



PRIVACY NOTICE

2024-04-23

Breeze Global, Inc. and its affiliates (“Breeze”, “we”, “us”) contributes to the success of its clients through the provision of payroll reporting software services via <https://app.breezehr.com> a Payroll reporting platform which Corporate Clients may use as a Cloud-based SaaS solution.

For the operation of our business and to perform our duties, we consider the protection of personal data/information (“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 ("CPR").
- Other applicable national laws.

Note 1: Although not equivalent in scope and stringency to the laws identified above, there are some other Personal Data Protection laws being enforced around the globe which have been taken into account by Breeze while executing its adequacy process towards complying with this type of legislation (especially where those natural persons whose Personal Data is under Processing by us). Some examples are: LGPD (Brazil); POPIA (South Africa); PIPEDA (Canada); and PDPA (Singapore). Even though we take these into account, the laws identified above represent a more stringent or specific set of requirements and are the laws that may be most relevant to you.

What entitles Breeze to undertake the Processing of Personal Data pertaining to you?

There are two contexts in which Breeze will Process Personal Data pertaining to third-party natural persons:

- Breeze processes the Personal Data, such as the name, role, email address and other types of data, of certain team members of its prospective Corporate Clients when it

reaches out to these representatives in a business-to-business setting. In this case, Breeze undertakes such Processing under Legitimate Interest for the Purpose and within the Scope of conveying Breeze's services to another organization via its authorized representatives/stakeholders, hence not violating their Rights and Freedoms under relevant Personal Data Protection legislation.

- Breeze Processes Personal Data by allowing Corporate Clients to upload their payroll information so its SaaS platform can process such information in accordance with the services provided to the Corporate Clients. This Processing takes place under the legal basis of Fulfilling a Contractual Obligation.

Note 2: Breeze does not engage in automated processing of Personal Data.

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.

Personal Data Protection legislation ensures that those natural persons whose Personal Data is under Processing by third-party entities maintain full control over such Processing activities. In cases where Breeze acts under a Contractual Obligation towards



a Corporate Client, once a natural person exercises his/her Rights under applicable Personal Data Protection laws, we shall inform the Corporate Client of such interaction or request. It is the responsibility of the Corporate Client under the law to provide Breeze with a response with respect to the natural person's exercise of his/her rights and to instruct Breeze on how to proceed with interaction or request. If we have reasonable doubt regarding the identity of a natural person who submits a request to Breeze regarding their Personal Data, we may request additional information as necessary to confirm the identity of such natural person making the request before we take any actions.

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.

Mr. Rui Serrano

Country: Portugal

Email: dpo@breezehr.com

Your rights under Personal Data Protection law:

As determined by applicable Personal Data Protection Legislation, you have the following rights in respect to the Processing of Personal Data pertaining to you:

Right of access. The right to obtain confirmation as to whether your Personal Data is being processed, and, if so, to access such Personal Data as well as related information.

Right to rectification. The right to obtain the rectification of inaccurate Personal Data.

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 obligation or motive of Legitimate

Interest prevents it, in which case the data subject shall be duly informed.

The right to restrict Processing. This is the right to request and impose Processing restrictions (in scope and purpose) regarding the Personal Data that pertains to you.

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.

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.

Right to be informed about a Personal Data breach. If you reside in the European Economic Area of the UK, 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, where Breeze is not Processing Personal Data pertaining to you under the Legal Basis of fulfilling a Contractual Obligation towards a Corporate Client; in such case the obligation lays with the Corporate Client. In other geographies, this Right may also exist under local applicable Personal Data Protection legislation, yet the timeline for information will differ.

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: dpo@breezehr.com