

Privacy Policy

Effective date: June 20, 2022

Privacy Policy describes the manner in which SoftTeco collects, uses, maintains and discloses information collected from users of the <https://softteco.com> website (“Site”).

1. Terminology

Basic concepts used in this Policy:

Protection of personal data - a set of measures (organizational, administrative, technical, legal) to ensure the protection of personal data from unauthorized or accidental access, modification, blocking, copying, distribution, provision, removal of personal data, as well as from other unlawful actions about personal data.

Confidentiality of personal data - processing of personal data, by which the Operator is obliged not to disclose to third parties as well as not to disseminate personal data without the consent of the subject of personal data unless otherwise provided by legislative acts. Personal data is confidential, protected information and is subject to all requirements established by local legal acts of the Operator for the protection of confidential information.

Processing of personal data - any action or series of steps performed with personal data, including collection, systematization, storage, modification, use, depersonalization, blocking, distribution, provision, and removal of personal data.

Operator - a state authority, a legal entity, other organization, individual, including an individual entrepreneur, independently or together with other specified persons, who organize and (or) carry out the processing of personal data.

Personal data - any information relating to an identified individual or an individual who can be identified.

Website - a set of graphic and informational materials, texts, design, video materials, and other results of intellectual activity of the Operator, as well as computer programs, ensuring their availability on the Internet at the network addresses: <https://softteco.com>, other network addresses owned by the Company and containing the corporate name "SoftTeco".

Services are any acts of assistance, products, programs, events, goods, works, and ministrations of the Company.

A personal data subject is an individual in respect of whom the processing of personal data is carried out.

2. Information about your data that we are entitled to receive

We have the right to receive and process the following data:

2.1. The data You provide. You can provide us with information about you by filling out the relevant forms on our Site or by providing us relevant information by phone, email, or otherwise.

This data includes information you provide when you register to use our Site for searching or using the Service or when you report problems on our Site.

Information provided to us may include the following:

- first name, last name, middle name,
- date of birth,
- address,
- contact email,
- telephone number and cell phone number.

We expect You to provide us with this information. However, if you do not want us to know your personal information, you do not have to provide it. Please note that if you do not provide this information, in some cases we may not be able to provide you with the requested Service or another service.

2.2. Information we may collect about You. Each time you visit our Site, through automated means, we may collect the following information:

2.2.1. technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone information, types and versions of browser plug-ins, operating system and platform;

2.2.2. information about Your visit to the Company's website by IP addresses <https://softteco.com>, The Company's Site, other IP addresses, including the full Universal Resource Locator (URL) addresses related to Site views and Site transitions (including date and time); about the products (goods, works, services) that you viewed or searched for; page response times, loading errors, length of time you viewed certain pages, information about your interactions and actions on the page (such as scrolling, clicking and hovering), and the methods used to account for pages viewed, the phone numbers from which the call was made.

3. Purposes of personal data processing

3.1. We use the information we have with Your data for the following purposes:

- to fulfill the Company's obligations arising from contracts entered into between the Company and You;
- to provide you with the requested information, Services, including resolving any disputes, charging and troubleshooting, and solving other problems;
- to provide You with information about other services, products (goods, works, and services) the Company offers, similar to those that You have already purchased or are interested in;
- to monitor and enforce your compliance with the Company's policies and

- rules;
- to provide you with information or allow selected third parties to provide you with information about Services according to the Company may be of interest to you;
 - to notify You of changes to the Company's Services;
 - to provide content from the Site to You and Your computer system in the most efficient manner possible;
 - to administer the Site and perform internal operations, including troubleshooting, analyzing data, testing, conducting research, and performing analytical and statistical evaluations;
 - to improve the operation of the Site;
 - to provide You with opportunities to participate in interactive functions of the Company's Service, if you wish to use them;
 - to ensure the safe operation of the Site;
 - to evaluate the effectiveness of the Company's advertising activities for Your benefit and the benefit of others, and provide You with relevant advertising services, which include evaluating customer satisfaction and conducting similar research;
 - to form suggestions and recommendations for you and other users of the Site regarding Services that may be of interest to you or relevant users;
 - satisfy requests and comply with legal requirements from regulatory organizations or other competent authorities.

