

Privacy Policy

Effective date: June 2, 2025

1. IMPORTANT NOTICE

This is the Privacy Policy of Loftware, Inc., whose principal office is located at 249 Corporate Drive, Portsmouth, New Hampshire 03801, United States of America ("Loftware"). Loftware is part of a group which is made up of a number of legal entities, including:

- i. Loftware, Inc., 249 Corporate Drive, Portsmouth, New Hampshire 03801, United States of America
- ii. Loftware GmbH, Leopoldstr. 175 80804, München, Bayern Germany
- iii. GAP Systems Ltd., C/O RSM Fifth Floor, Central Square, 29 Wellington Street, Leeds, England, LS1 4DL
- iv. Loftware Asia Pacific Pte. Ltd., 171 Chin Swee Road #07-02 CES Centre, Singapore 169877
- v. Loftware UK Ltd., Central Square, 5th Floor, 29 Wellington Street, Leeds, England LS1 4DL
- vi. NiceLabel International Limited, 2 Ashgate Road, Chesterfield, Derbyshire, S40 4AA, UK
- vii. Euro Plus d.o.o., Poslovna cona A 2, SI-4208 Šenčur, Slovenia
- viii. NiceLabel GmbH, Mendelssohnstraße 87, 60325 Frankfurt am Main, Germany
- ix. NiceLabel Asia Pacific PTE Ltd., 138, Cecil Street, #12-01A, Singapore (069538)
- x. NiceLabel Software Co. Ltd., Chuangzhan Building, Room 1106, No.928 Xikang Rd, 200040 Shanghai, China
- xi. PrisymID Limited, C/O RSM Fifth Floor, Central Square, 29 Wellington Street, Leeds, England, LS1 4DL
- xii. PrisymID Support Service Limited, C/O RSM Fifth Floor, Central Square, 29 Wellington Street, Leeds, England, LS1 4DL
- xiii. GAP Systems Asia Ltd., 16F Shing Lee Commercial Building, 8 Wing Kut Street Central, Hong Kong
- xiv. GAP SYSTEMS CHINA LIMITED, RiSheng Building, Room 1010, Minkedong RD, Shiqi, Zhongshan, Peoples Republic of China

(collectively, "Group or individually "Group entity").

Any regulatory specifics in relation to a jurisdiction where a Group entity has been incorporated is stated in the Regional Specific Provisions at the Section 16 of this Privacy Policy.

Data controllers that are part of a group of undertakings or institutions affiliated to a central body have a legitimate interest in transmitting personal data within the group of undertakings for internal administrative purposes, including the processing of clients' personal data. The Group utilized various centrally managed information technology systems and solutions.

Where legal entities within the Group jointly determine the purpose and means of data processing their respective responsibilities as joint controllers for compliance with the obligations under the respective data privacy laws, in particular as regards the exercising of the rights of the data subject and their respective duties to provide the information referred to (for example: in Articles 13 and 14 of the GDPR) are regulated by means of an intra-group data processing contract. Summary of such an arrangement may be provided to you by way of a written request sent to privacy@loftware.com.

Where this Privacy Policy refers to “Loftware”, “we”, “us” or “our”, it is referring to the relevant Group entity.

This Privacy Policy sets out how we collect and process your personal data.

This Privacy Policy relates to personal data that identifies “you”, meaning (a) customers or potential customers, (b) individuals who browse our website (including, but not limited to, individuals who (1) register on our website to attend seminars and other events offered through our website, (2) provide personal data on our website in connection with inquiries about our products and services, or (3) download product documentation or other resources via our website), (c) suppliers, or (d) individuals outside our organization with whom we interact. If you are an employee, contractor or otherwise engaged in work for us or applying to work for us, a separate privacy notice applies.

We refer to personal information throughout this Privacy Policy as “personal data” and Section 3 sets out further detail of what this includes.

Please read this Privacy Policy to understand how we may use your personal data.

