

# Privacy and Data Protection Policy

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By using our website, you are agreeing to be bound by this Policy.

## Privacy

We know that you are concerned with how we deal with your personal information. This privacy statement sets out our current policies and demonstrates our commitment to your privacy. Our privacy policy may change at any time in the future. You agree to revisit this page regularly and your continued access to or use of the Website will mean that you agree to the changes.

## Purpose of the Data processing

We are required to maintain certain personal data about individuals for the purposes of satisfying our operational and legal obligations. We recognize the importance of correct and lawful treatment of personal data as it helps to maintain confidence in our organization and to ensure efficient and successful outcomes when using this data.

We only use personal information as appropriate to provide you with a high quality of service and security. For example, we may use the information collected from you to verify your identity and contact information. This information helps us improve our services and inform you about new products, services or promotions that may be of interest to you.

Personal data may consist of data kept on paper, computer or other electronic media; all of which is protected under the applicable personal data protection laws.

## Principles of the Data processing

All data is:

- Fairly and lawfully processed;
- Processed for a lawful specified purpose;
- Adequate, relevant and not excessive;
- Not kept for longer than necessary;
- Accurate;
- Processed in accordance with the individual's (data subject's) rights;
- Secure;
- Not transferred to other countries without adequate protection;

## Personal Data We Collect

We may collect and process the following data about you:

- Information that you provide by filling in forms on our Website, in emails, by calls
- Up-to-date data about yourself, if you register your personal details for our service
- Details of your visits to our Website (including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access)

The types of personal data that we may process, for instance, include information about current, past and prospective clients and customers, website visitors, etc. with whom we have dealings. This information includes information required to communicate with you, including your name, mailing address, telephone number, email address, birth date and your location information.

We may also ask you for information when you report a problem with the Website. If you contact us, we may keep a record of that correspondence. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

You have choices about the data we collect. When you are asked to provide personal data, you may decline. You are also entitled to have the Soft-FX erase your personal data, cease further dissemination of the data and potentially have third parties halt processing of the data. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. However, if you choose not to provide data that is necessary to provide a service or feature or to withdraw the data that is still relevant to original purposes of processing, you may not be able to use that service or feature.

The data we collect depends on the context of your interactions with Soft-FX, the choices you make, including your privacy settings, and the service and features you use.

## Use of Cookies

We use cookies to enhance the performance of our Website. (Cookies are small text files sent from the Web server to your computer.) Cookies used by us do not contain any personal information, nor do they contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on.

We may share Website usage information about visitors to the Website with reputable advertising companies for targeting our Internet banner advertisements on this site and other sites. For this purpose, pixel tags (also called clear gifs or web beacons) may be used to note the pages you've visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.

To administer and improve our Website, we may use a third party to track and analyze usage and statistical volume information including page requests, form requests, and click paths. The third party may use cookies to track behavior and may set cookies on behalf of us. These cookies do not contain any personally identifiable information.

### **Reasons We share Personal Data**

We share your personal data with your consent or as necessary to provide any service you have requested. We also share data with Soft-FX affiliates and subsidiaries, with vendors and service providers providing software, IT and other services in order to provide our services to you. We share data with third person and authorities if this is required by law, in respond to legal process, to protect our clients, to maintain the security of our services and to protect the rights or property of Soft-FX.

**Our affiliates and partners.** We may share information with affiliates and partners if the information is required to provide the product or service you have requested, or to provide you with the opportunity to participate in the products or services our affiliates offer. We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our Customers. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful to yourself. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

**Non-affiliated third parties.** We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below.

We reserve the right to disclose your personal information to third parties when required to do so by law to regulatory, law enforcement or other government authorities. We may also disclose your information as necessary to credit reporting or collection agencies. We may also disclose your information to non-affiliated third parties if it is necessary to protect the Soft-FX rights or property.

