Privacy Policy

Your privacy is important to us. This Privacy Policy ("Privacy Policy") describes how Cloudwick Technologies, Inc. ("Cloudwick", "we", "us", or "our") may collect, use, store, disclose, process, and transfer your personal information through your access to or use of Cloudwick products and services, including those available through our corporate website and its subdomains, any other Cloudwick website that links to this Privacy Policy, related websites, and other offerings (collectively, the "Services"). By using the Services or, if required by laws applicable to you, opting into this Privacy Policy, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Services. Cloudwick may change this Privacy Policy from time to time by posting changes here. Your continued use of the Services following the posting of such changes will be deemed your acceptance of those changes, unless additional consent is required.

Privacy Policy Applicability

This Privacy Policy applies when you use or access the Services or share information with Cloudwick. By accessing or using the Services and/or opting into this Privacy Policy (as applicable in your jurisdiction), you consent to this Privacy Policy. Cloudwick may update this Privacy Policy at any time. If you do not consent to this Privacy Policy for any reason, please do not access or use the Services or share your information with us. Please note that this Privacy Policy applies only to the Services and not to any other third-party website linked to or from it, or any third-party website in which Cloudwick's content or functionality is embedded. We do not control the privacy policies or practices of others.

Information We Collect from You

In general, we receive and collect all information you provide via the Services, including through website input fields, phone, email or other such ways. This includes personal information that can identify or relate to you, including, but not limited to:

Category of Personal Information	Examples of Personal Information We Collect	Sources from which such Personal Information is Collected	Third Parties to whom we share such Personal Information
Profile or Contact Data	Examples may include: • First and last name • Telephone number • Email address • Unique identifiers, such as usernames and passwords	• You • Cloudwick's affiliated entities, partners, etc.	• Service providers • Third-party vendors • Partners you authorize, access, or authenticate
Demographic Data	Examples may include: • Zip code	• You • Cloudwick's affiliated entities, partners, etc.	Cloudwick does not share this information.
Commercial Data	Examples may include: • Records of products or services sold, used, or purchased	• You • Cloudwick's affiliated entities, partners, etc.	Cloudwick does not share this information.
Device/IP Data	Examples may include: • IP address • Device ID • Browser type • Type of device	• You	• Data analytics providers • Service providers • Third-party vendors • Partners you authorize, access, or authenticate
Web Analytics	Examples may include: • Web page interactions • Referring webpage/ source through which you accessed the Services • Statistics associated with the interaction between device or browser and the Services	• You • Service providers	• Data analytics providers
Geolocation Data	Examples may include: • General physical location • Precise physical location • Movements	• You	• Partners you authorize, access, or authenticate

Professional or Employment-Related Data	Examples may include: • Employer • Job title	• You	• Partners you authorize, access, or authenticate
Sensory Data	Examples may include: • Photos • Videos • Recordings	• You • Service providers • Cloudwick's affiliated entities, partners, etc. • Other independent third-party sources	• Data analytics providers • Service providers • Cloudwick's customers • Partners you authorize, access, or authenticate

You have the choice regarding what information you share and the Services you want to engage in. You can choose not to provide information to us, but in general, some information about you is required in order for you to access certain functionalities of the Services.

We may periodically obtain information about you from customers, affiliated entities, partners and other independent third-party sources and will add it to our database of information, including any information that you provide to third parties that are associated with or whose products or services are integrated with the Services. For example, you may have access to the Services through your employer's subscription to the Services. Your employer may provide us certain information to activate your user account and for us to verify your identity. This could include your name, email, and job title.

Additionally, you may provide personal information to us to facilitate your access to and interaction with a third-party provider (each, a "Cloudwick Provider"). If you direct us to provide personal information to such Cloudwick Provider, any usage of that information will be subject to the agreement(s) in place between you and such Cloudwick Provider.

We may use cookies, log files, and similar technologies, including those from third-party service providers such as Google Analytics, Amazon Web Services, and other cloud-based tools, to collect information about your use of the Services, including website interactions, usage patterns, and performance data. This information helps us operate, analyze, and improve the Services. Non-essential analytics cookies are used only where permitted by your cookie consent preferences. For more information on how we use cookies, please see the “Cookies” section below.

The Services are not designed to recognize or respond to “do not track” signals received from browsers. You can control the information collected by such tracking technologies or be alerted when cookies are sent by adjusting the settings on your Internet browser or devices, but such adjustments may affect or disable certain functionality of the Services. You can also manage your preferences for non-essential cookies through the cookie consent settings available on our website.