This Privacy Policy is not intended for children and we do not knowingly collect personal data relating to children. If you are under 16, do not provide any personal data to us or otherwise provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please notify us at privacy@loftware.com.

This Privacy Policy may vary from time to time so please check it regularly. In that case, the 'last updated' date at the top of this page will also change. Any changes to this privacy policy will apply to you and your data immediately. If these changes affect how your personal data is processed, Loftware will take reasonable steps to let you know.

2. HOW TO CONTACT US

For the purposes of relevant data protection legislation, we are a controller of your personal data and as a controller we use the personal data we hold about you in accordance with this Privacy Policy.

If you wish to correct your personal data held by us, please contact us at privacy@loftware.com.

You may also opt-out of receiving marketing communications from us or alter your marketing preferences by updating your email preferences in our email [preference center](#), sending us an email to privacy@loftware.com, or by unsubscribing through the "unsubscribe" or "opt out" link in any marketing email.

If you need to contact us in connection with our use or processing of your personal data, or gain access to it, you can email us at privacy@loftware.com.

You can reach Loftware Group's data protection officer Mr. Boris Zupancic any time at privacy@loftware.com.

3. TYPES OF PERSONAL DATA WE COLLECT

Loftware processes various types of personal data about the people we interact with when conducting our business or operating our various web presences and other communication channels.

Depending on the individual case, this may comprise the following types of personal data:

Contact Data

Loftware processes the following categories of personal data as contact data: first name, last name, email addresses, postal address/location (country, state/province, city), telephone numbers.

Personal data related to the business relationship with Loftware

In the context of established business relationships, Loftware processes the business partners company name, industry, your job title and role, department and function and your company's relationship history to Loftware. If you provide a credit card number or bank details to order products or services, Loftware will collect this information to process your payment for the requested products or services.

Compliance related personal data

If required by statutory law or regulation, Loftware may process data categories like date of birth, academic credentials, identity cards or other ID numbers, geolocation, business partner relevant information about e.g., significant litigation or other legal proceedings, and other export control or custom compliance relevant information.

Data generated through your use of, or participation in, Loftware's internet pages, web, or online offerings

Usage data

Loftware processes certain user related information, e.g., info regarding your browser, operating system, or your IP address when you visit Loftware's web properties. We also process information regarding your use of our web-offerings, like the pages you visit, the amount of time you spend on a page, the page which has referred you to our page and the links on our sites you select.

Registration data

Loftware may process your contact data as set out above and other information which you may provide directly to Loftware if you register for any of Loftware's events or other web services.

Participation data

When you participate in webinars, virtual seminars, events, or other Loftware web services, Loftware may process your interactions with the relevant webservice to organize the event including its sessions, polls, surveys, or other interactions between Loftware and/or its participants. Depending on the event and subject to a respective notification of the participants, Loftware may collect audio and video recordings of the event or session.

Special categories of personal data (sensitive information)

In connection with the registration for an event, Loftware may ask for your dietary preferences or information about potential disabilities for purposes of consideration for the health and well-being of our guests. Any collection of such information is always based on the consent of the participants. Kindly note that if you do not provide such information about dietary preferences, Loftware may not have the opportunity to respond to such requests at the time of the event.

Personal data received during an application for a job at Loftware

Loftware processes personal data of individuals applying for a job at Loftware as set out in the privacy statement of the Loftware Career Section.

Personal data received by third parties, including publicly available sources

Loftware generally aims to collect personal data directly from the data subjects. If you or applicable law allows Loftware to do so, Loftware may obtain personal data also from third party sources. These third-party sources may include:

- your employer in the context of its business dealings with any Group entity,
- third parties you directed to share your personal data with Loftware,
- third party sources and publicly available sources like business oriented social networks or information broker.

When we collect personal data from third party sources, established internal controls aim to ensure that the third-party source was permitted to provide this information to Loftware and that we may use it for this purpose. Loftware will treat this personal data according to this Privacy

Policy, plus any additional restrictions imposed by the third party that provided the personal data to Loftware or by applicable national law.

