

# Datanational Corporation HR Data Privacy Policy

Datanational Corporation respects your privacy and believes you should be informed about how we collect, use and store information on persons including those from the European Economic Area ("EEA"). This Privacy Policy describes our practices regarding how we use and store any Personal Information (as defined below) that you choose to provide us via our websites. Datanational also hosts and manages Enterprise Resource Planning (ERP) systems for our manufacturing and distribution industry client base. Datanational does not collect personal information or process transactions for our hosted ERP clients. We manage a secure environment for our client systems to operate, where our clients access and run their applications and store their own manufacturing and distribution system data.

In support of the General Data Protection Regulation (GDPR) we have determined to treat all data stored on our hosted and/or managed systems as HR data. Datanational Corporation does not process, transform or access client systems or data for its own use, nor share client data with Business Partners or Vendors.

In certain situations, Datanational Corporation may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Datanational Corporation commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to human resources data transferred from the EU in the context of the employment relationship.

## Request for Access to and Ability to Delete Personal Information:

You may request Personal Information stored in our system (previously submitted by you via information request form), to be removed from our system by submitting a deletion request via email to us at <Privacy@Datanat.com>. We may need to request additional Information from you (for security purposes) in order to verify your identity in relation to your request for deletion of information. If you wish to modify information you previously provided to Datanational Corporation, you have the option to first request existing information to be deleted and then submit new information via one of our online information request forms.

After proper identification as the owner of the Personal information, you may request a copy of the information stored on Datanational's system to be provided to you in a CSV format. After proper identification as the owner of the Personal information, you may request your personal information to be deleted from Datanational's system. Once we have processed your request, we will confirm verification that your Personal information has been deleted from our systems.

You may request access to or request a change to Personal Information you feel may be stored in one of our client systems via email request to us at <Privacy@Datanat.com>.



We will forward your request to our client who owns that system, and has the responsibility to reply to your request.

## Request for Limiting the use and disclosure of Personal Information:

You may request that data provided by you via one of our online information request forms to be limited in its use and to not be disclosed to anyone in our organization who does not need to have the information in order to fulfill your request for information. Simply mention the one time use of the information submitted in your request in the "Message" section of our form. Your personal information will be promptly deleted after fulfilling your request for information.

You may also request the limited use and disclosure of your Personal Information via email request to us at <Privacy@Datanat.com>. At our discretion, we may choose to delete your personal information submitted via information request form to ensure your request for limitation is fully executed without further concern.

## Data Privacy:

Our goal is to respect your privacy. Datanational is committed to resolve complaints about our privacy or data collection. If you have any issues or have suggestions on how we can improve our policies, please contact us, free of charge, at <a href="mailto:privacy@datanat.com">privacy@datanat.com</a>. If you do not receive a timely acknowledgment of your inquiry or complaint, or if your complaint is not satisfactorily addressed, please contact our U.S.-based third party dispute resolution provider.

Under certain conditions, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

For more detailed information regarding HR Data Privacy rights of a member of the EEA please visit https://edpb.europa.eu/guidelines-your-rights en.

If you wish to contact the European Data Protection Agency in your country, you will find them listed at the following URL: https://edpb.europa.eu/about-edpb/board/members\_en.

#### Data collection on Datanational's websites:

We may collect certain domain information in order to improve and customize your experience on our site(s). Specifically, Datanational may collect the following types of information when you agree to accept cookies on the Datanat.com or Datanational-affiliated websites:

- Usage data, collected via Google Analytics, such as IP address, web browser type/version, operating system and datanat.com website visit information such as date, time and pages viewed.
- 2. Click-through information related to Datanational emails and banner advertisements.
- 3. Information you provide directly to us via submitted form, including personally identifiable information, when you complete an online registration form for offers, events, user groups, online meetings, demos, etc. or submit an inquiry via email, direct mail, or over the phone.
- 4. Aggregate, non-personally identifiable information, such as the number of weekly visits or page views to a Datanational or Datanational affiliated websites.

**Note:** Datanational does not provide an option for submitting a resume' online on any of its websites.

## Use of Cookies on our websites:

A "cookie" is a small text file that is transferred to your browser and stores information about your interactions with our websites. A cookie is then read by the web server that placed it on your browser. It works as a sort of identification card, storing your preferences and recalling previously entered information on that site. By using cookies, your navigation time is reduced and use of a website is simplified.

