

PRIVACY FACTS

Click blue facts for more detail.

Our Company name	Software Current
Information we collect	We collect information you provide to us when subscribing to or participating in our Services. We (and our service providers) may also automatically collect certain information about your use of our Services.
Categories of personal data collected	We may collect information that personally identifies you as well as information that does not personally identify you. We do not collect sensitive personal information about you. If we combine non-personal data with personal data, we will treat the combined information as personal data under this Privacy Notice.
How we use information	We use the information we collect to respond to your specific requests, send you periodic information and special offers from Software Current and our sponsors, and to provide our sponsors and Business Partners with information about our users.
How we disclose information	We disclose certain personal data with our service providers to perform and enhance our Services. We may disclose certain personal data like name and contact information with sponsors of our products and services when you register to received those sponsored products or services.
Do you sell or share personal data with unrelated third parties for cross-contextual behavior advertising?	No . However, we may use personal data collected on our Websites and in connection with our Services to market our Services and those of our Business Partners to you across unrelated Websites. You can opt-out of our use of your personal information for this purpose.
Third Party content and links	Our Services may embed content from, or link to, third-party websites and services , including social media platforms, that are outside of our control.
How do we do secure and store information?	We use reasonable precautions, including appropriate technical, administrative, and physical procedures , to try to protect collected Personal data from loss, misuse, or unauthorized disclosure or alteration.
Do we collect information about children?	No. Our Services are not intended for children under 16 years of age .
How can I update or correct my information?	You may correct or amend information that is inaccurate by reviewing and updating your account preferences or by contacting us by email at dpo@softwarecurrent.com or by mail at Software Current, Attention: Data Privacy Officer, 2740 SOUTH RD, POUGHKEEPSIE, NY 12601.
Jurisdiction-specific privacy information and rights	European Union and United Kingdom , and Canada(CASL) , and certain States within the United States , and Asia-Pacific Region .
Cookie Notice	This explains our use of cookies and other tracking technologies

Software Current Privacy Notice

LAST UPDATED: August 28, 2024

Software Current, LLC, its subsidiaries and affiliates (collectively “Software Current” or “we”) recognizes the importance of protecting the privacy of information provided to us by those who use our products and services. Our goal is to provide you with an experience that delivers the information, resources and services that are the most useful to you. In order to achieve this goal, we may collect information from you.

This privacy notice explains how we collect, use and disclose information about you when you use our websites, mobile apps, and other online products and services that link to this Notice; subscribe to our publications and newsletters; participate in learning or research activities; attend our events; purchase other products or services from us (collectively, the “Services”) or when you otherwise interact with us or receive a communication from us related to the Services. For certain Services we may provide you with additional privacy information that supplements this Notice.

Please be sure to read this Privacy Notice before using any Service offered by Software Current or its subsidiaries and affiliates or submitting information to us. This Privacy Notice is current as of the date written above. If we change our privacy practices, we will also update this Privacy Notice. Users should review this notice periodically to monitor any changes. Your continued use of our Services constitutes your acceptance of this Privacy Notice, as updated from time to time.

Please note, this notice includes sections with additional information for users in specific jurisdictions. We will only process your personal data in accordance with applicable data protection and privacy laws. Importantly, we note that we are a “controller” for those Services where we make decisions on how personal information is used in connection with our Services, and we are a “processor” for those services where we only use personal information as allowed by our customers. For the purposes of UK and EU data protection legislation, when acting as a “controller”, the data controller is Software

Current, LLC, a Delaware limited liability company, 2740 SOUTH RD, POUGHKEEPSIE, NY 12601. You understand that your personal data, including any data you provide, is processed by Software Current in the United States, which may have different data protection standards if you reside in another country.

What information does Software Current collect?

Information You Provide to Us. We collect the information you provide to us directly when you use the Services, including when you:

- Subscribe to a publication or a newsletter; register for or attend a webinar or an event; or purchase a product (such as a research report or continuing education program)
- Participate in a quiz, poll, contest, promotion, focus group or survey
- Submit Content to the Services or Interact with Content
- Contact Us or Provide Feedback

Automatically Collected Information. We (and service providers on our behalf) automatically collect certain information about your use of the Services, including any devices used to access the Services. For example, we may collect:

- Device information such as hardware model, IP address, device identifiers, operating system, browser type and settings (like language and available font settings) and settings of the device you use to access the Services.
- Usage information such as the Services you use, the time and duration of your use, and other information about your interaction with content, such as the articles you read, where you click on our site, customer service interactions, cursor movements, and certain screen interactions and images (please note we do not capture personal information that you type into form fields (e.g., name or email address) before you submit such information), and how you interact with our emails.
- Location information such as general location derived from your computer’s IP address, your mobile device’s GPS signal, or information about nearby WiFi access points and cell towers that may be transmitted when you use certain Services.

