



Softcentric Development S.R.L.

PRIVACY POLICY


We consider ensuring the right to the protection of personal data as a fundamental commitment of SOFTCENTRIC DEVELOPMENT, therefore we will dedicate all the necessary resources and efforts to process your data in full compliance with Regulation (EU) 2016/679 ("General Data Protection Regulation" or "GDPR"), as well as with any other legislation applicable on the territory of Romania. As one of the essential principles of this legal framework is transparency, we have prepared this document through which we want to inform you about how we collect, use, transfer and protect your personal data when you interact with us in connection with our products and services, including through our website.

We reserve the right to periodically update and modify this Privacy Policy to reflect any changes in the way we process your personal data or any changes in legal requirements. In the event of any such change, we will display on our website the amended version of the Privacy Policy, which is why we ask you to periodically check the content of this Privacy Policy.

This Privacy Policy regarding softcentric development services ("Privacy Policy") is organized into three sections:

I. The first section (Terms of Data Processing in Personal Information for Services) describes the privacy and security practices that SOFTCENTRIC DEVELOPMENT and its affiliates use to treat Personal Information for services (as defined below) to provide technical support, consulting, cloud or other services ("the Services"), provided to SOFTCENTRIC DEVELOPMENT customers ("You" or "Your") during the period of your order for the Services.

Personal Information for the Services is personal information that is provided by You, resides on the systems and environments of SOFTCENTRIC DEVELOPMENT, customers or third parties and is processed by SOFTCENTRIC DEVELOPMENT on



Your behalf to provide the Services. Personal information for the Services may include, depending on the Services: information about family, lifestyle and social circumstances; details of employment; financial details; Online IDs, such as mobile device IDs and IP addresses, and data from online behaviors and interests from the first entity. Personal information for the services may be correlated with your representatives and end users, such as your employees, job applications, contractors, collaborators, partners, suppliers and customers.

II. The second section (Terms of Data Processing in Systems Operations) describes the privacy and security practices that apply to personal information that may be incidentally included in System Operations Data that is generated through end-user interaction of our Services ("Users") with the SOFTCENTRIC DEVELOPMENT systems and networks used to monitor, protect and deliver the Services to our customer base.


System operations data may include log files, event files, and other tracking and diagnostic files, as well as aggregated statistical information that is related to the use and operation of our Services and the systems and networks on which these Services run.

III. The third section (Communications and notices for customers and users) applies to both Personal Information for services and to the personal information included in the Data in systems operations, describes how SOFTCENTRIC DEVELOPMENT handles legally binding disclosure requests and how it informs you and users about how to communicate with the SOFTCENTRIC DEVELOPMENT Data Protection Officer or how to communicate with the SOFTCENTRIC DEVELOPMENT Data Protection Officer or how to file a complaint.

I. CONDITIONS FOR THE PROCESSING OF DATA FROM PERSONAL INFORMATION FOR SERVICES

SOFTCENTRIC DEVELOPMENT treats all Personal Service Information under the terms of Sections I and III of this Policy and in accordance with the terms of Your order for the Services.

In the event of any conflict between the terms of this Service Privacy Policy and any privacy conditions incorporated in your order for the Services, including a SOFTCENTRIC DEVELOPMENT Data Processing Agreement, the relevant privacy conditions of your order for the Services shall prevail.



1. Performance of the Services

SOFTCENTRIC DEVELOPMENT may process Personal Information for the Services for the processing of activities necessary to provide the Services, including testing and applying new versions, patches, updates and upgrades of products or systems, and resolving bugs and other issues that you have reported to SOFTCENTRIC DEVELOPMENT.

2. Instructions for customers

You have control over the Personal Information for the Services processed by SOFTCENTRIC DEVELOPMENT to provide the Services. SOFTCENTRIC DEVELOPMENT will process your Personal Information and personal services as specified in your order for services and in the additional written instructions documented by you, to the extent necessary for SOFTCENTRIC DEVELOPMENT to (i) comply with the obligations of its processors under the applicable data protection law or (ii) to assist you in complying with your control obligations under the applicable data protection law, relevant to Your use of the Services. SOFTCENTRIC DEVELOPMENT will promptly inform you if, in our reasonable opinion, your instruction violates the applicable data protection law. Additional fees may apply.