Personal data necessary for customer satisfaction

To the extent permitted by law or based on your consent, Loftware may combine the information we collect either directly or indirectly about specific users to ensure the completeness and correctness of the data and to help us better tailor our interactions with you and determine the information which best serves your respective interest or demand.

We may also create personal data about you. For example, if you contact us by telephone to make a complaint about our services or products, then we may make a written record of key details of the conversation so that we can take steps to address the complaint.

We may also obtain and use certain aggregated data such as statistical or demographic data for any purpose ("Aggregated Data"). Aggregated Data may be derived from your personal data but does not directly or indirectly reveal your identity. For example, we may aggregate certain information technology-related data of yours with others' data to calculate the percentage of users accessing a specific feature on our website. We may use Aggregated Data for any purpose without restriction. However, if we re-combine or re-connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not sell your personal data.

4. THE SOURCES FROM WHICH WE OBTAIN YOUR PERSONAL DATA

We obtain your personal data from the following sources:

Directly from you, either in person (at our locations or otherwise), via our website, by email, or by telephone or via handheld devices or via our partners and distributors. This could include personal data which you provide when you:

- (a) place an order for our products or services;
- (b) request Loftware documentation from our website or our partners' websites;
- (c) subscribe to our publications;

- (d) request information on our products or services or for other marketing to be sent to you;
- (e) enter into a competition or promotion;
- (f) complete a survey from us or give us feedback;
- (g) register to attend our seminars or events; or
- (h) download our product documentation or other resources available on our website or app.

We may automatically collect certain personal data about your equipment, browsing actions and patterns by using cookies, server logs and other similar technologies. Please see Section 15 for further details.

Third parties, such as:

- (a) analytics providers (such as Google Analytics – V2 basic consent, Hubspot, Insight Squared, Lead Forensics, Get Clicky, DemandBase and Marketo);
- (b) survey providers (such as Survey Monkey, SurveyAnyplace and TechValidate);
- (c) advertising networks (such as Google Adwords, LinkedIn, and DemandBase);
- (d) search information providers (such as Google);
- (e) providers of technical, payment and delivery services (such as Payflow);
- (f) data brokers or aggregators (such as Salesforce.com, ZoomInfo, Marketo, Hubspot, and 6sense);
- (g) content providers (such as Media Shower and Brafton);
- (h) providers of social media platforms (such as FaceBook, Twitter and LinkedIn) for example where you share our content through social media, for example by liking us on Facebook, or following or tweeting about us on Twitter;
- (i) Vimeo and Youtube; and
- (j) third-party syndication and media partners.

5. HOW WE USE YOUR PERSONAL DATA & OUR BASIS FOR USING IT

a) Where we are relying on a basis other than consent

We may rely on one or more of the following legal bases when processing your personal data. We have set out below the purposes for which we may process your personal data and a legal base:

Purposes for which we process your personal data	The basis on which we can do this (this is what the law allows)
<p>To register you or your company as a new customer and process your order.</p>	<p>The processing is necessary:</p> <ul style="list-style-type: none"> • To perform a contract with you; and • Our legitimate interest in the provision of products and services to our guests.
<p>In order to perform our contractual obligations to you. This would include:</p> <ul style="list-style-type: none"> • Processing, providing and performing any products, services or other orders placed by you; • orders placed by us where you are a supplier; • making or receiving payments, fees and charges; and • collecting and recovering money owed. 	<p>The processing is necessary:</p> <ul style="list-style-type: none"> • To perform any contract entered into with you; and • Our legitimate interest in recovering debts owed to us.