We and our service providers may use cookies, web beacons, and other tracking technologies to collect such information. See our [Cookie Notice](#) for more information about these technologies.

When is personally identifiable information collected?

Software Current collects information by which someone could identify you as a specific, identifiable individual (we refer to this type of information in this Privacy Notice collectively as “personal data”) that you choose to provide us when you subscribe to our publications, sign up for e-newsletters, enter a contest, participate in surveys, login into our Websites using a third party login system (including, but not limited to, Facebook Connect, LinkedIn, X (formerly known as Twitter), etc.), register for a Website, webinar, continuing education course, conference, trade show, or otherwise communicate with us. When you provide this information to us, you are no longer anonymous.

We also collect, use, and share “Aggregated Data” such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data since it does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. If we combine non-personal data with personal data, we will treat the combined information as personal data under this Privacy Notice.

Categories of Personal Data Collected.

CATEGORY OF PERSONAL DATA EXAMPLES OF PERSONAL DATA WE MAY COLLECT UNDER EACH CATEGORY	
Identity Data	First and Last Name, social media handle/profile, profile photo
Contact Data	Physical address, email address, telephone number, and any other contact information you provide to us
Financial Data	Payment card details. However, please note that payment methods (e.g., credit card number and/or PayPal and/or bank account details) are not collected by us directly, but by secure payment service providers
Transaction Data	Details about payments to and from you, and details regarding the services that you have subscribed to or purchased from us
Technical Data	Device IDs, your login data, access dates and times, browser type and version, device information, cookie data, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website
Profile Data	Your username and password, orders made by you, preferences, user-generated content
Demographic Data	Gender/sex, race or ethnicity, age, geographic location such as city or state
Business/Professional Information	Job title, industry, education, company name
Usage Data	Information about how you use our Website, products and services; Actions you take related to content such as sharing content; customizing newsletters, notifications, and alerts; and liking, replying to, or reporting (and providing additional information regarding) comments

Marketing and Communications Data	Your preferences in receiving marketing from us and our third parties and your communication preferences
User Generated Data	Comments, requests, and questions you submit through customer service interactions with us; your comments on articles, content in message boards, images, photos, videos, online ads you post, or other content you provide to the Services; Your survey responses, which may include your interests, opinions, and information about you including demographic information. From time to time our surveys offer you the option to voluntarily provide information that may be considered sensitive under applicable law such as your race or ethnicity. We process such information for disclosed purposes as permitted by and in compliance with applicable law.

If You Fail to Provide Personal Data Where Such Data is Required to Provide Services to You

Where we need to collect personal data under the terms of a contract we have with you, or a prospective contract, and you fail to provide that Personal Data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our Services). If so, we may have to cancel the service you have with us (or have requested from us), and you accept that as a condition of service.

We will tell you at the time we collect information whether the information requested is necessary for you to participate in a particular feature.

Personal Data Retention

We will retain your personal data and any information collected from your use of our Services for as long as you are a Customer or Subscriber or otherwise maintain a user account on our Websites and for a reasonable time thereafter.

How do we use and disclose the information we collect?

The information we collect is used to respond to your specific requests, to send you periodic information and special offers from Software Current and our Business Partners (described below) who sponsor one or more of our products or services, to provide you with updates on Software Current offerings and features, to provide you with product information relevant to you from manufacturers or service providers in our database, and to provide our Business Partners with information about our users.

We may use your contact information to send notices for subscription renewal or provide you with information about products or services you have ordered with us. We may also use your contact information to send you e-newsletters or other promotional e-mails that contain targeted, relevant content that may be useful to you or your business. All promotional e-mails you receive from us will include an option to opt out of similar e-mail communications in the future.

