

Privacy Whitepaper

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The General Data Protection Regulation (“**GDPR**”) of the European Union safeguards the fundamental right to privacy and the protection of personal data for individuals. The GDPR includes robust requirements that raise and harmonize standards for data protection, security, and compliance.

Considering the GDPR, Zenzap decided to put this document together to provide an overview of its compliance and standing with regard to privacy regulation.

Zenzap's take on the GDPR? We welcome the positive changes the GDPR brings, such as the increased harmonization and the "privacy by design and privacy by default" approach. Our view is that the GDPR is not only an obligation but also an opportunity to build privacy-mindful products while further fostering customer trust.

Who does the GDPR apply to? The GDPR applies to all organizations established in the EU. In addition, it applies to organizations that process the personal data of EU individuals in connection with either the offering of goods or services to data subjects in the EU or the monitoring of behavior that takes place within the EU, whether established in the EU, or not. Personal data is any information relating to an identified or identifiable natural person, including names, email addresses and phone numbers.

If I am a customer not based in the EU, should I still be concerned about the GDPR? Given the GDPR's extraterritorial effect, our non-EU based customers are also encouraged to assess whether the GDPR applies to them or not. The GDPR will not only apply to companies that process the personal data of European individuals and have a presence in the EU (e.g. offices or establishments) but also to companies that do not have any presence in the EU but offer goods or services to individuals in the EU and/or monitor the behavior of European individuals where their behavior takes place within the EU.

Should I, as a Zenzap customer, be concerned about the GDPR?

Our recommendation is that all our customers assess carefully whether they are subject to the GDPR, and if so, to what extent. The consequences of breaching the

GDPR is very serious. Zenzap recommends that you consult with legal counsel regarding your obligations (if any) under the GDPR.

As a Zenzap customer, where should you start your "privacy compliance journey"?

If GDPR applies to your company, we highly recommend conducting internal due diligence to map your specific data collection practices. This includes, among other matters, understanding what specific personal data (including sensitive personal data) of individuals protected by the GDPR your company is collecting (e.g., end-users, customers, employees, etc.), from whom is the data collected, where is it being stored, for what purposes is it being used, with whom is it being disclosed, and whether the personal data is transferred outside of the European Union or European Economic Area.

What is Zenzap doing in order to comply?

This is a high level summary of what we have done so far:

Privacy strategy.

- We retained a leading outside counsel to help us understand the GDPR and prepare a privacy compliance plan.
- We built an internal taskforce with members of different departments (security, sales, product development, and others) to implement the privacy compliance plan internally.
- Top management has been personally involved in the supervision of its implementation.
- We defined a Privacy Policy and other top-level policies as needed – e.g., Cookies Policy, Data Retention Policy.

Privacy policy.

- Zenzap as a data controller – When Zenzap determines the means and purposes of collecting and processing the personal data, including, without limitation, when Zenzap collects personal data on the website (for example, the website forms), Zenzap acts as a data controller. For more information, please review Zenzap's privacy policy available: <https://www.zenzap.co/>.
- We have reviewed the purposes of our processing activities and selected appropriate lawful basis (or bases) for each activity. We have included information about both the purposes of the processing and the lawful basis for the processing in our privacy policy.

- **Privacy principles.** When collecting and processing personal data, Zenzap has taken into consideration the seven key principles:
 - (i) Lawfulness, fairness and transparency,
 - (ii) Purpose limitation,
 - (iii) Data minimization,
 - (iv) Accuracy,
 - (v) Storage limitation,
 - (vi) Integrity and confidentiality (security), and
 - (vii) Accountability.
- **Data Processing Agreement.** We drafted a Data Processing Agreements (DPAs) under GDPR requirements for signature with our customers upon request. Consider what personal data you are using on our platform (if any) and, if required, reach out to privacy@zenzap.co to execute our DPA.

Security.

- We reviewed our security measures and defined and implemented internal policies and procedures to ensure that information within the organization is protected at an appropriate level as needed – including Documented Information (Data Retention Policy).
- Zenzap provides training and awareness among its employees about key GDPR requirements.
- Zenzap has processes for external and internal information security risk management that seeks to identify, assess and address risks using a risk treatment plan to implement recommendations and decisions. The risk assessment methodologies utilized include:
 - SOC2 type 2, Security Framework
 - AWS Well Architected Framework
 - We make sure that we regularly review our information security policies and measures and improve them when necessary.
 - We understand the requirements of confidentiality, integrity, and availability for the personal data we process.
 - We conduct regular testing and reviews of our measures to ensure they remain effective, and act on the results of those tests where they highlight areas for improvement
- **Response to data requests.** We receive and respond to requests to grant access, correct or to information data made by our customers through our customer success or the relevant account manager, in a timely manner.

Data transfers.

- Zenzap staff. Our staff sits in Israel. Israel was declared by the European Commission as a country that offers adequate level of data protection (see: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).
- Other vendors and partners. We only share personal data that is subject to the GDPR with vendors and partners who, like Amazon Web Services, have announced that they will comply with the GDPR and have undertaken to do so.

Ongoing compliance. We are not approaching GDPR compliance as a one-time exercise. Therefore, we are committed to periodically review our roadmap and ensure ongoing compliance.

Where can I learn more about GDPR? Additional information about GDPR is available on the European Commission's website here (http://ec.europa.eu/justice/data-protection/reform/index_en.html/).

I have more questions. Who should I contact? If you have any additional questions about our privacy compliance, you are welcome to contact us at privacy@zenzap.co.

Disclaimer: The information in this document may not be construed or used as legal advice about the content, interpretation or application of any law, regulation or regulatory guideline. Customers and prospective customers must seek their own legal counsel to understand the applicability of any law or regulation on their processing of personal data.

