

## PRIVACY POLICY PLUGIN MYNDOOR PER SLACK

We have created this **Privacy Policy**, pursuant to Art. 13 of European Regulation 679/2016, so that our users can better understand their rights over their **Personal Data** and to ensure **compliance of data processing under the General Regulation on the Protection (hereinafter also "GDPR") of Personal Data.**

This **Privacy Policy** covers our data collection practices and describes your rights to access and correct your personal data or to limit its use, with express reference to the plugin developed by Myndoor (hereinafter also "**Application**") for the Slack software.

We remind you that by using our services you accept the terms of this **Privacy Policy, if you do not intend to accept our Privacy Policy we kindly ask you not to use our services.** Myndoor is not responsible for further processing carried out by its customers and/or business partners or for any additional data requested.

### Art. 1 - DATA CONTROLLER

1. The owner of the data processing is: **Myndoor S.r.l.**, with registered office in via Aldo Moro 3/5, Rosate (MI), 20088, VAT 12097060961, represented by Mr S. **Francesco Finazzi**, hereinafter also **Owner**, e-mail: [info@myndoor.it](mailto:info@myndoor.it).

### Art. 2 - TYPE OF DATA COLLECTED

1. Myndoor is a software that analyzes users' textual conversations in order to obtain certain information on the emotional state (in particular the levels of "anger", "fear", "joy", "sadness" and "stress" are detected, hereinafter also **Emotional Parameters**) and return a report on the general level of well-being.
1. The **Application** does not require specific personal data for the purpose of operation, however these may incidentally be recorded as they are autonomously entered by the **interested party** within the conversations.
2. In particular, also in the context of the activity referred to in Article 2, paragraph 2, the data indicated in the following table may be collected:

<u>Registration data</u>	<u>Registration data</u>
<u>Processing data</u>	The Application uses an artificial intelligence model to analyze the textual contents of the messages sent by the Data Subject within Slack. This data is processed to evaluate the <b>Emotional Parameters</b> of users. The analysis data, being information fully and discretionally provided by the user, may include:- <u>Common data: such as, by way of example, name and surname, e-mail, telephone number, place and date of birth, residence.</u> <u>- Categories of particular data</u> , pursuant to Article 9 of EU Regulation no. 697/2016. These data are however analyzed anonymously and <u>not</u> stored by the <b>Application</b> .
<u>Usage data</u>	We collect anonymous data regarding the use of the <b>Application</b> , such as the number of messages analyzed and the stress assessments generated.

### Art. 3 - LEGAL BASIS OF THE PROCESSING

1. The aforementioned personal data will be processed by the **Data Controller** for the following purposes:
  1. fulfill the technical requirements necessary for the provision of the requested services;
  2. comply with any legal obligations;

3. ascertain, exercise or defend any right in court;
1. The legal basis of the processing for the purposes under a) is Article 6.1. letters a) and b) of the **GDPR**.  
The legal basis of the processing for the purposes sub c) is art. 6.1. lett. c) of the **GDPR**.  
The legal basis of the processing for the purposes sub d) is Article 6.1. letter f) of the **GDPR**.

#### **Art. 4 - PURPOSE OF DATA USE**

1. The processing data is used for the purposes of preventive medicine, diagnosis and care. In particular, the data will be used for the purpose of evaluating the **Emotional Parameters** aimed at identifying the levels of general well-being or stress of the **interested party**. These **Emotional Parameters** will be identified through the analysis of the textual contents entered by the interested party within Slack, as part of the daily work activity.
1. The evaluations referred to in Article 4, paragraph 1 above are provided to the user as a result of the analysis carried out on the texts.
2. Finally, we use usage data to improve the performance and effectiveness of the Myndoor Application, as well as for research and development purposes.

#### **Art. 5 - DATA SHARING**

1. Your **Personal Data** will not be disseminated except in the event that their communication or dissemination is required by virtue of legal provisions or orders of the Authorities, acting in their capacity as independent data controllers.
2. Your **Personal Data** may be disclosed to service providers strictly related and functional to the activity of the Data Controller, who typically act as data processors pursuant to art. 28 of the **GDPR**. The complete list can be requested at any time to the Data Controller by writing to the addresses indicated above.
3. Your **Personal Data** may be processed by employees of the company departments responsible for pursuing the aforementioned purposes, who have been expressly authorized to process and who have received adequate operating instructions in compliance with the provisions of art. 29 of the **GDPR**.

