This Privacy Policy explains what information of yours will be collected by SoftServe when you access the website at www.softserveinc.com (the "website"), all related websites (subdomains), other services provided by SoftServe on which a link to this Privacy Policy is displayed, and all other communications with you through from written or oral means, such as email or phone. It also describes how the information will be used, how you can control the collection, correction and/or deletion of information and how to get in touch with us if you need. Our privacy practices are designed to provide a high level of protection for your personal data. We will not use or share your information with anyone except as described in this Privacy Policy. This Policy is incorporated into, and is subject to, the Terms and Conditions of use available on this website. Please read this Privacy Policy carefully to understand our views and practices regarding your personal data before browsing this website.

Please get familiarized with <u>SOFTSERVE PERSONAL DATA PROTECTION</u> RULES

# **VERSION**

This version of Privacy Policy was published 17/05/2024

# HOW THE INFORMATION ABOUT YOU IS USED

We use the information that we collect to operate and maintain our website and to provide the services and information that you request, to allow you contact us, provide access to requested whitepaper, respond to your comments, questions and concerns and for other purposes specified herein.

If you have contacted us via this website or otherwise, we may process your personal data you provided to us to be able to answer your questions, to organize the meeting, call or other communication based on our legitimate interest. We will also process your job applications where you applied for a

vacancy or would like to join us as freelancer relying on your consent. When you register your personal account, we will process your data in order to provide you information about vacancies, IT Academy courses you have attended and information about new courses we are planning to conduct.

We will send you updates on latest products, event announcements, and thought leadership or notifications of company news, hot vacancies and marketing offers if you tick the box to receive news and updates from us. We are relying on your consent which you provide by ticking that box. If you have consented to receive marketing, you have a right to withdraw your consent to marketing communication at any time. You may unsubscribe or update your email preferences at any time by following the instructions contained within the email or by sending an email to the address provided in the Contacting Us section. You may manage your subscriptions and you may withdraw your consent to marketing communication at any time.

We can also process your personal data if it is necessary for us to administer the contractual relationship between ourselves and our suppliers/clients in connection with the performance of a contract. If you are a representative of our current/potential client, vendor, partner we may process your personal data to develop and/or maintain business relations and communications, to promote our new products, works and services, to invite you to the meetings, events and organize them based on our legitimate interest.

Where you are our existing client and we have an existing relationship with you, or we reasonably believe you can be our client, we will send you information about products and services, events or other material that will be relevant to your individual interests and process your personal information to make sure we send you only relevant, targeted information based on our legitimate interest. You can opt-out of this at any time by following the instructions contained within the email or by sending an email to the address provided in the Contacting Us section.

If you have visited or intend to visit our event or participate our conference, we may process your personal data to invite you and to organize your participation in our existing and future events/conferences based on our legitimate interest. We may also send you marketing emails where you give us your email address expressly to receive marketing.

#### WHAT INFORMATION DO WE PROCESS

We collect information about you when you submit the information through the form on the website, when you connect your account to third-party services or sign in using a third-party partner (such as Facebook, Google + or LinkedIn) or otherwise make the information available for us (by phone, email, etc.) or our partners or vendors, as well as from publicly available sources. For example, we collect your full name, email, company name and address, job title, phone number and additional information you provide us when you request receiving whitepaper or contacting you directly.

We collect your full name, email, phone number, information contained in your CV, industry, position, info source from which you received information about SoftServe and additional information you provide us when applying for a vacancy. In cases where you would like to join us as freelancer, we will collect your full name, email, phone number, type of engagement, your professional profile, hourly rate and additional information you provide us. You can also register your personal account where you want to apply for a vacancy, register for IT Academy courses, track the status of your requests, and contact IT Academy recruiters. In this case we will collect your full name, email, phone number, date of birth, country, city, your language skills and information contained in your CV. From time to time, we may also receive personal data about you from third parties, for example if you publish your CV in the Internet or if someone recommended you as potential job candidate.

If you are a representative of our current/potential client, vendor, partner we may process your full name, contact details, position, company you represent, activities in relation to sales process, data on our communications with you, content and results of such communications, our internal notes about you, publicly available professional information about you.

We may also collect, store and use any other personal data that you choose to send to us. In cases where it is specifically stated that some data is not mandatory, you are free not to submit this data. Our website is not directed to children and we do not knowingly collect personal data from children. If you are under 16 years of age (or any other age under the applicable law), then please do not use or access the website at any time or in any manner or contact us and provide the consent of your parent or legal guardian.

#### **COOKIES**

We collect anonymous information from visits to our website to help us provide better customer service. For example, we record certain automatically collected information, which include IP address, web browser, OS, the web pages or sites visited just before or just after using the website, keep track of the domains from which you visit and we also measure your activity on the website, but we do so in ways that keep the information anonymous. SoftServe uses this data to analyze trends and statistics, to prepare analytics for business intelligence, to target our advertising and to help us provide better customer service. Cookies can be used to provide you with tailored information from a website.

#### How to opt out of cookies?

#### **Cookie preferences**

You can withdraw your consent to the use of non-essential cookies at any time by using the Cookie Preferences (link) feature. Here you can reject all non-essential cookies, consent to the use of certain categories of cookies or accept all. You can change your mind at any time and without justification on your part.

