

Soldo SaaS Services Privacy Notice

Soldo recognises the importance of protecting your personal data and is committed to handling it responsibly and transparently.

This Privacy Notice explains how Soldo collects and processes personal data in connection with its SaaS Services.

Soldo's SaaS Services support organisations in managing employee spending, related approvals, supporting documentation and reporting.

For customers registering for Soldo services online, access to the SaaS Services may be provided before the identity and company process verification (Verification) is completed. During this period, customers can access and configure the SaaS Services, but regulated financial services remain unavailable until the Verification is completed. Customers can continue the Verification process at any time through the links available within the SaaS Services. The account will be closed if the required Verification is not completed within six (6) months of the customer's last interaction with Soldo, or earlier at the customer's request.

Customer organisations determine who can access the SaaS Services and how information is processed through them. Information processed through the SaaS Services on behalf of a customer organisation is subject to that organisation's privacy notice.

This Privacy Notice should also be read together with any additional privacy notices applicable to specific services or processing activities provided by Soldo.

About us

Soldo operates through several legal entities.

Soldo Software Ltd provides SaaS Services to customers established in the United Kingdom and the European Economic Area (EEA), except for Italy.

Soldo Italia S.r.l. provides SaaS Services to customers established in Italy.

In this Privacy Notice, "Soldo", "we", "us" or "our" refers to the relevant Soldo company, which is the controller of personal data in connection with the SaaS Service.

How to contact us

If you have any questions about this Privacy Notice or wish to exercise your rights under applicable data protection laws, please contact the Data Protection Officer at privacy@soldo.com.

Soldo Software Ltd

119 Marylebone Road, London NW1, United Kingdom

privacy@soldo.com

Soldo Italia Srl

Via degli Olivetani 10/12, Milan, Italy

privacy@soldo.com

What personal data we collect

We may collect personal data directly from you or from the organisation you represent.

The categories of personal data we collect include, for example:

- identification and business contact information (name, business email address, telephone number, and job title);
- account, authentication and access information (account identifiers, login credentials and access records);
- technical, usage and security information (IP addresses, device and browser information, application logs and security records);
- communications and support information (personal data relating to correspondence, enquiries, support requests and complaints).

The provision of certain personal data is necessary to establish and manage the relationship with the customer organisation and to provide access to the SaaS Services. Failure to provide such information may prevent us from making the SaaS Services available or responding to related requests.

Why we use personal data

We process personal data for the following purposes:

- a. Customer relationship management
to manage our relationship with customers and their authorised representatives, including account administration, billing, customer support and service-related communications.
- b. Security and operation
to protect the security, availability and reliability of our services, including managing access, monitoring performance and responding to security incidents.
- c. Monitoring, improvement and development

to monitor the performance and effectiveness of our services, identify opportunities for improvement, optimise existing functionalities and develop new features and capabilities.

d. Customer engagement and participation

to invite customer representatives and, where enabled by the customer organisation, other users authorised to access the SaaS Services to participate in optional activities, including research, feedback, surveys, usability testing, customer experience, customer reference, sales engagement, demonstrations, webinars, events and similar initiatives.

Participation is voluntary. Where an activity is subject to a separate privacy notice, that notice will be provided at the time of the invitation.

e. Compliance and audits

to comply with legal and regulatory obligations, respond to requests from individuals and competent authorities, and manage internal and external audits and certification activities.

f. Legal claims

to establish, exercise or defend legal claims.

Lawful basis for processing

We rely on the following legal bases:

Contract and steps taken at your request

Processing is necessary to take steps at your request prior to entering into a contract, administer the contractual relationship with customers and provide the SaaS Services.

Legitimate interests

Our legitimate interests include maintaining and improving the quality, effectiveness, security and reliability of the SaaS Services, promoting awareness and adoption of new functionalities and related service enhancements, facilitating participation in customer engagement and product-related initiatives, ensuring compliance with recognised standards and best practices, and protecting our business, systems and legal rights.

Legal obligation

Processing is necessary to comply with applicable legal and regulatory requirements, including obligations arising under applicable laws, regulations, court orders or requests from competent authorities.