We use the information we collect, including personal data and Website usage data:

- to enable you to use our Websites, to create an account or profile, to process information you provide via our Websites (including verifying that your email address is active and valid) and to process your transactions;
- to provide related customer service and care, including responding to your questions, complaints, or comments and sending surveys and processing survey responses;
- to provide you with information, products, or services that you have requested;
- to receive and process job applications for jobs with us or freelance engagements with us;
- for internal business purposes, such as to improve our Websites and services;
- to administer and process contests, sweepstakes, and promotions;
- to contact you with administrative communications and, in our discretion, changes to our Privacy Notice, Terms and Conditions of Use, or any of our other policies;
- to comply with regulatory and legal obligations; and
- to provide you with information, products, or services that we believe in good faith will interest you, including special opportunities from us and our third-party Business Partners;
- to tailor content, recommendations, and advertisements we and third parties display to you, both on the Websites and elsewhere online;
- for such purposes as disclosed at the time you provide your information, with your consent, and as further described in this Privacy Notice.

You can opt-out of Software Current processing your personal information for targeting advertising across unrelated websites (known as ‘cross-contextual behavioral advertising’) under applicable state law by: (1) submitting this [OPT-OUT FORM](#), (2) email dpo@softwarecurrent.com, or (3) by mail to Software Current, Attention: Data Privacy Officer, 2740 SOUTH RD, POUGHKEEPSIE, NY 12601. We do not sell or share personal information with unrelated third parties for them to use in cross-contextual behavioral advertising.

We may disclose your information to:

- **Affiliates** within our family of affiliated companies.
- **Business Partners** to provide you with Services that you participate in or request, such as sponsors of certain content or events, co-sponsors of a promotion or activity that runs in connection with our Services. We are not responsible for the privacy practices of these entities.
- **Service Providers** that provide services on our behalf, such as hosting vendors, analytics or advertising and marketing service providers, list managers, and payment processors.
- **Other Parties When Required by Law** or as necessary to protect our users and Services including as we believe is necessary or appropriate to protect, enforce, or defend the legal rights, privacy, safety, or property of the Services, our company, employees or agents, customers or users, or to comply with applicable law or legal process, including responding to requests from public and government authorities.

- **Social Media Services**, if you log into the Services with a social media service or if you connect a social media account with the Services. In that case, we may disclose certain of your personal information to that social media service depending on your settings. The social media service's privacy notice then applies to their practices regarding your information. We are not responsible for the privacy practices of these entities.
- **Third Parties that Provide Advertising, Content, or Other Functionality**. Third parties may collect or receive certain information about you and/or your use of the Services to provide ads, content, or functionality, or to measure and analyze ad and content performance on our Services.
- **Other Parties in Connection with a Corporate Transaction**. We may disclose information we have about you in the event that we sell or transfer all or a portion of our business or assets to a third party, such as in the event of a merger, acquisition, or in connection with a bankruptcy reorganization, or in contemplation of or due diligence related to such a corporate transaction.
- **Otherwise With Your Consent or At Your Direction**. We may also disclose information about you with third parties whenever you consent to or direct such sharing.

We may disclose aggregated information about users that does not identify any individual, without restriction.

How does Software Current secure and store your information?

We use reasonable precautions, including appropriate technical, administrative, and physical procedures, to try to protect collected Personal data from loss, misuse, or unauthorized disclosure or alteration.

Our Site uses Transport Layer Security (TLS) to protect personal data. By using a browser that supports security functions, when you access to our Websites and enter Personal data, including your name and e-mail address, this information is transferred to our server and the information is automatically encrypted when transmitted and received by servers. Therefore, if the transmitted data is intercepted by a third party, there is no need to worry about the content being stolen.

If you use a browser that does not support TLS, you may not be able to access our Website or input information.

Due to the design of the Internet and other factors outside our control, we cannot guarantee that communications between you and our servers will be free from unauthorized access by third parties.

Any information you provide may be stored and maintained in an Software Current database, either housed at Software Current or with a third party service provider. In the case of a sale, change of ownership or merger involving Software Current or any parent, subsidiary or affiliated company, your information may be transferred to a third party.

In some cases, you may use passwords to access our Services and customize your information, preferences and experience with our Services. We recommend that you do not share your password(s) with anyone, and notify us promptly if you believe your password security has been breached. Software Current will never ask you for your password in an unsolicited phone call or in an unsolicited e-mail. Also, if you are using a computer that others have access to, such as one in a computer lab, Internet cafe or public library, always remember to log out and close your browser window when leaving any of our Websites.

