

ZONE MEDIA OÜ PRIVACY POLICY

This privacy policy (hereinafter the “**Privacy Policy**”) governs how Zone Media OÜ (hereinafter „**Zone**”/”**us/we/our**”) gathers and uses personal data. We always aim to protect the privacy of our client’s and other data subjects (together herein after “**you**”). Please read this Privacy Policy as it contains important information about the processing of your personal data. If you do not wish for your personal data to be processed as described in the Privacy Policy, you must not use our service nor website.

This Privacy Policy applies to all of our services and to our online activities incl., processing in connection to our website and social media.

If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us.

1. DEFINITIONS

Definitions are terms often used in the Privacy Policy. Definitions are defined in this Section of the Privacy Policy or in the text of the Privacy Policy.

- 1.1 Personal data protection terms have the same meaning as defined here or in the General Data Protection Regulation (2016/679) (hereinafter the “**GDPR**”).
- 1.2 Terms that are not defined in the Privacy Policy nor the GDPR are defined in our terms and conditions (see on our website “[Contracts and Terms of Use](#)”).
- 1.3 **Client** means the legal person or natural person using our Service.
- 1.4 **Cookies** mean data files stored in the Visitor’s device upon visitation of the Website according to the selection made. More information about the use of Cookies by us can be found via the Cookie solution on our Website.
- 1.5 **Contract** means any contract entered into between us and a Client or any other data subject, incl. terms of use.
- 1.6 **data subject** means a natural person regarding whom we have information or information that can be used to identify a natural person.
- 1.7 **personal data** means any information relating to an identified or identifiable natural person i.e., data subject.
- 1.8 **Privacy Policy** means this text, which sets out our principles of personal data processing.
- 1.9 **Service(s)** means services offered by us, e.g., server room services, domain name registration services.
- 1.10 **Usage Data** means data about usage of our Service and Website i.e., data about usage of our Service and Website incl. technical data about device used, information about browser used, IP address, the pages of our Service visited, the time and date of the visit, the time spent on those pages, unique device identifiers and other diagnostic data and logs.
- 1.11 **Visitor** is a person visiting our Website.
- 1.12 **Website** means our website accessible via <https://www.zone.ee/en/> and all its subdomains and where applicable also refers to our social media pages.

2. GENERAL INFORMATION AND CONTACT DETAILS

Here you will find when the Privacy Policy applies, information about who we are, and how to contact us.

- 2.1 **About us.** We are a private limited company Zone Media OÜ, business registry code 10577829, address Lõõtsa 5, 11415 Tallinn, Estonia, general email info@zone.ee. We are a company offering different server solutions and domain name registration.
- 2.2 **Contacts.** You can contact us in matters related to personal data processing by e-mailing our data protection officer at dataprotection@zone.eu .
- 2.3 **About the Privacy Policy.** The Privacy Policy applies to personal data processing done by us. We have the right to unilaterally amend this Privacy Policy. We will notify the data subject of all important material changes on the Website or otherwise.
- 2.4 **About the Controller-Processor statuses.** We offer our Service to our Clients and by doing so we may need to process personal data of our clients' customers' and other data subjects'. We do not define the purpose of the processing of personal data nor decide what personal data is processed by our Clients, e.g., when a Client uses our server room services. For such cases we are the processor of personal data and our Clients are the controllers. We are controllers of personal data when processing personal data of our Client's (if natural person) or our Client's employees' and representatives' when providing our Service(s) (e.g., doing accounting, providing customer support).
- 2.5 **Other links/apps etc. Please note,** that the links on our Website may lead to media that is governed by privacy terms of the respective service providers', and not by this Privacy Policy. We are not responsible for anything on those other websites. Processing of your personal data on our social media channels by providers of those platforms is done according to the privacy terms of relevant platform.

3. PRINCIPLES OF PERSONAL DATA PROCESSING

Here you will find the key principles that we are always guided by when processing your personal data.

- 3.1 **Compliance and aim.** Our aim is to process personal data in a responsible manner where we are able to demonstrate the compliance of personal data processing with the purposes set and the applicable regulations.
- 3.2 **The principles.** All our processes, guidelines and activities related to personal data processing are based on the following principles: lawfulness, fairness, transparency, purposefulness, minimisation, accuracy, storage limitation, integrity, confidentiality, and data protection by default and by design.

4. INFORMATION WE PROCESS

Here you can find categories of data subjects and personal data we process.

