



LAST MODIFIED: SEP 2023

PRIVACY @ ZENWORK

Introduction

Welcome to Zenwork's privacy policy.

Zenwork respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (as defined in the Glossary) and will tell you about your privacy rights.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. [Alternatively, you can download a pdf version of the policy here: [Download PDF](#)]. Also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE DATA WE COLLECT ABOUT YOU

3. HOW IS YOUR PERSONAL DATA COLLECTED

4. HOW WE USE YOUR PERSONAL DATA

5. DISCLOSURES OF YOUR PERSONAL DATA

6. INTERNATIONAL TRANSFERS

7. DATA SECURITY

8. DATA RETENTION

9. YOUR LEGAL RIGHTS

10. GLOSSARY

1. IMPORTANT INFORMATION AND WHO WE

ARE Purpose of this privacy policy

This privacy policy aims to give you information on how Zenwork collects and processes your personal data through your use of this Website, including any data you may provide through this Website when you sign up to our newsletter, purchase a product or service.



Please note however, in some instances the collection of personal data may differ depending on the purchased product or service, and such collection will be agreed upon and detailed in the applicable agreement between the parties.

Zenwork products, other than appHR, do not collect the date of birth of our data subjects. We collect tax/ regulatory reporting/ inputs for identity verification checks from our users and their customers. Furthermore, this Website is not intended for children, and we do not knowingly collect data relating to children. No one under age thirteen may provide any information to or on the Website. If you are under thirteen, do not use or provide any information on this Website. If we learn we have collected or received personal information

apply to information collected by any third party, including through any application or content (including advertising) that may link to or be accessible from or through the Website.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Zenwork is made up of different legal entities, of which can be found here: [<https://zenwork.com/entities>]. This privacy policy is issued on behalf of the Zenwork Intermediate Inc. ("**Zenwork**") so when we mention "Company", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Zenwork Group responsible for processing your data. Zenwork is the controller and responsible for this Website.

We have appointed a data protection officer (DPO) Jeff Cronin who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this



from a child under age thirteen without verification of parental consent, we will delete that information.

Additionally, this policy does not apply to information collected by us offline or through any other means, including on any other website operated by any third party. It also does not privacy policy, including any requests to exercise your legal rights, please contact jeff@zenwork.com or using the details set out below.

Contact details.

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: Zenwork Intermediate Inc.

Email address: privacy@zenwork.com

Postal address: 1 East Center Street #250 Fayetteville, AR 72701

Telephone number: Ph:1-877-811-3829

Changes to the privacy policy and your duty to inform us of changes.

We keep our privacy policy under regular review and will provide notice when we make any changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This Website may include 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. We do not control these third-party websites and are not responsible for their



privacy statements. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account, payment card details (we only store reference number/ token number provided by third party processor), Tax Identification Number (Social Security Numbers and Employer Identification Number) and other financial information captured for e-filing recipient tax forms to the IRS or other applicable regulatory body.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.



- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

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.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, chatbot or otherwise. This includes but is not limited to personal data you provide when you:



- apply for our products or services.
- create an account on our website.
- upload files, connect via API or other integrations,
- subscribe to our service or publications.
- request marketing to be sent to you.
- when you interact with us at conferences or events.
- enter a competition, promotion, or survey.
- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other Websites employing our cookies. Please see our cookie policy [https://zenwork.com/cookie_policy] for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties [and public sources] as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google Analytics, Salesforce Pardot and Convertkit to analyse the use of and improve the functionality of our website. All of which we have embedded their privacy policy above for your review. For example, Google Analytics gathers information about Website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website for marketing and improvement purposes. We have hyperlinked to the privacy policies of these third parties above.
- (b) Identity and Contact Data from data brokers or aggregators Sales Navigator or ZoomInfo

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the services as described within the applicable contract that is entered into between the parties.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Click here [[GLOSSARY, LAWFUL BASIS](#)] to find out more about the types of lawful basis that we will rely on to process your personal data. Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and fulfil your request for products and services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To complete a survey, Reuse existing data	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) To improve product or services we offer

<p>To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
<p>To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical 	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> (a) Technical (b) Usage 	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical (d) Usage 	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>



	(e) Profile (f) Marketing and Communications	
--	---	--

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You may control the collection of data by opting out of certain cookies from our cookie settings.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

Third-party marketing

For the purposes of clarity, we do not share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by controlling your own cookie settings or contacting us at privacy@zenwork.com with your request.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.



Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when Website set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly. For more information about the cookies we use, please see [https://zenwork.com/cookie_policy].

Please note, if you do not wish to allow the use of cookies, you can disable them through your browser settings. At any time feel free to review your browsers help file to gather the instructions necessary to remove these persistent cookies, however, please keep in mind they are only being used in the first place to streamline our interaction with you and better our service.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose or where an appropriate regulator requires a change. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, or what regulatory change required the change, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with this policy or where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table [Purposes for which we will use your personal data] above.

- Internal Third Parties as set out in the [Glossary].



- External Third Parties as set out in the [Glossary].
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also share your personal data with the following:

- (1) Government agencies. We share only that data which is required to fulfil tax reporting requirements of the customer. Our data hosting services provider has a contractual obligation which prohibits them from making any use of the data beyond what is required to fulfil their obligations.
- (2) To respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law.
- (3) As necessary if we believe that there has been a violation of our site Terms of Use, of the law or of our rights or the rights of any third party.

6. INTERNATIONAL TRANSFERS

The personal data that you provide us may be transferred to and maintained on computers/servers located outside of your state, province, country, or other governmental jurisdiction, but will always be held under strict conditions of confidentiality. In the event the personal data is subject to GDPR, the parties will enter Zenwork's provided data processing agreement and any transfer of personal data which is subject to the GDPR outside the EU, such transfers will be governed by Standard Contractual Clauses approved by the European



Commission. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Zenwork will securely delete or, at your option, return all personal data to Customer, and securely delete any existing copies of the personal data, unless further storage of the personal data is required by applicable law as outline in the chart below, in which case Zenwork:



- (i) will continue to ensure the privacy, security and confidentiality of the personal data;
- (ii) will not process the personal data further except to maintain it for 3 years and securely store it for at least one year in archive;
- (iii) will continue to comply with its obligations under its Agreement with the customer;
- (iv) will securely delete the personal data immediately after Zenwork's duty under applicable law to retain it expires.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Zenwork's Data Retention Policy for Zenwork's Products	
Zenwork Product	Time Period
<ul style="list-style-type: none">• Tax1099• 1099online	3 years +1 year in archive
<ul style="list-style-type: none">• Compliancely• Exakto• TINverify	Auto delete after 30 days (at customer's option- request to be sent via email)
<ul style="list-style-type: none">• Zencanna	3 years +1 year in archive
<ul style="list-style-type: none">• Fbaronline	3 years +1 year in archive
<ul style="list-style-type: none">• appHR	6 months + 6 months in archive

<ul style="list-style-type: none">• Fidentity	Deleted manually based on customer request via email
<ul style="list-style-type: none">• Greentax2290• 2290.US• ez2290	3 years +1 year in archive
<ul style="list-style-type: none">• ezextension	3 years +1 year in archive
<ul style="list-style-type: none">• Fbaronline	3 years +1 year in archive

9. YOUR LEGAL RIGHTS

If you may have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please contact us. We will consider and act upon any request in accordance with applicable data protection laws.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm



You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

If you are a California resident, California law affords you certain rights regarding our collection and use of your personal information. To learn more about your California privacy rights, please email us at privacy@zenwork.com.

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are a Nevada Resident and wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address: privacy@zenwork.com.

No fee is usually required.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has

no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Zenwork Digital India Pvt Ltd acting as a joint processor who is based in India and provides IT development services.

External Third Parties

- Infrastructure as a Service, acting as processors based the United States who provides hosting services.
- Payment Card Processing Services, acting as joint controllers in the United States.
- Paper Fulfilment/Print and Mail/ couriers, acting as processors based in the United States.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are



processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided with your consent for us to use or where we used the information to perform a contract with you.

Website means collectively the following websites ran by Zenwork:

https://www.tax1099.com	https://www.greentax2290.com
https://www.1099online.com	https://www.fidentity.com
https://compliance.ly.com	https://tinverify.com
https://www.zenwork.com	https://www.exakto.com
https://apphr.io	https://www.zencanna.io
https://2290.us	https://www.fbaronline.com



https://www.ez2290.com	https://ezextension.com
https://www.zenworkuniversity.com	

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any process carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.