

## **GENERAL PRIVACY POLICY OF CLOUDWICK TECHNOLOGIES, INC.**

We at Cloudwick (“Cloudwick”, “we”, “our” and/or “us”) treat personal data responsibly. With this general privacy policy (the “Policy”) we want to inform our users and/or clients (collectively “you”, “your”) about the personal data we process in the course of our business as well as through our website <https://cloudwick.com> in compliance with the EU-General Data Protection Regulation 2016/679 (“GDPR”) and the applicable national legislation.

This Policy explains and helps you understand your rights in connection with your personal data and how you can request that we delete, correct, update, transfer, and/or provide you with access to your data.

### **WHO ARE WE?**

Cloudwick UK Limited and Cloudwick Technologies UK are a part of Cloudwick Technologies, Inc. which is headquartered in Newark, California, USA. Cloudwick provides strategic technology services and software solutions to migrate and modernise data into the cloud, as well as offering cloud-based managed services and training. For more information, please visit <https://cloudwick.com>

Each of the entities within Cloudwick is a data controller when it processes personal data in the course of its business and with respect to the management of our website.

### **WHAT PERSONAL DATA DO WE COLLECT AND FOR WHAT PURPOSE?**

Cloudwick collects data provided by clients in the course of business. For the purposes of preparation, signing and execution of contracts with clients, Cloudwick needs some minimum of personal data of the representative bodies of such clients and/or contact persons, such as: names, business email address and mail address, phone number, job title. We need these data in order to identify our clients as well as to ease the communication and coordination between us. We may also use these data for accounting purposes as per the applicable legislation.

When we provide training services to our clients we may also have access to the personal data of our clients’ employees attending the training, such as: names and occupation. We need such personal data to control the participation in our training courses. Sometimes you may also contact us with follow-up queries related to the training courses and in these cases, we need to have access to your business emails in order to reply and keep in touch.

Data provided by you when using our website <https://cloudwick.com/> (the “website”) has different functionalities and provides you the opportunity to communicate with us on different occasions. Below are details about how we treat information you provide us with via various website pages on the website:

### **“Contact Us” Page**

You may approach us with any queries related to our business via email through the email addresses, phone number or the contact forms published on our website. In these cases, we receive your names and email address. You may also contact us via mail to our offices in which case we will also receive your mail address. We need this data in order to contact you back and answer your queries.

### **“Talk to Sales Experts” Website Sections**

You may wish to book a meeting with our Sales Experts using the respective form on our website. We need the data which we receive when you book a meeting, as described herein, to identify you and to contact you back in case of changes, further clarifications or unexpected occasions.

You may book a meeting as a non-registered user. In this case you choose a date and time on the website and fill the respective booking form by providing your names, email address and phone number.

We will use the provided personal data for the agreed upon purposes only.

You can easily opt-out from such communication at any time, by using the unsubscribe form at the end of each email which you receive from us. Please note that we might need to send you one more message to confirm that you want to opt-out.

### **Information We Automatically Collect From You**

If you visit our website to browse, read, or download information, we may collect certain information from your device, namely your web browser automatically sends us (and we can retain) information such as the:

- Internet domain through which you access the Internet (ISP);
- Internet Protocol (IP) address of the computer you are using;
- Type of browser software and operating system you are using;
- Date and time you accessed our website; and
- The Internet address of the website from which you came to our site (referring URL).

We will use this data in aggregate to help us maintain this website and/or the landing pages, when applicable (e.g., to determine the number of visitors to different sections of our site, to ensure the website is working properly, and to help us make our website more accessible and useful).

Please note that our website can contain links to other websites. However, once you have already used these links and left our website, you should know that we have no control over these other websites. Therefore, we cannot be held responsible for the protection and confidentiality of any personal information you provide while visiting such websites, as these websites are not governed by the current Policy.

