

## **STRUSOFT PRIVACY POLICY**

StruSoft value the Customer's and the End User's privacy and is dedicated to protect information about the Customer and the End User. StruSoft will process certain personal data of its Customer and the End User of the StruSoft Product(s) in accordance with the Section "Personal Data" in the terms and conditions, in addition, the Customer's and the End User's privacy will be respected. StruSoft is a processor to the Customer (End User specified for the SaaS and Related Services) and the Customer (End User) is the controller in the meaning of the GDPR (Regulation (EU) 2016/679). Moreover, StruSoft is the controller in any processing conducted for the purpose of maintaining customer relations, such as establishing contractual arrangements, customer service, and marketing.

StruSoft reserves the right to email the Customer and the End Users, when the StruSoft Product is delivered as a license, maintenance or subscription ("Licenced Software"), with technically related, product related, and marketing related information. StruSoft processes personal data for the purpose of performance of contract, as stated in the Agreement, based on End User consent, as well as on the basis of legitimate interest such as for the purpose of running the service, ensuring security and fraud prevention. In the case of processing on the basis of consent, each individual End User has the possibility to opt-in, and withdraw consent at any time through an opt-out. Opting-out is done by sending an email to [privacy@strusoft.com](mailto:privacy@strusoft.com) with the subject line "Opt-out" in the email. Once one has opted out from receiving marketing and promotional materials, StruSoft will not send any additional materials other than those required by StruSoft's agreement with the Customer.

### **Personal Data**

When the Customer register an End User to StruSoft's Product(s), the Customer must complete a registration form that requires the Customer to provide Personal Data (including, without limitation, the End User's name and email address).

### **Announcement Email Information**

From time-to-time StruSoft provide information about its products to the Customer and/or End Users in the form of email. Announcement Emails will be emailed directly to the address that the Customer and/or the End User provides when registering, or in the event where the registration has been done by an administrator. The individual End User can opt-out by sending an email to [privacy@strusoft.com](mailto:privacy@strusoft.com) with subject line as "Opt-out" in the email.

StruSoft may place email links and/or forms on StruSoft's Website to allow the Customer and/or the End User to contact StruSoft directly. The Personal Data provided in these links and forms is processed on the basis of legitimate interest and used to respond directly to the questions or comments. StruSoft may also file the comments to improve the quality of the website, products, or process, or review and discard the Personal Data. All information, other than the Personal Data that is sent to StruSoft using these email links or forms, will not be considered or treated as confidential information. Do not send StruSoft any information, ideas, suggestions, proposals, or comments that you consider confidential or that you want to be treated as confidential.

### **Use of Your Personal data**

StruSoft uses Personal Data for legitimate interests such as responding to the Customer's and/or the End User's inquiries, improve StruSoft's marketing and promotional efforts, to analyse Licensed Software and service offers, and to customize services and Licensed Software(s). StruSoft may use Personal Data to deliver information to the Customer and/or the End User and to contact the same regarding administrative notices. StruSoft may also use Personal Data to resolve disputes and troubleshoot problems.

The Customer and/or the End User has the right to opt-out from such messages using StruSoft's opt-out policy, refer to separate Section below.

### **Required Disclosures**

StruSoft may disclose Personal Data if required to do so by law or in the legitimate interests of a third party such action is necessary to prevent injury or property damage. StruSoft will usually attempt to notify the Customer and/or the End User when StruSoft is making such a disclosure, but StruSoft may not do so in an emergency or when StruSoft is prohibited by law or court order from giving such notice.

### **Personal Data Sharing**

StruSoft does not share Personal Data about the Customer and/or End User with other people or non-affiliated companies without the Customer's and/or the End User's prior consent or unless that access, use, preservation, or disclosure is necessary to (a) satisfy any law, regulation, legal process or enforceable governmental request, (b) enforce any applicable Terms of Service (including investigation of potential violations thereof), or (c) detect, prevent or otherwise address fraud, security, or technical issues.