- 4.1 **Categories of Data Subjects.** Generally, we may process personal data of the following data subjects:
 - (a) our Client's (if natural person) and
 - (b) our Client's representatives and employees;
 - (c) representatives of our cooperation partners;
 - (d) our employees or contractors;
 - (e) Website Visitors;

(f) our Client's clients and other data subjects.

4.2 Collection of Personal Data. We collect the following types of personal data:

- (a) Personal data disclosed to us by the data subject (e.g., data submitted for the purpose of entering into contract or obtaining information about our Service(s). Usually – name, contact details, e-mail address, data sent or made available to us on our social media by the data subject);
- (b) Personal data resulting from standard communication between us and the data subject (e.g., correspondence regarding the Service(s));
- (c) Personal data resulting from the consumption and use of Service(s);
- (d) Personal data resulting from visiting and using the Website;
- (e) Personal data obtained from third parties (e.g., when verifying identity of the Client);
- (f) Personal data provided to us by our Client when Client uses our Service(s) (Zone is a processor);
- (g) Personal data generated and combined by us (e.g., correspondence within the context of Client relationship, user activity analytics).

4.3 Data we process as a Controller. As a controller we mainly process the following personal data:

- (a) About Visitors – data gathered from use of Website incl., by Cookies (if enabled);
- (b) Our Client's representatives or Client (if natural persons) identification data – name, date of birth, ID-code, ID document data and copy (if used for identification), position and authorisation;
- (c) Client's and representatives' contact data – e-mail, phone nr, address, server user names;
- (d) Client's and representatives' Service usage and preferences data – language preferences, Usage Data, Contract data (incl., service plan), billing information;
- (e) Client's and representatives' communications - communications with us (sms, chats, calls);
- (f) Client and representatives on video recording (if any) e.g., when they visit our premises (they on the surveillance recording);
- (g) Client's payment behaviour data – payments and claims data gathered in the course of accounting;
- (h) Client's and representatives' other data – e.g., provided in satisfaction surveys in feedback.

We are **not** controllers for personal data inserted to our systems by our Clients and their representatives in their own service provision (e.g., data on their servers, incl., files, logs etc.).

Contact us if you need more precise information on your personal data processing. **Please note** that in case where we are the processor, we redirect you to your data controller if you have provided us with necessary information.

5. GENERAL PURPOSES, GROUNDS FOR, AND ACTIVITIES OF PROCESSING

Here you will find information about the purposes and grounds for processing of your personal data.

5.1 Consent. Based on consent, we process personal data precisely within the limits, to the extent and for the purposes for which the data subject has given their consent. The data

subject's consent must be freely given, specific, informed, and unambiguous, for example, by ticking the box on the Website. Please note that you have the right to withdraw your consent at any time. Withdrawal of consent will not influence the rightfulness of personal data processing done under the consent before the withdrawal of the consent.

5.2 **Entry into and performance of a Contract.** Upon entering into and performing a Contract, we may process personal data for the following purposes:

- (a) taking steps prior to entering into a Contract, which are necessary for entering into a Contract or which the data subject requests (e.g., data marked at clause 4.34.3.1(b), c and e are used);
- (b) identifying you to the extent necessary for entering into and performing a Contract or taking steps to enable usage of our Service (e.g., data marked at clause 4.34.3.1(b), c and e are used);
- (c) performing the obligations assumed (e.g., billing) (e.g., data marked at clause 4.34.3.1(b), c and d are used);
- (d) communicating with you, incl. sending information and reminders about the performance of the Contract or about the usage of the Service (e.g., data marked at clause 4.34.3.1(b), c, d and e are used);
- (e) protection of rights and claims (depending on the data all gathered data may be used);
- (f) to detect, prevent and address technical issues (depending on the issue all gathered data may be processed);
- (g) to provide customer support (mainly data marked at clause 4.34.3.1(b) and e are used);
- (h) to provide and maintain our Service, incl. monitor usage of our Service and Website (mainly Usage Data is used, but all data may be processed);
- (i) to notify you about changes to our Service or to give you other Contract/Service related notice (mainly data marked at clause 4.34.3.1(b) and c are used).

Please note that exact purpose and grounds may also be defined in the terms and conditions and/or Contract.

5.3 **Legal obligation.** We process personal data to comply with a legal obligation in accordance with and to the extent provided by law. For example, obligations from Cybersecurity Act when reporting or investigating an incident; obligation to retain accounting documents from Accounting Act.

