



***MusalaSoft***

**DATA PRIVACY POLICY**

## 1. INTRODUCTION

Musala Soft understands the importance of privacy. Therefore, we are committed to ensure the measures that protect the personal information you have decided to share with us.

We are the controller in accordance with current privacy legislations.

The following information is designed to help partners, customers, applicants and users of our website understand what information we collect and how we handle and use the information after that. This Data Privacy Policy ("The Policy") explains our practices, including your choices and rights, regarding the collection, use, and processing of certain information, including your personal information.

## 2. PRINCIPLES OF DATA PROTECTION

The processing of personal data shall be carried out in accordance with the principles of data protection set out in Article 5 of Regulation (EU) 2016/679, as well as other local data protection laws. The policies and procedures of Musala Soft aim to ensure compliance with these principles:

- Personal data must be processed lawfully, in good faith and transparently:
- Personal data may only be collected for specific, explicit and legitimate purposes (Principle of Purpose limitation).
- Personal data must be adequate, relevant, limited to what is necessary for the processing for that purpose (Principle of data minimization).
- Personal data must be accurate and up-to-date at all times, and the necessary efforts must be made to enable immediate (within the scope of possible technical solutions) deletion or rectification (Principle of Accuracy).
- Personal data must be stored in such a form that the data subject can only be identified for as long as is necessary for the processing (Principle of Storage limitation).
- Personal data must be processed in a way that ensures adequate security (Principle of Integrity and confidentiality).
- Observance of the principle of accountability - the principle of accountability requires the administrator to prove that he/she observes the other principles in the GDPR and explicitly states that this is his/her responsibility.

### 3. COLLECTION OF INFORMATION

The collection and use of information, enable us to provide the services and products we offer, meaning, they are inevitable in order to be able for us to perform our business and provide services or offer products to you. We do not use or share your information in any other way except what is prescribed in this Policy.

Information you provide to us, such as, but not limited to: e-mail address, name and surname, address or postal code, telephone number, professional and educational experience, can be collected by us in a number of ways:

- When business communication is in process;
- Through e-mail communication;
- When you contact us via our website contact form;
- When applying for a job position and/or applying for relocation.

### 4. PURPOSES OF COLLECTING PERSONAL DATA

- Service Delivery and Communication - we collect personal data to provide our software development services and to communicate with clients about projects, updates, and support;
- Account Management - personal data is used for creating and managing user accounts, including authentication and account recovery;
- Analytics and Improvement - we gather data for analyzing user interactions and website performance, enabling us to enhance our services and user experience;
- Legal Compliance - we collect and store data as required by applicable laws and regulations;
- Security and Fraud Prevention - personal data aids in maintaining the security of user accounts, detecting fraudulent activities, and ensuring service integrity;
- Consent and Preferences - data helps us respect user preferences and manage consents, including cookie preferences and marketing communications;
- Payment Processing - for payment processing, we collect necessary data to facilitate secure transactions;
- Research and Development - we use aggregated and anonymized data to improve our software offerings and services;
- Third-Party Integration - data enables integration with third-party services that enhance user experience, like social media plugins or payment processors;
- Recruitment (if applicable) - data is collected for recruitment purposes when individuals apply for positions within our company.

## 5. DATA TRANSFER

Your information may be subject of transfer to service providers and other third parties. However, all such entities will adhere to the internal policies and procedures of Musala Soft. These internal guidelines govern the collection and processing of personal data, ensuring alignment with fundamental data protection principles. This encompasses the equitable handling of personal data and the maintenance of a sufficient level of protection as per the GDPR and applicable data protection laws.

In case of international transfers of information to countries outside of the European Economic Area and other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with this Policy, and as permitted by GDPR and the applicable laws on data protection.

## 6. DATA SECURITY

In order to achieve high level of protection of your data, we have established safeguards and measures and applied them so adequate organization, administrative and technical protection is achieved and applied thoroughly.

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed on or offline is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

## 7. DATA DISCLOSURE

We might disclose your data within Musala Soft in order to be able to achieve best possible service to you. As a data controller, Musala Soft regulates and safeguards the processing of your data through intercompany contracts and procedures and this Policy applies to all of them.

