

**Who are we?**

Softline is the data controller of the websites <https://login.softline.com> and <account.softline.com> (hereafter the “Platforms”) which is operated on behalf of itself and its operating companies within Softline (affiliates). Depending on your location of the user, different legal entities will act as controllers. You can find a comprehensive list of Softline’s affiliates [here](#).

**What does this Privacy Notice cover?**

This Privacy Notice applies to the Platforms and it is meant to explain who we are, what personal data we process, why, for how long, with whom we might share your data, what are your rights and where you can contact us. For purpose of this Privacy Notice, personal information means data or set of data that can identify an individual, such as name, address, telephone number, and email address. For what type of data we collect for a specific purpose see below.

**What personal data do we collect and how do we intend to use it?**

**Data collected for the enablement and usage of the Platforms**

- **Categories of data:** User Account Information, Contact Information, Browsing Information, Personal Identification, Geolocation, Financial,
- **Purposes:**
  - Create and manage sales services/solutions;
  - Develop and manage IT resilience and risk;
  - Develop, Manage, and Deliver Analytics.
- **Legal basis:**
  - **Applicable from data subjects located in countries listed in Annex 1A:** We consider that our legitimate interests justify the processing; we find such interests to be justified considering that the data is limited to what is usually shared by the people acting in their business or professional capacities. The legitimate interest pursued is efficiency of the services delivery process;
  - **Applicable from data subjects located in countries listed in Annex 1B:** consent;
- **Retention time:** we will keep the data as long as necessary to enable the usage of the Platforms, including the existence of a contract between your company and Softline. The data will be anonymized/deleted after the account was deactivated in the Platforms and/or the contract ended. The criteria we use to determine the retention term is the commercial relationship term plus the mandatory retention term of records provided by the local legislation applicable;
- **Source of data:** the data is provided by you directly and via alternative internal applications;
- **Requirement to provide data and consequences of not providing:** the fields are necessary for the usage of the Platforms, not providing such data will result in failure to register into the Platforms.

**Data collected through cookies and similar technologies**

- **Type of data:** IP address and related information such as location and internet provider, browser and content type, version and settings, viewed content and activities;
- **Purpose:** see the table below;
- **Legal basis:**
  - **Applicable from data subjects located in countries listed in Annex 1A:** legitimate interests of the controllers. We find the legitimate interest to be justified considering that the data is necessary for making the website functional (our website does not offer any content directed to individual consumers as well as any content which might be used for any inferences about your private life habits or interests), and limit the retention of data;
  - **Applicable from data subjects located in countries listed in Annex 1B:** consent;
- **Retention time:** see the table below;
- **Source of data:** data is obtained automatically through your use of the website and from external parties as per the table below;
- **Requirement to provide data and consequences of not providing:** you are not required to provide any data yourself.

**Necessary cookies**

- Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Name	Provider	Purpose	Expiry	Type
XSRF-TOKEN	login.softline.com	This cookie is set by Wix and is used for security purposes.	2 hours	Necessary

Name	Provider	Purpose	Expiry	Type
laravel_session	login.softline.com	laravel uses laravel_session to identify a session instance for a user, this can be changed	2 hours	Necessary

#### With whom we share your data?

We disclose your information to SOFTLINE employees from the relevant teams, companies processing the data on our behalf (hosting providers, mail system provider, organizations providing maintenance services; entities providing services in the field of tax and legal services, subcontractors performing customer service and logistics tasks, providers of statistical, advertising and analytical services, payment service providers, independent third parties when this is necessary (auditors, lawyers, inspection agencies) or based on your choices and actions (as when you ask us to send you a shipment or letter using a third-party provider). Depending on applicable local laws you may obtain from us further information about specific entities having access to the data. Your data will be transferred to third countries and any subsequent transfers will follow applicable local and regional laws. For data transferred outside of EU/EEA, SOFTLINE also implements EU Standard Contractual Clauses (more information about such clauses is available [here](#)) to ensure similar level of protection as in EU/EEA. For data transferred outside of Serbia, SOFTLINE also implements Standard Contractual Clauses (more information about such clauses is available only in Serbian [here](#)). For data transferred outside of Argentina, SOFTLINE implements Standard Contractual Clauses (more information about such clauses is available only in Spanish [here](#)).

For countries listed in Annex 1B:

By submitting this form, you accept your data will be directly transferred to third countries, and any subsequent transfers will follow applicable local and regional laws.

We may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claim, whether in court proceedings or in an administrative or out-of-court procedure.

