



## General Privacy Policy

Ver. 2.0 – 22/06/2023

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

This privacy policy aims to give you information on how Soldo collects and processes your personal data through your use of [www.soldo.com](http://www.soldo.com), including any data you may provide through completing the online forms or communicating via webchat, or when you register to receive marketing information from us. This privacy policy also covers information about what data Soldo collects and processes as part of its call and email business to business marketing campaigns.

### About Soldo

Soldo is made up of different legal entities.

Soldo Financial Services Ireland DAC provides Financial Services to customers resident in or with registered office in an EEA country.

Soldo Financial Services Ltd provides Financial Services to customers resident in or with registered office in the UK.

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

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

The website is managed by Soldo Software Ltd.

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 law, Soldo Software Ltd is the controller of your personal information processed for marketing activities or collected through the website, unless you submit data via online forms or webchat having prior relationship with a Soldo company, or specified otherwise. If this is the case, the Soldo company that you have dealings with is the 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.

We are required under the data protections 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 Financial Services Ireland DAC as follows:

Address: 33 Sir John Rogerson's Quay, Dublin 2, D02 XK09

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

You can contact Soldo Financial Services 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 complain 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?

We may collect personal information directly from you, as well as automatically related to your use of our website.

We may receive information from our related companies or third-party sources such as public databases or partners.

The information we collect may include:

- information you may voluntarily submit to us when you make contact with us, fill in the forms, sign up to our marketing emails, register to our services or a demo, or a webinar;
- information on how you use the site, using cookies and page tagging techniques;
- information received from third-party sources: name, company name, job title, business email address.

## Cookies

Like many websites, this website uses cookies. A cookie is a small piece of data that a website stores in the visitor's computer or mobile device. Cookies are widely used in order to make website work, or work more efficiently, as well as to provide information to the owners of the site.

This site uses cookies to collect and analyse information on site performance and usage, to provide social media features and to enhance and customise content and advertisements. We obtain certain information by automated means when you visit this site, such as the IP address of the device you use to connect to the Internet and the pages accessed. By collecting this information, we learn how to best tailor the website to our visitors.

Cookies other than the technical ones will be set only if you accept. You can change your cookie preferences at any time by clicking on the gear icon that appears on the left bottom corner of each website page.

To learn more about our use of cookies, [click here](#).

## Why do we collect and use your data?

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

- provide navigation and use of the website;
- provide information or service requested by you, or respond to any feedback you sent us;



- provide a demo of our services;
- provide a webinar;
- send you event reminders;
- invite you by email to complete the free trial registration form;
- send you marketing communications if you have consented to receiving marketing emails from us;
- create call and email business to business marketing campaigns;
- monitor the use of the site to identify threats;
- monitor the performance of the site and make performance improvements.

## The lawful basis for processing your data

The lawful basis we rely on for processing of analytics information and user preferences, and contact details for marketing communication, is your consent.

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: processing your personal data in relation to site security to ensure the security and integrity of our website, sending registration invitation emails, and creating call and marketing business to business campaigns.

The lawful basis we rely on for processing all other personal data is that it is necessary for the performance of a contract or in order to take steps at your request.

## 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.

Cookies retention period can be found on our [cookie policy](#).

## 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 put in place security measures to minimise the possibility of the loss or unauthorised access of your personal data. 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 privacy of customer data.



We maintain physical, electronic and procedural safeguards that comply with the relevant applicable laws and regulations, to protect your personal data from unauthorised access. We set up systems and processes to prevent unauthorised access or disclosure.

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 European Economic Area (EEA) and the UK.

## **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, and lead generation, marketing, 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.

Where we are relying on your consent to use your personal data, you can withdraw that consent or unsubscribe from our services at any time. If you want to disable the use of some cookie on our website, please use the gear icon that appears on the left bottom corner of each website page. If you want to stop receiving marketing emails, please use the unsubscribe button which is on all marketing emails.



You can request access to the personal data we hold about you at any time by contacting the Data Protection Officer whose contact details are found at the top of this policy.

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.

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 the Data Protection Officer.

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.

### **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 22 June 2023