



## Privacy Policy

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Effective Date: February 2, 2023

### Purpose

The purpose of this policy is to provide information about how ZEN-BIO collects, uses, shares, and safeguards the personal information it gathers from people who use our website, contact us by phone or email, or through a third party contractor or website.

ZEN-BIO is concerned about its users and protection of their private information. Accordingly, ZEN-BIO has created this Privacy Policy that applies to the services offered by ZEN-BIO, including its website and third-party contracted services.

### Scope

This policy is applicable to all ZEN-BIO employees, contractors, temporary workers, volunteers, interns and consultants.

### Definitions

As described below, ZEN-BIO may collect the following categories of personal information ("PI" or "Personal Information"). We may add to the categories of personal information we collect. In that case, we will update this policy.

- A. PERSONAL IDENTIFICATION INFORMATION. Real name, alias, postal address, email address, phone number, account name or similar identifiers.
- B. COMMERCIAL INFORMATION. Services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- C. OTHER ELEMENTS. Name, signature, characteristics or description, address, telephone number, education, employment, employment history, bank account number, credit card number.
- D. PROFESSIONAL OR EMPLOYMENT-RELATED INFORMATION

### Policy

ZEN-BIO's privacy policy is intended to be made available to the public to inform users of the type of personal data collected, its use and their rights related to its use. The public policy is located at the end of this document.

## **Employee Responsibilities**

All employees must ensure that they read, understand and comply with this policy.

Data privacy is the responsibility of all employees. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their Supervisor **OR** the Company President or a member of the Management Team as soon as possible if they believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

## **How to Raise a Concern**

Employees are encouraged to raise concerns about any issue or suspicion at the earliest possible stage. If you are unsure whether a particular act constitutes a breach in privacy, or if you have any other queries or concerns, these should be raised with your Supervisor **OR** the Company President or through ZEN-BIO's Whistle Blower Policy.

## **Training and Communication**

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy.

## **Responsibility for this Policy**

The Company Management Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all employees comply with it.

The Company President has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

## **Monitoring and Review**

The Company President will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in maintaining proper data privacy.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company President.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

## **ZEN-BIO, Inc. Privacy Policy**

This privacy policy explains how our organization uses the personal data we collect from you when you use our website, contact us by phone or email, or through a third party contractor or website.

### **Topics:**

- What data do we collect?
- How do we collect your data?
- How will we use your data?
- How do we store your data?
- Marketing
- What are your data protection rights?
- What are cookies?
- How do we use cookies?
- What types of cookies do we use?
- How to manage your cookies
- Privacy policies of other websites
- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authorities

### **What data do we collect?**

ZEN-BIO may collect the following data:

- Personal identification information (Name, email address, phone number, etc.)
- Commercial information. (Services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.)
- Other elements. (Name, signature, characteristics or description, address, telephone number, education, employment, employment history, bank account number, credit card number.)
- Professional or employment-related information

### **How do we collect your data?**

You directly provide ZEN-BIO with most of the data we collect. We collect data and process data when you:

- Register online or place an order for any of our products or services.
- Phone and email communications.
- Visits to our location or attendance at one of our events.
- Social media interactions on our websites and other third party websites.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser's cookies.

ZEN-BIO may also receive your data indirectly from the following sources:

- Interactions with third party vendor sites that contract with us to fulfill orders or services.

### **How will we use your data?**

ZEN-BIO collects your data so that we can:

- Process your order and manage your account.
- Email you with special offers on other products and services we think you might like.
- Process applications of candidates for open positions at ZEN-BIO.
- Provide the information, services or support you request and related after-sales services.
- Identify you, and to contact you from time to time with product or service updates.
- Send other messages that are useful to the service we provide.
- Manage our relationship with you and to carry out any related administration.
- Promote our services, events, conferences, or the services, events, conferences of our partners, including by email, telephone and via social media platforms.
- Compare information for accuracy, and verify it with third parties.
- Detect, investigate and prevent activity we think may be potentially illegal, unlawful or harmful and to enforce our Privacy Policy and/or our terms or any other purpose referenced herein or therein.
- Carry out research, including market research, statistical research on website traffic, sales and other commercial information to assist us in improving the services we provide to you and tailor the website(s).

ZEN-BIO will not share your data with other companies so that they may offer you their products and services unless specifically directed by you.

When ZEN-BIO processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

### **How do we store your data?**

ZEN-BIO takes what we consider to be reasonable technical and organizational measures to guard against unauthorized or unlawful processing of your Personal Information and against accidental loss or destruction of, or damage to your Personal Information. While no system is completely secure, we believe the measures implemented reduce ZEN-BIO's vulnerability to security problems to a level appropriate to the type of data involved. We have security measures in place which are designed to protect our user database and access to this database is restricted internally. In the course of handling your Personal Information, ZEN-BIO takes measures reasonably designed to protect that information from loss, misuse, unauthorized access, disclosure, alteration or destruction.

ZEN-BIO will keep your Personal Information for as long as we think it necessary for processing purposes for which they were collected, processed and/or used and any other associated purposes (for example certain transaction details and correspondence may be retained until the time limit for claims in respect of the transaction has expired or in order to comply with regulatory requirements regarding the retention of such data). Therefore, if information is used for two purposes we will retain it until the purpose with the latest period expires; but we will stop using it for the purpose with a shorter period once that period expires.

ZEN-BIO restricts access to your Personal Information to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs and your Personal Information that is no longer needed is either irreversibly anonymized (and the anonymized information may be retained) or securely destroyed.

## **Marketing**

ZEN-BIO would like to send you information about products and services of ours that we think you might like.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop ZEN-BIO from contacting you for marketing purposes.

If you no longer wish to be contacted for marketing purposes, please contact [information@zenbio.com](mailto:information@zenbio.com).

## **What are your data protection rights?**

ZEN-BIO would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- **The right to access** - You have the right to request ZEN-BIO for copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification** – You have the right to request that ZEN-BIO correct any information you believe is inaccurate. You also have the right to request ZEN-BIO to complete information you believe is incomplete.
- **The right to erasure** - You have the right to request that ZEN-BIO erase your personal data, under certain conditions.
- **The right to restrict processing** - You have the right to request that ZEN-BIO restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** - You have the right to object to ZEN-BIO's processing of your personal data, under certain conditions.
- **The right to data portability**- You have the right to request that ZEN-BIO transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: [information@zenbio.com](mailto:information@zenbio.com)

Call us at: +1 919-547-0692

Or write to us: ZenBio Inc., 3920 South Alston Ave, Durham, NC 27713

## **Changes to our privacy policy**

Our Company keeps its privacy policy under regular review. This privacy policy was last updated on 2 February 2023.

## **How to contact us**

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

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