<p>In order to manage our relationship with you, including:</p> <ul style="list-style-type: none"> • to send you important notices such as communications about changes to our terms and conditions and policies (including this Privacy Policy); • to provide you with important real-time information about products or services you have ordered from us (e.g., a change of time or location due to unforeseen circumstances); • to send you information you have requested; • to deal with your inquiries; and • to ask you to provide a review or feedback on us. 	<p>The processing is necessary for our legitimate interest to promote our business.</p>
<p>In order to make suggestions and recommendations to you about products or services that may be of interest to you, deliver relevant website content and advertisements to you and to measure or understand the effectiveness of our advertising.</p>	<p>The processing is necessary for our legitimate interests to study how guests use our products/services, to develop our products and services and ensure our marketing is relevant to you, to grow our business and to inform our marketing strategy.</p>
<p>For internal purposes to use data analytics, to identify usage trends, determine and measure the effectiveness of promotional campaigns and advertising and to improve our website, for internal research, technological demonstration and development, and to help Software create, develop, operate, deliver, improve, upgrade or enhance Software products and services, marketing, customer relationships and experiences.</p>	<p>The processing is necessary for our legitimate interests in defining the following:</p> <ul style="list-style-type: none"> • types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy • to improve our website performance by tracking how many unique and returning visitors are visiting our website.

<p>To communicate with you about, and administer your participation in, seminars and other special events, programs, and promotions.</p>	<p>The processing is necessary:</p> <ul style="list-style-type: none"> • For performance of a contract with you; and • Necessary for our legitimate interests to promote our business.
<p>To sell, make ready for sale or dispose of our business in whole or in part including to any potential buyer or their advisers.</p>	<p>The processing is necessary for our legitimate interests in the sale or disposal of our business or assets.</p>
<p>In order to enforce or apply our terms of use, terms and conditions of supply and other agreements with third parties.</p> <p>To ensure compliance with statutory obligations.</p> <p>Software processes your personal data for the purpose of ensuring an adequate level of technical and organizational security of Software's products, services, online events, facilities, and premises. For this, Software will take the measures necessary to verify or maintain the quality and safety of a product or service which is owned, manufactured by or for, or controlled by Software. This may comprise the use of personal data for sufficient identification and authorization of designated users, internal quality control through auditing, analysis, and research, debugging to identify and repair errors that impair existing or intended functionality, account and network security, replication for loss prevention, detecting security incidents, protection against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for such</p>	<p>The processing is necessary for our legitimate interests in protecting our business and property and recovering debts owed to us.</p> <p>The processing is necessary for our legitimate interests of ensuring Software compliance with relevant laws and regulations.</p>

kind of activity. We may further process your name, likeness, and other contact or compliance related data when you visit a Group entity in the context of access management and video surveillance to protect the security and safety of our locations and assets.	
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Where we refer above to GDPR Article 6.1 (f) and consequently Loftware's legitimate business interest as our legal permission to process your personal data, Loftware is pursuing its legitimate business interests:

- to efficiently manage and perform its business operations,
- to maintain and operate intelligent and sustainable business processes in a group structure optimized for the division of labor and in the best interest of our employees, customers, partners, and shareholders,
- to operate sustainable business relationships with Loftware customers and partners including you (each of which as further set out below),
- serve you with the best possible user experience when using Loftware's web services,
- comply with extraterritorial laws and regulations, or
- assert or defend itself against legal claims.

We believe that our interest in pursuing these business purposes is legitimate and thereby not outweighed by your personal rights and interest to refrain from processing. In any of these cases, we duly factor into our balancing test:

- the business purpose reasonably pursued by Loftware in the given case,
- the categories, amount and sensitivity of personal data that is necessarily being processed
- the level of protection of your personal data which is ensured by means of our general data protection policies, guidelines, and processes,
- and the rights you have in relation to the processing activity.

If you wish to obtain further information on this approach, please contact us at privacy@loftware.com.

When ensuring compliance with applicable laws and regulations, Group entity may process your Personal data based on:

- GDPR Article 6.1 (c) if necessary, to fulfill legal requirements under European Union or EU Member State law to which Loftware is subject,
- GDPR Article 6.1 (f) if necessary, to fulfill laws and regulations extraterritorial to the EU (legitimate interest to comply with extraterritorial laws and regulations),
- or the equivalent articles under other national laws, when applicable.