5.4 **Legitimate interest.** Our legitimate interest means our interest in managing or directing our activities and enabling us to offer the best possible Service. In case we are using legitimate interest, we have previously assessed our and your interests. You have the right to see conducted assessment connected to processing of your personal data. We may process your personal data (except special categories of personal data) based on legitimate interest for the following purposes:

- (a) **managing and analysing a client database and Service** (if not covered with the Contract) to improve the availability, functions and quality of Service(s), e.g., using a CRM or analytics solutions to enable the foregoing (mainly identification data and contact data is used);
- (b) **development of our Service and Website** (mainly anonymous; however, depending on the development all data may be used);
- (c) **ensuring a better client/user experience**, to provide higher quality Service(s); we may monitor the usage of our Service and Website, analyse identifiers and personal data collected when our Website, Service, our social media pages and

other sales channels are used, and we may collect statistics about Clients, users and Visitors; and Usage Data may be processed;

- (d) **organizing campaigns**, incl. organising personalised and targeted campaigns. The terms and conditions of campaigns are set out separately;
- (e) **sending offers/information to the Client or potential client** if the respective person has previously purchased or shown interest in a similar product, and if such processing is allowed in respective jurisdiction. In this case, the person is always guaranteed to have a simple opportunity to resign from the communication, and we have considered our and the (potential) client's interests;
- (f) **conducting satisfaction surveys** and measuring the effectiveness of marketing activities performed (contact data is used and service usage general data e.g., what service what package);
- (g) **making recordings and logging**; we may record messages and orders given both in our premises and using means of communication (e-mail, phone etc.) as well as information and other activities we have performed. If necessary, we use these recordings to prove orders or other activities;
- (h) **technical and cyber security reasons**, for example measures for combating piracy and ensuring the security of the Website as well as for making and storing back-up copies and preventing/repairing technical issues (depending on the issue all data may be processed);
- (i) **processing for organisational purposes**, foremost for management and processing of personal data for internal management purposes (but also audits and other potential supervision), including for processing the personal data of Clients or representatives (mainly general service usage and Client data);
- (j) **establishing, exercising or defending legal claims**, incl. assigning claims to, for example, collection service providers, or using legal advisors (depending on the claim/issue all data may be processed);
- (k) If you have given us information about not sending you a certain type of information – retaining the information about such prohibition.

5.5 **New purpose.** Where personal data is processed for a new purpose other than that for which the personal data are originally collected or it is not based on the data subject's consent, we carefully assess the permissibility of such new processing. We will, in order to ascertain whether processing for a new purpose is compatible with the purpose for which the personal data are initially collected, take into account, inter alia:

- (a) any link between the purposes for which the personal data are collected and the purposes of the intended further processing;
- (b) the context in which the personal data are collected, in particular regarding the relationship between the data subject and us;
- (c) the nature of the personal data, in particular whether special categories of personal data are processed or whether personal data related to criminal convictions and offences are processed;
- (d) the possible consequences of the intended further processing for data subjects;
- (e) the existence of appropriate safeguards, which may include encryption or pseudonymisation.

6. **TRANSFER AND AUTHORISED PROCESSING OF PERSONAL DATA**

Here you will find information about the transfer and authorised processing of personal data.

- 6.1 **Usage of cooperation partners.** We cooperate with persons to whom we may transmit data, including personal data, concerning the data subjects within the context and for the purpose of that cooperation. We may have different type of controller-processor-sub-processor relationships with those cooperation partners. When transferring personal data to third parties (generally our cooperation partners), we comply with the applicable data protection requirements.
- 6.2 **Requirements for the usage of cooperation partners that are our (sub-)processors.** Such third parties may include, among other, advertising and marketing partners, payment service providers, customer satisfaction survey companies, advisers, IT partners, i.e., service providers for various technical services, provided that:
- (a) the respective purpose and processing are lawful;
 - (b) personal data is processed pursuant to the instructions of the controller and on the basis of a valid contract.
- 6.3 We are using following co-operation partners: <https://zone.ee/static/Zone-EE-2023-06-Personal-Data-Processing-ENT.pdf>.
- 6.4 **Other transfers.** In other cases, we may transmit your personal data to third parties provided that we have your consent or a legal obligation or there is an exception in the event that the transfer is necessary to protect your vital interests.
- 6.5 **Transfers outside the EEA.** Please note, that our server rooms are in EU. But for our other activities, we may use service providers/co-operation partners from outside EEA. Such transfer is only commenced if requirements from the GDPR Chapter V are met (e.g., adequacy decision or EU SCC). We usually use EU standard contractual clauses for transferring your personal data outside of the EEA. We will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information. You can find more information under our (sub-)processor list (see clause 6.3).
- 6.6 **Other disclosures.** We may disclose personal data also on the following cases:
- 6.6.1 **For Law Enforcement.** Under certain circumstances, we may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities. We always assess the lawfulness of information requests before disclosing any personal data.
 - 6.6.2 **For Information Security Reasons.** If it is necessary and proportionate for ensuring network and information security by public sector authorities, Computer Emergency Response Teams (CERT), Computer Security Incident Response Teams (CSIRT), providers of electronic communications networks and services, and providers of security technologies and services.
 - 6.6.3 **For Business Transactions.** If we or our subsidiaries are involved in a merger, acquisition or asset sale, your personal data may be transferred.

