

This website is managed by NILTASOFT LIMITED, Address: Kosta Charaki 11, 3rd floor, Flat/Office N302, 3041, Limassol, Cyprus. Registration number: HE190472; VAT-ID: CY-10190472H. Below we provide information about the legal aspects of personal data processing on our Websites. This Privacy Policy was updated in March, 2021.

We use the following terms in this policy:

1. Softline or “We”, “our”, “us” means NILTASOFT LIMITED.
2. Website means the current website <https://support.ecommerce.softline.com/>.
3. Software means the software for which Partner are intended to provide the licenses.
4. “User”, “Visitor” or “You” means a person visiting the Website to review information, providing feedback to Softline, sending request for technical support or cooperation or otherwise use a service.
5. Partner means one of the intellectual property owners for the software that has entered into the Contract with Softline to distribute its Software. It must be noticed that Partner may also be subject to the conditions of this policy related to Visitors.

Unless otherwise provided in this document or the context otherwise requires, the definitions of words shall be in accordance with the GDPR.

## GDPR for Users

In essence, We are an aggregator that cooperates with various Partners in order to provide with the access rights for the Software to the end users.

In relation to Your personal data (in the context of GDPR) We act as a data controller. The specific relationship between us and our partners may be provided in the Contract concluded between Softline and the Partner.

This policy may be supplemented with specific terms and conditions if with between any Partner and us is concluded a contract with non-standard terms. In such supplement we will point out specific cases of personal data processing with this Partner and clarify the conditions of personal data processing in a particular case.

As required by the GDPR, we have entered into a written agreement with our Processors regarding the processing of personal data, which strictly includes the mandatory conditions for the processing of this data, and we can guarantee that each of these Processors will correspond to the GDPR. Also, such agreements contain conditions on the periodic control of processors and the possibility of applying to them contractual sanctions.

### **What personal data do We process?**

**As a Controller, we process the following information about You:**

**In order to identify an individual or an authorized representative of a legal entity to provide you with requested services, satisfy your needs or answer your questions before contractual relationship if You contact us on behalf of your employer and send us a message:**

- via special form on the Website: first name, last name, e-mail, phone number, order number, files attached by you (remittance advice or screenshot showing an error message, for example);
- via e-mail or by phone: the exact list of personal data transmitted will be determined by you personally. This could be: email address, phone number, payment information, job title, areas of interest and specific information about the company you work for (company name and address), as well as information about the type of relationship that exists between the company you represent and you.

**For better understanding of our audience, their preferences and to improve our service -**

IP-address, statistics about visits to our website.:

**For marketing communications and provide You with marketing information and advertisement by email upon Your consent that you provide us in the special form on Website:**

- first name, last name, email.

**To whom should You contact to remove / refine / get access to personal data?**

You should contact Softline at [privacy@allsoftglobal.com](mailto:privacy@allsoftglobal.com).

**What is the legal basis for processing the data?**

We process personal data of Visitors on the basis of the Contract, the consent of the Visitors with respect to each category of personal data and on the basis of legitimate interest in connection with the need to make improvements to our Website (para 1 (a, b, f) Art 6).

Under the Contract, we process the personal data that is required directly for the provision of services.

The data We collect on the basis of legitimate interest is related to Your use of the Website. These data include: the number of page views, interest in fragments of information on the site, other statistical information, server logs.

Based on your consent, we process personal data that is not required to use the Website, but is required to provide you with any additional or relevant information. To do this, we use cookies in accordance with the pre-selected settings of your browser, and also interact with you by phone, email, messenger, chat, other similar service.

**Will the data be shared with any third parties?**

We use the analytics services listed in this Policy below.

**Third parties involved in the processing of personal data**

We use Analytics:

1. to provide statistics on the messaging effectiveness. The basis for data processing is the Contract (para 1 (b) Art 6 GDPR).
2. to track the Visitor's behavior on the website in order to improve the quality of the services provided. The basis for data processing is the Contract (para 1 (b) Art 6 GDPR).
3. to track advertising campaigns. The basis for data processing is the legitimate interest (para 1 (f) Art 6 GDPR).