When tracking and evaluating the usage behavior of users of our web services by means of cookies or similar technologies, Loftware is processing your personal data on the basis of the following legal permissions:

- GDPR Article 6.1 (a) if it is necessary that we ask you for your consent to process your personal data,
- GDPR Article 6.1 (b) if necessary to fulfill (pre-)contractual obligations with you,
- GDPR Article 6.1 (f) if necessary to fulfill (pre-)contractual obligations with the company or other legal body you represent as a customer contact (legitimate interest to efficiently perform or manage Loftware's business operation),
- or equivalent legal permissions under other relevant national laws, when applicable.

b) Where we may rely on consent

We may use your personal data for a variety of different purposes. For certain of these purposes it is appropriate for us to obtain your prior consent. These purposes include:

- where we would like to use photos or images taken of you in promotional materials;
- where we or our carefully selected third parties have new products and services which we think you will be interested in; or
- where an opportunity arises to work for or with us.

The legal basis of consent is only used by us in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way.

You may at any time withdraw the specific consent you give to our processing your personal data by sending us an email to privacy@loftware.com.

Please note even if you withdraw consent for us to use your personal data for a particular purpose we may continue to rely on other bases to process your personal data for other purposes.

6. WHO RECEIVES YOUR PERSONAL DATA

Your personal data may be passed on to the following categories of third parties:

Entities of the Group

As Group is selling its products and services to its customers also via local business relationships, Loftware entity may transfer your personal data to the locally relevant Group entity for the purpose and to the extent necessary to conduct a business relationship. Other entities of the Group may also receive or gain access to personal data either when rendering group internal services centrally and on behalf of Loftware, Inc and the other Group entities or when personal data is transferred to them on a respective legal basis. In these cases, these entities may process the personal data for the same purposes and under the same conditions as outlined in this Privacy Statement. The current list of Group entities can be found in Section 1 of this Privacy Policy. If you would like to find out which Group entity is responsible for the business relationship with you or your employer, please contact us at privacy@loftware.com.

Third party service providers

Loftware may engage third party service providers to process personal data on Loftware's behalf, e.g., for consulting or other services, marketing and advertising platforms, organizing marketing events, and data analytics platforms, other IT infrastructure, IT services, the provision of the website, the fulfillment and provisioning of offers from Loftware or newsletter dispatch. These service providers may receive or are granted with access to personal data when rendering their services and will constitute recipients within the meaning of the relevant data privacy law, including GDPR.

Loftware discloses your personal data only to third parties who act as agents to perform task(s) on behalf of and according to the instructions of

Loftware and have in place an appropriate Data Protection Agreement (DPA).

Some third-party service providers (such as among others: Zoom, Twilio/SendGrid) processes personal Account Data and Usage Data as a Controller for the purpose of optimizing and improving the performance of their services.

Loftware partners

Loftware may share your personal data with designated partner companies to provide you the product or service you have requested.

7. PERSONAL DATA ABOUT OTHER PEOPLE WHICH YOU PROVIDE TO US

If you provide personal data to us about someone else (such as one of your directors, officers or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Policy.

You must ensure the individual concerned is aware of the various matters detailed in this Privacy Policy, as those matters relate to that individual, including our identity, how to contact us, the way in which we collect and use personal data and our personal data disclosure practices, that individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided.

8. ACCURACY OF YOUR PERSONAL INFORMATION

It is important that the personal data we hold about you is accurate and current and we take all reasonable precautions to ensure that this is the case but we do not undertake to check or verify the accuracy of personal data provided by you. Please keep us informed if your personal data changes during your relationship with us either by logging onto your account on the website or by contacting us. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

9. INTERNATIONAL TRANSFERS OF PERSONAL DATA

We collect information globally and may transfer, process, and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the Services. Whenever we transfer your information, we take steps to protect it.

