Procedure for processing personal data of SOFTELLIGENCE SRL

Privacy Statement & Cookies

Introduction

Softelligence SRL, including its controlled subsidiaries and affiliates, (collectively "Softelligence") is committed to protecting your privacy. This statement details the steps we take to protect your personal information when you visit our websites or use an online application that contains a link to this statement (collectively, the "sites"). This statement also covers information we receive when you contact us (e.g., to submit a comment or query or to seek support with one of our products or services). It describes the personal information that we collect, the purposes for which we use such information and your choices regarding our use of it. The steps we take to protect your personal information and how you can review and correct your personal information are also covered here. By accessing our sites or providing us your information when you contact us, you are consenting to the information collection and use practices described in this privacy statement.

For purposes of this statement, "personal information" means information that identifies a particular individual, such as name, postal address, email address or phone number. When other information, such as email newsletter choices, product purchases or consumer product preferences, is associated with personal information, this other information also becomes personal information.

Our collection of information

<u>Information collected directly from you.</u> Generally, you can visit Softelligence's sites without entering any personal information. On certain pages, we may ask you for personal information to provide a service or carry out a transaction that you have requested. You may also provide some personal information to us when you contact us (e.g., with a comment, inquiry or customer support request). The personal information we collect or receive may include:

- contact details, such as your name, title, company/organization name, e-mail address, telephone and fax numbers and physical address;
- information about your company and job function;
- your e-mail marketing preferences;
- financial information (including credit card or account information); information, such
 as your nationality and country of residence, that allows us to determine your
 eligibility under export control regulations to receive information about certain
 technologies; information used to customize and facilitate your use of our sites,
 including login and technical information;
- inquiries about and orders for our products and services; information that assists us in identifying the products and services that best meet your requirements;
- event registration information; and
- feedback from you about our sites and our products and services generally.

You are not required to provide any of this information, but if you do not, we may not be able to provide you the requested service or complete your transaction.

Information collected automatically. We collect information about your visit to our sites, including what pages you view, the number of bytes transferred, the links you click, the materials you access and other actions taken within Softelligence's sites. We may combine this information with your personal information to and use the combined information in accordance with this privacy statement. We also collect certain standard information that your browser sends to every website you visit, such as your Internet Protocol (IP) address, your browser type and capabilities and language, your operating system, the date and time you access the site and the website from which you linked to one of our sites. We do not combine this standard information with other personal information.

Our use of information

<u>Services and transactions.</u> We use your personal information to deliver services or carry out transactions you have requested, including, but not limited to, providing information on Softelligence products or services, registering purchased products, processing product orders, handling warranty claims, replacing product manuals, answering customer service requests and facilitating the use of our sites. In order to offer you a more consistent experience in your interactions with Softelligence – including, but not limited to, learning about you and how you interact with and use Softelligence products and services; developing and managing our products, services and customer care; and providing you with information about Softelligence products and services that you may be interested in -- information collected by our sites may be combined with information we collect or acquire through other means.

<u>Website and product improvement.</u> We may use your personal information to perform business analyses or for other purposes to improve the quality of our business, our sites and Softelligence products or services (including new products or services), or to make our sites easier to use by eliminating the need for you to repeatedly enter the same information or by customizing our sites to your particular preference or interests.

<u>Communications.</u> We may use your personal information to inform you of products or services available from Softelligence in which you may be interested and to send you surveys regarding your use of Softelligence products and services. You can opt out of receiving promotional communications from us by contacting us using the contact information listed in this privacy statement. Moreover, each promotional e-mail communication we send includes an unsubscribe link allowing you to stop delivery of that type of communication. If you elect to unsubscribe, we will remove you from the relevant list within 10 business days.

<u>Employment Applications.</u> In connection with a job application or inquiry, you may provide us with information about yourself, such as a resume or curriculum vitae. We may use this information throughout Softelligence for the purpose of employment consideration. If your application or inquiry is unsuccessful, we will keep the information for future consideration for a limited period of time, unless you direct us not to do so.

