

# Privacy Policy

## PRIVACY NOTICE

(November 1<sup>st</sup>, 2023)

Breeze and its affiliates (“Breeze”, “we”, “us”) contributes to the success of its clients through the provision of payroll reporting software services.

For the expansion of our business and to perform our duties, we consider the protection of Personal Data/ Information (ahead referred to as “Personal Data”) to be of vital importance.

This notice was formulated to inform you how we process your Personal Data both as the Controller (meaning the entity that defines the purpose and scope of Personal Data Processing Activities) and as a Processor (acting under the instructions of a Controller), while observing applicable Personal Data Protection legislation requirements; plus, which rights assist you under those laws and how you can exercise them; and additionally to show our commitment to information security and our promise is to abide by the rules set forth below.

**Please take a few minutes to read and understand it.**

**Updating this Privacy Notice**

Breeze reserves the right to modify this Privacy Notice at any time by posting an updated version on its websites. Such versions shall take effect from the date of posting (published above at the top of this notice).

### **What laws do we comply with?**

This Privacy Notice is provided to you in accordance with the following applicable Personal Data Protection laws (as they may apply to the purpose and scope of our Personal Data Processing Activities) for these are, at present time, the most stringent in terms of protecting you and assuring your legal rights:

- Japan's Act on the Protection of Personal Information (Act No. 57 of 2003 or APPI) which came into effect in 2003, had an adequacy decision from the European Commission (EC) in 2019 with regards to the GDPR and the most recent amendment in 2020.
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, also known as the General Data Protection Regulation (the GDPR).
- Directive 2009/136/EC of the European Parliament and of the Council of 25 November 2009, also known as the ePrivacy Directive, Directive 2002/58/EC concerning the Processing of Personal Data and the protection of privacy in the electronic communications sector and Regulation (EC) No 2006/2004 on cooperation between national

authorities responsible for the enforcement of consumer protection laws.

- The California Consumer Privacy Act 2018 (CCPA) as amended by the California Consumer Privacy Rights Act (CPRA).
- Other applicable national laws.

**Note:** Although not equivalent, there are some Personal Data Protection laws being enforced around the globe which have been taken into account by Breeze while doing its adequacy process towards complying with this type of legislation (specially where those natural persons whose Personal Data is under Processing by us), however the above-mentioned laws still represent a more stringent or specific set of requirements. Some examples are: LGPD (Brazil); POPIA (South Africa); PIPEDA (Canada); PDPA (Singapore).

### **Technical and operational safeguards**

We are aware that Processing Personal Data may represent a risk to you if the data is accessed by unauthorized third parties. Breeze's IT landscape is configured and monitored under guidance provided by the strictest security market standards (e.g., ISO 27000 family, Soc2, ITIL, Privacy by Design) and we have developed a set of policies, operational processes, and mechanisms to ensure that the Personal Data entrusted by you to us will be processed in a manner that guarantees to the maximum possible extent, (having regard to the

current state of technical knowledge) its security, accuracy, confidentiality, and privacy.

Personal Data is exclusively Processed under the scope and purpose of the services described in this Privacy Notice.

### **Your data is under your control.**

Every natural person (no exception) maintains full control over their Personal Data (and, where applicable, that of their children if minors), as well as over the Personal Data Processing Activities undertaken by Breeze (as defined under applicable national Personal Data Protection Legislation or the GDPR, whichever is stricter). Please refer to the below legal rights that assist you under this set of laws.

### **Breeze's Data Protection Officer (DPO) contact information:**

All questions or requests regarding the Processing of Personal Data under Breeze's control may be addressed to Breeze's Data Protection Officer.

Ms. Rui Wang

Country: Japan

Email: [rui@breezehr.com](mailto:rui@breezehr.com)

### **Accessory Processing of Personal Data**

When you use a Breeze website, a session cookie file may be placed on your browser; please check that you have set your preferences in the cookie management tool.

You should be aware that, in some cases, the data collected in this way may make it possible for third parties to identify an individual who has accessed the website. You should disable non-essential cookies if you wish to avoid this.

Breeze only uses cookies that record information about the IT architecture and landscape of the device being used by the visitor (e.g., browser, device, etc...).

## **Your data rights under the law**

Under applicable Personal Data Protection Legislation, you have the following rights in respect of your Personal Data:

**Right of access.** The right to obtain from us confirmation as to whether your Personal Data is being processed, and, if so, to access such Personal Data as well as related information. You may exercise this right by reviewing information on the Breeze website user account area or by submitting a request to our Data Protection Officer.

**Right to rectification.** The right to obtain the rectification of inaccurate Personal Data. Participants may exercise their right by submitting a request to our Data Protection Officer.

**Right to erasure.** The right to have your Personal Data that is processed by Breeze erased and, therefore, to have Processing stopped, unless a legal duty or a Legitimate Interest to retain certain data prevents Breeze from observing such right, in which case the data subject shall be duly informed. This right may be exercised by submitting a request to our Data Protection Officer.

**The right to restrict Processing.** This is the right to request and impose Processing restrictions (in scope and purpose) for your Personal Data. This right may be exercised by submitting a request to our Data Protection Officer.

**The right to object to Processing.** The right to object to Processing Activities that have been qualified under this Privacy Notice as arising under the legal basis of Legitimate Interest on the part of Breeze. This right may be exercised by submitting a request to our Data Protection Officer.

**Right to opt out of sales/ sharing of Personal Data** – We do not sell your data, under any circumstances.

**Right to data portability.** The right to receive your Personal Data in a structured, commonly-used and machine-readable format as well as the right to transmit them to another controller without obstacle. This right may be exercised by submitting a request to our Data Protection Officer

**Right to be informed about a Personal Data breach.** You have the right, and it is our obligation to ensure it, to be informed of any unauthorized disclosure or potential disclosure of your Personal Data to unauthorized third parties within 72 hours of the occurrence of such disclosure or knowledge by Breeze of potential disclosure, as the case may be.

**Right to lodge a complaint with a supervisory authority.** The right to lodge a complaint regarding Breeze's processing activities in relation to Personal Data with any of the European Union Member States' data protection Supervisory Authorities as well as your local Supervisory Authority if you are located outside of the European Union. You can find a list of the European Union Member States; data protection Supervisory Authorities here [Our Members | European Data Protection Board \(europa.eu\)](#).

**Right to be free from discrimination.** You may exercise any of the above rights without fear of being discriminated against. For any of the above-mentioned CCPA/ CPRA related rights, you may designate an authorized agent to make a request on your behalf.

You may exercise your rights under applicable Personal Data Protection Legislation by contacting Breeze's Data Protection Officer through the e-mail address: [rui@breezehr.com](mailto:rui@breezehr.com)