



SOFTWAY SOLUTIONS, INC. (SOFTWAY) Privacy Statement

This Privacy Statement is effective as of July, 2018.

SOFTWAY is committed to processing your personal data responsibly and in compliance with applicable data protection laws.

This Privacy Statement describes SOFTWAY'S privacy practices that apply to personal information we collect, use and share about consumers and other individuals within our clients, business partners, supplier and other organizations with which SOFTWAY has or contemplates a business relationship.

Why and how we collect and use your personal information

We may collect your personal information as an individual for various purposes, such as the following:

- **Access and use of websites or other online services**

When entering one of our websites, or using an online service, we will record information necessary to provide you with access, for the operation of the website and for us to comply with security and legal requirements in relation to operating our site, such as passwords, IP address and browser settings. We also collect information about your activities during your visit in order to personalize your website experience, such as recording your preferences and settings, and to collect statistics to help us improve and further develop our websites, products and services.

- **Responding to your request for information, order, or support**

When you contact us (online or offline) in connection with a request for information, to order or inquire of a product or service, to provide you with support, or to participate in a forum or other social computing tool, we collect information necessary to fulfill your request, to grant you access to the product or service, to provide you with support and to be able to contact you. We retain such information for administrative purposes, defending our rights, and in connection with our relationship with you.

When you provide your name and contact information to register in connection with such a request, the registration may serve to identify you when you visit our websites

- **Contacting employees of our clients, prospects, partners and suppliers** In our relationship with clients or prospects, partners and suppliers, they also provide us with business contact information (such as name, business contact details, position or title of their employees, contractors, advisors and authorized users) for purposes such as contract

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management, fulfillment, delivery of products and services, provision of support, invoicing and management of the services or the relationship.

- **Visitor information**

We register individuals visiting our sites and locations (name, identification and business contact information) and use camera supervision for reasons of security and safety of persons and belongings, as well as for regulatory purposes.

- **Marketing**

Most information we collect about you comes from our direct interactions with you. When you register for an event we may collect information (online or offline) in relation to the event organization, and during an event, such as participation in sessions and survey results. We combine the personal information we collect to develop aggregate analysis and business intelligence for conducting our business and for marketing purposes. You can always opt-out from receiving personalized communication by sending an e-mail to info@softwaysolutions.com.

Where we reference that we use your personal information in connection with a request, order, transaction or agreement (or preparing for the same), or to provide you with services that you requested (such as a website), we do this because it is necessary for the performance of an agreement with you.

Where we reference that we use your personal information in relation to marketing, improvement or development of our products or services, for reasons of safety and security, or regulatory requirements other than in connection with your agreement or request, we do this on the basis of our or a third party's legitimate interests, or with your consent. When we collect and use your personal information subject to the EU Privacy Legislation this may have consequences for [Your Rights](#).

Sharing of Personal Information

We may share information about you with our subsidiaries and business partners and transfer it to countries in the world where we do business in accordance with this Privacy Statement.

SOFTWAY shares your personal information with selected business partners to help us provide you, or the company you work for, products or services, or to fulfill your requests, or with your consent. When selecting our suppliers and partners, we take into account their data handling processes.

Should SOFTWAY decide to sell, buy, merge or otherwise reorganize its business or business structure, such a transaction will likely involve the disclosure of personal information to prospective or actual

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purchasers, or the receipt of such information from sellers. SOFTWAY will be mindful of the need to protect personal information and data in connection with such transactions.

Please be aware that in certain circumstances, personal information may be subject to disclosure to government agencies pursuant to judicial proceeding, court order, or legal process. We may also share your personal information to protect the rights or property of SOFTWAY, our business partners, suppliers or clients, and others when we have reasonable grounds to believe that such rights or property have been or could be affected.

Information Security and Accuracy

We intend to protect your personal information and to maintain its accuracy. SOFTWAY implements reasonable physical, administrative and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure. For example, we encrypt certain sensitive personal information.

Retention Period

We will not retain personal information longer than necessary to fulfill the purposes for which it is processed, including the security of our processing complying with legal and regulatory obligations (e.g. audit, accounting and statutory retention terms), handling disputes, and for the establishment, exercise or defense of legal claims in the countries where we do business.

How to contact us

If you have a question related to this Privacy Statement, please contact us by using [this form](#). Your message will be forwarded to the appropriate member of SOFTWAY charged with the obligation and duties set forth in this Privacy Policy.

For the purposes of the EU General Data Protection Regulation (GDPR), the controller of your personal information is SOFTWAY SOLUTIONS, 11330 Clay Road, Suite 300, Houston, Texas 77041 (USA). Where SOFTWAY or a subsidiary it controls (not established in the European Economic Area (EEA)) is required to appoint a legal representative in the EEA, the representative for all such cases is:

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California Users And Residents

If any complaint with us is not satisfactorily resolved, you can contact the Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs in writing at 1625 North Market Blvd., Suite N 112, Sacramento, California 95834 or by telephone at (800) 952-5210 or (916) 445-1254.

Your Rights

You can request to access, update or correct your personal information. You also have the right to object to direct marketing. You can access the request process [here](#).

You may have additional rights pursuant to your local law applicable to the processing. For example, if the processing of your personal information is subject to the EU General Data Protection Regulation ("GDPR"), and your personal information is processed based on legitimate interests, you have the right to object to the processing on grounds relating to your specific situation. Under GDPR you may also have the right to request to have your personal information deleted or restricted and ask for portability of your personal information.

Right to Lodge a Complaint

In the event you consider our processing of your personal information not to be compliant with the applicable data protection laws, you can lodge a complaint:

- Directly with SOFTWAY by using [this form](#).
- With the competent data protection authority. The name and contact details of the Data Protection Authorities in the European Union can be found [here](#).

Changes to our Privacy Statements

From time to time we may update this Privacy Statement, as well as any other specific privacy statement. When making changes to this Privacy Statement, we will add a new date at the top of this Privacy Statement.

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contact@softway.com

281.914.4381

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