Online Privacy Statement

softline Group

DATA PRIVACY POLICY

Softline Group Northern Europe

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Contact information		
Who	*Email*	*Phone*
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Terms and definitions

- **Data Processing**: This term refers to any operation or set of operations performed on personal data, such as collection, recording, organization, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, alignment, combination, restriction, erasure, or destruction.
- **Data Subject Rights**: These are the rights of individuals regarding their personal data. Under GDPR, data subjects have various rights, including the right to access, rectification, erasure, data portability, and more.
- **Data Retention**: This describes the policy of retaining personal data for a specific period, as required by regulations or for legitimate purposes.
- **Data Breach**: A data breach is an incident where personal data is accessed, disclosed, or processed by unauthorized parties, posing a risk to individuals' rights and freedoms.
- **Cookies**: Cookies are small pieces of data stored on your device when you visit a website, used for various purposes, including improving user experience and tracking website usage.
- **Web Beacons**: Web beacons are small, often invisible, objects embedded in a web page or email to track user behaviour and collect information.
- **Personal Data**: Personal data includes any information that relates to an identified or identifiable natural person (data subject). It is the data that the privacy policy is concerned with.
- **Data Controller**: The data controller is the entity or organization responsible for determining how and why personal data is processed. In this context, "Data Controller" refers to the organization responsible for managing and safeguarding your personal information.
- **IP Address**: An IP address, or Internet Protocol address, is a unique numerical label assigned to each device (e.g., computer, smartphone) participating in a computer network that uses the Internet Protocol for communication.
- **Withdraw Consent:** This means revoking your previously given consent for an organization to process your data.
- **Opt-out**: Opting out means choosing not to participate in something, such as receiving marketing emails or being tracked.

Abbreviated terms

- **GDPR:** General Data Protection Regulation (GDPR) is a regulation in EU law on data protection and privacy for all individuals within the European Union (EU) and the European Economic Area (EEA). It also addresses the export of personal data outside the EU and EEA areas.
- **MFA**: Multi-Factor Authentication (MFA) is an authentication method in which a computer user is granted access only after successfully presenting two or more separate pieces of evidence (factors) to an authentication mechanism.
- **SaaS**: Software as a Service (SaaS) is a cloud computing model in which software applications are provided over the internet on a subscription basis.
- **HTML5**: Hypertext Markup Language, version 5 (HTML5), is the fifth revision of the HTML standard for structuring and presenting content on the World Wide Web.
- **DAA:** Digital Advertising Alliance (DAA) is an organization that provides tools for consumers to opt out of targeted advertising.
- **NAI:** Network Advertising Initiative (NAI) is an industry trade group that develops self-regulatory standards for online advertising.
- **EDAA:** European Interactive Digital Advertising Alliance (EDAA) is an organization that provides transparency and choice regarding data-driven digital advertising.

Introduction

At Softline Group NE, we value your privacy and are committed to maintaining your trust. This Privacy Policy explains how we collect, use, share, and process personal information obtained through our websites, services or third parties. It applies to all Softline Group Northern Europe websites linking to this Privacy Policy, except those with their own Privacy Statement.

This policy is effective as of, 1st of November 2023

We may supplement this Privacy Policy with additional information, and agreements, for specific interactions or services provided to you.

Privacy policy

Data controller information

Softline Solutions Netherlands B.V., Softline Solutions N.V., Softline Solutions Ltd., hereafter known as: Softline Group Northern Europe, is committed to safeguard your privacy and be compliant to the EU General Data Protection Regulation (GDPR): Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016. For any questions, concerns, or remarks to be addressed to the controller, Softline Group NE, regarding privacy topics we refer to the "Privacy Questions and complaints" section.

Data controller, Softline Group Northern Europe, contact information:

Address: Coltbaan 33, 3439 NG, Nieuwegein, Utrecht, the Netherlands

Email: info.nl@softline-group.com

Phone: +31 30 55 00 300

Types of (Personal) Data collected.

You may provide personal information directly to us in various situations, such as when you:

- Communicate with us.
- Order a product or service.
- Register for a service or subscription.
- Do business with us as a supplier or business partner.
- Provide education and work experience information for job applications.

