



Privacy Policy

of International Resource Management Ltd.

Privacy Policy General Review

We understand that your personal data and security of the information you share with us is extremely important. That's why our Privacy Policy gives a detailed description of the way we process your data and what measures we have undertaken to secure them. It also explains where and how we collect your personal data and the rights you have with respect of all the information that we store, including how you could control the use and disclosure of your information and to what extent your information is protected.

This policy concerns you in case that you provide us with personal data on the phone, in the online registration form through the website <https://softwareshop.net/>, by mail or courier, in the social media, corporate or promotional website, mobile application or other. Our Privacy Policy is an expression of our readiness to protect your personal information and to keep you update on anything related to your personal data processing.

This Privacy Policy will discuss the following major issues:

Basic definitions in the field of Personal Data Protection

1. Who we are?
2. What information about you we store and process?
3. Cookie Policy
4. Purposes for which we use the data that you provide to us and the grounds for their processing
5. Who we can share your data with?
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Basic definitions in the field of Personal Data Protection

Controller of personal data means a person or an entity, which alone or jointly with others, determines the purposes and means of the processing of personal data.

Data Subject means the person whom the personal data are related to.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring,

storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Personal Data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

1. Who we are?

When we say "we" (or "our") within the framework of this Privacy Policy, we mean the following legal entity:

International Resource Management Ltd., UIC 130549116, having its registered address at Sofia, Bulgaria, 1680, Krasno selo district, 60, Bulgaria blvd., entr. V, fl.5, office 11 - the Controller.

This list may be extended by new legal entities, which are or will be a part of our group in the future.

2. What information about you we store and process?

- The information that you share with us when sending an inquiry or buying products about prices on our corporate website or when visiting our Facebook site:

<https://softwareshop.net/>

www.i-r-m.com

<https://www.facebook.com/irm.bg>

This information may include any or all of the following data: your names, physical address, phone number, e-mail address, IP address, geolocation by IP address and any feedback that you provide to us by mail, on the phone, by e-mail or messaged in the social media.

- In case that you visit us at Sofia, Bulgaria, Krasno selo district, 60, Bulgaria blvd., entr. V, fl.5, office 11, there may be collected data about your physical identity – record of images by making a video recording through surveillance devices placed at the entrance of the business premises.

Use of Children's Data

- We do not collect intentionally or store personal data about children under the age of 16, nor we offer any our products directly to children under the age of 16.
- In case that personal data of children under the age of 16 have been collected accidentally via our website relating to our offered products, they will be erased immediately.

3. Cookie Policy

3.1. Cookie Policy General Review

By accessing the website <https://softwareshop.net/> and the information contained therein ("the website") you acknowledge that you have read, understood and agreed with this Cookie Policy ("the Policy").

International Resource Management Ltd. collects information while you are visiting our website <https://softwareshop.net/> using the common tools in the data collection practice – "the Cookies". In compliance with the applicable law, International Resource Management Ltd. respects your data confidentiality and guarantees their lawful processing and protection. This Policy aims at giving you a clear explanation about the way in which the Cookies are used on the website.

3.2. What is Cookie

Cookies are a text file consisting of letters and figures which is saved and stored on your device when visiting a given website or an application.

They are used for identification of your device and for saving of your preferences while searching information on the website, to improve your user experience within our site, for customizing imaging information, to count

the site visitors and to help users easily get registered for the services offered on the site and for protection of data and user's rights.

If you don't want to accept Cookies, they may be disabled by the settings of your browser. If you decide to deny the Cookies, then you may not have access to all functions of this website.

3.3. Types of Cookies and how to use them

A kind of the Cookies that we use is Google Analytics.

For additional information about all cookies used on our website <https://softwareshop.net/>, please visit the following address: <https://softwareshop.net/cookie-policy/>. For further information about Cookies please visit www.allaboutcookies.org.

3.4. Consent for using Cookies

Before starting using the website, International Resource Management Ltd. should obtain your consent for the use of Cookies. That's why, when you go to the website, you will see a pop-up window notifying you about the use of Cookies and will ask for your consent for their use by clicking on "Only functional" or on "All Cookies". In case that you do not agree with the use of Cookies, you must cease using the website. If you do not accept the use of Cookies by clicking on one of the two buttons but continue using the website, this will be deemed that you have given your consent for using Cookies.

