users in Brazil

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running www.myzone.org and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users in Brazil (Users are referred to below, simply as “you”, “your”, “yours”), according to the "Lei Geral de Proteção de Dados" (the "LGPD"), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal information“ as it is defined in the **LGPD**.

The grounds on which we process your personal information

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

Categories of personal information processed

To find out what categories of your personal information are processed, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

Why we process your personal information

To find out why we process your personal information, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

Your Brazilian privacy rights, how to file a request and our response to your requests

Your Brazilian privacy rights

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

How to file your request

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

How and when we will respond to your request

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your

personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

Transfer of personal information outside of Brazil permitted by the law

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of www.myzone.org or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, www.myzone.org may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, www.myzone.org and any third-party services may collect files that record interaction with www.myzone.org (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within www.myzone.org and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Further information for Users in Brazil

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- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

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- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

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You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

How and when we will respond to your request

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

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We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through www.myzone.org (or third-party services employed in www.myzone.org), which can include: the IP addresses or domain names of the computers utilized by the Users who use www.myzone.org, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using www.myzone.org who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of www.myzone.org. The Data Controller, unless otherwise specified, is the Owner of www.myzone.org.

www.myzone.org (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by www.myzone.org as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Current City

Provides access to the User's current location.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to www.myzone.org, if not stated otherwise within this document.

Latest update: March 08, 2024