### **Data Provided by You When Using Our Landing Pages**

For marketing purposes, we use different standalone landing pages created specifically for the purposes of a marketing or advertising (temporary) campaign where you may book a consultation or download e-resources (e.g., e-books, whitepapers, etc.). When you use a landing page, you provide us with the following personal data: full name, business email address, company's name and position. If you wish, you can also provide us with your phone number to contact you easily, e.g., in case you haven't succeeded in downloading some papers etc. We need this data to identify you and to contact you back, if necessary. The name of your company is needed for statistical and marketing purposes so that we can make our web content more interesting, useful and practical oriented towards the needs of our clients.

### **Social Media: Facebook, Twitter, LinkedIn**

We use the following social platforms to share our ideas with you – Facebook, Twitter and LinkedIn. For this reason, our website has integrated plug-in buttons for these platforms. These buttons can be recognised by the logo of the respective platform. All buttons are set up in accordance with the relevant privacy requirements. When you click on the relevant button on this website, and only in this case, it establishes a direct link between your browser and the operator's social network. Operators of these platforms do not collect personal data without the clicking of the respective button. Personal data is collected from registered members only, including their IP address. If you do not want your visit to be associated with that profile, please log out of your profile on the appropriate platform.

We use these social media platforms to keep in touch with our clients and to keep them aware of the news about us, but our intention is not to process or access your personal data. However, it is useful to get acquainted with the privacy policies of these platforms in order for you to be informed about the data processed by them. More information about the separate platforms is available here:

- You can find us on Facebook. We do not receive any information about the content of the transmitted data or its use by Facebook. For more information see [Facebook's privacy policy](#).
- The plug-in button of Twitter leads you to our Twitter account. These functions are offered by Twitter Inc., Twitter, Inc. 1355 Market St, Suite 900, San Francisco, CA 94103, USA. Through the use of Twitter and the "Re-Tweet" button, the web pages your visits are linked to by your Twitter account and made known to other users. This data is also transmitted to Twitter. For more information, see [the privacy statement of Twitter](#). You can change the account settings [here](#).
- Find us on LinkedIn too! The provider of the LinkedIn network is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. A connection to LinkedIn servers is formed for any access to our website that includes functions from LinkedIn. LinkedIn is informed that you visited our website with your IP address. If you click the LinkedIn "Recommend" button and are logged in to your LinkedIn account, LinkedIn is able to connect your visit to our website with you and your user account. We advise you to be aware of the content of the personal data transmitted to LinkedIn and how it is used. You can learn more by consulting [LinkedIn's privacy policy](#).

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With respect to all the possibilities to contact us via mail, phone or through our various contact forms, we would like to inform you that further personal data (other than that which we have requested as described above) are not processed and not stored by us by any means whatsoever, and we are not responsible for such data if you provide us with such. Usually, we delete such data as soon as possible and/or return it back to you.

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## **WHAT IS THE LEGAL GROUND FOR PROCESSING YOUR PERSONAL DATA?**

The legal basis for processing your personal data is described in this section and it will depend on the relevant personal data and the context in which we collect such data:

- Based on the contracts we have with our clients we can receive personal data of a representative or a contact person of such a client so that we may identify the clients and easily coordinate the execution of our contracts.
- It is our legitimate interest to contact you back and also to better understand the needs of our clients and improve our web contents accordingly, when we collect your name and email address, phone number and company in the cases you have contacted us with certain queries, book a meeting or download e-resources via the website or via our landing pages. However, based on the described possibilities to collect your data, we would like to assure you that we process the data by respecting the different purposes for which we have collected such data.
- We collect your personal data also on the legal basis of your application for an open job position published on our website.
- We collect your name and email address to send you news and insights about our activities, as described above, based on your provided explicit consent to do so.
- It is our legitimate interest to receive your personal data as automatically collected by your use of our website. Otherwise, you will not be able to benefit from the full functionality of our website.

Sometimes we may have a legal obligation to use your personal data, or we may need to use it in order to protect your vital interests or those of another person. If we ask you to provide your personal data in order to comply with a legal requirement, we will specify this at the relevant time, and we will let you know if the provision of your personal data is mandatory or voluntary. Respectively, we will inform you about the possible consequences if you do not provide your personal data.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

Personal data collected in connection with the contracts with our clients is retained for up to five years or the legal retention requirement for the region as of the termination of the respective contract. The length of time we retain your personal data for job application purposes depends on the applicable laws for each entity within Cloudwick, which we strictly respect and apply.

