# PRIVACY AND SECURITY POLICY OF PERSONAL DATA PROCESSING FOR USERS OF SOFT-TRANSPORT APPLICATION

The owner of Soft-Transport application, Euload SRL, hereinafter referred to as the Provider, is committed to protect the confidentiality and security of your personal data as data subjects (users of Soft-Transport application or of the website soft-transport.com, customers, potential customers) within this Privacy and Security Policy of Personal Data Processing (the Policy), applicable for the purposes listed below.

This Policy applies to all devices used to access the Soft-Transport application and the website soft-transport.com, including smartphone or tablet devices. If you do not agree with the terms and conditions related to the use thereof (set out in this document from the point of view of personal data protection) please do not use our application or website and do not provide us with your data.

The owner of the Soft-Transport application, the Provider, processes personal data in accordance with the provisions of the General Regulation on Data Protection no. 679/2016, and manages safely and only for the specified purposes, the personal data you provide us, in the context of visiting the application or website and purchasing our services.

By continuing to use our application, website and services after reviewing this Policy, you agree to this and to the collection and processing of your personal data by the Provider holding the Soft-Transport application.

### THE PURPOSES FOR WHICH WE COLLECT AND PROCESS YOUR PERSONAL DATA

The owner of the Soft-Transport application, the Provider, collects and processes your personal data for the following processing purposes:

- Administration, improvement and implementation of the services provided by the Soft-Transport application and website, as well as for the provision of information or news for Soft-Transport users/customer.
- Commercial activities of sales of services, including performance, administration and development of the sales of services, administration of customer accounts, market surveys/research, statistics;
- Advertising, marketing and publicity, service promotion activities, conducting promotional campaigns, sending newsletters, tracking and monitoring sales of services and consumer behavior.
- After-sales activities, including customer relations services, informing users/customers regarding the evaluation of the services offered (including the evaluation of services through the application or on the website soft-transport.com).
- For purposes of proof in connection with the above activities and for the purpose of archiving.

#### CATEGORIES OF PERSONAL DATA WE PROCESS

To achieve the above purposes, we process the following categories of personal data: surname, first name, address (domicile/residence), e-mail address, phone number as well as the date when the Soft-Transport website or application was used.

We do not collect any special category of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, information about your health and biometric and genetic data, etc.).

We also do not collect any information about criminal convictions and offences.

The provision of personal data is necessary for EULOAD SRL to perform the activities listed according to the above. A refusal on your part to provide us with this data could lead to the impossibility on the part of EULOAD SRL to provide you with those services, information, to respond to your requests or to carry out any other activities among those listed above.

The employees of the Provider holding the Soft-Transport application have access to the data collected and/or processed.

The data collected by us are stored on the Provider's servers in specialized data centers. The servers on which the Soft-Transport services and applications run are virtualized machines that are maintained and managed directly by the Provider's technical staff. The data center staff does not manage the servers running on these virtual machines, but only the communications and systems infrastructure where they are installed.

#### METHODS IN WHICH WE COLLECT YOUR PERSONAL DATA

We use various methods to collect your data and the data about you, including:

- Direct interactions. You can give us your identity, contact and financial data by filling in the forms available through the Soft-Transport application or the website soft-transport.com or by correspondence with us by mail, telephone, e-mail or otherwise. These include personal data that you provide when you order our products or services, you subscribe to our services or publications or you fillin a feedback form or provide us with your feedback in any other way;
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, actions, and navigation patterns. We collect this personal data using cookies and other similar technologies. We may also receive technical data about you if you visit other websites that use our cookies. Please see our cookie policy below for more details.

#### THE DURATION OF DATA PROCESSING

The owner of the Soft-Transport application, the Provider, will retain the personal data for as long as is necessary to fulfill the purposes for which we collected it, including in order to meet any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the value, nature and sensitivity of your personal data, the potential risk of harm caused by unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and we may achieve these purposes by other means and applicable legal requirements.

In certain circumstances, we may make your personal data anonymous (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information for an unlimited period of time without notifying you in advance.

In order to achieve the mentioned processing purposes, the owner of the Soft-Transport application, SC. EULOAD SRL, will process the personal data during the performance of the services offered, as well as subsequently in order to comply with the applicable legal obligations, including, but not limited to, the provisions regarding the archiving obligation.

#### TO WHOM WE DISCLOSE YOUR PERSONAL DATA

In order to achieve one or more of the above purposes, the owner of the Soft-Transport application, EULOAD SRL, may disclose your personal data to the following categories of recipients: to other companies from the same group as EULOAD SRL; as well as you as a data subject in the context of exercising your right of access.

The data recorded by the Provider owning the Soft-Transport application is not sent to third parties and is only used for the purpose of improving the services of EULOAD SRL.

#### **DATA SECURITY**

The owner of the Soft-Transport application, SC. EULOAD SRL, implement technical and organizational measures to protect against unauthorized or illegal processing and against accidental loss, destruction or damage.

## **YOUR RIGHTS**

- the right to information, namely the right to receive details regarding the processing activities performed by the owner of the Soft-Transport application, SC. EULOAD SRL, as described in this document;
- the right of access to data, namely the right to obtain confirmation from SC EULOAD SRL regarding the processing of personal data, as well as details regarding the processing activities;
- the right to rectification, namely the right to obtain the rectification by SC EULOAD SRL of inaccurate data, as well as the completion of incomplete data;
- the right to delete data (the right to be forgotten), provided that the conditions provided by the law are met, but it is possible that, following the request for deletion of data, SC EULOAD SRL will make this data anonymous (thus depriving them from the personal nature) and to continue under these conditions the processing of data for statistical purposes;
- the right to object, with regard to the processing activities carried out for direct marketing purposes,including profiling activities, the right of opposition may be exercised at any time, by submitting a request as indicated below;
- the right not to be subject to an automatic individual decision, namely the right not to be the subject of a decision only taken on the basis of automatic processing activities;
- the right to address the National Supervisory Authority for the Processing of Personal Data or the competent authorities, insofar as you deem it necessary;

You may exercise these rights and you can oppose at any time and without justification the processing of your personal data for direct marketing purposes, by sending to the owner of the Soft-Transport application, SC. EULOAD SRL (through the Soft-Transport application, or on the web-site soft-transport.com at the e-mail address contact@soft-transport.com a written request, dated and signed to this end. In this case, your request will be forwarded to the Provider's specialized department. After sending your request, it is likely that you will receive a message confirming that your option has been registered, as well as any other necessary information, as appropriate.

Last modified: 01.02.2023 (day.month.year)