3.2. In the case of processing personal data without your consent, the purposes of personal data processing are established by the laws on personal data protection and other legislative acts.

4. General requirements for the processing of personal data

4.1. We process Your data with Your consent, except as required by personal data protection laws and other legislation.

4.2. Consent to the processing of personal data is given by You and (or) Your legal representative by taking appropriate actions on the Site, including, but not limited to, registration in the personal cabinet, subscription to the newsletter, as well as putting a mark by this Policy.

4.3. We process Your personal data:

4.3.1. no longer than the purpose of processing personal data requires, unless otherwise provided by personal data protection laws and other legislation;

4.3.2. with the use of automation and (or) without the use of such means (using a variety of media, including paper);

4.4. Our processing of personal data includes any action or set of actions performed by us with Your data, including collection, systematization, storage, modification, use, depersonalization, blocking, distribution, provision, and deletion of personal data.

5. Disclosure of your information

5.1. We do not sell Your personal information or provide it for use or trade purposes.

5.2. We may grant access to Your information and allow it to be processed to a strictly defined extent and strictly for the specified purposes by designated third parties, including the following from the list:

5.2.1. Business Associate: suppliers, contractors, and implementers in the performance of any contract that we enter into with those entities or with You. This list includes, but is not limited to, air carriers, payment transfer organizations, factoring service providers, logistics service providers, customer support service providers, etc.

5.2.2. Analysts and search engine suppliers who help us improve and optimize our Site.

5.2.3. Technical solution suppliers who provide services related to sending our messages to You (including marketing messages or customer satisfaction surveys (if You consent to receive such information), such as mass mailing list providers, mass texting solution providers).

We may also disclose Your personal data to third parties in the following instances:

5.2.4. If we sell, buy or otherwise transfer any business or assets, in which case we may disclose Your personal data to the prospective seller, buyer, or acquirer of such business or assets.

5.2.5. If our Company or substantially all of its assets are acquired by a third party, in which case the personal data it maintains about its customers will be considered one of the transferred assets.

5.2.6. If we are required to disclose or transfer your data to comply with legal obligations or enforce or apply our Policy or protect our rights, property, or the safety of our customers or others. Data transfer terms include sharing information with other companies and organizations for fraud protection and credit risk reduction purposes.

6. How and where we store Your personal data

6.1. All information You provide to us and we collect about You is stored on secure servers.

6.2. We may transfer personal data cross-border to states that provide adequate protection of the rights of personal data subjects. We may transfer personal data cross-border to foreign countries that do not provide adequate protection of the rights of personal data subjects only with your written consent as the subject of personal data, or if the cross-border transfer is required to fulfill an agreement to which you are a contracting party as the personal data subject.

7. Your rights as a personal data subject

7.1. The right to receive information related to the processing of personal data

You have the right to receive information related to the processing of Your personal data, containing: the name and location of the Operator, confirmation of the fact of personal data processing by us, Your data and its source, legal grounds, and purposes of the processing of Your data, the term for which the consent to process personal data was given, the name and location of the authorized person to whom we transfer Your data for processing.

We will provide the information You requested or notify You of the reasons for refusal to provide it within 5 business days of receipt of Your application.

7.2. The right to receive information about disclosure of personal data to third parties

You have the right to receive information from us about the provision of Your data to authorized persons once per calendar year free of charge.

We will provide, within 15 calendar days of receipt of Your request, information about what and to whom Your personal data was provided during the year previous to the date of application, or we will notify You of the reasons for refusal to provide it.

7.3. The right to change Your personal data

You have the right to request us to amend Your data if it is incomplete, outdated, or inaccurate.