Sensitive Information

Cloudwick does not request sensitive personal information through its corporate website contact forms. Sensitive personal information, as defined by applicable data protection laws, may include information relating to race, ethnicity, religious beliefs, political opinions, trade union membership, health, genetic or biometric data, sexual orientation, or financial information.

Cloudwick products and services may process sensitive personal information provided or controlled by customers, depending on the nature of the Services and applicable contractual arrangements. Where Cloudwick processes such information on behalf of customers, the processing is governed by applicable agreements, data protection obligations, and security controls.

Cookies Policy

Cookies, also known as tracking cookies or browser cookies, and similar technologies such as web beacons, clear GIFs, pixel tags, and JavaScript (collectively, "Cookies") are small pieces of data, usually text files, placed on a computer, tablet, phone, or similar device when you use that device to access the Services.

We use the following types of Cookies:

- **Essential Cookies**

  Essential Cookies are necessary for the website to function properly. These Cookies support core functionality, security, and the management of your cookie consent preferences. They are required for the operation of the website and cannot be disabled through our cookie consent settings.

- **Preferences Cookies**

  Preferences Cookies allow the website to remember choices you make, such as language preferences or other settings, to provide a more personalized experience. These Cookies are used only where applicable and in accordance with your cookie consent preferences.

- **Analytics Cookies**

  Analytics Cookies help us understand how visitors interact with our website, including the pages visited, website usage patterns, and overall website performance. We may use Google Analytics for these purposes. Analytics Cookies are used only after you provide consent through our cookie consent management platform. You can change or withdraw your consent through the website's cookie settings.

You have the option to decide through your internet browser's settings whether or not to accept Cookies. Most browsers allow users to choose whether to turn off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the browser) allow you to toggle whether to accept each new Cookie. You can also clear all cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit the Services and some functionalities may not work. To explore what Cookie settings are available to you, look in the "settings", "preferences" or "options" section of your browser's menu.

To find out more information about Cookies, including information about how to manage and delete Cookies generally, please visit http://www.allaboutcookies.org/.

How We Use Your Information

We process your personal information with your consent or as needed to provide you the Services. We may also use your personal information to comply with legal obligations, operate our business, protect the vital interests of you, our customers, or the public, or for other legitimate interests of Cloudwick as described in this Privacy Policy.

More specifically, we may use your personal information to:

- **Optimize and Improve The Services**
  We continually try to improve the Services based on the information and feedback we receive from you and our other users, including by optimizing the content on or functionalities of the Services.
- **Personalize The User Experience**
  We may use your information to measure and optimize engagement with the Services and to understand how you and our other users interact with and use the Services and other resources we provide.
- **Improve Customer Service**
  Your information helps us to more effectively develop the Services and respond to your support needs.
- **To Respond to Inquiries**
  The information you provide through our website contact forms will be used to respond to your inquiries or other requests.
- **Carry Out Other Legitimate Business Interests**
  We may use the information you provide to carry out other legitimate business purposes, as well as other lawful purposes.

We may use any aggregated information (as described below) for any purpose.

How We Share Your Information

We share your information with our partners, service providers, contractors, agents, and third-party vendors as needed to provide the Services. Please note that our partners may contact you as necessary to obtain additional information about you, facilitate any use of the Services, or respond to a request you submit.

Third-party vendors who provide products, services or functions on our behalf may include cloud database providers, data analytics companies, customer service vendors, communications service vendors, logistics service providers, marketing vendors, and security vendors. Third-party vendors have access to and may collect personal information only as needed to perform their functions, may only use personal information consistent with this Privacy Policy and other appropriate confidentiality and security measures, and are not permitted to share or use the information for any other purpose.

We also may share your information:

- In response to subpoenas, court orders, or other legal processes; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us.
- When we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, interests, or safety of our company or the Services, our customers, or others; or in connection with our contractual obligations.
- In connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

Other than as set out above, we will attempt to notify you when your personal information will be shared with third parties.

Aggregated Information

We may use, publish, share, distribute, or disclose personal information that has been aggregated with information from other users and otherwise anonymized and de-identified in a manner that does not allow third parties, including Cloudwick partners, customers, and vendors, to de-identify the data or identify it as originating from you. Such information may help Cloudwick identify and analyze training, demographic, and psychographic trends and information and report to third parties how many people saw, visited, or clicked on certain content, areas of the Services, or other materials. We may also use such data for research purposes and optimizing the Services' functionality.

