## General Data Protection Regulation

# STACHANOV PRIVACY STATEMENT

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## INTRODUCTION

This is an overview of how Stachanov uses, stores, and processes information about you. This includes your choices as you use Stachanov applications. Your company, organisation, or other providing entity ("Company") has subscribed to these. This document does not cover the use of personal data outside of the subscribed product.

Your Company has subscribed to Stachanov applications. This document does not change terms of the business agreement with your Company, or between your Company and reseller. This document intends to provide extra information to you about Stachanov applications. Your Company is a data controller in the sense of the data protection laws. And Stachanov a data processor. Your Company should answer any questions about how Stachanov applications process data about you.

## PERSONAL DATA

"Personal data" means any information relating to you that is:

- Entered by your Company
- Entered on behalf of your Company
- Entered by your Company's authorised users
- Supplied to or accessed by Stachanov to provide support.

In general, personal data in Stachanov applications consist of the following categories:

- Name, age, gender, e-mail address, financial information, account data for connected services
- Organisational information, such as employee identification, payroll, cost centre, associated approvers information
- Mobile data, such as mobile device information and location data
- Data for associated connected services to support for example payment needs

Which categories of information Stachanov applications collect about you, depends on two factors:

- Which Stachanov applications your Company has subscribed to
- The configuration of the applications by your Company

You provide personal data when you enter it in Stachanov applications. Other users, such as account administrators, may create an account on your behalf or may provide personal data. This will occur only with permission of your Company.

Stachanov applications may get personal data from other sources as well. Your Company contracts or governs these sources. We may collect personal data from:

- Back office financial systems
- Human resources systems

By using Stachanov applications, some information is automatically collected. This includes data such as:

- IP-address
- Device or devices used
- Browser information
- Clickstream information

We use this for insight in usage and activity. We also use this to provide technical support. Stachanov applications may use tracking technologies to get this information. This could include cookies or third-party analytics tools

#### HOW PERSONAL DATA IS USED

Stachanov applications will use personal data for:

- Enabling you to use and connect to Stachanov applications
- Providing, operating, hosting, maintaining, connecting, and improving Stachanov applications
- Processing and completing transactions in Stachanov applications, such as creating and submitting reports
- Providing customer service and support
- Understanding how clients configure and use Stachanov applications
- Understanding how we can improve the user experience to the benefit of all users
- Investigating and preventing fraudulent transactions, unauthorised access, or other illegal activities

### CHOICES YOU HAVE ABOUT PERSONAL DATA

Certain parts of Stachanov applications offer choices about what data we collect, how we use it, and with which third parties we share it. These choices may be available through "Settings" in your Stachanov applications-profile. This depends on your subscription.

You may refuse the use of cookies. You do this through appropriate settings in your browser. Disabling cookies does mean that some functionality may not be available to you. Stachanov aims to limit the use of cookies or "Analytics"-services as much as possible.

## HOW PERSONAL DATA IS SHARED

Personal data about you in Stachanov applications is available to:

- Your Company
- Other users, persons, or third parties to which your Company chooses to provide access.
- Business partners
- Service vendors
- Authorised third-party agents
- Contractors as required by the subscription of Stachanov applications
- To investigate, prevent, and act on illegal activities, suspected fraud
- In situations involving potential threats to the physical safety of any person
- In case of violations of agreements

To respond to instructions as required by law and authorities

Stachanov does not sell or lease your personal data to third parties for marketing purposes. We would need your permission to do so.

### HOW PERSONAL DATA MAY BE TRANSFERRED TO THE UNITED STATES

Stachanov applications do not transfer data to the United States. We can only do this if the contract support this. Moreover, you must give consent. Also, we will pseudonymise and encrypt your personal data. Stachanov will be the controller of the decryption keys.

### RIGHTS FOR CERTAIN USERS

Stachanov applications adhere to European Union data protection laws<sup>1</sup>. You have the following rights:

- Where we process your personal data with your consent, you can withdraw your consent for future processing
- The right to request rectification or erasure of your personal data
- The right to receive a copy of your personal data in a usable format
- The right to object to the processing of your personal data under certain circumstances
- The right to lodge a complaint with an applicable data protection authority

You must contact your Company if you want to exercise any of these rights.

## SECURITY AND RETENTION OF PERSONAL DATA

Stachanov applications use appropriate standard security technology. Organisational measures to protect personal data from unauthorised disclosure are in place. Stachanov will keep personal data in active databases. The duration depends on the subscription and applicable legislation.

## **UPDATES AND QUESTIONS**

If Stachanov changes this privacy statement, we will post the changes. Stachanov may do this at any time and without notice. If you have questions or concerns about this privacy statement, you contact first your Company. If you do not get a satisfactory answer, you may ask the Stachanov account manager or write to support@stachanov.com.

<sup>&</sup>lt;sup>1</sup> The EU GDPR: https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=NL