We will amend Your data if it is incomplete, outdated, or inaccurate within 15 calendar days of receipt of Your request.

7.4. The right to demand termination of processing of personal data and/or its deletion

You have the right to request us to stop processing Your data, including deletion, free of charge, if there are no grounds for the processing of personal data.

We will stop the processing of Your personal data within 15 calendar days of receipt of your request,

Please note that termination of processing of Your personal data may make it impossible to provide You further Services of the Company.

7.5. The right to withdraw Your previously given consent to the processing of personal data

If Your consent is the legal basis for processing Your personal data, you can withdraw it at any time. This will not affect the lawfulness of the personal data processing carried out based on Your consent until you withdraw Your consent.

We will, within 15 calendar days of receipt of Your request, cease processing Your data, delete it and notify You thereof.

To exercise one or more of the rights provided for in paragraphs. 7.1 - 7.5 of this Policy, you must send us a request which must contain:

- first name, last name, middle name;
- address;
- date of birth;
- identification number or Your identity document number (if You do not have an identification number), if this information was specified when You gave Your consent or if the processing of personal data is carried out without your consent;

- a statement of the essence of Your claims;
- personal or electronic signature.

The request should be sent to the e-mail address: privacy@softteco.com.

7.6. The right to appeal against actions (inaction) and decisions of the Operator related to the processing of personal data

If You believe that the processing of Your personal data violates legislation in the field of personal data protection, You may complain to the competent authority for the protection of the rights of subjects of personal data.

You may appeal the decision made by the authority responsible for the protection of rights of subjects of personal data in court in the manner prescribed by law.

8. Our responsibilities

As an Operator processing Your data, we are obliged to:

- explain to You Your rights related to the processing of Your personal data;
- obtain Your consent, except as required by law;
- ensure the protection of personal data in the course of its processing;
- provide You with information about Your personal data, as well as provide your data to third parties, except in cases provided by subsequent legislative acts;
- make changes to personal data that are incomplete, outdated, or inaccurate, except in cases where another procedure for making changes to personal data is provided by subsequent legislative acts, or if the purpose of the processing of personal data does not involve subsequent changes to such data;
- terminate processing of personal data, as well as their removal or blocking (ensure the termination of processing of personal data, as well as their removal or blocking by an authorized person) in the absence of grounds for the processing of personal data provided by legislative acts;
- notify the authorized agency for the protection of the rights of personal data subjects about breaches in the personal data protection systems immediately, but no later than three business days from the moment when we became aware of such breaches, except in cases stipulated by the authorized agency for the protection of the rights of personal data subjects;
- modify, block or delete inaccurate or illegally obtained personal data at the request of the authorized agency for the protection of the rights of subjects of personal data, unless other procedure of modification of personal data, their blocking or deletion is stipulated by subsequent legislative acts;
- perform other requirements of the authority for the protection of the rights of subjects of personal data to eliminate violations of legislation on personal data;
- perform other duties provided by legal provisions.

9. Cookies

Our Site uses cookies (identification files stored on your hard drive) to distinguish You from other users of our Site. This helps us improve the user experience when You visit our Site and allows us to improve our Site. We use cookies to analyze the flow of information; customize services, content, and advertising; measure the effectiveness of advertising; to increase trust and security.

Certain cookies contain personal information - for example, clicking "remember me" when you log in will store your username. Most cookies do not collect information that identifies the user, they collect more general information, such as how users visit the Site and use the system or the user's general location.

We offer certain services that are available only through the use of cookies. Cookies typically perform up to four different functions:

9.1. Obligatory cookies

Some cookies are important for the functioning of the system. For example, some cookies allow you to identify registered users and provide access to the entire system. If a registered user does not use these cookies, he or she may not be able to access all of the content of the relevant system.