In addition to the uses listed above, we may use the information we have collected in order to detect, prevent and respond to fraud, intellectual property infringement, violations of law or another misuse of the sites.

Our use of cookies and web beacons

Cookies are text files containing small amounts of information which is downloaded to your hard disk or to your browser's memory when you visit one of Softelligence's sites. Cookies are useful because they help arrange the content and layout of our sites and allow us to recognize those computers or other devices that have been to our sites before. Cookies do many different jobs, such as allowing our websites to remember your preference settings and helping us to enhance the usability and performance of our sites and your experience using them.

Our sites also may contain electronic images known as web beacons – sometimes called single-pixel gifs – that allow us to count the number of users who have visited specific pages. We may include web beacons in promotional e-mail messages or newsletters in order to determine whether messages have been opened and acted upon.

Cookie categories

The type of cookie that may be used on Softelligence's sites can be put into 1 of 4 categories: Strictly Necessary, Performance, Functionality & Profile and Advertising.

1. Strictly Necessary Cookies

These cookies are essential, as they enable you to move around our sites and use their features, particularly in connection with information searches and order placement. Without these cookies, services you have asked for cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet. An example of a strictly necessary cookie is a "shopping basket cookie," which is used to remember the products that you wish to purchase when you add products to your shopping basket or proceed to checkout.

2. Performance Cookies

These cookies collect information about how you use our sites, for example which pages you go to most often and if you get any error messages from certain pages. These cookies collect only anonymous information that is used to improve how our sites work. These cookies are not used to target you with online advertising. Without these cookies we cannot learn how our sites are performing and make relevant improvements that could better your browsing experience. Examples of performance cookies that our sites use include Google and Adobe Analytics (see further discussion below).

3. Functionality & Profile Cookies

These cookies allow our sites to store information that you provide such as your site language preferences and to store technical information useful for your interactions with our sites. For instance, they remember your user ID and elements of your user profile. They also ensure that your experience using the sites and Softelligence's marketing efforts are relevant to you. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymous and they cannot track your browsing activity on other websites. Without these cookies, a website cannot remember choices you have previously made or personalize your browsing experience. For example, we use a cookie to store your language preferences, which allows us to present you with product search results in the correct language, and we use a cookie to store your choice about the appearance of the cookie information banner that we display on our sites. This cookie will help us remember your choice about the appearance of the cookie information banner when you subsequently visit the same site where you made your choice about the banner and any other Softelligence sites with the same domain or the same top level domain.

4. Advertising Cookies

These cookies may be used to deliver advertisements that are more relevant to you and your interests. They may also be used to limit the times you see an advertisement as well as help to measure the effectiveness of the advertising campaign. Although these cookies may track your visits to other websites, they do not usually know who you are. Without these cookies, online advertisements you encounter will be less relevant to you and your interests.

<u>Setting your cookie preference</u> You have the ability to accept or decline cookies. Most internet browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies or to notify you when a cookie is being placed on your computer. If you choose to decline cookies, you may not be able to fully experience the features of Softelligence's sites or other websites that you visit.

<u>Our use of web analytics</u> Softelligence uses industry standard web analytics to track visits to our sites. These analytics are provided by Google Analytics and Adobe Analytics. The information generated by the cookie about your use of our sites (including your IP address) will be transmitted to and stored by Google and Adobe on servers in the United States. Google and Adobe will use this information for the purpose of evaluating your use of our sites, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google and Adobe may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's or Adobe's behalf. Google and Adobe will not associate your IP address with any other data held by Google and Adobe. You may opt out of web analytics by installing these tools on your computer

Google Analytics Opt Out Link

Adobe Analytics Opt Out Link

Do-Not-Track Signals and Similar Mechanisms

Some web browsers may transmit "do-not-track" signals to the sites with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. There currently is disagreement, including among participants in the leading internet standards-setting organization, concerning what, if anything, websites should do when they receive such signals. Softelligence currently does not take action in response to these signals. If and when a final standard is established and accepted, Softelligence will reassess how to respond to these signals.