We may use the following services to collect Analytics in order to improve the messaging efficiency and improve the quality of the services provided:

Google Analytics

GA Audiences

Floodlight

Omniure (Adobe Analytics)

Yahoo Analytics

Yandex.Metrics

Top mail

GA Audiences

Visual iq

For telephony we use the services of IP Telecom Bulgaria.

For the purpose of storing users' data, backups and logs We use the services of Servers.com B.V. and SoftLine Trade JSC. The basis for data processing is the Contract in accordance with para 1 (a) Art 6 GDPR.

FAQ for Users

Further information on compliance with the principles of confidentiality We provide in the answers to questions.

### **How do We use user data?**

We use information in compliance with the principles of confidentiality based on the processing grounds mentioned in Art 6 GDPR. No data collected is subject to sale and is not published by us in any way.

### **How can you confirm compliance with the GDPR?**

First of all, by means of legal, fair and transparent processing of personal data, and you can find these and other principles of personal data processing in this policy, in the terms of a contract, and in the service control options provided to you.

### **Is it possible to completely delete the data?**

Data will be deleted within 60 days after the use of this website.

When performing the deletion we will anonymize the personal data of the Users and their Contacts, taking into account Opinion 05/2014 on Anonymisation Techniques WP29.

### **How You implement technical and organizational measures designed to protect data subjects and reduce risk?**

Following the selection of the necessary measures, we entered into contracts with hosting providers who are able to implement the required protection measures, and also developed local documentation and organized business processes in accordance with the requirements of the GDPR.

### **Can you stop using the services of some processors?**

Our service is configured for specific processors. Using different processors depending on the preferences of the User is technically impossible or economically incompatible with the cost of implementing such functionality. Given the dependence on processors, We carefully considered their choice and made sure that our relationship with them complies with the requirements of the GDPR, as indicated by para 4 Art 28.

## **GDPR for Visitors**

We have allocated the Personal Information of Visitors into a separate category of personal data processed. However, Partners may also be included in this category along with any visitors to the Website.

### **Who is collecting the data?**

Softline is the Data Controller for the Visitor as defined by Art 4 (7) GDPR and collects data.

### **What data is being collected?**

Softline may collect, record and analyze information about Visitors to its website.

In addition, Softline may collect and process any personal data that the Visitor voluntarily provides through the forms of our website (by filling out the fields or/and attaching the files) or by direct contact via email or telephone, for example, to communicate with us.

## **How will the information be used?**

All Softline Visitors data is kept strictly confidential. We do not sell, transfer such data to any other companies for any purpose other than to provide data to certain service providers who can help us deliver or improve our service, including sales and marketing. In this case, any processing will be carried out in accordance with the requirements of the GDPR.

## **Cookie Policy**

This section is meant to explain the types of cookies and other tracking technologies that Website may place on your device, either when you are visiting our web properties, or if you are visiting the storefront of a merchant who uses our platform to power their site.

### **What are cookies?**

A cookie is a small amount of information that's downloaded to your computer or device when you visit certain websites. We use a number of different cookies on the website, including strictly necessary, statistics and unclassified cookies. Cookies make your browsing experience better by allowing the website to remember your actions and preferences. This means you don't have to reenter this information each time you return to the site or browse from one page to another. Cookies also provide information on how people use the website, for instance whether it's their first time visiting or if they are a frequent visitor.

### **What cookies do we use and why?**

We use different types of cookies on the Website. These cookies serve different purposes. According to their purpose, cookies may generally be assigned to one of the following categories:

- "Necessary Cookies", i.e. cookies that are strictly necessary for your booking on our Website;
- "Analytical", i.e. these cookies allow to customise this site to visitor requirements; we measure the number of visits, the number of pages viewed, what Visitors do on the site and how often they return to it.