To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a party with customer's information from our database to help us to analyze and identify customer's needs and notify customers of product and service offerings. Use of the shared information is strictly limited to the performance of the task we request and for no other purpose. All third parties with which we share personal information are required to protect personal information in a manner similar to the way we protect personal information. We use a variety of legal mechanisms, including contracts, to help insure your rights and protections.

## **Restriction of responsibility**

If at any time you choose to purchase a product or service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Policy. We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded Website or to a linked Website, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party, and you should familiarize yourself with the privacy policy provided by that third party.

## **Access to Personal Data**

All individuals who are the subject of personal data held by us are entitled to:

- ask what information we hold about them and why;
- ask how to gain access to it;
- be informed how to keep it up to date;
- have inaccurate personal data corrected or removed;
- to receive the personal data concerning them, which they have previously provided;
- prevent us from processing information or request that it is stopped if the processing of such data is likely to cause substantial, unwarranted damage or distress to the individual or anyone else, etc.;
- require us to ensure that no decision which significantly affects an individual is solely based on an automated process for the purposes of evaluating matters relating to him/her, such as conduct or performance;
- be informed what we are doing to comply with our obligations under the applicable data protection laws.

If you cannot access certain information and personal data collected by Soft-FX, you can always contact Soft-FX Services by using our contact form. We will respond to requests to access or delete your personal data within 30 days.

## **Security of Personal Data**

We maintain strict security standards and procedures with a view to preventing unauthorized access to your data by anyone, including our staff. We use leading technologies to secure your data: hardware and software facilities. The hardware protection includes Cisco security products. The software protection tools include strict control mechanisms as follows: SSL 3, TLS 1.2 with keys equal or larger than 2048-bit. All Soft-FX members, all our staff and third parties whenever we hire them to provide support services, are required to observe our privacy standards and to allow us to audit them for compliance.

## **Where Personal Data is stores and processed**

Personal data collected by Soft-FX may be stored and processed in your region or in any other country where Soft-FX or its affiliates, subsidiaries or service providers maintain facilities. Typically, the primary storage location is in the European Union, with a backup to the data centers in another regions. The storage location(s) are chosen in order to operate efficiently, to improve performance, and to create redundancies in order to protect the data in the event of an outage or other problem. We take steps to ensure that the data we collect under this privacy statement is processed according to the provisions of this statement and the requirements of applicable law wherever the data is located.

We transfer personal data from the European Economic Area to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. When we do, we use a variety of legal mechanisms, including contracts, to help ensure your rights and protections travel with your data.

### **Retention of Personal Data**

Soft-FX retains personal data for as long as necessary to provide the services, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. Because these needs can vary for different data types in the context of different products, actual retention periods can vary significantly. The criteria used to determine the retention periods include, for instance:

- **The period of data processing needed to provide the services.** This includes such things as maintaining and improving the performance of those services, keeping our systems secure, and maintaining appropriate business and financial records. This is the general rule that establishes the baseline for most data retention periods.
- **The data subject's consent for a longer retention period.** If so, we will retain data in accordance with the consent.
- **Soft-FX is subject to a legal, contractual, or similar obligation to retain the data.** Mandatory data retention laws can be applied in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation.

### **Changes to this Privacy Policy**

From time to time, we may update this Privacy Policy. In the event we materially change this Privacy Policy, the revised Privacy Policy will promptly be posted to the websites and we will post a notice on our websites informing you of such changes. You agree to accept posting of a revised Privacy Policy electronically on the Website as actual notice to you. Any dispute over our Privacy Policy is subject to this notice, our Customer Agreement. We encourage you to periodically check back and review this policy so that you will always know what information we collect, how we use it, and to whom we disclose it. If you have any questions that this statement does not address, please contact us via our contact form.

## Contact

If you have a privacy concern, complaint or a question, please contact us via our contact form or call us: +44 (0) 203 519 8716. We will respond to questions or concerns within 30 days.

Unless otherwise stated, Soft-FX Holdings Limited is a data controller for personal data we collect through the services subject to this statement.