

Privacy

THIS PRIVACY STATEMENT EXPLAINS THE INFORMATION, COLLECTION AND USE POLICIES OF CLIENTCONNECT LTD. D/B/A **SOFTPLUG** AND ANY OF ITS AFFILIATED COMPANIES (“**SOFTPLUG**“, “**WE**” or “**US**”) WITH RESPECT TO YOUR USE, ACCESS OR INTERACTION WITH (“**USE**“) <https://softplug.github.io/website/> (THE “**SITE**”), AND EXCLUDES SERVICES THAT HAVE SEPARATE PRIVACY POLICIES THAT DO NOT INCORPORATE THIS PRIVACY POLICY (FOR EXAMPLE OUR CAREERS PAGE). BY USING THE WEBSITE, YOU CONSENT TO THE DATA PRACTICES AND INFORMATION COLLECTION AS DESCRIBED IN THIS STATEMENT. **SOFTPLUG** IS COMMITTED TO PRESERVING THE PRIVACY OF ITS USERS. THIS PRIVACY STATEMENT EXPLAINS WHAT INFORMATION WE MAY COLLECT AND HOW WE MAY USE IT.

IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS SET FORTH HEREIN, DO NOT USE THE SITE.

This Privacy Policy explains how SoftPlug treats your information and protects your privacy when you Use the Site and the rights and options available to you regarding your information. SoftPlug believes that you have a right to know our practices regarding the information we may collect and use when you Use the Site. The Site may include various features and content that are offered and delivered to you by us and/or by third parties, such as news and messages (“**Content**”).

The issues covered under this Privacy Policy:

- Information SoftPlug Collects and Receives;
- How SoftPlug Uses Your Information;
- Sharing Information with Third Parties;
- Third-Party Content;
- Social Networks;
- Third Party Advertisers, Cookies and Other Technologies;
- Minors;
- Your Rights;
- Information Obtained from Other Companies;
- Data Retention;
- Transfer of Data Outside Your Territory;
- Information Security;
- Do Not Track;
- Complaints;

- Notice to Californian Residents – Your California Privacy Rights;
- Changes to This Privacy Policy;
- How to Contact SoftPlug.

Information Softplug Collects and Receives.

When you Use the Site, we automatically collect and store the following types of information:

1. Log Files. We make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us.
2. Usage Information. Certain usage related information regarding your use and interaction with the Site, such as when and how you Use the Site.
3. Contact Information. If you communicate with us via our Contact Us Page or via email, we will collect your email address, name, phone number, company details and any other information voluntarily submitted by you in connection with such contact.
4. Cookies and Other Tracking Technologies. Our Site utilize “cookies”, anonymous identifiers and other tracking technologies in order to for us to provide our Site and present you with information that is customized for you. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Site.

How Sofplug Uses Your Information.

1. Respond to Your Requests.
 - We use the Contact Information that you voluntarily provide us to respond to your requests. We do ask that you do not provide us with any personal information (other than your name and email address which we require to respond to your queries) for such purposes.
 - We process this information on the basis of a legitimate interest to respond to your requests. In certain cases, such requests may relate to our products and services, in which case, we process this information on the basis of a performance of a contract with you.
 - If you do not provide us with your name and email address, we cannot respond to your requests.
 - For this purpose, we use third party service providers who will have access to your personal information. Such service providers include hosting and email platform providers.
 - We will retain this information for the duration of time required in order to respond to such requests or as otherwise required by law.
2. Direct Marketing.

- If you agree to receive marketing and commercial messages from us, we use your name and email address to send you marketing and commercial messages about our products and services.
- We process this data on the basis of a legitimate interest (to the extent that we have a business relationship with you in connection with your interest in or purchase of one of our products or services) or your consent.
- Please note that you have the right to object at any time to processing of your personal information for such purposes at any time and to withdraw your consent for such processing. You can ask us to stop sending email marketing, by following the ‘unsubscribe’ link you will find on all email marketing messages we send you. Alternatively, you can contact us.
- Please note that even if you opt out of receiving the foregoing emails, we will still send you a response to your requests that you submit through the Site.
- We will retain this information until you object to the processing of such Information for this purpose.
- For direct marketing purposes, we use third party email marketing, survey and e-commerce platforms who will have access to your name and address to assist us in providing direct marketing to you.