#### **Art. 6 - DATA SECURITY**

1. We have implemented appropriate security measures to protect the analyzed data and usage data from the risk of unauthorized access, disclosure or alteration.
2. The results of the analysis on emotional levels are shared only with the user who authorized the installation of the **Application**.
3. The processing data are not saved by the **Application** and are used only as functional material for the creation of the analyses.

#### **Art. 7 - NOTE ON MINORS**

1. We do not use the **Application** to knowingly collect data from or to market to children under the age of 14. If a parent or guardian becomes aware that their child has provided information without their consent, they should contact us at **info@myndoor.it**. We will delete such information from our files within a reasonable time.

#### **Art. 8 - RIGHTS OF THE INTERESTED PARTY**

1. As an **interested party**, in addition to the right to lodge a complaint with the Supervisory Authority, it is possible to exercise the following rights, which can be activated with a specific written request to the **Data Controller**:
  1. RIGHT OF ACCESS: the interested party **has the right** to obtain from the **Data Controller** confirmation that personal data concerning him or her is being

- processed and in this case, to obtain access to personal data and information ;regarding the processing
2. **RIGHT OF RECTIFICATION:** The **interested party** has the right to obtain from the **Data Controller** the correction of inaccurate personal data concerning him without undue delay. Taking into account the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, including by providing a supplementary statement;
  3. **RIGHT TO CANCELLATION:** the **interested party** has the right to obtain from the **Data Controller** the **cancellation of personal data concerning him without** undue delay and the **Data Controller** has the obligation to delete personal data without undue delay.
  1. **RIGHT TO LIMITATION OF PROCESSING:** The interested party **has the right to obtain from** the Data Controller the limitation of processing when one of the following hypotheses occurs: i) **the interested party disputes the accuracy of personal data, for the period necessary for the Data Controller to verify the accuracy of such personal data;** ii) **the processing is unlawful and the** interested party opposes the erasure of personal data and calls instead for its use to be restricted; iii) although the **Data Controller** no longer needs it for the purposes of processing, the personal data are necessary for the interested party to ascertain, exercise or defend a right in court; iv) the **interested party** has opposed the processing pursuant to Article 21, paragraph 1, pending verification of the possible prevalence of the legitimate reasons of the **Data Controller** of the treatment with respect to those of the interested party.
  1. **RIGHT TO DATA PORTABILITY:** The **interested party** has the right to receive in a structured format, commonly used and readable by automatic device, the personal data concerning him / her provided to a **Data Controller** and **has the right to transmit such data to another data controller without hindrance by the Data Controller** the processing to which it has provided them. When exercising their rights regarding data portability pursuant to paragraph 1, the **Data Subject** shall have the right to obtain the direct transmission of personal data from one controller to another, if technically feasible.
  2. **RIGHT TO OBJECT:** The **interested party** has the right to object at any time, for reasons related to his particular situation, to the processing of personal data concerning him pursuant to Article 6, paragraph 1, letters e) or f), including profiling on the basis of these provisions.

#### **Art. 9 - DATA RETENTION**

1. The personal data collected will be kept for the period strictly necessary and not exceeding the pursuit of the aforementioned purpose, respecting the principle of minimization referred to in Article 5.1. c) of the **GDPR**, unless a further retention period is necessary, where legally permitted, for reasons of security, protection of company assets, for the exercise of rights in court as well as for reasons of public interest or for the exercise of public authority.
1. Usage data is stored anonymously for statistical purposes and to improve the **Application**.

#### **Art. 10 - CHANGES TO THE PRIVACY POLICY**

1. We may update this Privacy Policy from time to time. If we make a material change to this policy, we will notify you by email. Unless otherwise indicated, changes will take effect from the day of their publication. To the extent permitted by law, if you continue to use the Services after a change becomes effective, your access to and/or use of the Services will be deemed to constitute your acceptance of the revised Privacy Policy

and the obligations arising from it. The modified version supersedes all previous versions of the Privacy Policy.

**Art. 11 - INTERPRETATION**

1. This document must be interpreted in the light of the legislation concerning the collection and processing of personal data in force. In addition, this document shall be construed in conjunction with the Terms of Service.