



DATA COLLECTION PRIVACY POLICY

SoftInWay, Inc.

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 Responsible Unit: Data Privacy Group
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A. Introduction

SoftInWay, Inc (“SoftInWay”, “Company”, or “we”) respects your privacy. This Privacy Policy Statement (“Privacy Policy”) describes the ways we collect information from and about you, and what we do with the information, so that you may decide whether or not to provide information to us. By accessing our website www.softinway.com, or purchasing our products or services, you agree to this Privacy Policy in addition to any other agreements we might have with you. In the event that such agreements contain terms that conflict with this Privacy Policy, the terms of those agreements will prevail. We strive to adhere to all international data privacy laws and regulations, including, without limitation, the European Community General Data Protection Regulation (“GDPR”) and similar regulations in the countries in which we operate and license our software. This policy is designed to adhere strictly to these regulations, and will be modified from time to time to ensure continuing compliance.

B. Credit

This document was created using a template from SEQ Legal (seqlegal.com) and modified by SoftInWay, Inc. (www.softinway.com).

C. Collecting Personal Information

SoftInWay follows the principles of Article 5.1-2 of the GDPR in the types of personal information may be collected, stored, and used:

1. **Lawfulness, fairness and transparency** — Processing must be lawful, fair, and transparent to the data subject.
2. **Purpose limitation** — You must process data for the legitimate purposes specified explicitly to the data subject when you collected it.
3. **Data minimization** — You should collect and process only as much data as absolutely necessary for the purposes specified.
4. **Accuracy** — You must keep personal data accurate and up to date.
5. **Storage limitation** — You may only store personally identifying data for as long as necessary for the specified purpose.
6. **Integrity and confidentiality** — Processing must be done in such a way as to ensure appropriate security, integrity, and confidentiality (e.g. by using encryption).
7. **Accountability** — The data controller is responsible for being able to demonstrate GDPR compliance with all of these principles.



As such, the personal information we may collect and store, in order to meet the minimum purpose of providing the best user experience with our software may include:

1. Information about your computer including your IP address, geographical location, browser type and version, and operating system;
2. Information about your visits to and use of this website including the referral source, length of visit, page views, and website navigation paths;
3. Information, such as your email address, that you enter when you register with our website;
4. Information that you enter when you create a profile on our website—for example, your name, telephone number, email address, interests, educational details, and employment details;
5. Information, such as your name and email address, that you enter in order to set up subscriptions to our emails and/or newsletters or chat with our help desk;
6. Information that you enter while using the services on our website;
7. Information that is generated while using our website, including when, how often, and under what circumstances you use it;
8. Information relating to anything you purchase, services you use, or transactions you make through our website, which includes your name, address, telephone number, email address, and credit card details;
9. Information that you post to our website with the intention of publishing it on the internet, which includes your username, profile pictures, and the content of your posts;
10. Information contained in any communications that you send to us by email or through our website, including its communication content and metadata;
11. Information that you provide in order to download or use our software products including, license type, license version, account numbers, name, email address, company, IP address, geographical location, browser type and version, operating system and other identifying information.
12. Information that you provided in order to access our Technical Support services including, license type, license version, account numbers, name, email address, company IP address, geographical location, browser type and version, operating system and other identifying information.
13. Any other personal information that you send to us.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy



D. Using Your Personal Information

Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website. We may use your personal information for the following:

1. Administering our website and business;
2. Personalizing our website for you;
3. Enabling your use of the services available on our website;
4. Sending you goods purchased through our website;
5. Supplying services purchased through our website;
6. Sending statements, invoices, and payment reminders to you, and collecting payments from you;
7. Sending you non-marketing commercial communications;
8. Sending you email notifications that you have specifically requested;
9. Sending you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
10. Sending you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
11. Providing third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
12. Dealing with inquiries and complaints made by or about you relating to our website;
13. Keeping our website secure and prevent fraud;
14. Verifying compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service); and
15. Other uses.

If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.

Your privacy settings can be used to limit the publication of your information on our website and can be adjusted using privacy controls on the website.

We will not, without your express consent, supply your personal information to any third party for their or any other third party's direct marketing.



E. Disclosing Personal Information

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers, or subcontractors as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information to any member of our group of companies (this means our subsidiaries) as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information:

1. To the extent that we are required to do so by law;
2. In connection with any ongoing or prospective legal proceedings;
3. In order to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
4. In providing feedback and user experience data for improvement of our software and services to our customers;
5. To the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
6. To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this policy, we will not provide your personal information to third parties.