Disclosure of your personal information

Except as described below, personal information that we collect about you through our sites or that you provide to us when you contact us will not be shared outside of Softelligence without your permission.

<u>Disclosure to service providers.</u> Softelligence contracts with other companies to provide services on our behalf, such as hosting websites, sending out information, conducting surveys, processing transactions, analyzing our sites and performing business and other analyses to improve the quality of our business, our sites and Softelligence products or services. We provide these companies with only those elements of your personal information they need to deliver those services effectively. These companies and their employees a

<u>Disclosure to distributors.</u> In responding to a request made by you, we may share your personal information with companies that distribute our products. In those cases, we provide these companies with only those elements of your personal information they need to respond to your request, and these companies and their employees are prohibited from using that personal information for any other purpose. In some cases, we may seek your permission to share your information with distributors for marketing purposes other than responding to a request from you. However, we will not share your information for such marketing purposes unless we have obtained your express consent to do so.

<u>Disclosure in connection with transactions.</u>In connection with certain transactions, we may disclose some or all of your personal information to financial institutions, government entities and shipping companies or postal services involved in fulfillment of the transaction.

<u>Disclosures in connection with acquisitions or divestitures.</u> Circumstances may arise where for strategic or other business reasons Softelligence decides to sell, buy, merge or otherwise reorganize businesses in some countries. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of personal information sellers. We may disclose information we maintain about you to the extent reasonably necessary to proceed with the negotiation or completion of a merger, acquisition or sale of all or a portion of Softelligence's assets. It is Softelligence's practice to seek appropriate protection for information in these types of transactions.

<u>Disclosure for other reasons.</u> We may disclose personal information if required or authorized to do so by law or in the good-faith belief that such action is necessary to comply with legal requirements or with legal process served on us, to protect and defend our rights or property or, in urgent circumstances, to protect the personal safety of any individual.

Security

Softelligence is committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure. For example, we store the personal information you provide on computer systems with limited access that are located in facilities to which access is limited. For sites to which you log in, it is your responsibility to ensure the security of your password and not to reveal this information to others. When you move around a site to which you have logged in, or from one site to another that uses the same login mechanism, we verify your identity by means of an encrypted cookie placed on your machine.

Reviewing your personal information

In some cases, you can review and correct personal information provided through our sites by going to the page on which you provided the information. In all cases, you can make a request to review and correct your personal information that is collected via our sites or that you provide when you contact us or ask Softelligence to stop using it by contacting us using the contact information listed below. We may take steps to verify your identity before providing you access to your personal information. You can help us to maintain the accuracy of your information by notifying us of any change to your mailing address, phone number or e-mail address.

Consent to international transfers of personal information

The personal information we collect on our sites or that you provide to us when you contact us may be sent to the United States or to any other country in which Softelligence or its agents or suppliers maintain facilities. We may also store and process the information there. Although the laws that protect personal information in those countries may differ from the laws where you live, we will take reasonable steps to ensure that your privacy is protected. By using our websites or contacting us and giving your information to us, you consent to the transfer of the data outside of your country.

Children's information

Softelligence does not knowingly collect information from children and does not target or direct its sites to children.

Links to other sites

Our sites may contain links to other websites such as Softelligence distributors and sales affiliates, professional and government organizations and publications. We also link to third-party providers that host, maintain and operate on-line training curricula. Although we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other websites.

Enforcement of this privacy statement/Contact Us

If you have questions regarding this statement or our handling of your personal information, please contact us using the contact information listed below. We will promptly address your concern and strive to reach a satisfactory resolution.

Mailing Address:

SOFTELLIGENCE SRL

CUI 19333723 Reg. Com. J40/1411/2008

4D Gara Herastrau St., 2nd Floor, 2nd District, 020334, Bucharest, Romania

Changes to this privacy statement

Softelligence may occasionally update this privacy statement. When we do, we will revise the "last updated" date at the top and bottom of the privacy statement. If we make any material changes in the way we collect, use and/or share personal information that we collect about you through the sites, we will notify you by sending you an email at the last email address that you provided us and/or by prominently posting notice of the changes on the sites.