By clicking the "Customize" button, you will also be able to read the descriptions of the cookie categories.

#### **Browser settings**

Alternatively, most web browsers allow some control of most cookies through the browser settings. You can delete all cookies at any time by clearing the browsing history in your web browser. You can also disable or limit the use of cookies in your web browser settings. To find out more about cookies, including how to see what cookies have been set, visit <a href="https://www.aboutcookies.org">www.aboutcookies.org</a>. or www.allaboutcookies.org.

Please note that some of our services or functionality may not work at all or may not work properly if you block the use of cookies.

#### **Do Not Track**

"Do Not Track" (DNT) is a setting in web browsers that allows users to opt out of being tracked by websites, advertisers, and third-party companies. When DNT is enabled, a special header is sent with each web request indicating that the user does not want to be tracked. This setting adds a signal to your browser's header, telling other websites that you don't want their tracking cookies. Currently, we do not respond to Do Not Track signals.

#### **Google Analytics**

To opt out of being tracked by Google Analytics across all websites use Google Analytics Blocker. **YOUR RIGHTS** 

If you wish to access or amend any personal data we hold about you, or to request that we delete any information about you may contact us as set forth in the Contacting Us section. When technically feasible, SoftServe will transfer your personal data to you or transmit it directly to another controller. At any time, you may also object to processing of your personal data for direct marketing purposes or ask us to restrict processing of your personal data. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact us as set forth in the Contacting Us section. You also have a right to lodge a complaint with data protection authorities.

# DATA PROCESSING AND TRANSFER

In addition to SoftServe, in some cases, personal data may be accessible to certain types of persons in charge, involved with the operation of the website or external parties (such as third-party technical service providers, hosting providers, communications agencies). These third parties may have access

to, or process personal data as part of providing those services for us. Your information collected by SoftServe may be stored and processed in the Europe, United States or Ukraine or any other country in which SoftServe or its subsidiaries, affiliates or service providers maintain facilities.

SoftServe Entities worldwide as follows: Ukraine, US, Canada, UK, Germany, Malta, the Netherlands, Poland, Bulgaria, Romania, Singapore, UAE, Colombia, Mexico, Chile. Please get familiarized with information about SoftServe company offices.

SoftServe may transfer information that we collect about you, including personal data, to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. We will comply with GDPR requirements providing adequate protection for the transfer of personal data from Europe to third parties, in particular, will enter into the standard contractual clauses approved by the European Commission. By submitting your personal data, you agree to this transfer, storing and processing.

# **OTHER WEBSITES**

This website contains links to other websites. This Privacy Policy only applies to this website so when you link to other websites you should read their own privacy policies. SoftServe is not responsible for the privacy practices or the content of such websites.

# INTEGRATED SERVICES

You may be given the option to fill in the contact form, or to log in to our site through the use of your user name and passwords for certain services provided by third parties (each, an "Integrated Service"), such as through the use of your LinkedIn Facebook or Google+ account, or otherwise have the option to authorize an Integrated Service to provide personal data or other

information to us. By authorizing us to connect with an Integrated Service, you authorize us to access and store your full name, email address(es), date of birth, gender, current city, profile picture URL, and other information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Privacy Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to us, and make changes as appropriate. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting us.

# **DATA RETENTION**

We keep your personal data for as long as it is necessary to do so to fulfil the purposes for which it was collected as described above. The criteria we use to determine data retention periods for personal data includes the following: retention in accordance with legal and regulatory or internal business requirements. We may retain and use your information in order to comply with our legal obligations, resolve disputes, prevent abuse or till there is legitimate interest need.

Personal data may be retained in backups and/or historical <u>system archives</u> if there is no technical option to delete personal data in backups or archives and this data will remain in backups and/or archives for the specified period of time which is outlined in our <u>Backup/Restore Standard</u> and <u>Archiving Policy</u>.

If we no longer need your personal data as described above, we delete or anonymize the personal data, in accordance with regulatory provisions and applicable law.

### **SECURITY**

We endeavour to use appropriate technical and physical security measures to protect your personal data which is transmitted, stored or otherwise processed by us, from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access.

To increase data security and protect the rights and freedoms of data subjects we use encryption as a standard tool included in many operating systems and data protection solutions for both data at rest and in transit. Please get familiarized with our security measures implemented within the company in Information Security Posture.

# **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to change this Privacy Policy at any time in our sole discretion. If we make changes to this Privacy Policy they will be posted on the website so that you are always aware of what information we gather, how we might use that information and in what circumstances we may disclose it.

# **CONTACTING US**

In the event you have any questions, comments and requests about the information set out in this Privacy Policy, please contact us by submitting the form below.

#### CONTROLLER

For the purposes of the data protection legislation, the Data Controller is Ukrainian Information Technologies LLC d/b/a SoftServe (hereunder referred to as "SoftServe"), a company registered in Ukraine, having its registered office at Lviv region,Lviv, 79017,Vodohinna, 2 street. We have designated an EU representative, the contact details of which are the following: SoftServe Poland Sp. z.o.o., a company registered in Poland, having its registered office at 11-13 Jaworska street. 53-612 Wroclaw