

The Cloud Connectors Privacy Policy

Introduction

The Cloud Connectors, Inc. (“The Cloud Connectors”, “we”, “us”, “our”) provides a platform through a Software as a Service (SaaS) model, accessed via web browser. At The Cloud Connectors, we are committed to protecting your privacy and the data you share with us. This privacy policy explains how The Cloud Connectors processes information that can be used to directly or indirectly identify an individual (“Personal Data”) collected through use of its website and platform in accordance with the applicable regulation and standards identified in this Privacy Policy (such as GDPR, for example).

For the purposes of this policy, The Cloud Connectors defines the term “client” as an entity with which The Cloud Connectors has an established relationship, the term “Participant” as any individual who responds to marketing campaigns by The Cloud Connectors or who is included as a contact in a client’s account, and the term “Visitor” as an individual that visits our front-end website (for example <https://thecloudconnectors.com/>).

Any information stored on our platform is treated as confidential. All information is stored securely and is accessed by authorized personnel only. The Cloud Connectors implements and maintains appropriate technical, security and organizational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

Information We Collect On Our Corporate Website

In general, you may visit The Cloud Connectors’ website, <https://thecloudconnectors.com/>, without providing us with any directly identifiable personal data. However, we may collect indirectly identifiable (pseudonymous) information from you, which includes your IP address used to track unique visits to our site for analytic purposes. In order to grant you access to protected and secure resources we may collect your full name, postal address and email address, to fulfill your requests for information including white papers, allow you to download updates to our products, or participate in feedback surveys. In other instances, we may ask you to provide us with information such as your product interests so that we can send you only the information that is useful to you, including articles, newsletters, product and service alerts, new product and service announcements and event invitations. When we collect your personal data, we will inform you as to why we are asking for information and how the information will be used. However, please note that providing directly identifiable personal data is optional. When you receive your confirmation email or when you receive any email from The Cloud Connectors, you will be given instructions on how to remove yourself from the list.

The Cloud Connectors’ accountability for personal data that it receives under the EU-US Privacy Shield framework and subsequently transfers internally or to a third party outside the European Economic Area (such as the United States) is described in further detail below. In particular, The Cloud Connectors remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless The Cloud Connectors proves that it is not responsible for the event giving rise to the damage.

Grounds For Using Data

The Cloud Connectors as Processor

When providing our software and providing The Cloud Connectors services to our corporate clients, The Cloud Connectors acts as a Data Processor. We need to collect and use personal data to enter into a contract with a client or to fulfill our contractual obligations. We may also use such data for our legitimate business interests to administer our platforms, provide access to interfaces and features, and to enforce our acceptable use policies and terms of service.

To the extent our clients need to collect and share and allow us to process personal data of their employees and customers to enable our services, we will rely upon our clients to provide necessary privacy notices and to obtain required consents.

As a Data Processor, The Cloud Connectors do not share data with third parties unless it is specifically required in our contract with our clients.

The Cloud Connectors as a Controller

When administering our website and other digital properties (such as login portals) The Cloud Connectors acts as a Controller. We rely upon our legitimate business interests to collect and use personal data to improve our website and content, to optimize your website experience, and to use the business contact information you provide us to enter into a contract with you and to deliver information regarding our business relationship. With your consent we may also use the personal data described in this privacy policy for electronic marketing and message personalization, which may also include collecting technical information about your mobile device or computer. You may withdraw your consent at any time by using the opt-out mechanisms provided within The Cloud Connectors emails, or by contacting us using the contact information provided below.

As a Data Controller, The Cloud Connectors policy is to never share personal information with third parties.

Information Sharing

Website Activity

If you are a Visitor to our website only, and not a client of our platform or Participant, then this section is relevant for you.

By visiting this website, you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, please do not visit this website. If required by applicable law, we will seek your explicit consent to process Personal Data collected on this website or volunteered by you. Kindly note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this website may not be possible.

The Cloud Connectors may collect, record and analyze information of Visitors to its website. We may record your IP address and use cookies. The Cloud Connectors may add information collected by way of page view activity. Furthermore, The Cloud Connectors may collect and process any Personal Data that

you volunteer to us in our website's forms, such as when you register for events or sign up for information and newsletters. If you provide The Cloud Connectors with your social media details, The Cloud Connectors may retrieve publicly available information about you from social media.

Such Personal Data may comprise your IP address, first and last name, your postal and email address, your telephone number, your job title, data for social networks, your areas of interest, interest in The Cloud Connectors products, and certain information about the company you are working for (company name and address), as well as information as to the type of relationship that exists between The Cloud Connectors and yourself.

The Cloud Connectors gathers data about visits to the website, including numbers of Visitors and visits, Geo-location data, length of time spent on the site, pages clicked on or where Visitors have come.

Cookies

We, our service providers, and/or non-affiliated third parties, may use "cookies" or similar technologies such as "pixel tags" on our digital properties. We and our partners use cookies or similar technologies in order to analyze trends, administer the websites, and track users' movements around our digital properties. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

We use these technologies with our website visitors in a de-identified fashion. We may also use third party analytics and marketing integration services such as those by Google, to help us track and optimize our website performance and client-facing marketing. These third parties may also use both cookies and pixels to help us better manage content on our site by informing us what content is effective. These third parties are prohibited from using collected data for any purpose other than as a service provider to us.

Security and Retention

The Cloud Connectors takes commercially reasonable steps to ensure the ongoing confidentiality, integrity, availability and resilience of our systems and services processing your personal data.