In addition, any personally identifiable information or sensitive data that you choose to disclose through any discussion boards or other public online forums hosted on the Website, such information may be collected and used by others. We recommend caution when giving out personal information to others in these public online forums. When you provide information on these forums, you do so at your own risk. Software Current does not take any steps to protect the privacy of information you volunteer about yourself in public forums or other publicly accessible sections of our Websites. The information you share may be viewed by any other user of the Website.

Third Party Content and Links

Our Services may embed content from, or link to, third-party websites and services, including social media platforms, that are outside of our control. We are not responsible for their practices and this Privacy Notice does not govern those third parties' content, services, or use of your information.

Many of our Websites contain links to Websites owned and operated by unaffiliated third parties. These links are provided as a service to you, and do not constitute Software Current's endorsement or support of those third parties or their Websites. Each third party Website has its own information collection and use practices, and we advise you to review their policies.

Software Current is not responsible or liable for third party privacy practices or the content of third party sites. We are not responsible or liable for any breach of security or for the actions of these parties.

What options do you have about how Software Current uses or shares your information?

We strive to provide you with choices regarding the personal data you provide us. To exercise control over your information, we have provided you with the following mechanisms:

If you no longer wish for us to share your mailing address or other contact information with our sponsors or other third parties, you may adjust your account preferences or you can send us an e-mail at dpo@softwarecurrent.com. For us to be able to locate your record, your e-mail must include your name, mailing address, e-mail address, and must identify the Software Current product, event, or service for which you are registered. We will strive to process your request within 10 business days, and thereafter we will no longer share your contact information with third parties. Please note that we will not be able to stop third parties from sending you information about their products or services if your information was shared with them before we received your request.

Regarding e-mail specifically, you have the opportunity to elect to stop receiving advertising messages from Software Current about our products or services each time you receive such a communication from us. To unsubscribe from such advertising e-mail messages, please follow the directions included in that e-mail message. We will strive to process your request within 10 business days. Please note that during that time, you may continue to receive e-mail messages from Software Current about its products or services or those of our affiliates or customers.

If you receive broadcast e-mail messages that we may send about third party manufacturers or service providers in whose products or services we believe you may be interested and no longer wish to receive such messages, you can do so by following the directions included in the e-mail message you receive. If you have further questions regarding your options with respect to your account information, please contact us at the e-mail or mailing address included at the beginning of this **Privacy Notice**.

Additionally, regardless of whether you have unsubscribed from receiving advertising and promotional material from Software Current, you will continue to receive transactional information from us, such as information relating to your account or payment or bill information.

Do Not Track Signals

Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of Websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and/or across different Websites. Our Websites do not support Do Not Track requests at this time, which means that we collect information about your online activity while you are using our Websites.

How Can I Correct or Amend Information About Me?

We want to assure you that you have access to your personal data that we collect and store. You may correct or amend information that is inaccurate by reviewing and updating your account preferences or by contacting us by email at dpo@softwarecurrent.com or by mail at Software Current, Attention: Data Privacy Officer, 2740 SOUTH RD, POUGHKEEPSIE, NY 12601.

Collection and Use of Information from Children

Our Services are not intended for children under 16 years of age. No one under age 16 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or on or through any of its features. If we learn we have collected or received personal information from a child under 16 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 send an email to: dpo@softwarecurrent.com. You may also call +1 601-879-4436 and ask for the Data Privacy Officer, or mail your request to the attention of the Data Privacy Officer at 2740 SOUTH RD, POUGHKEEPSIE, NY 12601.

Privacy Rights

Depending on where you live, you may have certain rights with respect to your information.

Residents of certain U.S. states that have enacted individual data privacy laws (including California, Colorado, Connecticut, Utah, Virginia and such others as may be enacted from time to time), in addition to residents of the EEA, UK, or Switzerland, may be able to request:

- access to and/or a copy of certain personal information we hold about you;
- correction of inaccurate information that we have about you;
- deletion of certain personal information we have collected from you; and/or
- provide information about financial incentives that we offer to you, if any.

California, Colorado, Connecticut, Utah and Virginia residents also have certain “opt out” rights described below. Applicable law may further provide you with the right to not be discriminated against for exercising your rights.

Please note: Your rights and our responses will vary based on your state or country of residency. You may be located in a jurisdiction where we are not obligated, or are unable, to fulfill a request. In such a case, your request may not be fulfilled.