If you request not to be contacted beyond fulfilling your request, we will respect your wishes. We may also collect information related to your website usage through various technologies, including but not limited to:

- IP address
- Browser type and language.
- Access time and duration.
- Referring website addresses.
- Pages viewed on our sites.
- Actions taken on our website.

We may also use these technologies to personalize your experience, analyse website usage, and improve our interactions with you, whilst monitoring your interactions with our marketing and/or sales content we can adjust our efforts and tailor the experience to you.

Legal basis for processing

Softline Group NE processes personal data in accordance with the requirements of the GDPR, ensuring that we have a lawful basis for each processing activity. The common lawful bases include:

- **Freely given consent:** We may process data when individuals provide explicit consent for specific purposes. Consent can be withdrawn at any time.
- **Contract Performance:** Data processing necessary for the performance of a contract with the individual is another basis. For example, processing data to fulfil service agreements.
- **Legal Obligations:** We process data to comply with legal obligations, such as financial or regulatory requirements.
- **Legitimate Interests:** Data processing may be based on our legitimate interests, provided these interests do not override the rights and interests of the individuals.
- **Vital Interests:** In situations where processing is necessary to protect someone's life, we will rely on this basis.

We are committed to ensuring that the legal basis for processing personal data is clear, appropriate, and in compliance with GDPR. If you have any questions about our legal bases for processing, please contact us, see the "Privacy Questions and complaints" section.

Purpose of processing

We use your personal information for the following purposes outlined below:

Purpose of processing	Explanation
Fulfilling Transaction Requests	Processing data to complete specific requests, such as product orders or service transactions.
Personalizing your website experience	Using data to tailor website content and services to individual preferences for an enhanced user experience.
Providing support	Processing data to offer assistance or notify users of updates related to products or services they've obtained.
Marketing	Using data to keep users informed about events, products, and services that align with their interests.
Recruitment	Handling data provided by job applicants or inquiries for employment consideration.
Protecting Rights and Property	Using data to safeguard the rights and property of the organization and others, as well as complying with legal requirements.
Providing product and/or consultancy services	Processing data to deliver the products or consulting services offered by the organization.

Please note that the handling and processing of personal information during technical support are governed by our Terms of Use or other agreements. Handling of (personal) information specific to

projects are subject to Data Processing Agreements agreed upon in accordance with the statements of work and aligned with the EU General Data Protection Regulation (GDPR): Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016

Data subject rights

As a data subject, you have certain rights concerning your personal information under applicable data protection laws, including but not limited to the General Data Protection Regulation (GDPR). We are committed to respecting and facilitating the exercise of these rights. Here is a summary of your rights:

1. **Right to Access**: You have the right to request access to the personal data we hold about you and receive a copy of that data.
2. **Right to Rectification**: If you believe the personal data we hold about you is inaccurate or incomplete, you have the right to request corrections or updates.
3. **Right to Erasure (Right to Be Forgotten)**: You can request the deletion of your personal data when it is no longer necessary for the purposes for which it was collected, or if you withdraw your consent.
4. **Right to Restriction of Processing**: You have the right to request the restriction of processing your personal data under certain circumstances, such as when you contest its accuracy or the processing is unlawful.
5. **Right to Data Portability**: You can request a copy of your personal data in a structured, commonly used, and machine-readable format, and, in some cases, have it transmitted to another data controller.
6. **Right to Object**: You have the right to object to the processing of your personal data for specific purposes, such as direct marketing or purposes based on legitimate interests.
7. **Rights Related to Automated Decision-Making and Profiling**: You can object to automated decision-making, including profiling, when it significantly affects you.
8. **Right to Withdraw Consent**: If we rely on your consent for processing your personal data, you can withdraw your consent at any time.

To exercise any of these rights or if you have questions or concerns about how we process your personal data, please contact us using the information provided in the "Privacy Questions and complaints" section of our Privacy Policy. We will respond promptly to your requests and inquiries in accordance with applicable data protection laws. Please note that we may need to **verify your identity** before addressing certain requests.

Sharing of (Personal) data

Softline Group Northern Europe operates globally and may share your information with sister companies within the European Union. We may also share information in the context of selling, buying, merging, or reorganizing businesses, with appropriate data protection measures.

In accordance with local, governmental, or European jurisdiction in certain circumstances, we may disclose personal information to government agencies as required by law.

