

This Privacy and Data Protection Policy sets out the basis which Speway Ltd. ("we", "us", or "our") may collect, use or otherwise process personal data via our website <https://speway.com/> ("Website") and all related websites as specified below, downloadable software, mobile applications including desktop applications (collectively "Products"), and other services provided by us and on which a link to this Privacy Policy is displayed, and all other communication with individuals through written or oral means, such as email, chat or phone (collectively together with the Website and Products, our "Services").

We are committed to safeguarding your personal information that you entrust to us while using our websites and Services, including use of the following: [www.speway.com](http://www.speway.com) and other company websites including subdomains.

## Definitions

**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.

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

**Restriction of Processing:** means the marking of stored personal data with the aim of limiting their processing in the future.

**Controller:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**Processor:** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**Consent of the Data Subject:** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## 1. Collection and use of information

**1.1** We generally collect information that:

- a) you directly provide us via our websites or upon your request regarding our products or services,
- b) we receive from the use of our products and services including but not limited to our websites

**1.2** We may collect your personal information through several different sources, including but not limited to:

- Website forms and registrations to software products/applications
- Existing clients or employees
- Physical forms
- Online live assistance and support
- Over the telephone or email
- Social media and social networking
- Introducing agent
- Advertising counters and identifiers on websites

- 1.3 We may collect and use your personal data for any or all of the following purposes:
- A performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
  - B verifying your identity;
  - C responding to, handling, assessing queries, requests, applications, complaints, vacancy requests, and feedback;
  - D managing your relationship with us;
  - E sending you marketing information, including but not limited to surveys and questionnaires, about our products or services;
  - F complying with any applicable laws, regulations, codes of practice, guidelines, directives or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
  - G any other purposes for which you have provided the information;
  - H transmitting information to any affiliated third parties, including our third party service providers and agents, and relevant governmental and/or regulatory authorities, for the aforementioned purposes in this section;
  - I any other incidental business purposes related to or in connection with the above;
  - J administer and improve the features and functionality of our applications and associated services;
  - K to analyze application performance via collection of statistical data;
  - L to verify user accounts, combat harmful conduct on the Speway website, maintain the integrity of our Products and services and to promote safety and security on our website products and services. For example, we use personal information to contact you and to investigate suspicious activity or violations of our terms and policies and violations of intellectual property rights.

The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you or other lawful purposes).

In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another person.

We provide (or can provide) our services in collaboration with companies that provide services on our behalf, such as handling the processing and delivery of information, publication of information in the applications, delivery of content and services provided by the applications and services of our websites, or performing statistical analysis on the use of the applications and the aforementioned services. These service providers will be given limited access to your information as is reasonably necessary to deliver the Service, and we will require that such third parties comply with this Privacy Policy, or operate under a similar privacy policy.

We do not sell, rent, lease or freely distribute our mailing lists to any third party.

When you voluntarily disclose your personal information in your profile, on forums, feeds and comments in online forum /chat areas on our website, the information becomes publicly available and can be viewed by other users. Forums, chats, feeds and other areas of the SPEWAY community that are available through our websites products and services, are public information.

Public information can also be seen, accessed and reshared by you or other users through third party social media services such as Facebook, Twitter, etc. For example, when you write a topic in forums or make a comment in forum topics. In such areas, you should not disclose any information that can be used to establish your identity or the identity of any other person. We are not responsible for the security and protection of information disclosed by you in such areas and we shall not be held liable for any resharing or processing of such information derived from profile, on forums, feeds and comments in online forum/chat and any other areas of the website by you or other users.

If you use our website for product or service purchases, we collect information on the purchase but we do not collect any financial information or transactions on any purchases. Payments are effected through the third party payment processors available on the payment section, please familiarize with their data privacy policy prior to payment.

#### 1.4 Minor's personal information and privacy

We recognize the importance of protecting the information about minors and we do not knowingly collect any personal information from minors under eighteen (18) years of age. Our website and services are directed to persons over eighteen (18) years of age, Speway Ltd. accepts no responsibility for any failure to comply with this requirement.

We encourage parents and legal guardians to take the appropriate measures to prevent children under eighteen years of age from viewing at this Website without the appropriate permission.

In the event we become aware that we have received personal information from a visitor under eighteen (18) years of age, we shall delete as soon as reasonably practicable and not make use of such information.

#### 1.5 Collection of other information

We may collect other non-personal information about the use of our Software Applications, visits to our websites or use of additional services, including links you have clicked, software or information you have downloaded, as well as other actions related to the use of our products or services. We may also collect certain technical information necessary for the operation of our products/services and the collection of anonymous statistics on the use of such products/services, along with any error reports about our products.