If you would like information regarding your rights or would like to make a request (or if you are an authorized agent acting in accordance with applicable law), please email us at dpo@softwarecurrent.com.

We will take reasonable steps to verify your identity and requests, including by verifying your account information, residency or the email address you provide. If you are an authorized agent submitting a request on behalf of another individual, we may require proof of your written authorization before processing the request.

Certain information may be exempt from such requests under applicable law such as information we retain for legal compliance and to secure our Services. We may need certain information in order to provide the Services to you; if you ask us to delete it, you may no longer be able to use the Services.

Virginia, Colorado, and Connecticut residents may appeal the denial of a request by emailing us at dpo@softwarecurrent.com.

If you are a California, Colorado, Connecticut, Utah or Virginia resident, you have the right to opt out of certain processing of your personal information for cross-contextual targeted advertising under applicable law. Cross-contextual targeted advertising is when a business display ads to you based on your personal information that is collected across different businesses. We do not participate in this type of processing. Even if you opt out of this type of processing, you will still see advertising on our Websites that may be personalized for you based only on the data that the Software Current has collected about you.

Analytics. Some analytics providers we partner with may provide specific opt-out mechanisms. For example, you may opt out of having Google Analytics use your information for analytics by installing the [Google Analytics Opt-out Browser Add-on](#). You can visit our Cookie Notice for additional information on how to opt out of certain analytics providers.

California Consumers’ Privacy Rights

This section (“California Statement”) explains rights that certain natural persons residing in the State of California (each, a “consumer”) may have under the California Consumer Privacy Act of 2018 (CCPA), as amended and expanded by the California Privacy Rights Act of 2020 (CPRA), and such rules and

regulations as may be adopted from time to time implementing and interpreting such Acts (CCPA and CPRA are collectively referred to as “CCPA”). When we use the term “personal information” in this California Statement, we are using that term as CCPA defines it, which CCPA generally defines “personal information” to mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. However, personal information does not include publicly available, deidentified, or aggregate consumer information (which are all defined in CCPA).

Where we act as a “business” under CCPA (meaning we determine the manner and reasons for why we process your personal information), we may be required to disclose additional information regarding the categories of personal information we collect, the sources where we obtain that information, the purposes for why we collect that information, who we share that information with, as well as whether we sell that personal information – all of which depends on the specific service being provided.

Categories of Personal Information we collect

Depending on the nature of your relationship with us (e.g., subscriber, attendee, media partner, research partner, service provider or Software Current employee), we may collect the following categories of Personal Information about you, including:

- Identifiers such as name, postal address, email address, account name, or telephone number;
- Information that identifies, relates to or is capable of being associated with a individual, such as financial information;
- Characteristics of protected classifications under California or federal law such as race, sex/gender or marital status;
- Commercial information such as subscription history;
- Internet or other electronic network activity information such as browsing history;
- Geolocation data, available through your device, if enabled;
- Audio, electronic, or similar information;
- Professional or employment-related information;
- Education information;
- Other personal information, as described to you in this Privacy Notice, or otherwise at the point of collection; and
- Inferences drawn from any of the information identified above, including about your preferences.

Depending on your relationship with us, we may have collected each of the above categories of Personal Information about you. In addition, we may have shared one or more of these categories of Personal Information with third parties during the preceding 12 months for the business purposes described in this Privacy Notice. For each of these categories of Personal Information, please refer to the **“When is personally identifiable information collected? How is your information used?”** sections above for more detailed information regarding why we collect personal information and the categories of third parties with whom we may share personal information.

California residents can also request information about the categories of personal information we collect, disclose or sell or share about you; the categories of sources of such information; the business or commercial purpose for collecting, selling, or sharing your personal information; and the categories of third parties to whom we disclose personal information. Such information is also set forth in this Privacy Notice.

California residents also have the right to request that we delete your information. To make a request, you can contact us toll free at +1 601-879-4436 and ask for the Data Privacy Officer or by email to our Data Privacy Officer at dpo@softwarecurrent.com or in writing to Software Current, Attention: Data Privacy Officer, 2740 SOUTH RD, POUGHKEEPSIE, NY 12601. Provide us enough information to verify your identity. We will use information you provide to us to verify your request. If we cannot initially verify your identity, we may request additional information to complete the verification process, such as, for example, a copy of your driver’s license and/or a recent utility or credit card bill.