9.2. Operational cookies

Another type of cookie can be used to analyze how users use the Site and to monitor system performance. This allows us to provide a high-quality user experience by adapting the offer to user requests and quickly identifying and resolving problems that arise. For example, operational cookies may be used to track which pages are popular with users and to determine why certain pages are receiving error messages. These cookies may also be used to identify site products or services of interest to users based on an analysis of their user experience on the System.

9.3. Functional cookies

Functional cookies remember the individual personal preferences of users on the Site.

9.4. Cookies used for advertising purposes based on behavioral targeting

We may use cookies to serve users' needs by offering advertisements that are relevant to them and their interests. We may also use third-party cookies to conduct market research, track revenue, improve Site functionality, and monitor compliance with these terms and conditions and copyright policies.

10. Service Providers

10.1. Analytics tools

We may use analytics tools and other third-party technologies, such as Google Analytics, online chats, etc., to collect non-personalized information in the form of various usage indicators and user metrics when you visit the Site. These tools and technologies collect and analyze certain types of information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, Site usage information, metrics and statistics about various features, usage, and purchase history,

MAC address, unique mobile address, device identifier, and other similar information.

Third-party analytics companies that collect information from our Site and other online products and/or services may combine the information they collect with other information they have independently collected from other websites and/or other online or mobile products and services related to Your activities on their network of websites and online and/or mobile products and services. Many such companies collect and use information with their separate privacy policies.

10.2. Third-party specialized advertising

Periodically, we allow certain third-party companies to help us tailor advertisements that we believe may be of interest to You based on Your use of our Site and to otherwise collect and use data about Your use of our Site. Such third-party services may include Facebook, Google Ads, Microsoft Ads, Instagram, and LinkedIn. These companies may provide advertising that may also host cookies and otherwise track user behavior. These companies, and others like them, may use information about user behavior to provide personalized advertising for various services and products. In the course of providing these services, products, or advertisements, these third-party companies may place or recognize unique cookies on Your computer and may record information in those cookies based on Your activities on the Site and third-party websites. Each of these companies uses cookie information for their privacy and security policies. To opt out of Google's use of such targeted advertising, for example, visit <http://www.google.com/settings/ads>.

10.3. Remarketing

"SoftTeco" uses remarketing services to serve ads on third-party websites after You have visited our Site. We and our third-party vendors use cookies to inform, optimize and serve ads based on Your past visits to our Site.

10.4. Links to other websites

Our Site may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly encourage you to read the privacy policy of each site you visit.

We have no control over and are not responsible for the content, privacy policies, or practices of third-party sites or services.

10.5. Users may refuse cookies at any time if it is provided by their browser, although such refusal may interfere with the use of some systems of the Company. More information on how to disable cookies can be found at this link here (<http://www.allaboutcookies.org/manage-cookies/>).

More information on the use of cookies by commercial organizations can be found here (<http://www.allaboutcookies.org/>).

11. Changes to our Policy

11.1. Any changes that we may subsequently make to our Policy will be posted on our Site and, if appropriate, notified to You by email or other means. All changes are also available in our corporate filing locations. Such changes will be effective when posted. By using the Site after a modified version of this Policy has been posted or after You

place an order with us, You will be deemed to have accepted such changes.

11.2. Ignorance of the provisions of this Policy shall not relieve you from responsibility for failure to comply with the terms contained herein.

12. Collection of personal information about persons under the age of 18

Our Site is not intended for minors under the age of 18, and we do not collect personal information about this category of persons. No minor should provide personal information on the Site. If we determine that we have received such information from a minor without verifying parental consent, we will delete that information. If You believe that we may have any personal information of a minor that is not relevant to the purposes of this policy, please contact us using the "Contact Information and complaint referrals" below.

13. Contact information and referral of complaints

We welcome any questions, comments, and requests about this Policy, which should be sent to the email privacy@softteco.com.

If You believe that we have failed to comply with this Policy, You may report it to the address above. Please describe in as much detail as possible what You believe is non-compliance with this Policy. We will investigate such information as soon as possible.