

Privacy Policy for UpYour Time

Effective Date: July 2025

This Privacy Policy explains how UpYour Time ("we", "our", "us") collects, uses, discloses, and safeguards your information when you use our platform (<https://upyourtime.com>) and related services. We are committed to protecting your privacy and ensuring that your personal data is handled responsibly and in compliance with applicable laws, including the EU General Data Protection Regulation (GDPR).

1. General Information & Who We Are

UpYour Time is a time management and workforce tracking application used by companies to manage timesheets, working hours, and days off.

If you have any questions about this Policy or how we handle your data, you can contact us at:

Company Name & Address:

SC UPDIVISION SRL, Registry Number J2012005578408, CIF: RO30200922, address Bucharest, District 2, Str. Doamna Ghica, No. 20, Building. 4, Floor 7, Apt 87, Room 3 is the controller and responsible for your personal data (collectively referred to as ["UPDIVISION"], "we", "us" or "our" in this privacy policy).

We have appointed a contact person who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise, please contact us at:

Email: office@updivision.com

2. What Data We Collect

We only collect data that is necessary to provide and operate our services. This includes:

- Email address (required to create and manage an account)
- User role (Super Admin, Admin, or User)
- Login credentials (stored securely)
- Usage metadata (such as login timestamps, for internal analytics)

We do not collect sensitive personal data unless explicitly required and agreed upon.

3. How We Use Your Data

We use your data for the following purposes:

- To create and manage your user account
- To provide access to time tracking and company dashboards
- To send necessary service notifications
- To improve our platform's security and performance

- To comply with legal obligations

4. Legal Basis for Processing (GDPR)

Under GDPR, we process personal data based on:

- Contractual necessity: to deliver the services you or your employer have subscribed to
- Legitimate interest: to operate and improve the service, prevent fraud, and maintain security
- Consent: for any optional features (e.g., marketing emails – which we currently do not send)

5. Who Has Access to Your Data

Your data may be accessed by:

- Authorized personnel within your company
- Our internal team for technical support and service operations
- Third-party service providers (only where necessary and with adequate data protection agreements in place)

We do not sell or rent your personal data.

6. Data Retention

We retain your data as long as your account is active or as needed to comply with legal obligations or resolve disputes. You may request deletion of your account and associated data at any time.

7. Your Rights Under GDPR

As a data subject in the EU, you have the following rights:

- **Right to access your data**

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Right to rectification**

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Right to erasure ("right to be forgotten")**

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information

unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Right to data portability**

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Right to restrict or object to processing**

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- **Right to withdraw consent (if applicable)**

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

To exercise your rights, contact us at office@updivision.com.

8. International Data Transfers

If your data is transferred outside the EU/EEA, we ensure appropriate safeguards are in place to protect your privacy.

9. Data Security

We use industry-standard security measures to protect your personal data, including encryption, access controls, and secure hosting environments.

10. Cookies & Tracking

Currently, we do not use tracking cookies for analytics or advertising purposes. If this changes, we will update this policy and request appropriate consent.

11. Changes to This Policy

We may update this Privacy Policy from time to time. Any changes will be posted on this page and take effect immediately upon publication.

12. Contact Us

For any privacy-related questions or concerns, you can contact us at:

Email: office@updivision.com

You also have the right to file a complaint with your local Data Protection Authority.