

# Privacy Policy of Zentra

**Last update: July 27, 2021**

This Privacy Policy describes how Zentra OÜ (“Zentra,” “us,” “we,” or “our”) is committed to protecting and respecting your privacy in connection with your use of our mobile application (“App(s)”), website [www.myzentra.com](http://www.myzentra.com) (the “Website(s)”), and other products, services and features thereof (the Website, the Apps and such other products, services and features are collectively referred to herein as the “Product” or “Products”, which may be updated from time-to-time at the sole discretion of Zentra). This privacy policy (“Privacy Policy”) and any other documents referred to herein set forth the basis on which any personal data we collect from you, or that you provide to us, in connection with the Products will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will collect, use and disclose your personal data. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact us at [connect@myzentra.com](mailto:connect@myzentra.com).

## Collection of Information

When you register for your account, use our Services, purchase our Products and communicate with us we might collect and process the following information:

- Personal data including, for example, your name, e-mail address, password, and in certain instances, telephone number, address, feedback and survey responses, your payment method information, data about your usage of our Products and other data you provide in connection with your usage of the Products.
- Transactional Information: When you make a purchase or return the Product, we collect information about the transaction, such as product description, price, subscription or free trial expiration date, and time and date of the transaction. Zentra does not collect or process credit or debit card (“Payment Card”) data. Apple and Google collect Payment Card data with respect to in-app purchases made through the Apps.
- Device information such as operating system version, device type, and system performance data.

- Facebook, Apple and Google profile information, such as name, email address, Facebook ID and profile picture, Apple ID and profile picture and Google ID and profile picture, if you choose to log in to the Products through Facebook, Apple or Google.
- Data collected via other technologies as fully described in the “Tracking Technologies” section.

## Confidentiality and Security

Please know that the security of your personal data is very important to us. We follow generally accepted standards to protect your personal data submitted to us, both during transmission and once it is received. If you have any questions about the security of your personal data, you can contact us at [connect@myzentra.com](mailto:connect@myzentra.com). Except as described under the “Disclosure of Your Data” section below, we do not provide your personal data to any third party without your specific consent, as defined by applicable law.

## Use of Information

We use the information we collect to:

- Provide, maintain and improve our Services, including debugging to identify and repair errors, develop new products and service and ensure that content provided by the Products is presented and delivered to you in the most effective manner;
- Process transactions and fulfill orders;
- Communicate with you about products, services, and events offered by Zentra, request feedback, and send news, gifts or other information we think will be of interest to you;
- Send you transactional or relationship messages, such as receipts, account notifications, customer service responses, and other administrative messages;
- Allow you to participate in interactive and customised features of our Products, when you choose to do so;
- Monitor and analyze trends, usage, and activities in connection with our Services for constant further improvement;
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of Zentra and others, including to enforce our agreements and policies;

- Personalize your online experience and the advertisements you see on other platforms based on your preferences, interests, and browsing behavior; and
- Facilitate contests and promotions and process and deliver rewards.

## Newsletters and Other Electronic Communications

If you sign up to receive promotional materials from us via email and/or push notifications we will use the data you give us to provide the communications you have requested. If you inform us that you wish to cancel email promotional materials by selecting “unsubscribe” at the bottom of such communication or by emailing us at **connect@myzentra.com**, we will remove you from our mailing list. If you no longer wish to receive push notifications, you may turn them off at the device level.

## Tracking Technologies

Zentra and our analytics partners may use technologies such as cookies, beacons, tags, and scripts to enable a service to recognize your device so you don't have to provide the same data several times during one task, to recognize that you may have already given a username and password so you don't need to do it for every web page requested, and to measure how people are using the Products.

We partner with third parties, such as Facebook and Google, to manage our advertising of the Products on other sites or platforms as well as across your other devices based on your past visits to our Website. Our third party partners may use technologies such as cookies to gather data about your activities within the Products to deliver such advertising to you, such as retargeting ads.

Zentra may use third party trackers to let us know when users have visited the Products by “clicking-through” our sponsored advertising or content hosted on third party platforms. The Products use Google Analytics code to gather statistical data. Google Analytics sets cookies to help us accurately estimate the number of visitors to the Products and the volumes of usage of the Products. This is done to ensure that the Products are available when you want them and are fast. For more data on how Google Analytics processes this data, visit [www.google.com/analytics](http://www.google.com/analytics).

## Mobile Analytics

Zentra may use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record data such as how often you engage with the Products, the events that occur within the Products, aggregated usage and performance data, and where the Applications were downloaded from. We may link the data we store within the analytics software to any personal data you submit within the mobile application.