Further, we generally process and store your personal data: (a) as long as we need it to contact you back in cases of queries, booking a meeting or downloading e-resources (depending on how and whether the communication between us will continue to develop); and/or (b) until you decide to withdraw your consent to receive our news and insights, in which case we may continue to store your email address for other purposes as listed herein (in case you are in contact with us for different purposes as stated here above), but will no longer send you other communications.

Data collected automatically through your web browsing is retained by us for a period of maximum 90 (ninety) days. Upon the expiration of the given time limit or when we no longer need your personal data, we will destroy/erase it as soon as possible. If we face any technical limitations that prevent deletion or anonymization, we will safeguard personal data and isolate it from any further processing until deletion or anonymization is possible.

In the event of a legal dispute, or in connection with any other need to protect our legal interests, and/or if there is a legal obligation that we need to comply with, we can retain your personal data for a longer period of time: until the end of any legal proceedings, the protection of our interests, or the compliance with legal requirements.

#### **DATA ACCESS TO THIRD PARTIES-RECEIVERS**

We do not give access and do not provide your personal data to third parties, except for the following:

- To our “helpers” in the technical realisation of the provision of our services (such as our hosting companies, MailChimp etc.). This enables us to ensure that our services are delivered to you efficiently.
- If it is in our legitimate interests, we can also provide your personal data to our legal, IT, or other consultants for a specific case and for the time required to conduct a business consultation (and only if it is indeed necessary.)
- To a competent law enforcement body, government agency, regulatory body, court or other third party if we believe that disclosure may be necessary pursuant to the applicable law or regulation, to exercise our rights, or to protect your vital interests or the vital interests of another person.

#### **DATA TRANSFER**

The entities within Cloudwick are based in the UK and California and process your personal data in compliance with GDPR in the EU/EEA and the relevant legislation in the respective country wherein each entity is based.

In all cases, we take all relevant measures to ensure that your data will be protected in accordance with this Policy.

## YOUR RIGHTS

Within the statutory limits and conditions, and where technically possible:

- You have the right to ask us to access, update, correct, or request deletion of your personal data;
- You can object to the processing of your personal data and ask us to restrict processing of your personal data, or request to exercise your right to data portability;
- You have the right to information about and to comment on the automated processing of your personal data, in cases where we use this processing, and for which you will be duly informed.
- You have the right to opt-out of marketing communications by following the procedure as described in this Policy above.

If we have collected your personal data on the basis of your consent, then you may withdraw your consent at any time. The withdrawal of your consent will neither affect the lawfulness of the processing of your personal data prior to the withdrawal, nor the processing of your personal data based on other legal grounds.

Please note that your above rights are not absolute and are limited by the rights of others, including our rights that in certain cases may prevail. In this regard some of your rights may be inapplicable. In addition, in some cases your rights may be limited – for example, if we have a legitimate reason to keep your personal data, despite your wish to be deleted etc.

For any of the above requests (any other questions or concerns about how your personal data is handled by us), you may contact us by using the following email addresses: [dataprotection-us@cloudwick.com](mailto:dataprotection-us@cloudwick.com) and [dataprotection-uk@cloudwick.com](mailto:dataprotection-uk@cloudwick.com). We may require additional information to identify you (e.g. proof of identity) and to protect your personal data from unauthorised access.

We will answer to all your demands in a period of not more than 30 days after we have received such demand, or longer, as the case may be, for which you will be duly informed. In the cases where we have found that your demands are lawful and/or prevail our interests we will satisfy them within the above mentioned period. Please be aware that we may ask you to verify your identity in some way (such as checking your ID) to make sure we provide information about your data. This is an additional security measure to protect your data.

Please keep in mind that your demands will not affect the lawful processing of your data before the time you made it.

