

### Privacy Policy

Last updated on 24/05/2018

#### IMPORTANT INFORMATION AND WHO WE ARE

**CloudLayer8 Limited** (collectively referred to as “**CL8**”, “**we**”, “**us**” or “**our**” in this privacy policy) respects your privacy and is committed to protecting your personal data. The personal data that we collect depend on the service requested and agreed in each case. This privacy policy explains as to how we collect and process your personal data and tells you about your privacy rights under the processing of personal data (protection of individuals) Law 138 (I)/2001) as amended from time to time and the EU General Data Protection Regulation (“GDPR”) 2016/679.

- This Privacy Policy is directed to natural persons who are either current or potential clients of CL8, or are authorised representatives/agents or beneficial owners of legal entities of natural persons.
- It is also directed to natural persons who had such a contractual or other legal relationship with CL8 in the past.
- It also contains information about when we share your personal data with other third parties such as other service providers or suppliers).
- This Privacy Policy aims to provide you with information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when signing up to our newsletter and/or during our contractual relationship.

***It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing your personal data about you so that you are fully aware of how and why your data is being used. This privacy policy supplements the other policies and it is not intended to override them.***

#### WHO WE ARE

**CL8** is a Company registered in Cyprus under the registration number **HE 328783** having its registered office and head office at **17, Gr.Xenopoulou Street, Limassol, 3106, Cyprus**.

We have appointed a **Data Protection Officer (DPO)** who is responsible for overseeing questions in relation to privacy issues. If you have, any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

Email address: [DPO@cl8.com](mailto:DPO@cl8.com)

## **COLLECTION OF YOUR DATA**

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Example of personal data that we might collect is information you give us. You may give us information about you by filling in forms on our website <https://cl8.com> (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, search for a product, place an order on our site, enter a competition, promotion or survey, when you report a problem with our site, or any other activity that may be available on our site from time to time which requires the provision of information. The information you give us may include your name, address, e-mail address and phone number.

With regards to each of your **visits to our site** we may automatically collect the following information:

Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), and methods used to browse away from the page and any phone number used to call our customer service number.

CL8 uses Google Analytics and Cookies in order to improve its service, user experience and analyse how CL8 website is used. The only purpose of web analytics is to use collected data only for tracking CL8 website's performance. The collected data from analytics is **not being** used for any sort of user profiling, advertising or any other commercial purposes.

## **Children's data**

We understand the importance of protecting children's privacy. We may collect personal data in relation to children only provided that we have first obtained their parents' or legal guardian's consent or unless otherwise permitted under the law.

### **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide information when requested, we may not be able to perform the contract we have or are about to enter into with you (for example, to provide you with our services). In this case, we may have to abort all contractual obligations with yourself but we will notify you if this is the case at the time.

### **HOW IS YOUR PERSONAL DATA COLLECTED?**

We collect and process different types of personal data, which we receive from our Clients (potential and current) in person or from our website in the context of the contractual relationship.

We may also collect and process personal data which has been lawfully obtained not only from the Clients but from third parties e.g., public authorities or companies that has been introduce the client to us.

### **PURPOSE OF DATA PROCESSING AND LEGAL BASIS**

Most commonly, we will use your personal data in in accordance with the GDPR and of the processing of personal data (protection of individuals) Law 138 (I)/2001) as amended from time to time for one or more of the following reasons:

- To carry out our contractual obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
- Where it is necessary that our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; we process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. Examples of such processing activities include, initiating legal claims and preparing our defence in litigation procedures and/or measures to manage business and for further developing services.

- Where we need to comply with a legal or regulatory obligation; there are a number of legal obligations emanating from the relevant laws to which we are subject as well as statutory requirements, e.g. Tax laws.
- Promoting the best interest of the client.
- Provided that you have given us your specific consent for processing (other than for the reasons set out above) then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.
- To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing client, we will only contact you by electronic means (e-mail) with information about goods and services similar to those, which were the subject of a previous sale or negotiations of a sale to you.
- To notify you about changes to our services.
- To notify you about maintenance works that are carried out during a calendar year.
- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer.
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep our site safe and secure.
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

### CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at:

**Email address:** [DPO@cl8.com](mailto:DPO@cl8.com)

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis, which allows us to do so.

