

Transoft Solutions Inc. - Privacy Statement

Transoft Solutions Inc. (collectively referred to in this Privacy Statement as "we" or "Transoft") recognises the importance of protecting your privacy. This Privacy Statement covers Transoft's policies on the collection, use and disclosure of your information when you access the Transoft website (the 'website' or 'site'), use our services (the 'services'), or anytime you interact with Transoft in accordance with the applicable data protection regulations, including but not limited to the Personal Information Protection Act (British Columbia), the General Data Protection Regulation (EU), the Data Protection Act 2018 (UK), Australia's Privacy Principles (AU), the People's Republic of China's Personal Data Protection Law, and the California Online Privacy Protection Act (CalOPPA - US) and any resulting legislation (collectively referred to as 'Data Protection laws').

Any questions which you may have regarding this Privacy Statement should be directed to Transoft at the (email) address given at the bottom of this Statement.

This Privacy Statement together with our Cookies Policy explains how any personal data that we may collect from you, or about you, through the Transoft websites and online services will be processed, and protected by Transoft. We created this Statement out of a fundamental respect for our customers' right to privacy and to guide our relationships with our customers, protecting your rights under the Data Protection laws, and it is important that you understand what we will do with your data and are happy with this.

By using our website, you are agreeing to allow Transoft ("the data controller") to collect, store, and use your information in the methods described below. If for whatever reason you do not agree to this, you should immediately terminate your visit to the Transoft website and not visit again.

Our websites contain links to other sites, Transoft is not responsible for the privacy practices or content of such other sites. We encourage our users to be aware when they leave our site and to read the Privacy Policies of each website to which we may link that may collect personal data.

Purposes, legal grounds and types of personal data

Contact information

Our website is mostly accessible and useable without the need for you to provide personal data. In case we do request that users fill out their personal data, this is for the following purposes:

1. access to areas of our website restricted to clients
2. registration for access to our software services
3. registration for events, such as webinars and conferences
4. access to a copy of publications by Transoft
5. a request for further information about our products
6. a request for further information about Transoft events
7. subscription to newsletters, email services, alerts or other communication

The purposes listed under 1 and 2 have their legal basis in performance of contract.

The other purposes first of all have their legal basis in fulfilling your request for participation in events and access to information and to provide you with adequate information and updates about the free services for which you register. Within this context, your contact details might also be necessary to provide you with the technical assistance you require using those services. The legal basis for the processing which is part of fulfilling your requests is primarily your consent.

When you complete our sign-up form on our website you will be sent a 'double opt in' email from which you can confirm your request to opt-in to receive our marketing. You may withdraw this consent at any time and the request will be actioned promptly. You can exercise your right to withdraw from receiving marketing communications being sent to you by using the unsubscribe link included in every marketing email.

Secondly, the personal data processing as part of purposes 3 - 7 also has a lawful ground in our legitimate interest to know your contact details as part of our marketing efforts to promote our services. As part of these efforts we might also combine, aggregate, analyse and study information retrieved from personal data for the purpose of:

- enhancing, modifying, personalizing or otherwise improving our services / communications for the benefit of our customers
- better understanding how people interact with Transoft
- monitoring the effectiveness of our marketing campaigns

If necessary for the adequate protection of your privacy technical measures, including but not limited to aggregation, anonymization or pseudonymization of personal data.

The personal data we request as part of our collection for the above purposes will generally and initially be limited to:

- a. first name, last name
- b. email address
- c. company name
- d. postal address
- e. telephone number
- f. country of (business) residence
- g. function
- h. branch in which you are active

In case of further follow-up upon or initial contact with you, we might ask for additional details, which will mostly be background information in order to adequately process your request for services or information.

For our services that require payment (such as certain events, products and subscriptions), we also collect credit card information (such as account name, number and expiration date), which is used for our, or our agents, invoicing purposes only and is not otherwise shared.

Please be aware that as part of our contractual services with our clients, it might be necessary for the performance of contract that we process such data.

Regarding our free services and registrations for purely informational purposes you will be able to deregister at any time you wish.

Digital identifiers

Our website, newsletters and, from time to time, certain other products and services have features that may automatically collect information from customers, to deliver content specific to customers' interests and to honour their preferences. This information assists us in creating products and services that will serve the needs of our customers.

For example, we may use 'cookies', a piece of data stored on the user's hard drive containing information about the user. If users reject the cookies, they may be limited in the use of some areas

of our website. If you do not want us to place a cookie on your website and track activity, you may browse the site using **privacy mode in your web browser**. To learn more about Transoft's use of cookies, see our **Cookie Policy**.

For our internal purposes, we may gather (where available) date, time, operating system and browser type, navigation history and IP address of all visitors to our web sites. We use this information for our internal security audit log, trend analysis and system administration, and to gather broad demographic information about our user base for aggregate use.

When this information relates to, or identifies you, we treat it as personal data, and therefore apply equally strict technical and organizational measures to protect your privacy as with the other, earlier mentioned types of personal data.

Job postings

As part of our recruitment process we might open the possibility to apply for a job at Transoft through our website.

As part of such effort we will request all or part of the following information:

- a. first name, last name
- b. email address
- c. residential address
- d. telephone number
- e. data of birth
- f. country of birth
- g. country of residence
- h. résumé

We can also request a motivation for your job application. Although such motivation is not personal data per sé, it might comprise personal data or data which in conjunction with other data can take on the character of personal data.