3.5. Cookie Blocking and Erasure

If you want to restrict Cookies or block them on the website, you may do that by changing the settings of your internet browser. You may block all Cookies, accept Cookies only on the first page or delete all Cookies when going out of the browser. You may get further information in the help menu of your browser.

3.6. Social Media Plugins

We use the so-called social plugins on our Facebook site. When you use the plugins, your internet browser will make a direct connection with the servers of the respective social media. In this way the respective provider gets information that your internet browser has accessed our online offerings even if you do not have a user account with this provider or have not logged into your account at that time. In this case log files (including IP address) are transferred directly from your internet browser to a server of the respective provider and are stored there accordingly. Provider or their server may be located outside EU or EEA (e.g. in the USA). Plugins are independent extensions by the social media providers. For this reason we may not affect the scope of data collected and stored by them.

Facebook Plugins. Facebook is managed at www.facebook.com by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA, and at www.facebook.de by Facebook Ireland Limited, Hanover Reach, 5-7 Hanover Quay, Dublin 2, Ireland ("Facebook"). A review of Facebook Plugins and their types you will find here: <http://developers.facebook.com/plugins>; and information about protection of your personal data in Facebook here: <http://www.facebook.com/policy.php>.

3.7. Who we share your information with

International Resource Management Ltd. does not provide the above information to third parties, except upon your explicit consent or in the cases prescribed by the statutory regulations.

4. Purposes for which we use the data that you provide to us and the grounds for their processing?

In the capacity of a Controller and in order to be able to execute our obligations under the General Data Protection Regulation, we can use your personal data for one, any or all of the following purposes:

- To reply to your inquiry about any of our products;
- To provide you the possibility to use our products by purchasing the relevant license.
- To send you e-mails with news and offers by the company ('the Newsletter');
- To send you invitations for events we organize – either alone or in cooperation with our partners;

- For statistical needs and analyses;
- To help us understand more about you as our client, about the products you use, about the way you use them, and to ensure you better customer service by our employees;
- To find ways how to improve our products, applications or websites.
- Your personal data processing is based on one of the following conditions:
- You have given your consent for the processing of your data for one or more specific purposes;
- processing is necessary for the performance of a contract to which you are a party or for taking steps at your request before entering into a contract between us and you;
- processing is necessary for compliance with a legitimate obligation imposed on us as a Controller;
- processing is necessary to protect your vital interests or these of another individual;
- processing is necessary for the performance of a task of public interest or in exercising official authority we have been invested in as a Controller;
- processing is necessary for the purpose of our legitimate / lawful interest or that of a third party, except when your interests or fundamental rights and freedoms requiring special protection of your personal data are overriding to such interests.

5. Who we can share your data with?

5.1. With companies of the Group – affiliates

We may share your data (only within the framework of your consent for that) with other companies – our related parties, when we have your consent for this effect. In this way we may ensure you a first class service.

5.2. With our partners and/or providers

We work with partners and providers who may also process your personal data on our behalf, but provided that they correspond to our standards for data storage, processing and protection! Such partners are for instance:

- Courier or postal service companies, who must deliver document or other parcels on our behalf;
- Accounting companies that must process your personal data for the purposes of tax and accounting reports.
- Campaigns for organization of advertising and promotional events of our products, when you have registered for participation of such an event.

We only provide them with the information that is necessary for you to receive the respective product from us that you have showed interest.

5.3. Other organizations or persons:

We may provide your personal data to other entities in certain cases. For example:

- If we discuss the sale of the whole or part of our business, we may share data about you with potential buyers – but in a summarized form only, in order they to be able to assess the business potential;
- If required by law, governmental or private agency in fulfillment of their statutory regulated obligations (e.g. Police, National Revenue Agency, National Social Security Institution, Commission for Protection of Personal Data, etc.);
- If we have to share your personal data, to protect our lawful interest or to exercise our rights, regulated by law, and to protect our clients, consumers of our products, systems and servers;
- or
- In reply to a requirement by other individuals (or their representatives) who are attempting to defense their statutory rights or the rights of other individuals or entities.
- In any case we will inform you before providing these data to third parties. In case that it is practically impossible, we will inform you as soon as possible after we have provided your data to third parties.