How we share personal data

Personal data are shared with other Soldo entities where necessary for the purposes described in this Privacy Notice.

We also use technology, communication, security and other professional service providers that process personal data on our behalf. These recipients are required to protect personal data and process it only in accordance with our instructions.

We may also disclose personal data to professional advisers, auditors, certification bodies, competent authorities, courts, law enforcement agencies or other recipients where necessary to support audit, certification or legal processes, establish, exercise or defend legal claims, or where otherwise required or permitted by law.

International transfers of personal data

Where personal data is transferred outside the European Economic Area or the United Kingdom, we ensure that appropriate safeguards are implemented in accordance with applicable data protection laws.

These safeguards may include transfers to countries recognised as providing an adequate level of protection, the use of the European Commission's Standard Contractual Clauses (SCCs) and, where applicable, the UK International Data Transfer Addendum (UK Addendum).

We may also rely on the EU-US Data Privacy Framework or the UK Extension to the EU-US Data Privacy Framework, as applicable, for transfers to certified organisations in the United States.

How long we keep personal data

We retain personal data for as long as necessary to fulfil the purposes described in this Privacy Notice, in accordance with applicable legal and regulatory requirements and Soldo's legitimate business needs.

Retention periods vary depending on the nature of the personal data, legal and regulatory requirements and the jurisdiction applicable to the customer relationship.

Where different legal and regulatory retention periods apply across jurisdictions, we apply a harmonised retention approach to ensure consistent records management and the availability of records across Soldo entities.

Personal data forming part of the customer relationship, including customer onboarding, contractual and account records, customer support and related communications, is generally retained for six (6) years following the end of the customer relationship for customers established in the United Kingdom or Ireland, and for ten (10) years for customers established in other EEA countries. These retention periods take into account applicable legal and regulatory requirements and Soldo's harmonised data retention approach, including the need to maintain appropriate records and support related audit and compliance activities.

For analysis and performance monitoring activities, personal data is kept in identifiable form only for a limited period, determined by the specific analysis or monitoring activity and the nature of the data involved.

At the end of the applicable retention period, personal data will be deleted or anonymised in accordance with our internal operational procedures.

Personal data may be retained for longer where necessary to establish, exercise or defend legal claims.

How we protect personal data

We take the security of personal data seriously and implement appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

These measures are designed to ensure a level of security appropriate to the risks associated with the processing of personal data and include measures to safeguard the confidentiality, integrity and availability of personal data.

Access to personal data is limited to individuals who have a legitimate business need to access it. We also require third parties processing personal data on our behalf to implement appropriate security measures and comply with applicable data protection requirements.

Your data protection rights

We are committed to ensuring that you can exercise your rights in relation to your personal data.

Under applicable data protection laws, you have several rights regarding the personal data we hold about you. In particular, you may have the right to:

- request access to the personal data we hold about you;
- request correction of inaccurate or incomplete personal data;
- request the erasure of your personal data in certain circumstances;
- request the restriction of processing;
- object to the processing of your personal data where we rely on our legitimate interests as the legal basis for processing;
- receive the personal data you have provided to us in a structured, commonly used and machine-readable format and transmit it to another data controller. This right applies where the processing is carried out by automated means and is based on a contract with us.

Where you object to processing based on our legitimate interests, we will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or where the processing is necessary for the establishment, exercise or defence of legal claims.

We do not carry out decisions based solely on automated processing, including profiling, that produce legal effects concerning you or similarly significantly affect you.

You can lodge a complaint with the data protection authority in the country where you live or work. For example:

- United Kingdom - [Information Commissioner's Office \(ICO\)](#)
- Ireland - [Data Protection Commission \(DPC\)](#)
- Italy - [Garante per la protezione dei dati personali](#)
- Other EEA countries - [European Data Protection Board list of supervisory authorities](#)

We would, however, appreciate the opportunity to address your concerns before you approach the authority, so please contact us in the first instance.

Changes to this Privacy Notice

We may update this Privacy Notice from time to time to ensure that it remains accurate and up to date.

Where appropriate, we may also notify the customer's designated contact of material changes to this Privacy Notice.

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