



Ver. 2.0 – 06/08/2024

## Soldo Cloud Services Privacy Policy

Soldo understands that your privacy is important to you and that you care about how your personal data is used.

We provide a software-as-a-service (“the Services” or “our Services”) to organisations (“the Customers”) under an agreement located on our Terms and Conditions webpage, accessible at [www.soldo.com](http://www.soldo.com). It governs the use of our Services and allows authorised Users to enter data into the Services.

Data protection laws differentiate between Data Controllers and Data Processors of personal information. A Data Controller determines the purposes and means (or the why and the how) of processing personal information. A Data Processor processes personal information on behalf of a Data Controller subject to contractual restrictions.

We may act as either a Data Controller or Data Processor in respect of our data processing activities.

For example, we are the Data Controller for the personal data collected when authorised representatives express an interest in obtaining information about our Services, receive communications from us, submit inquiries, sign up for the Services, file a formal complaint with us, on behalf of a Customer or potential Customer. We are also the Data Controller for the personal data processed to ensure access to the Services.

Our Services are made available to Users at the request of the Customer. Users may only use the Services if they are employees or other authorised representatives of a Customer that holds a Soldo Business Account, and have been authorised by the Customer to access and use the Services on its behalf. In this context, the processing of Users’ personal data (for example, data related to payment transactions and expense reports) is carried out by Soldo in its capacity as a Data Processor on behalf of the Customer and based on the specific instructions given by the Customer as the Data Controller.

This Privacy Policy applies to all individuals located in an European Economic Area (EEA) country or in the UK who supply personal data to us in relation to our Services (for example, by attending our premises or communicating with us, or by accessing and/or using the Services), and concerns data for which Soldo is the Data Controller.

This Policy does not apply to the extent we process personal information in the role of a Data Processor on behalf of the Customer. For more information, please see the section “Notice to Users” below. A separate agreement governs the processing of any information provided to us by our Customers in their capacity as Data Controller (the Data Processing Agreement).

Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meaning as in our Terms and Conditions.

### About Soldo

Soldo is made up of different legal entities.



Soldo Software Ltd provides Cloud Services to customers resident in or with registered offices in an EEA country (except Italy) and the UK.

Soldo Italia Srl provides Cloud Services to customers resident in or with registered offices in Italy.

This Privacy Policy is issued on behalf of the Soldo companies, so when we mention “Soldo”, “we”, “us” or “our” in this Privacy Policy, we are referring to the relevant Soldo legal entity responsible for processing your personal information.

For the purposes of the European and UK data protection laws, the Soldo company that you have dealings with is the Data Controller of your personal information. This means that we are responsible for deciding what data is collected, how this data is going to be used and how this data is protected.

Services are provided through a mobile application and the web application <https://manage.soldo.com> (“the Business Console”).

We are required under the data protection laws to notify you of the information contained in this Privacy Policy. It is important that you read this Policy, together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

## Contact details

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the Data Protection Officer at [privacy@soldo.com](mailto:privacy@soldo.com)

You can contact Soldo Software Ltd as follows:

Address: 119 Marylebone Road, London NW1

Email: [privacy@soldo.com](mailto:privacy@soldo.com)

You can contact Soldo Italia Srl as follows:

Address: Via degli Olivetani 10/12, Milano

Email: [privacy@soldo.com](mailto:privacy@soldo.com)

You have the right to make a complaint to the Data Protection Authority of the state of your usual place of residence, place of work or place of the alleged infringement. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Authority, so please contact us in the first instance.

## What is personal data?



Personal data is defined as any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier.

This personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## **What personal data do we collect?**

The type of data we collect depends on how individuals use our Services, or otherwise interact with us.

We may collect personal information directly from you when you ask for information from us or submit information to us.

We may receive information from our related companies (for example, the Soldo entity that sets up your Soldo Business Account) or from your employer (where a Customer that holds a Soldo Business Account nominates you as a Super Administrator or invite you to access and use the Services), as well as from third-party sources such as public databases or partners.