6. International transfer of your personal data

International Resource Management Ltd. as Controller of personal data, do not transfer your personal data to a third party outside the EU/EEA.

7. How will you get information about our products?

When you explicitly agree to this, we will be happy to share with you by e-mail information about our special offers, ideas, products and/or services, when we have something to share with you.

If you do not agree to this or wish to withdraw your consent to receive emails/newsletters from us, you may do so in one of the following ways:

- by sending us an e-mail to opt out at office@i-r-m.com
- by contacting us on + 359 2 808 5959.

8. What rights you have in relation to your data and how to exercise them?

8.1. Access to and correction of your personal data

You have access to your personal data we process for the purposes outlined above. If we process this data and receive a request from you (or from a third party authorized by you), we will provide this access for free. You may also request a copy of your personal data we process.

Before we provide you or your authorized person with access to your personal data, we may request proof of identity and details of your relationship with us or our partners, so we can find the data that relate to you.

If any personal data we store and process for you is inaccurate or obsolete, you are entitled to ask us to correct them, including by adding a statement.

8.2. Right to have your data erased

You are entitled to request your personal data be deleted without unreasonable delay if:

- personal data are no longer necessary for the purposes that they have been collected for;
- when you have withdrawn your consent;
- when you have objected to the processing if it is illegal;
- when personal data must be deleted for the purpose of compliance with a statutory obligation by the EU law or the law of a Member State applicable to us as a Controller;
- when personal data have been collected in relation to providing services to the information society.

Under certain conditions we may deny erasing your data in the cases prescribed by law.

8.3. Right to data portability and right to complaint

You are entitled to receive the data we process for you in a structured, widely used and machine readable format in order to transfer your data to another Controller.

You have the right to file a complaint with the local regulator, the Commission for Personal Data Protection or the court if you believe that your rights have been violated. For this purpose, you can visit the CPDP website at <https://www.cpdp.bg/>, where you will learn more.

8.4. Right to withdraw your consent

You may withdraw your consent for processing of your personal data at any time by submitting a request to us by:

- sending us an e-mail at office@i-r-m.com
- contacting us on + 359 2 808 5959.
- sending a written application at Sofia, Bulgaria, 1680, Krasno selo district, 60, Bulgaria blvd., entr. V, fl.5, office 11.

8.5. Right to complaint

You have the right at any time to submit an objection to the processing of your personal data for purposes related to direct marketing, including profiling, in so far as it relates to direct marketing. The objection can be made by phone or by e-mail to the contact details listed below in p.10.

8.6. Limitation on personal data processing

You have the right to request that we limit the processing of your personal data when you believe that your personal data is inaccurate, the processing of your personal data is illegal, we do not need your personal data for processing purposes, or you have objected to the processing of your personal data. In this case, personal data will only be stored, but not processed.

8.7. Right not to be subject to an automated decision, including profiling

You have the right not to be subject to a fully automated solution, including profiling, when it gives rise to legal consequences for you or affects you considerably.

If you wish to exercise any of the rights described here, please contact us using the contact details listed in section 8.4.

9. How long we store your data?

We keep a record of your personal data in order to provide you with high quality and consistency of our services within the Group. We always store and process your data in accordance with the law and we never keep it for a longer time than necessary. In the general case, unless otherwise specified, your data is stored for the period according to the validity of the contractual relationship with us unless a law requires longer storage term.

10. Data Protection

We treat your personal data as strictly confidential. To protect them, we take a number of measures, including:

- We limit the access to the premises where we work only to the people who need to be there;
- We also control the access to our information technology systems by means of firewalls, physical access restriction, SSL protocols and other technical means.
- We never ask you to send us your password;
- We recommend you never enter an account number, password, or other sensitive information in an email to us.

11. Contact with us

If you wish to exercise any of the rights described in this Privacy Policy, or if you have a question or complaint about this policy or the way your personal data is processed, please contact us in any of the following ways:

- By e-mail: office@i-r-m.com.
- By post: to the contact person in charge of data processing of International Resource Management Ltd. at Sofia, Bulgaria, 1680, Krasno selo district, 60, Bulgaria Blvd., entr. V, fl.5, office 11.
- By phone: call us on + 359 2 808 5959 within our working hours 9 a.m. - 6 p.m.

12. Change in the Privacy Policy

This Privacy Policy was revised last on 24.10.2019.