International data transfers

At Softline Group Northern Europe, we recognize that data may need to be transferred outside the European Economic Area (EEA) to fulfil our services and meet your needs effectively. We take the necessary steps to ensure that your data remains protected during such transfers.

United States Transfers

In some instances, data may be transferred to the United States. We want to assure you that we carefully vet our suppliers and partners who are involved in these transfers. Before any data is transferred, these entities undergo a vendor assessment process.

This assessment ensures that they adhere to stringent data protection standards that are equivalent to those within the EEA. We work diligently to establish agreements and safeguards that align with the General Data Protection Regulation (GDPR) and other applicable data protection laws. These measures are in place to maintain the confidentiality, integrity, availability, and security of your personal information.

If you have any questions or require more information regarding international data transfers or our data protection practices, please refer to our "Privacy Questions and Complaints" section in our Privacy Policy. We are committed to addressing your concerns and providing transparency about how we handle your data. Your trust and privacy of information are of utmost importance to us.

Data Security and Accuracy

At Softline Group Northern Europe we prioritize the security of your personal data, and we have implemented robust measures aligned with ISO 27001 standards and the key principles of GDPR. Our commitment is to safeguard your information from unauthorized access, disclosure, alteration, or destruction.

Access Control

We strictly control access to our systems and databases. Our comprehensive access control mechanisms ensure that only authorized personnel have access to personal data. Role-Based Access Control (RBAC) and other administrative and technological measures are in place to limit access to information on a need-to-know basis. Where possible MFA authentication principles are applied to systems.

Secure Hosting

We do not rely on internal servers or hosting, minimizing the risks associated with physical breaches. Our choice of SaaS and/or hosting partners follows stringent security protocols, ensuring that your data remains protected even beyond our own security measures. And stored in a location that is compliant to industry best practices and safeguards.

Physical Entry Controls

Physical entry to our facilities is tightly controlled. We employ administrative and technological controls to monitor and restrict access. These controls are in line with ISO 27001 requirements, preventing unauthorized individuals from entering our premises.

Technological Safeguards

We employ state-of-the-art technological safeguards to protect your data. This includes mechanisms to prevent unauthorized exports of data, alteration, disclosure, or destruction. Our commitment to data security is an integral part of our operations, and we continuously update and improve our security measures to stay ahead of emerging threats. We are dedicated to maintaining the confidentiality, integrity, and availability of your (personal) data.

If you have any questions or concerns about our data security practices or wish to exercise your rights regarding your personal data, please refer to our "Privacy Questions and complaints" section in our

Privacy Policy. Your trust and data protection are of paramount importance to us, and we are here to address any inquiries you may have.

Data retention

We retain your personal information as long as needed to fulfil the purposes for which it was collected or for other valid reasons, such as legal obligations or dispute resolution. We strive to retain your data only for as long as it is relevant to deliver services, communications, or purpose it was collected for. The organisation applies retention of data that is in line with regulatory requirements, or if none specified, industry best practices.

Data breach notification

In the event of a data breach, Softline Group Northern Europe follows a clear procedure to comply with GDPR requirements:

1. **Detection and Assessment:** We promptly detect and assess any data breach. This involves identifying the scope and impact of the breach.
2. **Immediate Mitigation:** We take immediate steps to mitigate the breach and prevent further unauthorized access or data loss.
3. **Internal Reporting:** Our internal IT team notifies relevant internal stakeholders, including IT, marketing, and management, to initiate a coordinated response.
4. **Assessment of Risk:** We assess the potential risks to individuals' rights and freedoms due to the breach.
5. **Notification to Authorities:** If the breach is likely to result in a risk to individuals' rights and freedoms, we report it to the appropriate data protection authorities within 72 hours of becoming aware of the breach. The report includes details of the breach, its consequences, and the measures taken.
6. **Communication with Data Subjects:** If the breach is likely to result in a high risk to individuals' rights and freedoms, we will also notify affected data subjects without undue delay. This communication clearly outlines the nature of the breach, potential consequences, and recommended steps for them to protect their rights.
7. **Documentation:** We maintain detailed records of all data breaches, including the facts surrounding the incident, its effects, and our response.
8. **Continuous Improvement:** Softline Group NE constantly reviews and updates our procedures to enhance data security and minimize the risk of future breaches.