Datanational uses two types of cookies:

- A "session" cookie is temporary and is deleted once you close your browser. Session cookies are used to help a user's browser navigate a website more smoothly and may show up if the user comes from a website with which the subsequent website has some relationship (e.g., an affiliated Datanational website).
- 2. A "persistent" cookie is more permanent and is stored on the hard drive of your computer. Persistent cookies are used to customize a website for a user and are capable of providing websites with user preferences, settings and information for future visits. Persistent cookies provide convenient and rapid access to familiar objects, which enhance the user experience. As described in the following section, users are asked if they wish to accept cookies before using our website(s) and can easily opt out of this option.

A cookie cannot be executed as code or deliver viruses. Datanational uses both session and persistent cookies to collect and store information that allows us to offer better service and ensure easy navigation through our website(s). At your first landing on one of our websites, you are asked whether you want to accept a cookie. In most cases, if you do not accept the cookie, you are still able to use our sites.

You also have the option of setting your browser to reject cookies. In most cases, if you do not accept the cookie, you are still able to use our web sites.



Our sites may link to sites that provide chat rooms, forums, message boards, feedback forms, web logs, "blogs", news groups and/or other public messaging forums available to its users. Please remember that any information you disclose in these areas becomes public information. You should always exercise caution when deciding to disclose your personal information in any public forums.

#### General:

Datanational may use usage data in aggregated form to:

- 1. Measure the website's performance and activity as well as improve the website's design and functionality.
- Analyze statistical and general information to best understand how our visitors
  use the website. We also use collected information to investigate and prosecute
  attempted security violations.

## **Datanational Online Communications:**

Datanational will use personally identifiable information you have elected to provide to us via a submitted form, such as name, title, company, and email or other address, to communicate special promotions, events and announcements. This information may also be used to provide the products or services requested, respond to support needs, and/or provide additional information regarding Datanational products or services. If you do not wish to receive future promotional information and material from Datanational, you are offered the option to opt-out of upcoming email communications.

Please note that we do not knowingly solicit information from children nor do we knowingly market our products and services to anyone under the age of 16.

### Information Sharing and Disclosure (Onward Transfer):

Datanational values your business and strives to protect your privacy. Datanational will never sell or provide your information to list brokers or similar mass marketing entities. If you choose to purchase a product or service through Datanational Corporation, we may need to provide your personal contact information to a Vendor or Supplier in order to properly register your hardware, software or maintenance purchase. Datanational Corporation is responsible for this processing of personal data it receives, and will provide adequate safeguards for the transfer of personal information to the United States from the European Economic Area.

Datanational Corporation maintains responsibility for the processing of personal information it receives and subsequent transfers to a third party acting as an agent on its behalf. If personal information is provided by Datanational Corporation to an agent, we shall remain liable if said agent processes such personal information in a manner



inconsistent with Privacy Principles, unless Datanational Corporation proves that it is not responsible for the event giving rise to the damage.

## Marketing communications and website links:

Datanational provides the opportunity to opt-out of receiving its communications whenever we request personal information from you and when you receive material from us.

Datanational may provide links to Internet sites maintained by others. Datanational does not review such third-party websites in their entirety and is not responsible for the contents of or any products or services offered by such third-party sites. Datanational encourages you to read the privacy statement of every website you visit whether the site is linked to our website or not.

Datanational provides these links to you as a convenience and the inclusion of any link does not imply our endorsement of the linked site or our acceptance of any responsibility that arises as a result of your use of the site.

## Data Protection:

To prevent unauthorized access, maintain data accuracy and ensure the correct use of information, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information stored on our systems.

Datanational is based solely in the United States of America. We operate (or operate systems within) Private Secured Data Centers where we manage and protect client systems and data. Datanational does not store data or host systems outside of the US. By providing information via our website, you are consenting to the transfer of information from your country of origin to our systems where it will be protected within Private Secured Data Centers in the US.

All current Datanational Corporation employees are US Citizens and are solely based in the United States. In order to minimize risk, we severely limit access to data center facilities and systems. In addition, access to client systems in our Private Secured Data Center is only provided to those Datanational employees with a requirement for support from our clients. All facilities are secured at all times.

If a future Employee were to join our organization who is a citizen or resident of the European Economic Area, they have the opportunity to access a current copy of our HR Data Privacy Policy on our EU Employee Intranet.

All Datanational Corporation employees are provided third party system security training and certification regardless of their position in the company. All new Datanational employees are required to sign an Identity Theft policy along with a yearly acknowledgment process which is documented for all employees. All new Datanational



Employees are required to sign a Non-disclosure/Secrecy Agreement which is also renewed and acknowledged yearly.

**Note:** Datanational may modify or update this Privacy Statement at any time without prior notice. If there is a material change to this Privacy Policy, we will post a notice on our main page for 60 days, indicating that our policy has been updated and provide a link to the newly updated policy. We encourage you to check this Statement often so that you are aware of how we are protecting your personal information.