Personal data may also be disclosed to and partners that Musala Soft engages with, to perform a better service towards you, i.e. invitations, recruiting, partnering product purchases and promotions etc.

Such contractors are personal data processors for Musala Soft to which we require the same level of organizational and technical measures to safeguard your data.

In connection with any reorganization, restructuring, merger or sale, or other transfer of assets, we will transfer information, including personal information, provided that the receiving party agrees to respect your personal information in a manner that is consistent with our Privacy and Cookies Policy and safeguard procedures, as well as applicable laws and regulations.

Personal data may be disclosed to the police or other authority provided that Musala Soft is required to disclose the information by mandatory law or by mandatory ruling of an authority.

## 8. DATA STORAGE AND DESTRUCTION

Musala Soft does not store personal data in a form that allows the identification of subjects for a longer period than necessary in relation to the purposes for which the data were collected.

Musala Soft may store data for longer periods only if the personal data are processed for archiving purposes, for public interest purposes, scientific or historical research and for statistical purposes, and only with the implementation of appropriate technical and organizational measures to ensure the rights and freedoms of the data subject.

The retention period for each category of personal data is specified in the Internal Data Mapping document.

The Procedure for personal data erasure, as well as the rules for destroying information on unused recording media, shall apply in all cases. Personal data shall be securely destroyed by appropriate technical or organizational measures.

## 9. OTHER WEBSITES, PLATFORMS & APPLICATIONS

Musala Soft's website may contain reference and linked third party websites, platforms, applications and advertisers. We are not responsible for the privacy practices or the content of such websites, so by clicking on those links you may be directed to those websites which are not under control of Musala Soft and need to comply with those respective third-party policies. If you have any questions about how these other websites use your information, you should review their policies and contact them directly.

Social plugins and social applications are operated by the social network themselves, and are subject to their terms of use and privacy policies.

## 10. COOKIES, ADVERTISING & MARKETING

Cookies and Web Beacons:

- We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site and our mobile application to help customize the Site and improve your experience. For more information on how we use cookies, please refer to our Cookie Policy posted on the Site.

Internet-Based Advertising:

- Additionally, we may use third-party software to serve ads on the Site, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use cookies or similar tracking technology to help manage and optimize your online experience with us.

## Website Analytics:

- We may also partner with selected third-party vendors, such as Google Analytics, to allow tracking technologies and remarketing services on the Site through the use of first party cookies and third-party cookies, to, among other things, analyse and track users' use of the Site, determine the popularity of certain content and better understand online activity. By accessing the Site, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors. However, if you do not want any information to be collected and used by tracking technologies, you can visit the third-party vendor or the Network Advertising Initiative Opt-Out Tool or Digital Advertising Alliance Opt-Out Tool.

You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain opt-out cookies, plug-ins, or settings.

## 11. YOUR DATA PROTECTION RIGHTS

You have certain rights to protect your data. Musala Soft aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

You have the following data protection rights:

- *The right to access*, update or delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you;
- *The right of rectification*. You have the right to have your information rectified if that information is inaccurate or incomplete;
- *The right to object*. You have the right to object to our processing of your Personal Data;
- *The right of restriction*. You have the right to request that we restrict the processing of your personal information;
- *The right to data portability*. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format;
- *The right to withdraw consent*. You also have the right to withdraw your consent at any time where Musala Soft relied on your consent to process your personal information;
- *Right to demand* the deletion of personal data (the Right to be forgotten). Subject to the prescribed conditions, where (i) the data is no longer necessary for the purposes for which it was collected or otherwise processed, or (ii) the data has been unlawfully processed, you may ask us to delete your personal data at any time. If we deem your request to be justified, we will arrange for the destruction of your personal data to the extent necessary. The destruction of the data will not be carried out if the processing is necessary for the establishment, exercise or defense of legal claims against Musala Soft or if its retention is required by law.



Please note that we may ask you to verify your identity before responding to such requests. You have the right to file a complaint regarding our collection and use of your personal data. Primarily, please file the complaint with us, via the contact information provided below. For more information, you may also contact your local data protection authority (DPA).

## **12. CONTACT US**

For questions specifically about this Policy, our collection and/or processing of your personal information, cookies or similar technologies, or applying your data protection rights, please contact our DPO at: [gdpr@musala.com](mailto:gdpr@musala.com).