Our commitment is to transparency, timely response, and minimizing the impact of data breaches on both individuals and the organization in accordance with GDPR requirements.

Cookies, Web Beacon, and Other Technologies

We use various technologies to enhance your online experience. These technologies help us gather usage statistics, personalize content, and make our websites more effective. Here's a brief overview:

Cookies: These are small pieces of data that websites send to your browser for various purposes. They may be used to measure website usage, improve navigation, or personalize your experience. Some cookies are stored only temporarily (session cookies), while others persist across visits (persistent cookies). We use persistent cookies to save your language and location preferences.

Privacy Preferences: While our websites may not recognize "do not track" signals, you can usually manage your privacy preferences through your browser settings. You can choose to accept or reject cookies or configure your browser to notify you when cookies are sent. We recommend keeping cookies enabled, as they enhance your website experience.

Web Beacons: These technologies work alongside cookies to improve customer service. You can disable cookies associated with web beacons or manage cookies through your browser or product settings.

Local Storage: We may use Local Shared Objects (like Flash cookies) and Local Storage (HTML5) to store content preferences. Your browser may provide tools to manage HTML5.

Third-Party Partners: Some third parties we collaborate with, like YouTube and LinkedIn, use cookies and web beacons on our site. Social media buttons may also collect information. Note that we don't control these third-party tracking technologies.

Online Advertising: While we don't deliver third-party online ads on our sites, we advertise our services on other websites. You should review the privacy policies of these websites and networks to understand their advertising practices and data collection. If you wish to opt out of targeted advertising, you can use tools provided by organizations like the Digital Advertising Alliance (DAA), Network Advertising Initiative (NAI), and European Interactive Digital Advertising Alliance (EDAA).

Links to Non-Softline Group Northern Europe websites and Third-Party Applications

Our websites may contain links to non- Softline Group Northern Europe websites and third-party applications. Your use of these links and applications is subject to the privacy policies of those third parties. It is the responsibility of the visitor of the third-party website to ensure their privacy and accept cookies under their own accountability.

Notification of Changes

We will notify you of any material changes to this Privacy Policy via our website or as required by law. If we intend to use your personal data differently from how it was collected, we will inform you and seek your consent, if necessary.

Consent management

Under the GDPR every data subject has the right to revoke their consent, as such this option is applicable to the information processed by Softline Group NE. Consent for processing can be obtained or given to the organisation in the following systems and conditions:

- Using the “Opt-out” or update preferences options that can be in the footer of every email we send.
- Through your cookie settings you could select to not accept any cookies and not consent to being tracked or adjust your consent settings for tracking.
- Get in touch with our organisation and send a request to withdraw your consent for us to process your information, see the section “Privacy questions and complaints” for more information.

Privacy Questions and complaints

If you have questions about this Privacy Policy or how we handle your information, please contact us at:

Softline Group Northern Europe
Coltbaan 33, 3439 NG,
Nieuwegein, Utrecht, The Netherlands

Email: info.nl@softline-group.com
Phone: +31 30 55 00 300

Before we can provide information or make corrections, we may ask you to confirm your identity.

Policy acknowledgement

When you engage with our websites and utilize our services, you signify your consent and agreement to adhere to the conditions and principles delineated in this Privacy Policy. This policy serves as a contract of understanding between you, the user, and our organization, establishing the rules and guidelines that govern the handling, processing, and protection of your personal information. We encourage you to thoroughly review this Privacy Policy to ensure your comprehension of your rights and responsibilities in the context of your interaction with our platforms and services. Your commitment to these terms is vital to maintaining the privacy and security of your data as well as fostering a relationship built on trust and transparency between you and our organization.

Should you have any questions or concerns about any aspect of this Privacy Policy, please do not hesitate to reach out to us through the provided contact information in our "Privacy Questions and Complaints" section. Your privacy and your trust are of paramount importance to us, and we are here to assist and address any inquiries or issues you may have. Thank you for entrusting us with your data and for engaging with our services in accordance with the principles outlined herein.

Monitor and review

This document shall be continually monitored and will be subject to regular reviews which take place annually, or when significant changes to the policy described or document is made. The next review date is November 2024.