If you are an EU resident, you have the right to lodge a complaint with a supervisory authority in the EU Member State of your habitual residence, place of work, or place of the alleged infringement if you

are not satisfied with our use of your personal data. Contact details of the data protection authorities may be found [here](#).

## **AMENDMENTS**

This Policy was last updated in April 2022. We may make changes to it in order to comply with the applicable data protection law. We encourage you to check the Policy for any changes from time to time. It is always available for you in an easy and visible place on our website and the landing pages. Any amendments made to the Policy will apply from the date it is published on the website.

## **TERMS OF USE**

This Terms of Use section aims to provide you with general information about the purposes and terms under which you may use the website and landing pages operated by Cloudwick ("Cloudwick", "we", "our" and/or "us").

## **PURPOSE AND USE OF THE LANDING PAGES**

For marketing purposes Cloudwick also operates different standalone landing pages created specifically for the purposes of a marketing or advertising (temporary) campaign where you may book a consultation or download e-resources (e.g., e-books, whitepapers, etc.) about Amazon Web Services.

If you want to use the landing pages (e.g., for booking a meeting or downloading e-books, whitepapers, etc.), you need to fill out a certain download form. You may use our landing pages free of charge.

## **PERSONAL DATA**

We collect and process your personal data according to the General Privacy Policy of Cloudwick.

## **INTELLECTUAL PROPERTY**

The website and the landing pages as well as all their content, including: texts, design, graphics, logos, images, pictures, audio- and video clips, and all other materials which relate to the presentation of our services or which are developed to ensure the website's and landing pages' proper functioning are the property of Cloudwick Technologies, Inc. and subject to our copyrights.

## **LIABILITY**

Our website and landing pages may contain links to the websites of third parties and we are not liable for their content and proper functioning. When you switch to those links, you have to be aware of the terms of use of these websites and their privacy policies. Every user is liable for the damages caused



to us or to third parties by performing malicious and unlawful actions via the website and the landing pages and/or their software.

## **AMENDMENTS**

This Terms of Use are actual by April 2022. Cloudwick has the right to change these Terms of Use, the content and functions of the website and of the landing pages at any time due to changes in its business needs, market conditions and applicable laws as well as upon relevant acts of the competent authorities.

## **COOKIES POLICY**

Cookies are small text files that are placed on your computer by the websites you visit. The cookies are widely used to make websites work or work more efficiently, and to provide information to website owners. The cookies used by our website are needed to enable us to provide our services, to improve them, and to stay competitive. Cookies are not shared with third parties. Most web browsers allow most cookies to be managed through browser settings. To learn more about cookies, including how to see what cookies were set up and how to manage and delete cookies\*, visit: [www.allaboutcookies.org](http://www.allaboutcookies.org).

\*We are in a process of optimising our cookie management software and will soon be giving more opportunities to the visitors to our sites to manage their cookies.

### **1. Cookies on Our Website**

In order to make our website attractive to visitors and enable certain features, we use cookies on different pages (please see our cookie reports with a detailed explanation about all types of cookies we use at the end of this Cookie Policy). Most of the cookies we use are deleted at the end of each browser session or after a certain period of time. Other cookies remain on your device and allow us to locate your browser the next time you visit the website (permanent cookies). You can set your browser to notify you when cookies are saved so that you can choose which cookies to accept separately or never to accept cookies. However, kindly remember that if you decide not to accept cookies, the functionality of our website may be limited. You can find more on this in our Cookies Policy.

#### **Cookie can be:**

##### **Strictly Necessary Cookies (no consent required)**

The necessary cookies ensure that the website is usable and enable basic features like navigating around web pages or accessing secure areas of the website. Without these cookies, the website cannot function properly.

**Statistical Cookies (consent required)**

Statistical cookies help website owners understand how visitors interact with the website by collecting and reporting information anonymously.

**Marketing Cookies (consent required)**

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

**Third-party Cookies**

Our website may use features from other websites which may leave cookies. These are third-party cookies which we cannot block or switch off without removing the respective feature from our website. To learn more about these cookies, you will need to check the source website for their cookies.