California residents also have certain rights regarding the “sale” or “sharing” of “personal information” (as such terms may be defined by CCPA). California residents have the right to opt out of such “sale” or “sharing” of their “personal information” in accordance with CCPA: (1) [online](#), (2) by emailing dpo@softwarecurrent.com, (3) by writing to Software Current, Attention: Data Privacy Officer, 2740 SOUTH RD, POUGHKEEPSIE, NY 12601. Once a year, California residents can also request certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their direct marketing purposes in the preceding calendar year.

We will not discriminate against you because you have exercised any of your privacy rights under the CCPA.

Nevada Residents

Nevada consumers who have purchased goods or services from us may opt out of the “sale” of “covered information” as such terms are defined under Nevada law. We do not engage in such activity, but if you have questions about this you can email us at dpo@softwarecurrent.com.

Users Outside of the United States and Consent to Transfer

The Websites and Services provided by Software Current are operated in the United States. If you are located in another jurisdiction, please be aware that information you provide to us will be transferred to, stored and processed in the United States. By using the Websites or providing us with any information, you consent to this transfer, processing, and storage of your information in the United States, a jurisdiction in which the privacy laws are not as comprehensive as those in the country where you reside or are a citizen, such as the European Union. You understand that the U.S. government can obtain access to the personal data you submit if necessary for investigative purposes (e.g., terrorism investigation). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice. We use appropriate and suitable safeguards for transferring your Personal data to the U.S.

Your EU and UK Data Subject Rights

If you are a resident of the European Economic Area (EEA) or the United Kingdom (UK), we collect and process Personal data about you only where we have a legal basis for doing so under applicable data protection law, including under the European General Data Protection Regulation (GDPR) and the UK GDPR. The legal bases will depend on the purpose for which we process your personal data. This means we collect and use your personal data only where:

- We need it to provide the services including to operate the Website
- provide customer support and personalized features and to protect the safety and security of the Website
- It satisfies a legitimate interest (which is not overridden by your rights and interests), such as for research and development, to market and promote the Website and to protect our legal rights and interests
- You give us consent to do so for a specific purpose
- We need to process your Personal data to comply with a legal obligation.

Consent Requirements by Country Summary

Country	Law & Year	Consent Requirement	Type of Consent
India	DPDP Act, 2023	Required unless exempt	Explicit, informed
Indonesia	PDP Law, 2022	Mandatory	Explicit, documented
Japan	APPI	Required for sensitive data	Written or digital
Philippines	DPA, 2012	Required	Written, electronic, verbal
Vietnam	Decree 13, 2023	Required for all processing	Explicit, per-purpose
Thailand	PDPA, 2019	Required unless legal basis	Explicit, clear separation

Asia-Pacific Regional Data Protection and Consent Policy

For users residing in India, Indonesia, Japan, the Philippines, Vietnam, and Thailand, we acknowledge and comply with the respective data protection laws and regulations of these countries.:

- **India:** In accordance with the Digital Personal Data Protection Act, 2023, we ensure that personal data is processed with explicit consent and in compliance with applicable legal obligations.
- **Indonesia:** We adhere to the Personal Data Protection Law (Law No. 27 of 2022), obtaining explicit consent for data processing activities and respecting data subject rights..
- **Japan:** Our data handling practices comply with the Act on the Protection of Personal Information (APPI), including obtaining consent for cross-border data transfers and processing sensitive information.
- **Philippines:** In line with the Data Privacy Act of 2012, we secure informed and freely given consent for data collection and processing, with special considerations for sensitive personal information.
- **Vietnam:** We process personal data in accordance with Decree No. 13/2023/ND-CP, ensuring explicit, prior consent for each processing purpose and facilitating easy withdrawal of consent.
- **Thailand:** Our practices align with the Personal Data Protection Act B.E. 2562 (2019), requiring explicit, informed consent for data processing, especially concerning sensitive personal data and marketing activities.

Users from these jurisdictions have the right to access, correct, or delete their personal data, and to withdraw consent at any time. For inquiries or to exercise your rights, please contact us at dpo@softwarecurrent.com

Asia-Pacific Regional Data Protection and Consent Policy

This section outlines our data handling practices and user rights under data protection laws in India, Indonesia, Japan, the Philippines, Vietnam, and Thailand.