9.1. International transfers from the EU, UK and Switzerland to Loftware Inc., USA

- Loftware has implemented two data protection mechanisms when transferring data from the EU, UK and Switzerland to Loftware Inc. USA. One is through the use of Standard Contractual Clauses (see Section 9.3. Other International Transfers), and the other is the EU-U.S. Data Privacy Framework (EU-U.S. DPF), which is described below. The data subject (individual) can choose the mechanism that suits them better.
- **Data Privacy Framework Notice:** Loftware complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Loftware has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Loftware has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.
- Loftware is committed to subject to the DPF Principles all personal data received from the European Union, and the United Kingdom (and Gibraltar), and Switzerland in reliance on the the DPF program.
- Loftware's internal complaint system that complies with the EU-U.S. DPF and UK and Swiss extensions is as follows:
 - In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Loftware commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and UK and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to

the EU-U.S. DPF and the Swiss-U.S. DPF should first contact Loftware at: privacy@loftware.com.

- Loftware provides appropriate recourse mechanism free of charge to the individual. In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Loftware commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory Authority (GRA) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.
 - An individual has the possibility, under certain conditions, to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. The conditions can be found in [Annex I of the EU-U.S. DPF Principles](#).
 - The Federal Trade Commission has jurisdiction over Loftware's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).
 - Loftware must disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. If Loftware receives a request from a public authority to access Personal Data, it will (if legally allowed):
 - a. challenge the request and promptly notify the data exporter about it, and
 - b. only disclose to the public authority the minimum amount of Personal Data required and keep a record of the disclosure.
- As of the day of the issue of the Privacy Policy no such request has been received.
- Loftware has responsibility for the processing of personal information it receives under the DPF Principles and subsequently transfers to a third party acting as a sub-processor (agent) on its behalf. Loftware remains liable under the DPF Principles if its sub-processor (agent) processes such personal information in a manner inconsistent with the DPF Principles, unless Loftware proves that it is not responsible for the event giving rise to the damage.

9.2. Cross-border transfer of personal data from China

The export of customer personal data from Loftware's Chinese legal entities takes place on the basis of the Standard Contract for Outbound Cross-Border Transfer of Personal Information of the People's Republic of China, which was filed with The Cyberspace Administration of China.

9.3. Other international transfers

In connection with such transfers the relevant safeguard in place are the standard data protection contractual clauses between us and the recipient. A copy (redacted to remove commercial or irrelevant information) can be obtained by emailing us at privacy@loftware.com. You may also obtain more information from the European Commission on the international dimension of data protection [here](#).

10. HOW LONG WE WILL STORE YOUR PERSONAL DATA

Loftware will store your personal data taking into account the following:

- the purpose(s) for which we are processing your personal data, such as whether it is necessary to continue to store that data in order to continue to perform our obligations under a contract with you or for our legitimate interests;
- whether we have any legal obligation to continue to process your data, such as any record-keeping, accounting or tax obligations imposed by applicable law; and
- whether we have any legal basis to continue to process your personal data, such as your consent.

For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact us at privacy@loftware.com.

11. YOUR CONTRACTUAL OR STATUTORY REQUIREMENTS TO PROVIDE PERSONAL DATA

In certain circumstances the provision of personal data by you is a requirement to comply with the law or a contract, or necessary to enter into a contract.

It is your choice as to whether you provide us with your personal data necessary to enter into a contract or as part of a contractual requirement. If

you do not provide your personal data then the consequences of failing to provide your personal data are that we may not be able to perform to the level you expect under our contract with you. An example of this would be where we are unable to provide you with certain products or services as we do not have your full details, or where we cannot perform our contract with you at all because we rely on the personal data you provide in order to do so.

12. AUTOMATED DECISION MAKING

We use automated decision making in our processing of your personal data. We use the following logic in our marketing automation platforms to profile your website activity, certain aspects of your company as well as certain personal data in our databases. This includes (but is not limited to) the application of profiling data to your personal profile. Personal data used to profile you will include your job title, seniority, and web page visits and other details about your employer. We use such automated decision making to determine whether we believe a particular marketing campaign or program is applicable to you.

13. YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

If you would like to exercise any of the rights set out below, please contact us using the contact details set out in Section 2.