#### What are your rights?

- Right to withdraw your consent: You can withdraw your consent any time by writing us at the relevant contact points indicated below;
- Right to information and transparency: You have the right to be informed on the manner in which we process your personal data.
- Right to access – You have the right to know what if any of your data we process and obtain a copy of it in most cases.
- Right to rectification – You have the right to request us to rectify or complete your data, as the case may be, on the basis of an additional statement.
- Right to restrict the processing – You can request us to restrict the processing of your personal data in certain cases.
- Right to erasure („right to be forgotten”) – You have the right to request and obtain the erasure of your personal data in some cases.
- Right to data portability – In certain cases you have the right to receive the personal data that you have provided us in a structured, commonly used and machine readable format or to request we transfer it to another controller.
- Right to oppose the processing/ Right to oppose the processing in direct marketing purposes: We shall not make decisions about data subjects based solely on automated processing.
- Right to launch a complaint with the competent data protection authority. Depending on your location the contact data of the competent data protection authority might differ. You can find a comprehensive list of competent data protection authorities [here](#).

You may exercise any of your rights in relation to your personal data by written notice to us, using contact details set out below.

#### How do we safeguard your personal data?

We use a range of security measures to protect your personal information, which based on the specific data we process and the risk that the processing activity might pose to your rights and freedoms, might be”

- Measures for ensuring ongoing confidentiality, integrity, availability and resilience of processing systems and services.
- Measures for ensuring the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.
- Processes for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures in order to ensure the security of the processing.

- Measures for user identification and authorisation.
- Measures for the protection of data during transmission Measures for the protection of data during storage.
- Pseudonymisation and/or encryption of personal data.
- Measures for ensuring physical security of locations at which personal data are processed.
- Measures for ensuring events logging.
- Measures for ensuring system configuration, including default configuration.
- Measures for internal IT and IT security governance and management.
- Measures for certification/assurance of processes and products.
- Measures for ensuring data minimisation.
- Measures for ensuring data quality.
- Measures for ensuring limited data retention.
- Measures for ensuring accountability.
- Measures for early detection, management and recovery for incidents.

#### How can you contact us?

Subject	Email	Address
For personal information collected from individuals INSIDE Europe and MENA, written inquiries to the data protection responsible may be addressed to	<a href="mailto:Dataprotection.emea@softline.com">Dataprotection.emea@softline.com</a>	<b>London</b> 26-28 Hammersmith Grove, London W6 7HA, UK
For personal information collected from individuals INSIDE LATAM, written inquiries to the data protection responsible may be addressed to:	<a href="mailto:Dataprotection.LATAM@softline.com">Dataprotection.LATAM@softline.com</a>	<b>Buenos Aires</b> Maipú 939, Ciudad Autónoma de Buenos Aires, Argentina, C1006
For personal information collected from individuals INSIDE INDIA, written inquiries to the data protection responsible may be addressed to	<a href="mailto:Dataprotection.india@softline.com">Dataprotection.india@softline.com</a>	<b>New Delhi (Gurugram)</b> Unit No -515, 5th Floor, MGF Metropolis Mall, MG Road, Gurugram (Gurgaon), 122002, India
For personal information collected from individuals INSIDE APAC, written inquiries to the data protection responsible may be addressed to:	<a href="mailto:Dataprotection.APAC@softline.com">Dataprotection.APAC@softline.com</a>	<b>Ho Chi Minh City</b> Viet Dragon Tower, 7th Floor, 141 Nguyen Du Street, Ben Thanh Ward, District 1, Ho Chi Minh City, Vietnam
For personal information collected from individuals INSIDE CIS, written inquiries to the data protection responsible may be addressed to	<a href="mailto:Dataprotection.CIS@softline.com">Dataprotection.CIS@softline.com</a>	Derbenevskaya emb. 7, Building 8, Business Quarters "Novospassky", Moscow, Russia, 11511

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please report it via the contact points provided in [Speak UP Policy](#).

#### How do we keep this Privacy Notice updated?

We may update this Privacy Notice from time to time. If we materially change it, we will take steps to inform you of the change.

The date at the bottom of this Privacy Notice shows when it was last updated.

13.07.2022

#### ANNEX 1A

Country	Country	Country
Brazil	India	Thailand
Bulgaria	Moldova	Turkey
Czech Republic	Philippines	Turkmenistan
Croatia	Poland	Uzbekistan
Egypt	Romania	Slovenia
Hungary	Serbia	Georgia

ANNEX 1B<sup>1</sup>

Country	Country	Country
Argentina	Kazakhstan	Peru
Armenia	Kyrgyzstan	Venezuela
Belarus	Malaysia	Vietnam
Cambodia	Mexico	Venezuela
Chile	Myanmar	Russia
Colombia	Costa Rica	Tajikistan

---

<sup>1</sup> Plus any other country not listed in 1A