F. International Data Transfers

1. Information that we collect may be stored, processed in, and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
2. Information that we collect may be transferred to the following countries which do not have data protection laws equivalent to those in force in the European Economic Area: the United States of America, Russia, China, and India.
3. Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.
4. You expressly agree to the transfers of personal information described in this Section F.



G. Retaining Personal Information

1. This Section G sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations regarding the retention and deletion of personal information.
2. Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
3. Without prejudice to article G-2, we will usually delete personal data falling within the categories set out below at the date/time set out below:
 1. Personal data type will be deleted 30 days after no response on communication or, if they unsubscribe; and
 2. They explicitly tell us they do not want to be contacted.
4. Notwithstanding the other provisions of this Section G, we will retain documents (including electronic documents) containing personal data:
 1. To the extent that we are required to do so by law;
 2. If we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
 3. In order to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

H. Security of Your Personal Information

1. We will take reasonable technical and organizational precautions to prevent the loss, misuse, or alteration of your personal information.
2. We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
3. All electronic financial transactions entered into through our website will be protected by encryption technology.
4. You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
5. You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

I. Amendments

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you understand any changes to this policy. We may



notify you of changes to this policy by email or through the private messaging system on our website.

J. Your Rights

You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to the following:

1. Personal information will be provided free of charge; and
2. A confirmation email stating the data request must be received from the SoftInWay IT Department of the Marketing Department.

We may withhold personal information that you request to the extent permitted by law.

You may instruct us at any time not to process your personal information for marketing purposes.

In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

K. Third Party Websites

Our website may include hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

L. Updating Information

Please let us know if the personal information that we hold about you needs to be corrected or updated.

M. Cookies

Our website uses cookies. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry



date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies. We use both session and persistent cookies on our website.

1. The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:
 1. We use Google Analytics and Pardot on our website to recognize a computer when a user is searching for specific information, so that we could better tailor the emails they receive, and only provide relevant, and interesting information;
2. Most browsers allow you to refuse to accept cookies—for example:
 1. In Internet Explorer (version 10) you can block cookies using the cookie handling override settings available by clicking “Tools,” “Internet Options,” “Privacy,” and then “Advanced”;
 2. In Firefox (version 24) you can block all cookies by clicking “Tools,” “Options,” “Privacy,” selecting “Use custom settings for history” from the drop-down menu, and unticking “Accept cookies from sites”; and
 3. In Chrome (version 29), you can block all cookies by accessing the “Customize and control” menu, and clicking “Settings,” “Show advanced settings,” and “Content settings,” and then selecting “Block sites from setting any data” under the “Cookies” heading.

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

3. You can delete cookies already stored on your computer—for example:
 1. In Internet Explorer (version 10), you must manually delete cookie files (you can find instructions for doing so at <http://support.microsoft.com/kb/278835>);
 2. In Firefox (version 24), you can delete cookies by clicking “Tools,” “Options,” and “Privacy,” then selecting “Use custom settings for history,” clicking “Show Cookies,” and then clicking “Remove All Cookies”; and
 3. In Chrome (version 29), you can delete all cookies by accessing the “Customize and control” menu, and clicking “Settings,” “Show advanced settings,” and “Clear browsing data,” and then selecting “Delete cookies and other site and plug-in data” before clicking “Clear browsing data.”
4. Deleting cookies will have a negative impact on the usability of many websites.

N. Piracy Prevention Data Collection

Software piracy is the illegal distribution and/or reproduction of software. Purchasing software is actually purchasing a license to use the software. That license spells out how you may legally use such software. Any time someone uses the software beyond the scope of the license, that person



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or company, is violating the license agreement and copyright law. Whether software piracy is deliberate or not, it is still illegal and punishable by law.

To verify user compliance with the terms of the applicable license agreement, identify unauthorized use and users of software, and otherwise to protect and enforce intellectual property rights, SoftInWay uses software audit tools and 3rd party vendor to help determine which of our software products are installed on your machine or network.

We may share your data with our affiliates, as well as our (and our affiliates') contractors (including channel partners), representatives, successors and assigns, in connection with our (and our affiliates') license compliance and anti-piracy efforts, such as sharing data with suppliers of anti-piracy technology, as well as law firms and other enforcement partners and service providers responsible for protecting and enforcing our intellectual property rights. If we find you are not in compliance, SoftInWay and/or our contractors will work with you to acquire the appropriate AxSTREAM® licenses necessary to get back in compliance.

O. Questions about this Policy

Please direct all questions or concerns about this policy to our Data Privacy Officer via email to dpo@softinway.com.