Right to access, correct and delete

You can request from Lofware at any time access to information about which personal data Lofware processes about you and, if necessary, the correction or deletion of such personal data. Please note, however, that Lofware can or will delete your personal data only if there is no statutory obligation or prevailing right of Lofware to retain it.

Right to receive personal data back from Lofware

If Lofware uses your personal data based on your consent or to perform a contract with you, you can further request from Lofware a copy of the personal data you provided to Lofware. In this case, please contact privacy@loftware.com and specify the information or processing activities to which your request relates, the format in which you would like to receive the personal data, and whether it should be sent to you or another recipient. Lofware will carefully consider your request and discuss with you how it can best be fulfilled.

Right to restrict

You can request from Loftware to restrict your personal data from further processing in any of the following events:

- you state the personal data about you is incorrect, subject to the time Loftware requires to check the accuracy of the relevant personal data,
- there is no legal basis for Loftware to process your personal data and you demand Loftware to restrict your personal data from further processing,
- Loftware no longer requires your personal data, but you state you require Loftware to retain such data to claim or exercise legal rights or to defend against third party claims, or
- in case you object to the processing of your personal data by Loftware based on Loftware's legitimate interest (as further set out below), subject to the time required for Loftware to determine whether it has a prevailing interest or legal obligation in processing your personal data.

Right to object

If and to the extent Loftware is processing your personal data based on Loftware's legitimate interest, specifically where Loftware pursues its legitimate interest to engage in direct marketing or to apply profiling in relation to direct marketing, you have the right to object to such a use of your personal data at any time. When you object to Loftware's processing of your personal data for direct marketing purposes, Loftware will immediately cease to process your personal data for such purposes. In all other cases, Loftware will carefully review your objection and cease further use of the relevant information, subject to Loftware's compelling legitimate grounds for continued use of the information, which may override your interest in objecting, or if Loftware requires the information for the establishment, exercise, or defense of legal claims.

Right to revoke consent

Wherever Loftware is processing your personal data based on your consent, you may at any time withdraw your consent by unsubscribing or giving us respective notice of withdrawal. In case of withdrawal, Loftware will not process personal data subject to this consent any longer unless legally required to do so. In case Loftware is required to retain your personal data for legal reasons your personal data will be restricted from further processing and only retained for the term required by law. However, any withdrawal has no effect on past processing of personal data by Loftware up to the point in time of your withdrawal.

Right to choose

Loftware will only use your personal data for the purposes for which personal data was initially obtained. If Loftware intends to process your data for additional purposes beyond the original scope, it will seek your explicit consent before doing so, unless relevant privacy regulation allows otherwise. This also applies to special categories of personal data (sensitive information) and to the disclosure of this data to third parties. Loftware discloses your personal data only to third parties who act as agents to perform task(s) on behalf of and according to the instructions of Loftware and have in place an appropriate Data Protection Agreement (DPA). In addition, Loftware treats as sensitive any personal information received from a third party where the third party identifies and treats it as sensitive.

Right to lodge a complaint

If you take the view that Loftware is not processing your personal data in accordance with the requirements in this Privacy Policy or under applicable data protection laws, you can at any time, to the extent required by applicable law, lodge a complaint with your locally relevant data protection authority, specifically when you are located in an EEA country, or with the data protection authority of the country which data protection authority has been selected as lead supervisory authority as set forth below.

Individuals from the EU, UK and Switzerland can also lodge a complaint according to the procedure described in Section 9.1 International transfers from the EU, UK and Switzerland to Loftware Inc., USA.

14. LINKS TO OTHER SITES

This policy only applies to us. If you link to another website from our website, you should remember to read and understand that website's privacy policy as well. We do not control third-party websites and are not responsible for any use of your personal data that is made by third-party websites.

15. COOKIES

We use cookies and similar technologies on or via our website. Cookies do not harm your computer and do not contain any viruses. Cookies help make our website more user-friendly, efficient, and secure. Cookies are small text files that are stored on your computer and saved by your browser.