Artificial Intelligence

The Services may include or provide access to proprietary or third-party Artificial Intelligence functionalities ("AI Products"). You acknowledge that different terms of use and privacy policies apply to your use of third-party provided AI Products and that such terms and policies are solely between you and the third-party provider.

How We Store and Secure Your Information

Personal information collected by Cloudwick may be stored and processed in your region, in the Applicable Location, and in any other country where Cloudwick or its affiliates, subsidiaries, or service providers operate facilities. These countries may have data protection laws that are different from the laws of your country (and, in some cases, may not be as protective). However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy. Personal information collected through our corporate website is primarily stored in the United States and may be accessed by authorized personnel in the United States, United Kingdom, and India. You are solely responsible for complying with all local laws, rules and regulations regarding online conduct and access to and use of the Services. Where required by applicable law, international transfers are subject to appropriate safeguards.

For example:

- We transmit data over secure communication channels using HTTPS and Transport Layer Security (TLS);
- Personal information is stored by trusted third-party service providers, including Amazon Web Services (AWS) and Google Workspace;
- Access to systems supporting the Services is controlled through appropriate authentication and authorization mechanisms;
- All Services usage is restricted on a per-user basis on the principle of least privilege; and
- All data is encrypted during transfer and while at rest.

We rely on the security practices and controls of AWS and Google Workspace to help protect personal information while stored in their respective environments. For more information on AWS' security practices and processes, please see https://aws.amazon.com/security.

Data Retention

Cloudwick will retain your information as long as necessary for the purposes outlined in this Privacy Policy, in a manner consistent with our data retention policy discussed in this section, and for a commercially reasonable time thereafter for backup, archival, fraud prevention or detection or audit purposes or as permitted by applicable law. Cloudwick will retain your personal information consistent with the original purpose of collection or as long as necessary to comply with our legal obligations; maintain accurate accounting, financial and other operational records; resolve disputes; and enforce our agreements. We will never retain your information for a period longer than permitted by law.

We determine the appropriate retention period for personal information on the basis of the amount, nature, and sensitivity of the personal information being processed; the purpose for which it was collected; the potential risk of harm from unauthorized use or disclosure of the personal information; whether we can achieve the purposes of the processing through other means; and applicable legal requirements.

After expiration of the applicable retention periods, your personal information will be deleted.

Accessing and Updating Your Information

To the extent provided by the law of your jurisdiction, you may:

- Have the right to access certain personal information we maintain about you and request details about how we process it;
- Request certain information regarding our disclosure of personal information to third parties;
- Request that we update or correct inaccuracies regarding your personal information;
- Object to our use of your personal information;
- Ask us to block or delete your personal information from our database;
- Request to download the information you have shared on the Services; and
- Confirm whether Cloudwick stores your data in Applicable Location.

You may make these requests and any other inquiries about this Privacy Policy by emailing privacy@cloudwick.com, or at the email listed in your applicable jurisdiction below. Any such requests are subject to the protection of other individuals' rights and applicable law. Additionally, to help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the requested information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.

Additional Privacy Information

DATA TRANSFER

Our corporate website databases are hosted in the United States. Personal information may also be accessed and processed by authorized Cloudwick personnel located in the United States, United Kingdom, and India. Where required by applicable data protection laws, appropriate safeguards are used for international transfers.

COLLECTION OF DATA FROM CHILDREN

The Services are not directed to children, and you may not use the Services or provide any personal information to Cloudwick if you are under the age of 18 (or the lowest age permitted by applicable law) or if you are not old enough to consent to the processing of your personal information in your country. We do not collect or process personal information of individuals under the age of 18 or the lowest age permitted by applicable law unless we receive all necessary consents from the individual's parent or guardian.

CALIFORNIA RESIDENT PRIVACY RIGHTS

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please e-mail us or contact us through the methods stated above.

European Union and United Kingdom Data Subject Rights

If you are a resident of the European Union ("EU"), United Kingdom ("UK"), Liechtenstein, Norway or Iceland, you may have additional rights under the EU or UK General Data Protection Regulation (the "GDPR"), as applicable, with respect to your Personal Data. The following discusses these rights.