Notably, we implement comprehensive antivirus, anti-spam, and spyware protection for the servers along with an intrusion detection system, robust firewalls and alerts system in place.

Access and Your Right to Privacy

If you are our Client or prospect, you have enhanced rights under the GDPR. You may access, correct or request deletion of your personal data.

The Cloud Connectors abides by the Data Subject Rights requests referenced within GDPR Articles 13-22 with respect to:

- Right to be informed (about processing activities and applicable rights)
- Right to access data (or obtain data being processed)
- Right to rectify information (when outdated or incorrect)

- Right to erasure (and to be publicly forgotten)
- Right to object to processing (particularly activities based on consent)
- Right to restrict processing (when processing is deemed to be unlawful)
- Right to data portability (between proprietary systems in a common format)
- Rights related to automated decision making (including decisions based on profiling activities)

The Cloud Connectors has put into place operational processes to comply with all Data Subject Rights requests within 30 days when received, however we may need to verify certain Personal data fields to ensure we act upon the correct data.

If your business contact information changes, or if you would like to modify or remove your details, or to exercise your other rights, please contact info@thecloudconnectors.com.

Additionally, The Cloud Connectors is required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

International Data Transfers

All processing of Personal Data is performed in accordance with privacy rights and regulations following the EU Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 (the Directive), and the implementations of the Directive in local legislation. Please see below details for The Cloud Connectors' compliance with the EU-U.S. Privacy Shield Framework.

From May 25th, 2018, the Directive and local legislation based on the Directive will be replaced by the GDPR and The Cloud Connectors' processing will take place in accordance with the GDPR.

You are entitled to know whether we hold information about you and, if we do, to have access to that information and require it to be deleted, limited or corrected if it is inaccurate. You can do this by contacting us via info@thecloudconnectors.com. We encourage you to contact us should you have a Privacy Shield-related (or general privacy-related) complaint.

The Cloud Connectors complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. The Cloud Connectors has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

In compliance with the Privacy Shield Principles, The Cloud Connectors commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact The Cloud Connectors at: info@thecloudconnectors.com.

The Cloud Connectors is being subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). Individuals can, under certain conditions, invoke binding arbitration if a complaint can't be resolved in any other way.

The Cloud Connectors has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship.

Notification of Changes

The Cloud Connectors reserves the right to update or change this Privacy Policy from time to time.

Changes will be posted on this page. If we make a material change to our privacy practices, we will provide notice on the site or by other means as appropriate.

Contact

If you have any questions, please feel free to contact: info@thecloudconnectors.com.

DPO Information

To contact The Cloud Connectors' Data Protection Officer, please reach out to DataProtectionOfficer@thecloudconnectors.com.

The Cloud Connectors believes that your data rights are important – to view The Cloud Connectors' commitment to the General Data Protection Regulation (GDPR), please see the next section of this document.

Effective: March 5, 2019

The Cloud Connector's GDPR Commitment

Our Commitment to Protecting Your Data

At The Cloud Connectors we are committed to working with our customers to understand the General Data Protection Regulation (GDPR). The GDPR introduces enhanced data privacy laws to match the evolving technological landscape. These changes came into effect on May 25, 2018. Besides strengthening and standardizing data privacy across the EU nations, it requires new or additional obligations on all organizations that handle EU citizens' personal data, regardless of where the organizations themselves are located. This page explains our approach to achieve GDPR compliance.

Preparing for the GDPR

Our team has working diligently to ensure that The Cloud Connectors is aligned with the new regulation. Measures to achieve this include:

- Working with an external security advisory organisation.
- Continuing to invest in our security infrastructure.
- Making sure we have the appropriate contractual terms in place.
- Ensuring we can support international data transfers by maintaining our Privacy Shield self-certifications, and by executing Standard Contractual Clauses through our updated Data Processing.
- Confirming our policies include new tools for data portability and data management where necessary.
- Ensuring that under all circumstances user consent for data processing meets the new requirements.
- Reviewing breach notification procedures.
- Reinforcing all data protection and retention processes.

The Cloud Connectors will continue to monitor the guidance around GDPR compliance from official government regulatory bodies and will adjust our plans accordingly if any changes occur.

Our Security Infrastructure and Certifications

Protecting our customers' information privacy is very important to us. Because we offer cloud-based products and are entrusted with some of our customers' most valuable data, we have set high standards for security. We're currently investing in several security certifications such as SOC 2.

The Cloud Connectors has invested in building a robust security team. In accordance with GDPR requirements around security incident notifications, The Cloud Connectors will continue to meet its obligations and offer contractual assurances.

International Data Transfers: Privacy Shield and Contractual Terms

To comply with EU data protection laws around international data transfer mechanisms, we are self-certified under the E.U.-U.S. Privacy Shield. These frameworks were developed to establish a way for companies to comply with data protection requirements when transferring personal data from the European Union to the United States.

Data Portability Solutions and Data Management Tools

Customers have requested tools to help them comply with the GDPR. We understand our customers concerns and we are looking to offer data portability and personal data tools that assist with data exports. Information about the features and functionalities of these tools will be shared with you as it becomes available.

Stay Updated

Fulfilling our privacy and data security commitments is important to us. This page will be revised to reflect GDPR-related information as it becomes available. Please get in touch if you have any questions related to how The Cloud Connectors is becoming compliant with the GDPR.

Contact

info@thecloudconnectors.com

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