

SORACO TECHNOLOGIES

Privacy Policy

Effective Date: March 20 2018

Soraco Technologies (ST) respects and protects the privacy of its customers. This Privacy Policy ("Policy") explains how we collect and use customers' information.

In this Policy, "personal information" means information that identifies or could be used by or on behalf of ST to identify an individual, but not including encoded, anonymized, or publicly available data that has not been combined with non-public personal information.

Direct Customers - Personal Information

Direct customers refers to customers who purchased ST's Solution. ST is the controller of data collected for our direct customers. Where ST collects personal information directly from its EU customers, it informs them about the purpose for which it collects the data and the uses of their personal information.

The information ST collects and uses is limited to the purpose for which customers engage ST. When you purchase our solution, we ask for information such as your name, company name and address, phone number, e-mail address, a unique computer identifier and a computer name.

ST may use the personal information and other information we collect about your use of our solution to operate it, tailor it to your needs, for support, identification and authentication purposes, to contact you about your use of our solution and send you marketing materials (subject to your opt-out option).

In the event of a data breach, ST will issue a breach notification to the affected parties, without undue delay, and not later than 72 hours after having become aware of it.

Customers of our Customers

For ST customers who host their License Server with ST, ST is the processor of data collected by our customers from their customers. In providing our service we do not own, control or direct the use of the information stored or processed on our platform and do so only at the direction of our clients. In fact, we are largely unaware of what information is being stored on our platform and only access such information as authorized by our customers or as required by law. Only our customers are entitled to access, retrieve and direct the use of such information. As such, we are only the "data processors" and not the "data controllers" of the information on our platform. Our EU customers, who control their customer data and send it to ST for processing, are the "controllers" of the data.

We have no direct relationship with our customers' customers whose personal data we may process and store. ST's customers are responsible for complying with GDPR data controller regulations and any relevant data protection legislation in EU member states before sending personal data to ST for processing. We work with our customers to help them provide notice to their customers concerning the purpose for which personal information is collected and used.

As the processors of personal information on behalf of our EU customers, we follow their instructions with respect to the information they control. In doing so we implement appropriate technical, physical and administrative measures against unauthorized processing of such information and against loss, destruction of, or damage to, personal information.

Additionally, one of the security measures within your control are the 2 encryption keys that you were provided when you subscribed to our service. You must prevent unauthorized access to these encryption keys by protecting these keys appropriately, limiting access to your computer, signing off after you have finished accessing your account and taking any other necessary measure to limit access to authorized personnel only.

In the event of a data breach, ST will notify the data controller without undue delay, and not later than 72 hours after having become aware of it.

Information Sharing

ST will not give, sell, rent or loan any personal information to any third party. We may disclose such information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service, or as otherwise required by law.

Access to data and right to be forgotten

ST acknowledges that you have a right to access, correct and delete your personal information. If you are a customer of our customer and wish to no longer be contacted by one of our customers then please contact that customer directly. If you are a customer of our customer and wish to delete, correct, amend or view your personal data, you should contact our customer directly. If you are one of our customers or otherwise feel that you need to contact ST you may do so using the contact information on our website or at the end of this document. If you contact ST with such a request we will respond within a reasonable time frame (30 business days or less).

Security

We use appropriate technical, organizational and administrative security measures to protect any information we hold in our records from loss, misuse, unauthorized access, disclosure, alteration and destruction. We use standard safeguards such as firewalls, secure passwords, and strict security procedures. Communication between our client computers and our server uses SSL encryption to ensure that your data is secure in flight. Unfortunately, no company or service can guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

Data Retention

Since our core license model is perpetual, ST retains personal information stored about our direct customers as long as needed, to provide Service to our customers, subject to our compliance with this policy. We retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

For ST customers who host their License Server with ST, ST retains personal information we process on behalf of our customers, as long as required by our customers, to provide Service to our customers, subject to our

compliance with this policy. We retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Contact Information

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