## Log Files

As true of most websites, we may gather certain data automatically and store it in log files. This data may include Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data.

If you receive the HTML-formatted version of our email newsletter, your opening of the newsletter is notified to us and saved. Your clicks on links in the newsletter are also saved. These and the open statistics are used in aggregate form to give us an indication of the popularity of the content and to help us make decisions about future content and formatting.

## Where We Store Your Data

All data you provide to us through the Products is stored on secure servers located in the US and the European Union. All payment data is stored with our payment processor and is never stored on Zentra's servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Products, you are responsible for keeping this password confidential. We ask you not to share a password with anyone, and suggest that you change your password frequently.

Unfortunately, the transmission of data via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Products; any transmission is at your own risk. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorized access.

## Accessing Zentra Through Our Partners

Zentra is also offered through partnerships with other organizations. When our Partners (“Partner(s)”) wish to make Zentra available to their members, employees and their families, patients, customers, residents or others they may offer to use the Products through a code, credential, or other means of registration furnished by a Partner. In such cases the Partner may have access to your name, email address, the date you registered to use the Products, and the date on which you last used the Products.

## Access to and Deletion of Personal Data

Upon request, Zentra will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information, please email **connect@myzentra.com**. You may access your personal information to modify or update at any time via an online account, or by emailing **connect@myzentra.com**.

To request the deletion of your personal data that we have on file please email us at **connect@myzentra.com**. Zentra can permanently and irrevocably anonymize your data such that it can never be reconstructed to identify you as an individual. We will respond to your request in a reasonable timeframe.

## Disclosure of Your Data

We may disclose your personal data to third parties as follows:

- In some circumstances, based on your specific requests, we may need to disclose your personal data to a third party so that it can provide a service you have requested from such party, or fulfill a request for data from such party.
- In some circumstances, we may disclose the personal data that you have provided to Zentra to a third party that offers and/or provides goods or services complementary to our own for the purpose of enhancing our users’ experiences by offering you integrated or complementary functionality, complementary services or bundled pricing options.
- In some limited circumstances, our email service provider may receive certain information you share in-app to provide you with personalized email communications.

- If Zentra's service providers (like hosting, IT maintenance, market analytics, and payment service providers) require this data to provide services to Zentra. Zentra requires each of its service providers to agree to maintain the confidentiality and security of your personal data.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Zentra or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation such as to comply with a subpoena, bankruptcy proceedings, similar legal process, or in order to enforce or apply our agreements with you; or to protect the rights, property, or safety of Zentra, our customers, or others. This includes exchanging data with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- With third parties, such as Facebook, in order to serve Zentra advertisements on such third party platforms, to the extent that you have consented to such practices under applicable law.

## Withdrawal of Consent for Processing Activities

To the extent that you have provided appropriate consent under applicable law to certain processing activities, such consent can be withdrawn at any time by emailing [connect@myzentra.com](mailto:connect@myzentra.com).

## Data Retention

Zentra retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Services, Apps and Products or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

## Links to Third Party Sites

The Products may, from time to time, contain links to and from the Products of our partner networks, advertisers and affiliates. If you follow a link to any of these external websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their policies. Please check these policies before you submit any personal data to these external websites.

## Social Media Widgets

Our Products include social media features and widgets, such as the “Share This” button. These features may collect your Internet protocol address, which page you are visiting on or Products, and may set a cookie to enable the feature to function properly. Social media features and widgets are hosted by a third party or hosted directly on our Products. Your interactions with these features are governed by the privacy statement of the company providing it.

## Health apps

Mobile users, including Apple iOS and GoogleFit and Google users may opt-in to allow the Products to provide personal data regarding the use of Zentra, such as the amount of minutes and the number of times listened to the tracks to the health apps found on their mobile devices. This data will not be shared with third parties or used for marketing purposes.

## Use of Zentra by Minors

You must be 18 years of age, or the age of majority in your province, territory or country, to sign up as a registered user of the Products. Individuals under the age of 18, or the applicable age of majority, may utilize the Products only with the involvement of a parent or legal guardian under such person's account.

# Changes to Our Privacy Policy

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our website homepage or sending you a notification). We encourage you to review the Privacy Policy whenever you access the Services or otherwise interact with us to stay informed about our information practices and the choices available to you.

## Contact

If you have any questions about our practices or this Privacy Policy please contact us at **[connect@myzentra.com](mailto:connect@myzentra.com)**.