Please be aware that personal data acquired from you as part of our recruitment process will be stored in our files. We apply a retention period of six weeks counting from the first date of employment for the chosen candidate for a certain job listing. This is taking into account that Transoft has a legitimate interest to take the time diligently but carefully to complete an application procedure. Also, we wish to retain the possibility of contacting candidates if, after a candidate has been chosen, that candidate resigns or is dismissed during his/her probation period.

How we process your personal data

Information which you submit via our website is stored on a computer and sometimes on paper at our offices. This is necessary in order to process the information and to send you any information you have requested.

Transoft will not hold data for longer than is reasonably necessary for the purposes of the proper conduct of its business or as required by law. Transoft has implemented policies to delete or destroy personal data when there is no longer a business need to retain it.

Under the applicable privacy law, Transoft has a legal obligation to implement technical and organizational measures to protect your privacy. Our policies include the following measures to restrict access:

- specific training of employees regarding applicable privacy and data protection regulations

- specific communication with employees, associates and suppliers regarding applicable privacy and data protection regulations
- verify that processors are compliant with these terms, or if not setting appropriate contractual conditions for processing by carefully vetted processors
- confidential, state-of-the-art technical security measures to protect unauthorized access to personal data
- organizational measures including an authorization matrix for access to personal data
- application of privacy by default and privacy by design in our product design, including that of our websites
- the execution of data privacy impact assessments where legally mandatory or prudent

Transoft also employs a Privacy Officer who continuously monitors how personal data is handled within the organization. He/she monitors whether the privacy law and data protection law are properly applied.

Transoft does not apply profiling in the meaning of automated analysis of personal data collected from you, to evaluate or correlate the personal aspects of the natural persons whose personal data is processed. Transoft does not use automated decision making, whether or not by use of profiling, which affects your legal position, or otherwise affects your position in any significant way, in relation to the personal data collected from you.

Sharing of information with third parties

Personal data collected with the purpose of providing you with free of charge information or services as described above, will not generally be shared with third parties, but might be shared with trusted resellers of Transoft products.

Personal data processed under commercial contracts with clients might be transferred to third parties who process data on our behalf or who process data for their own purposes as part of their services to us. If you are a user of our paid services, please refer to the applicable contractual framework.

Personal data processed as part of our recruitment efforts might be shared with service providers in the field of recruitment, who will have to comply with the same strict data protection regulations as Transoft.

Personal data in the form of digital identifiers described above might be shared with service providers in the field of marketing and sales services, who will have to comply with the same strict data protection regulations as Transoft.

For more information about how we use cookies specifically, reference is made to our Cookie Policy. (www.transoftsolutions.com/cookie)

In all cases where personal data is transferred to data processors, we will set appropriate contractual conditions for processing by carefully vetted processors and auditing these processors for compliance with these terms.

Please note that personal data you share with Transoft might be transferred to other companies which form part of the same group of companies. Such companies can be shareholder companies, subsidiaries or other group companies, but also entities into which the company may be merged, or entities to which any of our assets, products, sites or operations may be transferred. Appropriate data protection policies will be maintained for any such transfer, in accordance with the applicable data protection regulations.

Some transfers might be between Transoft entities within the European Economic Area (EEA), and some might be transfers from Transoft entities in the EEA to Transoft entities outside the EEA. In case of transfers to countries outside the EEA, this will either be to a country which is the subject of an EU “adequacy decision” (such as our head offices in Canada), or otherwise will be subject to appropriate safeguards. Appropriate safeguards will mainly consist of appropriate contractual conditions for processing.

We will also disclose information we maintain when required to do so by law or other legal obligation, in response to a law enforcement agency's request, or in special cases when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property. Users should also be aware that courts of equity, such as Bankruptcy Courts, might have the authority under certain circumstances to permit personal information to be shared or transferred to third parties without permission.

Your rights

As a person whose personal data is processed, you have the following general rights under the applicable data protection regulations:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure (right to be forgotten)
- Right to restriction of processing
- Right to not be subject to automatic decision making
- Right to object
- Right to data portability
- Right to file a complaint with a supervisory authority

More information about your rights under the applicable data protection regulations can also be found on the website of the local data protection authority in your country. Please be aware that invoking your rights might, depending on the contents of your request, have the consequence that we are wholly or partly unable to continue our services towards you.

You may request details of personal information which Transoft hold about you at no cost. If you would like a copy of the information that is held on you by Transoft please email privacy@transoftsolutions.com or write to

Transoft Solutions Inc., 350 – 13700 International Place, Richmond, BC V6V 2X8, Canada; or

Transoft Solutions (Europe) BC, Wijnhaven 60, 3011 WS Rotterdam, Netherlands; or

Transoft Solutions (UK) Limited, Ardencroft Court, Ardens Grafton, Alcester, Warwickshire, B49 6DP, UK.

The accuracy of the personal information we hold is important to us, if you believe that any information is incorrect or incomplete, please email or write to us using the above addresses so that we can promptly rectify any information found to be incorrect.

Questions

In case you have questions about the way Transoft processes your personal data you can contact us via privacy@transoftsolutions.com or write to one of the addresses noted above.

Changes to this Privacy Statement

Transoft reserves the right to change the provisions of this Privacy Statement at any time but will alert you that changes have been made by updating the date of the last revision below.

Your use of the Transoft website following the issuing of an updated statement shall constitute your acceptance of any such changes. We encourage you to review our Privacy Statement whenever you visit our website to make sure that you understand how your information will be used.

Notwithstanding any change to this Statement, we will continue to process your personal data in accordance with your rights and Transoft's obligations in law.

Date of last revision: 29 March 2022