3. Use of the Site.

- We use Log Files and Cookies and Other Tracking Technologies, including IP address to operate, monitor, analyze and optimize the Site and provide you with certain features and functionalities on the Site.
- We will process this information on the basis of a legitimate interest in being able to provide and improve the functionalities of the Site offered to you. If you are located in the European Union, we also rely on your consent to use cookies.
- Based on the type of the cookie, we will retain this information for period lasting from 1 year to indefinite periods.
- With respect to Cookies and Other Tracking Technologies, to opt-out of providing this information to SoftPlug, please see the section headed “Third Party Advertisers, Cookies and Other Technologies”.

4. Tracking Advertising Performance.

- We run online media campaigns to advertise and promote our products and services through various online media channels. In order to measure the performance and effectiveness of these campaigns, we use Cookies and Other Tracking Technologies of our third-party media partners on the Site. These partners will receive a cookie ID and your IP address and other non-Personal Information such as your user agent.
- If you are in the European Union, we, and these third-party media channels, will process your Personal Information on the basis of your consent when you arrive at the Site.
- This information is stored for one (1) year.

- To opt-out of being tracked and identified through your Cookie ID by SoftPlug or our third-party media partners, please see the section headed “Third Party Advertisers, Cookies and Other Technologies”.
5. Disputes and Enforcement: Applicable law, regulations or Enforceable Governmental Request.
- We use your personal information to take action in case of a dispute involving you and to enforce the terms and conditions applicable to the Site. We also use your personal information to comply with legal and regulatory requirements (e.g., the disclosure of information to law enforcement or tax authorities), to protect against harm to the rights, property or safety of SoftPlug, our users, yourself or the public, and to protect against, detect, prevent, or otherwise address fraud or security issues.
 - For this purpose, we may share your information with law enforcement or other competent authorities and any third party, as may be required (e.g to respond to claims or satisfy any legal process, subpoena, or governmental request; or to protect the rights, property, or personal safety of SoftPlug, our users, partners, or the general public). We will also share this information with our professional advisors in the scope of this purpose.
 - We will retain this personal information for the amount of time as required by law to fulfill the above purposes. This may include ensuring that we have an accurate record of your dealings in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

Use of Non-Personal Information:

In addition to the above purposes, SoftPlug uses non-personal information it collects for the following purposes:

1. To operate and update the Site, and to provide you with existing and new functionality and features of the Site;
2. to improve, fix and customize the Site;
3. to monitor, analyze and optimize your use of the Site;
4. to maintain and improve the quality and operation of the Site, including, monitoring viewability of and interaction with the Site.

We retain this information for as long as necessary to fulfill our business and/or operational purposes or comply with a legal request. We may also choose to anonymize parts of your personal information so that it can no longer be identifiable or attributable to any person if we want to keep it for longer periods of time than the retention periods set forth above.

Additional Sharing of Information with Third Parties.

In addition to the above, we also share with third parties the information collected as follows:

- We share your information with our subsidiaries, affiliated and parent companies pursuant to the legitimate interest for the provision of the Site to you but their use of such information must comply with this Privacy Policy; and
- In the event SoftPlug goes through a business transition such as a merger or acquisition by another company, consolidation, change of control, reorganization, or sale of all or a portion of its assets, your information will be among the assets transferred.

With respect to sharing of your personal information, we take appropriate measures to minimize your personal information that we disclose to the third parties, and we require these third parties (i) to keep the data secured, and (ii) to use the data solely in compliance with this Privacy Policy. In any case other than the above, we will not share your personal information with third parties without your prior consent.