StruSoft may provide services for the Licensed Software through contractual arrangements, including sub-processing arrangements, with affiliates, service providers, partners and other third parties ("Service Partners"). Such third parties may include services such as customer relations and economic services. StruSoft and its Service Partners use Personal Data to operate and deliver their products and services. Unless otherwise agreed by the Customer and/or the End User in a separate agreement, StruSoft's Service Partners may not use any Personal Data to inform the Customer and/or the End User of other products or services available from those Service Providers.

StruSoft processes personal data within the European Union. StruSoft may also transfer personal data for the purpose of case management to our affiliate in India. In the event of third country transfers, StruSoft ensures that personal data sharing is based on applicable lawful grounds for such transfers, such as Commission adequacy decisions, standard contractual clauses or similar arrangements ensuring essential guarantees and appropriate safeguards.

If StruSoft becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, StruSoft will ensure the confidentiality of any Personal Data involved in such transactions and provide reasonable notice before Personal Data is transferred and becomes subject to a different privacy policy. Such notice may be given by a clear and concise statement on StruSoft's website or in a subsequent update to the Licensed Software that there has been an update to this Privacy Policy.

## **Access and Integrity of Stored Personal Data**

The Personal Data the Customer and/or the End User provide to StruSoft during registration of the Licensed Software may be shown directly in the Licensed Software's settings. The Customer and/or the End User shall assist StruSoft in ensuring that personal data is accurate and updated by regularly updating the Licensed Software settings any time the Customer's and/or the End User's Personal Data changes. In the event where the Customer and/or End User wish to actively delete the Personal Data that has been provided to StruSoft, subject to the Customer's and/or the End User's understanding that certain deletions may affect StruSoft's ability to provide the StruSoft services the Customer and/or the End User has requested, please contact StruSoft.

## **Links**

The Licensed Software may include links to other applications or sites. This Privacy Policy applies to the Licensed Software only. Any information submitted to linked sites or other applications will be subject to the privacy policies of those sites or applications. The Customer and/or the End User should review those policies carefully before providing any information to these linked sites or applications.

## **Security**

StruSoft undertakes steps to protect Personal Data from unauthorized or accidental access, disclosure, misuse or processing, or from alteration, destruction, or loss. Personal Data that StruSoft collects resides on servers operated by StruSoft or its affiliates and is accessible only to personnel who, by virtue of their duties, are required to have access and have been trained in, and tasked with, the observance of the principles embodied in this Privacy Policy.

## **Enforcement**

If the Customer and/or the End User has any questions or complaints regarding how StruSoft is handling Personal Data under this Policy or generally about the implementation of the principles of this policy, StruSoft encourages the Customer and/or the End User to contact StruSoft directly.

## **Data Retention**

StruSoft will process your personal data for the time period needed to fulfil the respective purpose of the processing, as established by the terms of the Agreement.

## **Data Subject Rights**

As a Data Subject, you have certain rights, including:

**Right to be informed.** You have the right to be informed about how we process your personal data. We provide this information through this Privacy Policy, other information on our website, and through any contact as set out above.

**Right to access and data portability.** You may request a human readable and machine-readable copy of the personal data we are processing about you.

**Right to rectification.** You may have inaccurate or incomplete personal data corrected or updated.

**Right to erasure.** You have the right to request deletion of your personal data.

**Right to restrict processing of your data or object to our processing.** If you believe your personal data is incorrect or processed unlawfully, you have the right to request that the processing is stopped. You may also object to processing that you believe is unlawful or processing for direct marketing.

**Right to withdraw consent.** Where processing is based on your consent, you may withdraw this consent at any time.

**Right to lodge a complaint.** You also have the right to issue a complaint to the Swedish Authority for Privacy protection (IMY).

Exemptions to your rights, in accordance with the GDPR, may depend on the legal basis for which personal data was collected as shown in the table below.

### **Changes to Privacy Policy**

Should StruSoft decide to change this Privacy Policy, StruSoft will update it with the release or update of the Licensed Software so that the Customer and/or the End User will always know what Personal Data that StruSoft gathers, how StruSoft might use it, and whether StruSoft will disclose it to anyone. Unless the Customer and/or the End User opt out of receiving Announcement Emails from StruSoft, as possible in the manner described herein, StruSoft may also notify the Customer by email of changes to this Privacy Policy.