The information we collect may include:

- information you provide to us through the Soldo website ([www.soldo.com](http://www.soldo.com)) forms or support channel (webchat), or otherwise provide it directly to us, including feedback to share or require any support with your Soldo Business Account, or when you ask for information from us or book a webinar, or file a formal complaint with us: name, address, business email address, phone number, job title, company name, company size;
- information you submit to us when applying for our Services: name, country, company name, date of birth, place of birth, job title, company size, business email address;
- information provided when you enter into a contract with us: name, job title, email address, signature on the contract for the Services (direct sales);
- information related to your Super Administrator account, including access to information collected as part of the identification process: name, citizenship, tax identification number, date of birth, place of birth, province of birth, country of birth, residential address, passport or other government-issued identification, and any information captured on such identification, company name, company size, job title, position in company, company ownership, management role, ownership role, business email address, password, User ID (access code assigned), User passcode;
- information provided by you as a User when accepting a Super Administrator's invitation and activating your account: name, business email address, password, User ID (access code assigned), User passcode;
- information about your activities on the Services and connection data: login data, kind of device you are using, type and version of your internet browser, type and version of your operating system, location, time zone setting, whether you are logging in from the mobile application or the web application, cookie identifiers;
- information received from third-party sources: name, company name, job title, and business email address.

## **Why do we collect and use your data?**



Our purpose for collecting your personal data is so we can:

- provide the information requested by you or respond to any feedback you sent us;
- provide a webinar;
- send you event reminders;
- manage our contract with you;
- set up your Super Administrator account or complete your registration as a User in order to provide access and use of the Services;
- monitor the use and performance of the Business Console and the mobile application to ensure effective and secure functioning, and improve the performance of the Services;
- provide customer service and support;
- manage our relationship with you;
- send you related information, including billing for our Services in accordance with our contract with you;
- keep records of the customers. We keep and update your personal data in our customer database to maintain our relationship with you and/or your company;
- comply with a legal obligation to which we are subject;
- conduct auditing activities to ensure we comply with applicable laws and regulations, and internal policies;
- send you marketing communications on products and services we offer that are similar to those you have already used and we think may help you get the most out of Soldo;
- ask for your feedback to understand how satisfied you are with our Services or invite you to take part in research activities to test messaging, asset and campaign ideas, or send you invitation emails asking you to write a review on the Trustpilot platform about our Services, in order to improve features and functionalities provided as part of the Service, to help us deliver the best possible experience and help other businesses decide whether Soldo is right for them;
- respond to and defend against legal claims.

## The lawful basis for processing your data

The lawful basis we rely on for processing your personal data in relation to information we collect as part of the contract process, is to take steps at your request prior to entering into a contract for services.

The lawful basis we rely on for processing your personal data in relation to information we need to provide our Services and bill for them, including contract and customer relationship management, is that it is necessary for the performance of a contract to which you are a party.

The lawful basis we rely on for processing your personal data for accounting purposes, is our legal obligation in national laws to retain certain personal data for a specified number of years.

We may also process your personal information where it is necessary to pursue our legitimate interests (or those of a third party), provided that your interests or your fundamental rights and freedoms do not override our interests. Our legitimate interests include: ensuring the security and the reliable functioning of the Services, keeping records of the customers, performing internal and certification audits, processing contact details for marketing communication on similar products and services, analysing our services to provide the best possible User experience, inviting you to take part in research activities, responding to and defending against legal claims.

## How long do we keep your data for?



We will keep your personal data for as long as is necessary for the purposes it was collected.

Note that retention periods vary in different jurisdictions and are set in accordance with local regulatory retention requirements.

We generally keep your data for 10 years after the end of the business relationship. After this period, the personal data will be cancelled.

We may keep your personal data for longer because of an ongoing court claim or another legal reason. In this case, we will retain your data for a period of 10 years after the closure of the case.

## **Data security**

We take the security of your personal data seriously. All personal data you provide to us will be stored securely in accordance with our policies.