Transferring Personal Information From and Outside of the European Union

We will take appropriate steps to ensure that transfers of your personal information are in accordance with applicable laws and carefully managed to protect your privacy rights and interests. To this end, if we as the data controller share your information with our corporate affiliates or third party service providers outside the EEA, we have – prior to sharing your information with such corporate affiliate or third party service provider – established the necessary means to ensure an adequate level of data protection. This may be an adequacy decision of the European Commission confirming an adequate level of data protection in the respective non-EEA country or an agreement on the basis of the EU Model Clauses (a set of clauses issued by the European Commission) or EU – US Privacy Shield certification. We will provide further information on the means to ensure an adequate level of data protection on request.

Third-Party Content.

The Site may include Content which may be in the form of buttons, gadgets, advertisements, websites, products and services (including search services and advertisements) provided to you by third parties (collectively, “**Third Party Content and Services**”). The use of such Third Party Content and Services is subject to their privacy policies. In order to clarify, we do not review, approve, monitor, endorse, warrant, or make any representations with respect to such Third Party Content and Services and your access to any Third Party Content and Services is at your own risk. We are not responsible for the information contained and/or made available through, the practices of, or your use or inability to use such Third Party Content and Services. You expressly relieve us from any and all liability arising from your use of such Third Party Content and Services. We recommended that you read the terms, conditions and privacy policies of such Third Party Content and Services before using or accessing any of them.

Third Party Advertisers, Cookies and Other Technologies.

As indicated above, the Site uses advertisers, ad networks and various ad platforms and exchanges, and other technology vendors, to serve, monitor and analyze advertisements on the Site. In doing so, we may collect or allow such third parties to collect, through blocks of code called “pixels” or “web beacons”, certain information about you and send it to our servers and to our partners (either directly or indirectly). We or our partners, may package all or part of this information into small text files called Cookies and send the Cookie to your computer. As an example, Cookies may store the web pages you accessed, your interaction with advertisements directing you to or presented on the Site, features you used, your session duration and your

configurations and preferences of the Site. You can learn more about cookies on the Internet Advertising Bureau's website: <http://www.allaboutcookies.org>.

Such Cookies and other technologies allow us and our partners to recognize you on your next use of, access or visit to the Site, or on your visits or access to our partner's network (i.e. sites and services outside of SoftPlug). To find out more about third-party advertising networks and similar entities that use these technologies, see <http://www.aboutads.info>, and to opt-out of such advertising networks' and services' advertising practices, go to <http://www.aboutads.info/choices>.

Most browsers are initially set up to accept Cookies but you can reset your browser to refuse all Cookies or to indicate when a Cookie is sent. However, some functions of the Site may not function properly if your cookies are disabled.

You can also generally opt-out of receiving personalized ads from third party advertisers and ad networks who are members of the [Network Advertising Initiative \(NAI\)](#) or who comply with the [Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising](#) by visiting the opt-out pages on the NAI site and DAA site.

By using the Site, you affirmatively consent to the collection of information and Cookies as described above.

Minors.

The Site are not intended for minors in any jurisdiction and you hereby represent that you are not a minor according to you relevant jurisdiction. For example, users under the age of 13 in the United States and users under the age of 16 in the European Union are not permitted to use the Site. We do not knowingly collect, use, share or disclose any personal information from minors. We reserve the right to request proof of age at any stage, so that we can verify that minors are not using the Site.

We advise parents and guardians to regularly monitor their children's use of email and other online communications and activities. Control tools that create a safer online environment for children are available from third party online services and software providers.

In the event that it comes to our knowledge that a minor is using the Site, we will prohibit and block such a user from accessing the Site and will make all efforts to promptly delete any personal information with regard to such user, as applicable.

If you are a parent or guardian who has discovered that your child has submitted his or her personal information without your consent, please contact us as provided in this Privacy Policy and we will take the necessary steps to remove that information from our database.

Your Rights.

The following rights (which may be subject to certain exemptions or derogations), shall apply to EU users of the Site:

- You have a right to access personal information held about you. Your right of access can normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law.