### **How long will cookies remain on my computer or mobile device?**

The length of time that a cookie remains on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Session cookies last until you stop browsing and persistent cookies last until they expire or are deleted. Most of the cookies we use are persistent and will expire between 30 minutes and two years from the date they are downloaded to your device. See the section below on how to control cookies for more information on removing them before they expire.

### **What are the restrictions regarding your use of cookies?**

We expect web browser owners to comply with the requirements of the GDPR and give you the opportunity to manage cookies using the opt-in principle. If, in accordance with the current settings of your browser, the use of any cookies files is permitted, you can use these settings to limit the use of cookies.

### **How to control cookies?**

You can control and manage cookies in various ways. Please keep in mind that removing or blocking cookies can negatively impact your user experience and parts of our website may no longer be fully accessible.

Most browsers automatically accept cookies, but you can choose whether or not to accept cookies through your browser controls, often found in your browser's "Tools" or "Preferences" menu.

In addition, you may configure the settings of your browser / your Device used to browse the Website to enable, disable or delete cookies. Detailed instructions on how to configure your browser have been published by the browsers' developers, and can be found here:

- [Internet Explorer](#);
- [Edge](#);
- [Chrome](#); [Chrome for iOS](#); [Chrome for Android](#);
- [Firefox](#); [Firefox for iOS](#); [Firefox for Android](#);
- [Safari for macOS](#); [Safari for iOS](#);

For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser's help file or through such sites as [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### Google Analytics

Our website uses Google Analytics. Google Analytics uses cookies to help the Website analyse how users use the site. The information generated by cookies about your use of this Website will generally be transmitted to and stored on a Google server. These cookies "remember" what our users have done on previous pages and how they've interacted with the website. For more information on Google Analytics, visit [Google's information page](#).

You may prevent the storage of the cookies required to create a profile by selecting the relevant setting in your browser.

Depending on the browser you are using, you may install a browser add-on that will prevent tracking.

**The following table lists illustrate the cookies use on our website:**

#### Category: Necessary

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Cookie name	Description	Expiry
PHPSESSID	session identifier	3 months
guest_id	unique identifier of the customer in the shopping cart	3 months

#### Category: Analytical

These cookies collect information to help us understand how our website are being used, how effective our marketing campaigns are, or to help us customize our website for you.

Cookie name	Description	Expiry
additional_parameters	cookie parameter in which parameters from the URL are stored and which are required for vendor statistics and/ or the correct execution of the license	45 days
formData_order_type_customer__phone_	parameter, telephone number of	1 year the customer, legal entity
formData_order_type_customer__surname_	parameter, name of the customer - individual or representative of the	1 year legal entity

formData_order_type_customer__type__	parameter that designates the customer as a legal entity or an individual	1 year
formData_order_type_paymentSystemId__	parameter, type of payment system	1 year
formData_vatNumberPrefix	parameter, tax number (legal entity identifier)	1 year
formData_vatNumberValue	parameter, tax amount (for legal entities)	1 year
formData_order_type_company__juridicalAddress__	parameter, legal address of the legal entity	1 year
formData_order_type_customer__email__	parameter, customer email	1 year
formData_order_type_company__name__	parameter, company name	1 year
formData_order_type_additionInfo__	parameter, additional information	1 year shared upon user's decision
last_order	the order identifier, where 'the ID of the previous unpaid order is	3 months retained to offer it to pay with the next visit
tracking_ga_mp_accounts	account ID of GA	1 year
tracking_universal_analytics_premium_metric3	auxillary cookie for GA	1 year

**How long is the data stored?**

We store the data associated with the correspondence and the Website logs for no more than 30 days after the expiration of the grounds for data processing.

We store information about web page views and other use of the site for no more than 30 days, then we anonymize the data.

**How to file a complaint?**

If you consider that your legal interests as a subject of personal data are violated, you can contact us at [privacy@allsoftglobal.com](mailto:privacy@allsoftglobal.com)

**Changes to this Privacy Policy**

Our policies and procedures are under continual review. We may, from time to time, update this Privacy policy. Any such changes will be posted on this page.