3. Rights of individuals

You control access to your Personal Information for services through your end users, and your end users must direct all requests related to their Personal Information for services to you. To the extent that such access is not available to you, SOFTCENTRIC DEVELOPMENT will provide reasonable assistance for requests from individuals to access, delete or remove, restrict, rectify, receive and transmit, block access to or object to the processing of Personal Information for services in softcentric development systems.

4. Security and confidentiality

SOFTCENTRIC DEVELOPMENT has implemented and will maintain the technical and organizational measures designed to prevent accidental or illegal destruction, loss, modification, unauthorized disclosure or access to Personal Information for the Services. These measures, which are aligned with the ISO/IEC 27001:2013 standard that our company complies, govern all security areas applicable to the Services, including physical access, access to systems, access to data, transmission, entry, surveillance and security enforcement.

SOFTCENTRIC DEVELOPMENT employees are obliged to maintain the confidentiality of personal information. Employee obligations include written

confidentiality agreements, regular training to protect information, and compliance with the company's policies regarding the protection of confidential information.

5. Incident management and notification of data violations

SOFTCENTRIC DEVELOPMENT promptly evaluates and responds to incidents that create suspicions or indicate unauthorized access or treatment of Personal Information for services.

If SOFTCENTRIC DEVELOPMENT learns and establishes that an incident involving The Personal Information for the Services qualifies as a breach of security, leading to accidental or illegal hijacking or destruction, loss, modification, disclosure or unauthorized access to the Personal Information for the Services, transmitted, stored or otherwise processed on softcentric development systems, which compromises security, the confidentiality or integrity of such Personal Information for the Services, SOFTCENTRIC DEVELOPMENT will report the breach to you without delay.

As information about the breach is collected or otherwise becomes reasonably available to SOFTCENTRIC DEVELOPMENT and to the extent permitted by law, SOFTCENTRIC DEVELOPMENT will provide you with additional relevant information regarding the breach known or reasonably available to SOFTCENTRIC DEVELOPMENT.

6. Subcontracting

To the extent that SOFTCENTRIC DEVELOPMENT involves third-party subcontractors in order to have access to personal information for services, to assist in the provision of services, these subcontractors will be subject to the same level of data protection and security as SOFTCENTRIC DEVELOPMENT, based on the conditions of your order for the Services. SOFTCENTRIC DEVELOPMENT is responsible for the compliance of its subcontractors with the conditions of Your order for the Services.

7. Deletion or return of Personal Information for services

Unless otherwise specified in an order for services or is required by law, upon termination of the services at your request, SOFTCENTRIC DEVELOPMENT will delete the data of the customers from production, located on the SOFTCENTRIC DEVELOPMENT computers, in a manner designed to guarantee that they cannot be accessed or read reasonably, unless there is a legal obligation imposed on SOFTCENTRIC DEVELOPMENT, that prevents the company from deleting all or part of the data. You can consult with your contact. SOFTCENTRIC DEVELOPMENT for services, for additional information about data deletion, before the services are completed.

II. CONDITIONS FOR THE PROCESSING OF DATA FROM SYSTEMS OPERATIONS

1. Responsibility and purpose of processing personal information

SOFTCENTRIC DEVELOPMENT and its affiliated entities are responsible for processing personal information that may be incidentally included in the Systems Operations Data, in accordance with Sections II and III of this Policy.

We may collect or generate Data from systems operations for the following purposes:

- to help maintain the security of the Services, including security monitoring and identity management;
- to investigate and prevent potential fraud or illegal activities involving our systems and networks, including to prevent cyber-attacks and detect robots;
- to manage our disaster recovery plans and policies with backups;
- to confirm compliance with licensing conditions and other conditions of use (monitoring of license compliance);
- for research and development purposes, including to analyze, develop, improve and optimise our Services;
- to comply with applicable laws and regulations and to conduct our business, including to comply with legally delegated reporting, disclosure or other legal processing requests, for mergers and acquisitions, financial and accounting activities, for archiving and insurance purposes, for legal and business advice, and in the context of dispute resolution.