- You have the right to ask us to correct inaccurate or incomplete personal information concerning you.
- If you no longer want us to use your personal information, you can request that we erase your personal information. Please note that if you request the erasure of your personal information, we will not be able to process your requests. We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety. We may also retain and use your personal information to the extent necessary to comply with our legal obligations, including for tax, legal reporting and auditing obligations. Also, because we maintain the Site to protect from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.
- You have a right to restrict the processing of your personal information, for example in case when we no longer need your personal information for the initial purposes for which they were collected, but it still may be required for the establishment, exercise or defense of legal claims.
- Where you have provided your consent to the processing of your personal information, you may withdraw your consent at any time by sending a communication to us specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.
- You have a right to object to our use of your Personal Information for direct marketing purposes. To object to Direct Marketing, please see the “Direct Marketing” section above. For opting out of cookies, please see the section “Third Party Advertisers, Cookies and Other Technologies” section above.
- You have a right to obtain a portable copy of personal information which is processed on the basis of your consent, or which is necessary for the performance of a contract between us. You have a right to have such portable copy of personal information transferred to another data controller in a structured, commonly used and machine-readable format.
- You also have a right to request details of the basis on which your personal information is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality.
- You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal information. We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

For all users of the Site, to the extent that you do provide us with personal information, if you would like to delete or correct any of your personal information that we may be storing, you may submit an access request by sending us an email.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform

you if we require further information in order to fulfil your request. In the event that your request, for example, would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

How we Protect your Information.

We have implemented and will maintain appropriate technical and organizational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. Note that, although we take measures to secure the information we collect and reduce the risk of unwanted disclosure, we cannot guarantee that the information will not be exposed as a result of unauthorized penetration to our servers. Nevertheless, we make commercially reasonable efforts to make the collection and security of such information consistent with this Privacy Policy and all applicable laws and regulations. As the security of information depends in part on the security of the computer or device you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

Do Not Track.

Do Not Track is a privacy preference that can be configured in certain web browsers (the “**DNT Feature**”); the DNT Feature, when enabled on a web browser, signals the websites you visit that you do not want certain information about your visit collected. As the Internet industry is in the process of defining how to interpret signals sent by the DNT Feature, SoftPlug does not currently respond or recognize DNT Feature signals.

Complaints.

If you have any complaints on our processing of your PII or if you believe that we have breached our own privacy policies or applicable law, we encourage you to contact us. However, please note that applicable EU data protection laws provide you with a right to lodge a complaint with the competent supervisory authority as well.

Notice to Californian Residents – Your California Privacy Rights.

California residents who provide us with certain types of personal information (as defined under California Civil Code Section 1798.83 (also known as California’s “Shine the Light” law)) are entitled to request and obtain from us once a calendar year information about the personal information we shared, if any, with other businesses for their own direct marketing use. To make such a request, please contact us through the email or physical address under the “How to Contact SoftPlug” section below.

When making such a request, please ensure that you write in the subject line and the body of your message “Request for California Privacy Information”.

Please be aware that not all information sharing is covered by California’s “Shine the Light” law.

Changes to This Privacy Policy.

We may, from time to time, change this Privacy Policy. We encourage you to visit and review this Policy frequently to stay informed. Prior to any material change to this Privacy Policy,

SoftPlug will present you with a detailed notification (e.g. a pop-up notification or other reasonable means) of such change. Other changes, including amendments made to the Policy to comply with legal requirements, will become effective immediately upon their initial posting. SoftPlug will also update the “Last updated” date at the end of this Privacy Policy. Your continued use of the Site after any change takes effect, will indicate your acceptance of the amended Privacy Policy. If you do not agree with any of the amended terms, you agree that you shall cease any further use of the Site.

How to Contact Softplug.

If you have any concerns or questions with respect to any matter covered by this Privacy Policy, you may contact us by email

Last updated: April 24, 2021