## 2. Cookies

Cookies are small text files containing a string of numbers and letters that are placed on your hard disk every time you visit a certain webpage. These files allow to identify your browser when you visit the same website again. Cookies can store user settings and other information. You can set your browser to reject all cookies or to notify you when you receive a cookie. Please note however that some website features or services may not function properly without accepting the receipt of cookies. Any data collected in this manner cannot be used to individually identify website users. Cookies cannot be used to run programs or deliver viruses to your computer. To view our cookie policy please [click here](#) (link)

## 3. Protection of personal data

We endeavor to ensure protection of the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example, firewalls, password protection and other access and authentication controls.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us.

## 4. Retention of personal data

We may retain data for different periods of time for different purposes as required by statute, our legitimate interests or best business practices. Other statutory obligations, legal processes and inquiries may also necessitate the retention of certain data.

## 5. Data Transfers around the world

We may have processors in different countries around the world and thus your personal data may be processed, used or transferred worldwide. We ensure that all necessary safeguards and security measures are in place, as deemed appropriate, under the relevant national, international laws.

## 6. Changes to this Privacy and Data Protection Policy

- 6.1 We reserve the right to revise and update this Privacy and Data Protection Policy from time to time in part or in full by publishing the new version on our website.
- 6.2 We encourage you to check our Privacy Policy periodically to keep yourselves updated with the changes.
- 6.3 To view the latest version of our Privacy Policy, click the <Privacy, Data Protection and Refund Policy> link at the following address: <https://www.speway.com/en/about/privacy>. In case of such revisions, the new revised version of the Privacy Policy shall become effective on the date of its publication, unless otherwise is provided by the revised version of the Privacy Policy.

## 7. Your Rights

### A the right to access

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.

### B the right to rectification

You have the right to request to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

### C the right to erasure

In some circumstances you have the right to request the erasure of your personal data if established that the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw permission to authorization-based processing; you object to the processing under certain rules of applicable data protection law and if established that the personal data has been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation or for the establishment, exercise or defense of legal claims and for reasons of public interest.

**D the right to restrict processing**

In some circumstances you have the right to restrict the processing of your personal data, for example when you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data and we will only process it for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person or for reasons of important public interest.

**E the right to object to processing**

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is necessary for the performance of a task carried out in the public interest or in the exercise of any official authority vested in us or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

You have the right to object to the processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

**F the right to data portability**

You have the right to obtain the personal information provided to us given that

- the processing is based on authorization; or
- the processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

**G the right to complain to a supervisory authority**

If you consider that the processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection.

**H the right to withdraw authorization.**

To the extent that the legal basis for our processing of your personal information is authorization, you have the right to withdraw that authorization at any time in which case we may not be able to provide to you some of the features and functionality of our Services. Withdrawal of permission will not affect the lawfulness of processing prior to the withdrawal request.

## 8. Notification of Breaches

In the event of unauthorized breaches or intrusions into our systems, that may affect your personal data security, we will notify you as soon as it is practically feasible and we will take all necessary measures and actions to avoid future occurrences and similar phenomena.

## 9. Refund Policy

You agree to follow the applicable terms of use or any other legal agreement with SPEWAY, a Payment Processor or a third party that governs the use of a given payment processing method. SPEWAY reserves the right to add or remove payment methods at its sole discretion. You alone are responsible for paying all additional costs associated with purchases in SPEWAY Services.

Prices in SPEWAY Services shall be expressed in US dollars. SPEWAY Services may display the prices to Users in their native currency, but they shall not be responsible for the accuracy of currency rates or conversion.

In executing financial operations in SPEWAY Services, You are responsible for paying all applicable taxes, duties and customs duties relating to financial transactions in SPEWAY Services, including any related penalty or interest.

You agree to comply with any and all applicable tax laws, including the reporting and payment of any taxes arising in connection with Your use of the [www.SPEWAY.com](http://www.SPEWAY.com) website and SPEWAY Services. You

Except as expressly provided otherwise in these Terms of Use or in Rules or Additional Terms or Additional Agreements of the appropriate SPEWAY Service, all sales are final, and no compensation, refund or replacement of purchased products, goods or services shall be provided. Your right to cancel, return purchases or get a full refund are provided in the above Rules, Additional Terms and Additional Agreements of corresponding SPEWAY Service.

## 10. Contact us

If you have questions about this Privacy, Data Protection and Refund Policy or the way personal information is processed or used in connection with the use of our Software Applications or websites, please contact us. Your request must include your name and other information needed for the identification, as well as for the full and complete processing of your request.