2. Sharing of personal information

The personal information included in the System Operations Data may be shared throughout the global SOFTCENTRIC DEVELOPMENT organization. A list of SOFTCENTRIC DEVELOPMENT entities is available as indicated above.

We may also share such personal information with the following third parties:

- third-party service providers (e.g. IT service providers, lawyers and auditors) for those service providers to carry out their business functions on behalf of SOFTCENTRIC DEVELOPMENT;
- relevant third parties in the event of a reorganization, merger, sale, joint venture, divestiture, transfer or other arrangement of all or part of our business, fixed assets or stock (including in connection with a bankruptcy or similar proceedings);
- as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights,

to protect your safety, or others, to investigate fraud or respond to government requests, including public and government authorities outside your country, of residence, for the purposes of security and/or application of national legislation.

When third parties are given access to the personal information included in the System Operations Data, we will take appropriate contractual, technical and organizational measures to ensure, for example, that personal information is processed only to the extent that such processing is necessary, in accordance with this Privacy Policy and applicable law.

3. Cross-border data transfers

If the personal information included in the System Operations Data is transferred to a SOFTCENTRIC DEVELOPMENT recipient in a country that does not provide an adequate level of protection for personal information, SOFTCENTRIC DEVELOPMENT will take measures designed to adequately protect information about Users, such as ensuring that such transfers are subject to the conditions of the EU Model Clauses.

4. Security

SOFTCENTRIC DEVELOPMENT has implemented the appropriate technical, physical and organizational measures, according to the SOFTCENTRIC DEVELOPMENT Corporate Security Practices, designed to protect your personal information, against accidental or unlawful destruction or loss, damage, accidental alteration, unauthorized disclosure or access, as well as other forms of unlawful processing (including but not limited to unnecessary collection) or additional processing.

III. COMMUNICATIONS AND NOTICES FOR CUSTOMERS AND USERS

1. Legal requirements

SOFTCENTRIC DEVELOPMENT may be obliged to provide access to the Personal Information for services and to the personal information included in the Data in the operations of the systems, as required by law, such as to comply with a subpoena or other legal process, when we consider in good faith that disclosure is necessary to protect our rights, to protect your rights or that of a User or the safety of others, investigate fraud or respond to governmental requests, including public and governmental authorities outside your country of residence or a User, for the purposes of security and/or national law enforcement.

SOFTCENTRIC DEVELOPMENT will promptly inform you of requests to provide access to Personal Information for the Services, unless otherwise required by law.

2. Global Data Protection Officer

SOFTCENTRIC DEVELOPMENT has appointed a Global Data Protection Officer who is also a Privacy Officer at SOFTCENTRIC DEVELOPMENT. If you or a user believes that the personal information has been used in a way that does not comply with this Privacy Policy or if you believe that the personal information has been used. or a user has/has additional questions, comments or suggestions related to the handling by SOFTCENTRIC DEVELOPMENT of personal information for services or personal information included in the Data in the systems operations, contact the Data Protection Officer.

Written requests to the Global Data Protection Officer may be addressed to:

Company Name: SOFTCENTRIC DEVELOPMENT S.R.L.

TO WHOM: 34297810

Trade Register: J23/3488/2019

Company type: Limited Liability Company

NACE: 6201

CAEN Description: Activities to create custom-made software

Address: Otopeni City, Str. I. G. DUCA, Nr. 36, BUILDING B1, ROOM 21, Floor 2, Ilfov County, Postal Code 75100

3. Dispute resolution or submission of a complaint

If you or a User have any complaints about our compliance with our privacy and security practices, please contact us first. We will investigate and attempt to resolve all complaints and disputes regarding our privacy practices.

4. Changes to this Service Privacy Policy

This privacy policy was added on August 1, 2022. However, the Services Privacy Policy may change over time, for example to comply with legal requirements or to meet changing business needs. In case of substantial changes, we will also inform you otherwise appropriately (for example, through a pop-up notification or statement of changes on our website) before the changes take effect.