For this section, the GDPR definition of "Personal Data" and "processing" are used. Generally, "Personal Data" means information that can be used to individually identify a person, and "processing" relates to actions that can be performed in connection with collecting, using, storing, and disclosing such data. Cloudwick acts as a data controller for personal data it processes for its own business purposes, including corporate website operations and business communications. Where Cloudwick processes personal data on behalf of customers through its products and services, Cloudwick generally acts as a data processor, subject to the applicable contractual arrangements.

If a conflict exists between this section and any other provision of this Privacy Policy, the more protective policy or portion shall govern to resolve such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at dataprotection-uk@cloudwick.com if you are in the UK and privacy@cloudwick.com if you are not in the UK.

We may also process Personal Data of our customers' end users in connection with our provision of services to our customers. In this case, we are the processor of Personal Data. If you have any questions regarding Personal Data when Cloudwick is the data processor, please contact the controller party in the first instance to address your rights with respect to such data.

Personal Data We Collect

The "Information We Collect from You" section above details the Personal Data that we collect from you.

Personal Data Use and Processing Grounds

The "How We Use Your Information" section above explains how we use your Personal Data. We will only process your Personal Data as explained in this Privacy Policy and if we have a lawful basis for doing so. The lawful bases include receiving your consent, having a contractual necessity, and furthering our legitimate interests or the legitimate interest of others. The following sections describe these in greater detail.

Consent

We process Personal Data based on the consent you expressly grant to us at the time we collect the data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.

Contractual Necessity

We may process the Personal Data as a matter of "contractual necessity". This means that we need to process the data to perform under our agreement with you and enable us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services.

Legitimate Interest

Depending on the purpose of processing and applicable law, we may process the following categories of Personal Data where necessary for our legitimate interests or those of third parties, provided that such interests are not overridden by the rights and freedoms of the individuals concerned. Where consent or another lawful basis is required, we process such Personal Data under the applicable lawful basis.

- Profile or Contact Data
- Demographic Data
- Commercial Data
- Device/IP Data
- Web Analytics

- Geolocation Data
- Professional or Employment-Related Data
- Sensory Data

We may also de-identify and anonymize Personal Data to further our legitimate interests.

Examples of these legitimate interests include (as described in more detail above in the "How We Use Your Information" section):

- Optimize and improve the Services.
- Personalize the user experience.
- Improve customer service.
- To respond to inquiries.
- Carry out other legitimate business interests.

Other Processing Grounds

Occasionally, we may also need to process Personal Data to comply with legal obligations, to protect the vital interests of you or other data subjects, or to carry out a task necessary for the public's interest.

Sharing Personal Data

The "How We Share Your Information" section above details how we share your Personal Data with third parties.

EU and UK Data Subject Rights

EU and UK data subjects have certain rights with respect to Personal Data. This is further set forth below. For more information about these rights or to submit a request, please email us at privacy@cloudwick.com. Please note that in some circumstances, Cloudwick may be unable to fully comply with your request, including if the request is frivolous, extremely impractical, jeopardizes other's rights, or not required by law. In those circumstances, we will still notify you of such a decision. Generally, we may also need you to provide us additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

Your rights include:

- **Access:** You can request information related to the Personal Data we store about you and request a copy of such Personal Data.
- **Rectification:** If you believe that any Personal Data we store about you is incorrect or incomplete, you can request we supplement or correct such Personal Data.
- **Erasure:** You can request we erase part or all of your Personal Data from our systems.

- **Withdrawal of Consent:** If we are processing your Personal Data based upon your consent (as indicated at the time of collection of such data), you have the right to withdraw consent at any time. However, please note that if you change or withdraw consent, you may have to then provide express consent on a case-by-case basis if use or disclosure is necessary to enable you to use the Services.
- **Objection:** You can request for a copy of your Personal Data in a machine-readable format. You can also request we transmit the Personal Data to another controller to the extent such transmission is technically feasible.
- **Restriction of Processing:** You can request Cloudwick restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to submit a complaint about Cloudwick's practices with respect to your Personal Data to the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: https://www.edpb.europa.eu/about-edpb/our-members_en

Transfers of Personal Data

The “Data Transfer” information in the “Additional Privacy Information” section above details how and where we transfer your data. Our corporate website databases are hosted in the United States, and authorized Cloudwick personnel in the United States, United Kingdom, and India may access and process website inquiry information, subject to applicable data protection requirements.