7. STORAGE AND SECURITY OF PROCESSING PERSONAL DATA

Here you will find a description of how we protect your personal data and for how long we store personal data.

- 7.1 **Storage.** If we are the controller of personal data, we comply with the purpose of processing, limitation periods for potential claims in the event of filing claims, and storage periods provided for in the law. We store personal data as long as need depending on the purpose of the processing. Client data is generally retained, for the duration of the period of validity of the Contract and additional 3 years for protection of possible claims. Certain personal data is stored depending on the requirement deriving from applicable law e.g., 7 years accounting data, 10 years data of employment contracts. Personal data for which the storage period has expired are destroyed or made anonymous. Personal data for which we are processor are retained as instructed by the controller.
- Please note** that data that is retained on our servers by our Client will be deleted in the end of Client relationship (there is a 14 day backup).
- 7.2 **Security measures.** We have established guidelines and rules of procedure on how to ensure the security of personal data through the use of both organisational and technical measures. Zone systems aligned with the ISO27001:2014 standard. Among others, we do the following to ensure security and confidentiality:
- (a) We have access-level management system in use;
 - (b) We process the personal data transferred to us only for the purpose and to the extent necessary for providing the Website and/or Services; and other purposes laid out in this Privacy Policy;
 - (c) we use software solutions that help ensure a level of security that meets the market standard.
- 7.3 **Incident.** In the event of any incident involving personal data, we do our best to mitigate the consequences and alleviate the relevant risks in the future. We will follow notice requirements of the GDPR.

8. GDPR DATA PROTECTION RIGHTS

Here you can read about your rights in connection to your personal data.

- 8.1 We would like to make sure you are fully aware of all of your data protection rights. Every data subject is entitled to the following rights (under certain preconditions):
- (a) **The right to access** – you have the right to access and to request copies of your personal data.
 - (b) **The right to rectification** – you have the right to request that we correct any information that is inaccurate.
 - (c) **The right to erasure** – you have the right to request that we erase your personal data, under certain conditions (e.g., we are processing your personal data under your consent).
 - (d) **The right to restrict processing** – you have the right to request that we restrict the processing of your personal data, under certain conditions (e.g., we are processing your personal data under consent).
 - (e) **The right to object to processing** – you have the right to object to our processing of your personal data, under certain conditions (e.g., we are processing your personal data under legitimate interest).
 - (f) **The right to data portability** – you have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

- (g) **Rights related to automated processing** and profiling mean that the data subject, on grounds relating to their particular situation, has the right to object at any time to the processing of personal data concerning them based on automated decisions/profiling and to require human intervention. The data subject may also require an explanation regarding the logic of making an automated decision. For avoidance of doubt, even though our solution uses automatic processing (and AI), we do not use automated processing or profiling that has a significant effect on the data subject or their rights.
- (h) **The right to file a complaint** – you have the right to file a complaint with us or supervisory authority or court if you think that your rights in connection to personal data have been infringed. **We kindly ask you to contact us first for finding a solution.** If needed our data protection supervisory authority is Office of Data Protection Inspectorate (Andmekaitse Inspektsioon) contacts can be find: <https://www.aki.ee/en/contacts>.

8.2 **Responses and additional information.** If you make a request connected to personal data processing, we have one month to respond to you. If you would like to exercise any of these rights or need more information on your rights, please contact us. Please note, that we may need to identify you before granting you any of the rights connected to your personal data.

9. CHILDREN'S INFORMATION

9.1 We as controllers do not knowingly collect any personal data from children under the age of 18. If we find out that we have obtained data of children, we will delete such data immediately or seek approval from legal guardian or parent. In case where we are a processor all grounds for processing derive from our Client.

10. CHANGES

10.1 The latest changes and entry into force of the Privacy Policy:

Publication	Entry into force	Key changes
June 2023	June 2023	1 st version of new Privacy Policy; previous privacy policy can be found here: https://www.zone.ee/en/terms-of-use/privacy-notice/