India – Digital Personal Data Protection Act, 2023 (DPDP Act)

Consent and Data Use

We collect and process personal data based on freely given, specific, informed, and unambiguous consent, or where otherwise permitted under lawful grounds (e.g., legal obligations, employment, etc.).

Collection and Use

Personal data is collected only for legitimate, specific purposes made known to the data subject at the time of collection. We ensure data is limited to what is necessary for the declared purpose.

Cross-Border Transfers

Personal data may be transferred outside India unless expressly restricted by the central government. We ensure reasonable data protection safeguards are in place in receiving jurisdictions.

Indonesia – Personal Data Protection Law, Law No. 27 of 2022

Consent and Data Use

Explicit and verifiable consent is required before processing personal data. Data subjects are informed of the purpose, scope, and consequences of the processing.

Data Collection and Use

We collect data in a lawful and transparent manner, limiting it to relevant and necessary information to fulfil the processing purpose.

Cross-Border Transfers

Cross-border transfers are permissible with the data subject's explicit consent and adequate safeguards in place and may require notification to relevant authorities.

Japan – Act on the Protection of Personal Information (APPI)

Consent and Data Use

Consent is required for the processing of sensitive personal data and for cross-border transfers. Processing must be linked to a clearly defined purpose.

Data Collection and Use

We inform users of data collection purposes at or before the time of collection. Data is not retained longer than necessary.

Cross-Border Transfers

Cross-border data transfers require prior consent unless transferred to countries designated by the PPC as offering adequate protection, or contractual safeguards are used.

Philippines – Data Privacy Act of 2012 (DPA)

Consent and Data Use

We obtain prior, freely given, and informed consent for the collection and processing of personal and sensitive personal information.

Data Collection and Use

Data collected is limited to what is necessary and proportionate for the intended processing activity. Purpose and use are communicated at the time of collection.

Cross-Border Transfers

Transfers outside the Philippines are allowed if the receiving country or entity ensures a level of protection equivalent to Philippine standards, or with the data subject's explicit consent.

Vietnam – Decree No. 13/2023/ND-CP on Personal Data Protection

Consent and Data Use

Consent is required for all data processing activities, including data collection and cross-border transfers.

Data Collection and Use

Personal data is collected only for specific and declared purposes. Over-collection is prohibited, and users must be informed of the scope and use.

Cross-Border Transfers

Transfers require the individual's consent and prior notification to the Ministry of Public Security. Certain data may need to be stored within Vietnam depending on the type.

Thailand – Personal Data Protection Act B.E. 2562 (2019)

Consent and Data Use

Explicit, informed consent is required unless processing is based on another lawful basis such as contract or public interest.

Data Collection and Use

Only necessary and lawful data is collected. Users are notified of purposes and retention periods at the time of collection.

Cross-Border Transfers

Transfers are allowed to countries with adequate safeguards or under specific agreements. Consent is required if adequacy is not guaranteed.

Your Rights

For all jurisdictions listed above, individuals have the following rights:

- The right to be informed about the collection and use of their personal data.
- The right to access, correct, and delete their personal data.
- The right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

- The right to lodge a complaint with the relevant supervisory authority.

If you have consented to our use of personal data about you for a specific purpose, you have the right to change your preferences at any time.

We note that we are a “controller” for those services where we make decisions on how personal information is used in connection with our services, and we are a “processor” for those services where we only use personal information as allowed by our customers.

Where we make decisions on how personal information is used in connection with our Websites, products or services (where we are acting as a controller), we are responsible for the obligations of a “controller” under applicable laws in connection with the processing of personal information – for example, we use this Privacy Statement and other notices to provide you with information about our use of personal information, as required by law. Where we only use personal information as allowed by our customers (where we are acting as a processor), our customers are similarly responsible for the obligations of a “controller” under applicable laws in connection with the processing of personal information.

We may use your email address to send you newsletters or marketing emails. We will ask for your consent consistent with the applicable law when you first provide your Personal data. You can opt out by following the unsubscribe instructions included in these emails, or you can contact us at dpo@softwarecurrent.com or in writing to Software Current, Attention: Data Privacy Officer, 2740 SOUTH RD, POUGHKEEPSIE, NY 12601.

Requesting access to your Personal data.