Most of the cookies we use are called “session cookies”. They are automatically deleted after your visit. Other cookies remain in your device’s memory until you delete them. These cookies make it possible to recognize your browser when you next visit our website. For further information on how we use cookies and similar technologies, including the information we collect through our use of cookies and similar technologies, please see our cookies policy, which is available via the following links:
loftware.com’s cookie policy: <https://www.loftware.com/company/cookie-policy>.

You can configure your browser to inform you about the use of cookies so that you can decide on a case-by-case basis whether to accept or reject a cookie. Alternatively, your browser can be configured to automatically accept cookies under certain conditions or to always reject them, or to automatically delete cookies when closing your browser. Disabling cookies may limit the functionality of our website. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org.

16. REGIONAL SPECIFIC PROVISIONS

Where Loftware is subject to privacy requirements in the EU, EEA, or other GDPR relevant countries:

Data Protection Officer for NiceLabel Germany GmbH located at Bürgermeister-Mahr-Straße 32, 63179 Obertshausen is DataGuard, DataCo GmbH, Nymphenburger Str. 86, 80636 Munich, Germany. Written inquiries, requests or complaints to our German Data Protection Officer may be addressed to privacy@loftware.com

Who is the relevant Data Protection authority of Loftware?

Loftware’s lead data protection supervisory authority is in Republic of Slovenia, Informacijski pooblaščenec Republike Slovenije and can be reached at Lesnina, Dunajska c. 22, 1000 Ljubljana. If you are in any other EU or EWR country, you may find the contact details of your competent data protection supervisory authority [here](#).

Where Loftware is subject to certain privacy requirements in the United States, the following also applies:

U.S. Children’s Privacy. Loftware does not knowingly collect the personal data of children under the age of 13. If you are a parent or guardian and

believe Loftware collected information about a child, please contact Loftware as described in this Privacy Policy. Loftware will take steps to delete the information as soon as possible. Given that Loftware websites and online services are not directed to users under 16 years of age and in accordance with the disclosure requirements of the CCPA, Loftware does not sell the personal data of any minors under 16 years of age.

Where Loftware is subject to certain privacy requirements in the United States in the State of California, the following also applies:

Do Not Track. Your browser may allow you to set a “Do not track” preference. Unless otherwise stated, our sites do not honor “Do not track” requests. However, you may elect not to accept cookies by changing the designated settings on your web browser or, where available, by referring to our Cookie Statement. Cookies are small text files placed on your computer while visiting certain sites on the Internet used to identify your computer. If you do not accept cookies, you may not be able to use certain functions and features of our site. This site does not allow third parties to gather information about you over time and across sites.

You have the right:

- to request from Loftware access to your personal data that Loftware collects, uses, or discloses about you;
- to request that Loftware delete personal data about you;
- to opt-out of the use or disclosure of your sensitive personal information;
- to non-discriminatory treatment for exercise of any of your data protection rights;
- if you request access to your personal data, for such information to be portable, if possible, in a readily usable format that allows you to transmit this information to another recipient without hindrance

In accordance with the disclosure requirements under the California Consumer Privacy Act (“CCPA”), Loftware does not and will not sell your personal data or otherwise permit the use of your information for any kind of cross-context behavioral advertising. In accordance with the verification process set forth in the CCPA, Loftware will require a more stringent verification process for deletion requests, or for personal data that is considered sensitive or valuable, to minimize the harm that might be posed to you by unauthorized access or deletion of your personal data. If Loftware must request additional information from you outside of information that is already maintained by Loftware, Loftware will only use it to verify your identity so you can exercise your data protection rights, or for security and fraud-prevention purposes.

In addition to contacting Loftware at privacy@loftware.com you may also exercise your rights as follows:

- You can also designate an authorized agent to submit requests to exercise your data protection rights to Loftware. Such authorized agent must be registered with the California Secretary of State and submit proof that you have given authorization for the agent to act on your behalf.