

CloudAttribution Ltd Privacy Policy

1. INTRODUCTION

- 1.1 We are CloudAttribution Ltd (referred to as "we", "us" and "CloudAttribution") and we are committed to protecting and respecting your privacy when you are visiting any website maintained by us including without limitation the website at www.cloudattribution.com and our social networking pages (together the "**Website**"), as we may publish and operate from time to time or communicating electronically with us.
- 1.2 This policy explains what types of personal and non-personal information we collect when you use the Website and the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.
- 1.3 Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By disclosing your personal information to us by using the Website or speaking to us over the telephone you consent to the collection, storage and processing of your personal information as stated in this policy.
- 1.4 CloudAttribution uses the personal information we collect from you to provide our services to you. We will not rent, sell or share your personal information with any other company for its own marketing purposes without your consent except where mentioned in this policy.
- 1.5 For the purpose of the Data Protection Act 1998 (the **Act**), the data controller is CloudAttribution Ltd of Unit 11, Hove Business Centre, Fonthill Road, Hove, East Sussex, BN3 6HA which is registered with the ICO with registered number ZA082849.

2. WHAT PERSONAL INFORMATION DO WE COLLECT?

- 2.1 We may collect, store and use the following kinds of personal information:
 - (a) if you register as a user of the Website, you will be asked to complete a form which will require you to provide some or all of your name, address, email address and telephone number;
 - (b) when you contact us by email or telephone or through any contact form provided on the Website, we may ask you to provide some or all of the information set out in paragraphs (a) above;
 - (c) we may collect, store and use information about your computer, mobile device or other item of hardware through which you access the Website and your visits to and use of the Website (including without limitation your IP address, geographical location, browser/platform type and version, Internet Service Provider, operating system, referral source/exit pages, length of visit, page views, website navigation and search terms that you use); and

(d) in order to improve your experience in using the Website, we may store information relating to your previous browsing habits.

2.2 We may also ask you to complete surveys and give feedback that we use for research purposes, although you do not have to respond to them.

3. HOW DO WE USE PERSONAL INFORMATION?

3.1 We may use your personal information for the following purposes:

- (a) to manage and administer the Website;
- (b) to improve your browsing experience by personalising the Website;
- (c) to enable you to use the Website;
- (d) to enable us to deliver the services to you;
- (e) to send you newsletters and other relevant and targeted promotional communications;
- (f) to deal with enquiries, complaints and feedback from you;
- (g) to provide third parties with statistical anonymised information about our users;
- (h) to send you emails offering you to take part in a survey and/or give feedback; and
- (i) to analyse and improve the services offered on the Website.

4. WHEN MIGHT WE DISCLOSE PERSONAL INFORMATION?

4.1 We may share your personal information with any member of the CloudAttribution group, including any holding companies or subsidiaries, as defined in section 1159 of the Companies Act 2006.

4.2 We may share your personal information with selected third parties including:

- (a) business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- (b) analytics and search engine providers that assist us in the improvement and optimisation of our site; and
- (c) credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

4.3 We may disclose your personal information to third parties:

- (a) 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;

- (b) if CloudAttribution 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;
- (c) 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 of use or terms and conditions and other agreements; or
- (d) to protect the rights, property, or safety of CloudAttribution, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

5. NEWSLETTERS AND OTHER PROMOTIONAL COMMUNICATIONS

If you wish to subscribe to any newsletter published by us or wish to receive other targeted and relevant promotional communications from us or other carefully chosen affiliates, we offer you the option to “opt-in” to this service. If you change your mind and wish to stop receiving any such communications, please either email us at infosec@cloudattribution.com or click the “unsubscribe” link in any email from us.

6. OUR USE OF COOKIES AND WEB BEACONS

- 6.1 Cookies are text files stored, either on a temporary or persistent basis on the hard drive of your computer. Cookies are used for authenticating, session tracking and maintaining specific information about the use and users of the Website.
- 6.2 The data collected by cookies is anonymous. You can delete all cookies that are already on your computer's hard drive by searching for files with "cookie" in it and deleting them. In addition, if you want to stop cookies from being stored on your computer, you can edit your browser settings so that cookies are blocked. Unfortunately, if you block cookies you may not be able to use the full functionality of the Website. For more information about cookies, please visit: www.allaboutcookies.org
- 6.3 Web beacons consist of a small string of software code that represents a graphic image request on a page or email. There may or may not be a visible graphic image associated with the web beacon and often the image is designed to blend into the background of a page or email. Web beacons can be used for many purposes - including site traffic reporting, unique visitor counts, advertising auditing and reporting, and personalization. Web beacons used by www.cloudattribution.com collect only anonymous data.
- 6.4 In order to improve the Website and the services we offer you, we may use (temporary and persistent) cookies, authorized third parties cookies, web beacons and/or other technologies to collect non-personally identifiable data. This non-personally identifiable data helps us to track browsing behavior, to create specific or tailor-made offers or advertisements, and to monitor and record the visits and use of the Website.

6.5 In order to understand how people use the Website and for marketing analysis and quality improvement purposes, we (and/or third party service providers) may collect, record, process and use on an anonymous basis certain information (including the total number of transactions, viewed pages, referring/exit pages, platform type, date/time stamp information and details like the number and location of mouse clicks on a given page, mouse movements, scrolling activity and the search words you use while being on and using the Website.

6.6 If you register with us or if you continue to use the Website, you agree to our use of cookies.

7. **SECURITY**

CloudAttribution continually tries to keep all information secure from unauthorised access by using SSL encryption on sensitive data. However, transmission over the Internet cannot be guaranteed to be 100% secure, so any information you submit is done so at your own risk.

8. **WHERE WE STORE YOUR PERSONAL DATA**

8.1 The 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. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

8.2 All information you provide to us is stored on our secure servers.

8.3 We take the security of your personal data very seriously. In particular we use all reasonable endeavours to ensure that appropriate security measures are in place to protect your personal data. Unfortunately, the transmission of information via the internet is not completely secure and so we cannot guarantee the security of your data transmitted through the Website; 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.

9. **LINKS TO THIRD PARTY WEBSITES**

The Website may include links to third party websites. We are not responsible for the content of third party websites. Please ensure that prior to using any such website, you have read and understood its Privacy Policy and Terms and Conditions. These documents will govern your rights and obligations when using the relevant third party website.

10. YOUR RIGHTS

- 10.1 The Act gives you the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at infosec@cloudattribution.com.
- 10.2 Our Website 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.

11. ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

12. CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this 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.

13. CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to infosec@cloudattribution.com.