### MARKETING

We may process your personal data to tell you about our services and news that may be of interest to you or your business.

You may "**opt out**" of receiving from such email updates, newsletters and/or other marketing emails by clicking the "unsubscribe" link in any email communication that we send you. You will then be removed from our mailing list.

You have also the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by contacting us at any time in writing.

### THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site.

If you do not want us to deploy cookies to your browser, you can set your browser to reject cookies or to notify you when a website tries to put a cookie on your computer. Rejecting cookies may affect your ability to use our website.

For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy (<https://cl8.com/legal/P6.3-Cookies-Policy.pdf>)

### WHO DO WE SHARE WITH YOUR PERSONAL DATA

In the course of the performance of our contractual and statutory obligations, your personal data may be provided to the different departments of CL8 and/or third party/ies providing service/s to and/or acting as agents and/or suppliers of CL8 in the context of the provision of our services. Consequently, third parties may also receive your personal data so that we may perform our services and/or legal obligations. Such third parties (service providers and suppliers) enter into contractual agreements with us by which they observe confidentiality and data protection according to the data protection law and GDPR.

It must be noted that we may disclose data about you for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations or if you have given your consent. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We strictly prohibit our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We only provide the necessary information they need to perform their specific services.

We may share your information with selected third parties such as:

- Business partners, suppliers and sub-contractors for the performance of our contractual obligations with you.
- Recipients of personal data may be, for example: income tax authorities, criminal prosecution authorities, auditors and accountants, legal consultants and so on.
- Analytics and search engine providers that assist us in the improvement and optimisation of our services.
- Disclosure of your personal data may occur in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions (<https://cl8.com/legal/D6.1-General-Terms-and-Conditions.pdf>) and other agreements; or to protect the rights, property, or safety of Cloudlayer8 Limited, our customers, or others. This includes exchanging information with other companies

and organisations for the purposes of fraud protection and credit risk reduction.

### DATA SECURITY

Appropriate security measures have been put in place, in order to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Procedures have been put in place, to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach and we shall notify you and any applicable regulator of a breach where we are legally required to do so.

### DATA RETENTION

#### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

1. The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you keep using our services).
2. Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them).
3. Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations).

You have the right to delete your data; to request erasure. This enables you to instruct us to erase your personal data (known as the 'right to be forgotten') where its process is of no further use or interest.

### YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under Data Protection Laws in relation to your personal data:

- **Request access to your personal data:** You may request a confirmation as to whether or not personal information is being processed by us and to obtain a copy of that information.
- **Request correction of your personal data:** You may request rectification if your personal information is inaccurate.
- **Request erasure of your personal data:** You may request that your personal information is erased in certain situations e.g. if it is no longer necessary to provide the services to you.
- **Object to processing of your personal data:** You may object to the processing of your personal data in certain situations e.g. for use of your data for ad targeting.
- **Request restriction of processing your personal data:** You may request restrictions of the processing of your personal data in certain situations e.g. if your personal information is inaccurate or unlawfully processed.
- **Request transfer of your personal data:** You may request to obtain and reuse your personal data for your own purposes across different services.
- **Right to withdraw consent that you gave us** with regard to the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by you.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer at:  
Email address: [DPO@cl8.com](mailto:DPO@cl8.com)

### CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on **24/05/18**. This Privacy Policy may be amended from time to time. We do however encourage you to review this statement periodically to be always informed about how we are processing and protecting your personal information.

***You have the right to make a complaint. We would, however, appreciate the chance to deal address your queries, so please do contact us at [DPO@cl8.com](mailto:DPO@cl8.com)***