We implement appropriate technical and organisational measures that comply with the relevant applicable laws and regulations, to ensure your personal data is adequately protected from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, when transmitted, stored or otherwise processed.

We restrict access of your personal data to those persons who have a business reason for knowing such information. We continuously educate and train our staff about the importance of confidentiality and protection of customer data.

All our suppliers who process personal data for us are required to keep that data secure.

## **Data store**

Personal data is held in data centres within the EEA.

## **Data sharing**

Your information may be processed by our staff or by the staff of other companies we work with to deliver our business.

The data we collect may be shared between Soldo companies or with suppliers that provide us with technology, customer support, event administration and communication services to help us provide our services to you and send you emails.



All the recipients of your personal data are required to take appropriate security measures to protect your personal data. They must only process your personal data for specified permitted purposes and in accordance with data protection laws.

We, or processors acting on our behalf, will only process personal data in countries outside the EEA and the UK, when we are assured those countries provide an adequate level of data protection. In absence of an adequacy decision, transfer will be made on condition that individual's enforceable rights and effective remedies are available, and appropriate safeguards are in place.

We will share your data if we are required to do so by law, for example, by court order, or to prevent fraud or other crime.

## Your rights

We ensure you can exercise your rights in relation to the personal data you provide to us.

You can request access to the personal data we hold about you at any time.

You can also ask us to update your personal data if it changes or it is incomplete. In certain circumstances, you can request we erase the personal data we hold or ask us to stop or restrict processing if you have an objection.

You have the right to object to us processing your personal information based on our legitimate interest, unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests, or where we need to process your information to investigate and protect us or others from legal claims.

Where personal data are processed for direct marketing purposes carried out for legitimate interests, you have the right to object at any time to processing of your personal information. If you want to stop receiving marketing emails on similar products and services, please use the opt-out box which is on all marketing emails.

In some circumstances, you may be entitled to obtain your personal data from us in a format that makes it easier to reuse your information in another context and transmit this data to another data controller of your choosing without hindrance. This is referred to as the right to data portability. The right will only apply to the information you have provided and where it is held electronically, and where you have either consented to processing, or where processing is conducted on the basis of a contract you have with us.

If you have any privacy-related questions or unresolved problems relating to the use of your personal data, you can contact us at [privacy@soldo.com](mailto:privacy@soldo.com).

You have the right to make a complaint at any time to the relevant data protection authority. We would appreciate the chance to deal with your concerns before you approach the data protection authority, so please contact us in the first instance.



## Notice to Users

By accessing or using our Services, you acknowledge and agree to be bound by the Soldo [Terms and Conditions](#). You are responsible for all actions that are performed on or through your Soldo User account.

Our Services are intended for use by businesses. If you are using our Services through an organisation that holds a Soldo Business Account (for example, you have been invited by the organisation to register as a User, and therefore have been authorised to use the Services on behalf of the organisation), that organization is the administrator of the Services, is responsible for your account, including but not limited to adding or removing you from the Services and managing permissions, and ultimately for your use of the Services. If this is the case, please direct your data privacy questions to your administrator (the Data Controller of your personal information) as your use of the Services is subject to that organization's policies.

From time to time, you may receive product communications within the Services or via the email addresses provided to Soldo by the Super Administrator during the registration process to the Services.

We may also process your information for communication with you, necessary for the improvement of the functioning and the quality of the Services (for example, we may send you a few in-product intercepts/pop-ups or use the email you have voluntarily provided to us through the Services, to invite you to take part in product research activities). Where this is enabled by your organisation, we will process a limited amount of your personal data in our capacity as a Data Controller and will keep it for no longer than we need it (for example, two months after the release of the pop-up message). Our lawful basis for processing this data is our legitimate interest in understanding how to improve our Services and your User's experience. You will have the right to object to the processing of your personal data by opting out of receiving such communications.

## Changes to this policy

We may update this privacy policy from time to time. In that case the last updated date at the bottom of this page will also change. Any changes to this privacy policy will apply to you and your data immediately.

Last updated 06 August 2024