PRIVACY POLICY

Cloud2Me Limited ("we", "us", "our") are committed to protecting and respecting your privacy.

This privacy policy ("**Privacy Policy**") together with our Professional Services Agreement ("<u>PSA</u>") and Data Processing Agreement ("<u>DPA</u>") and any other documents referred to herein, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By completing our C2M order form ("Order Form") to purchase services from us ("Services"), you are accepting and consenting to the practices described in this Privacy Policy.

For the purpose of the Data Protection Act 1998 or any subsequent amendment or replacement or supplementary legislation (the "**Act**"), the data controller is Cloud2Me Limited of Oldpost 19 High Street, Nutfield, Surrey, RH1 4HH, England.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

Information you give us. You may give us information about you by filling in forms on our support site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you subscribe to use our Services. The information you give us may include your name, address, e-mail address and phone number, financial information, personal description, photograph, IP address, router login and domain information.

Information we collect about you. With regard to using our Services 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, operating system and platform;
- Your name, email address, telephone number/s, work addresses.

Information we receive from other sources. We may receive information about you if you use any of the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected for our Services. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, credit reference agencies) and may receive information about you from them.

USES MADE OF THE INFORMATION

We use information held about you in the following ways.

Information you give to us. We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us;
- to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to notify you about changes to our Services;
- to ensure that our Services are presented in the most effective manner for you.

Information we collect about you. We will use this information:

- to administer our Services and for internal operations, including troubleshooting, data analysis and testing;
- to improve our Services to ensure that they are presented in the most effective manner for you;
- as part of our efforts to keep our Services safe and secure;
- to make suggestions and recommendations to you and other users of our Services about goods or services that may interest you or them.

Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

Information we share with third parties. We may share your information with selected third parties including:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.

Information we disclose to third parties. We may disclose your personal data to third parties:

- 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 Cloud2Me Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred 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 <u>PSA</u> or <u>DPA</u> and/or any other agreements; or to protect our rights, property, safety, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or partners. Such staff or subcontractors maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details or the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing outside of the EEA.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. In particular, this means that your personal data will only be transferred to a country that provides an adequate level of protection (for example, where the European Commission has determined that a country provides an adequate level of protection) or where the recipient is bound by standard contractual clauses according to conditions provided by the European Commission ("**EU Model Clauses**").

Our Services are accessible via the internet and may potentially be accessed by anyone around the world. Other users may access our Services from outside the EEA. This means that where you chose to post your data on our Services, it could be accessed from anywhere around the world and therefore a transfer of your data outside of the EEA may be deemed to have occurred. You consent to such transfer of your data for and by way of this purpose.

PROTECTION OF INFORMATION

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access our Services, you are responsible for keeping this password confidential. We ask you not to share any password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will endeavour to protect your personal data, we cannot guarantee the security of your data transmitted to our Services. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

LINKS TO OTHER WEBSITES

Our Services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

YOUR RIGHTS

You have the right under the Act, free of charge, to request:

- Access to your personal data.
- Rectification or deletion of your personal data.
- A restriction on the processing of your personal data.
- Object to the processing of your personal data.
- A transfer of your personal data (data portability).

You can make a request in relation to any of the above rights by writing to us at the contact address given at the end of this Privacy Policy. We will respond to such queries within 30 days and deal with requests we receive from you, in accordance with the provisions of the Act.

CONSENT

You have the right to withdraw your consent to us processing your personal data, at any time, by writing to us at the contact address given at the end of this Privacy Policy.

Where we process your personal data for marketing purposes, we will inform you and obtain your opt in consent (before collecting your personal data) if we intend to use your personal data for such purposes. If you change your mind about being contacted in the future, please click on the opt out options and we will remove you from our mailing lists.

We send push notifications from time to time in order to update you about any service updates, events and promotions we may be running. If you no longer wish to receive these communications, please disable these in the settings on your device.

DATA RETENTION

We retain personal data for as long as necessary for the relevant Service for which it was provided or collected. This will be for as long as we provide access to the Service to you, your account with us remains open or any period set out in any relevant contract you have with us. However, we may keep some data after your account is closed or you cease using the Services for the purposes set out below.

After you have closed your account, or ceased using the Services for a period of at least 60 days, we usually delete personal data, however we may retain personal data where reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, maintain security, prevent fraud and abuse, resolve disputes, enforce our <u>PSA</u> or fulfil your request to "unsubscribe" from further messages from us.

We will retain de-personalised information after your account has been closed.

Please note: After you have closed your account or deleted information from your account, any information you have shared with others will remain visible. We do not control data that other users may have copied from the Services.

COMPLAINTS

If you have any complaints about our use of your personal data please contact us as set out at the end of this Privacy Policy or contact our supervisory authority in the UK: The Information Commissioner's Office at, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England ("**ICO**").

AGE OF USERS

This Site is not intended for and shall not be used by anyone under the age of 16.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy. This Privacy Policy was last updated on 19.03.18 and replaces any other Privacy Policy previously applicable from this date.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to:

Oldpost 19 High Street, Nutfield, Surrey, England, RH1 4HH / enquires@cloud2me.co.uk