You have the right to request access to any Personal data we hold about you as well as related information, including the purposes for processing the Personal data, the recipients or categories of recipients with whom the Personal data has been shared, where possible, the period for which the Personal data will be stored, the source of the personal information, and the existence of any automated decision making.

Requesting correction of your Personal data.

You have the right to obtain without undue delay the rectification of any inaccurate Personal data we hold about you.

Requesting erasure of your Personal data.

You have the right to request that Personal data held about you is deleted.

Requesting restriction of processing your Personal data.

You have the right to prevent or restrict processing of your Personal data.

Requesting transfer of your Personal data.

You have the right to request transfer of Personal data directly to a third party where this is technically feasible.

Where you believe that we have not complied with our obligation under this Privacy Notice or European data protection law, you have the right to make a complaint to an EU Data Protection Authority.

Canada Consumers' Privacy Rights

This section ("Canada Statement") explains rights that certain natural persons residing in Canada (each, a "consumer") may have under the Personal Information Protection and Electronic Documents Act (PIPEDA), the Canadian Anti-Spam Legislation (CASL), as well as any applicable provincial privacy legislation, and such rules and regulations as may be adopted from time to time implementing and interpreting such Acts (PIPEDA, CASL, and provincial legislation are collectively referred to as "Canadian Privacy Laws").

When we use the term "personal information" in this Canada Statement, we are using that term as Canadian Privacy Laws define it, which generally refers to information about an identifiable individual. However, personal information does not include publicly available information, deidentified information, or aggregate information.

Where we act as a "business" under Canadian Privacy Laws (meaning we determine the purposes for which and the manner in which personal information is processed), we may be required to disclose additional information regarding the categories of personal information we collect, the purposes for which we collect that information, the sources from which we collect that information, who we disclose that information to, as well as whether we sell or otherwise disclose personal information for consideration – all of which depends on the specific service being provided.

Categories of Personal Information we collect

Depending on the nature of your relationship with us (e.g., customer, subscriber, user, employee, or supplier), we may collect the following categories of Personal Information about you, including:

- Identifiers such as name, address, email address, account name, or telephone number;
- Information that identifies, relates to, or is capable of being associated with an individual, such as financial information;
- Characteristics of protected classifications under Canadian or provincial law such as age or marital status;
- Commercial information such as purchase history;
- Internet or other electronic network activity information such as browsing history;
- Geolocation data, if enabled on your device;
- Audio, electronic, or similar information;
- Professional or employment-related information;
- Education information;
- Other personal information, as described to you in this Privacy Notice, or otherwise at the point of collection; and
- Inferences drawn from any of the information identified above, including about your preferences. Depending on your relationship with us, we may have collected each of the above categories of Personal Information about you. In addition, we may have disclosed one or more of these categories of

Personal Information with third parties during the preceding 12 months for the business purposes described in this Privacy Notice. For each of these categories of Personal Information, please refer to the "When is personal information collected? How is your information used?" sections above for more detailed information regarding why we collect personal information and the categories of third parties with whom we may share personal information.

Canadian residents can also request information about the categories of personal information we collect, disclose, or share about you; the categories of sources of such information; the business or commercial purpose for collecting, selling, or sharing your personal information; and the categories of third parties to whom we disclose personal information. Such information is also set forth in this Privacy Notice.

Canadian residents also have the right to request that we delete your information. To make a request, you can contact us at [provide contact information here]. Provide us enough information to verify your identity. We will use information you provide to us to verify your request. If we cannot initially verify your identity, we may request additional information to complete the verification process, such as, for example, a copy of your driver's license and/or a recent utility bill.

Canadian residents also have certain rights regarding the "selling" or "sharing" of "personal information" (as such terms may be defined by Canadian Privacy Laws). Canadian residents have the right to opt out of such "selling" or "sharing" of their "personal information" in accordance with Canadian Privacy Laws: (1) online, (2) by emailing [provide email address], (3) by writing to [provide mailing address]. Once a year, Canadian residents can also request certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their direct marketing purposes in the preceding calendar year.

We will not discriminate against you because you have exercised any of your privacy rights under Canadian Privacy Laws, including CASL.

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For any questions about this notice or to request a copy of previous versions of this notice, please direct to our data privacy officer at dpo@softwarecurrent.com or in writing to Software Current, Attention: Data Privacy Officer, 2740 SOUTH RD, POUGHKEEPSIE, NY 12601.

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