



## Privacy Policy

This Privacy Policy sets out how CLdN uses, collects and protects your personal data and provides guidance on your rights.

### **IMPORTANT INFORMATION AND WHO WE ARE**

- This Privacy Policy gives you information about how CLdN collects and uses your personal data through your use of this website, including any data you may provide when you contract with us or use our services.
- CLdN is a corporate group made up of different legal entities (Group). This privacy policy is issued on behalf of the Group so when we mention "CLdN", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Group responsible for processing your data.
- Personal data means any information about an individual from which that person can be identified.
- Your personal data may be collected automatically when you visit this website, when you request our services and when you contract with us.
- You acknowledge and accept, for yourself and on behalf of your affiliates, subsidiaries, employees, agents, subcontractors or other partner entities about whom you pass on personal data, and subject to any applicable legislation, that we may process this data in order to provide you the services requested or to receive your services.
- You acknowledge and accept, on your and on behalf of any individuals whose personal data we process within the framework of our business relationship, that you have informed the individuals concerned about such processing and obtained their consent where required.
- The CLdN website uses cookies as described below.
- Your information will not be shared with third parties for marketing purposes.
- You have the right to request the personal data we hold about you. You are also entitled to ask us to update, change or delete any of this information in certain circumstances.

### **You can do this by contacting us by e-mail at [gdpr@cldn.com](mailto:gdpr@cldn.com).**

- When referring to "you", "yourself", "your", we refer to you as a natural person.
- When referring to "we", "ourselves", "our", we refer to the CLdN company in the Group that is responsible for processing your data.
- Our Privacy Policy varies and is therefore adapted from time to time.

*By using this website and/or otherwise engaging with us you agree that we may use your personal data as set out in this privacy policy.*



## 1. The personal data we collect about you and how we collect it

**(a)** Your identity data may be required to access certain areas or services offered via this website; however, no such data is required to be submitted to navigate or browse this website.

**(b)** When you visit this website, our web server temporarily logs your IP address for specific purposes, such as access logging, error logging and audit trails, as outlined in more detail in paragraph (g) below. Additionally, we may collect connection data of the computer connecting to our website for security purposes. For analytical purposes, we may track the web pages you visit on our site, the date and duration of your visit, the website that referred you to our site, and details about your browser and operating system. However, we do not use this data to identify individuals unless you contact us for troubleshooting assistance.

**(c)** The collection of personal data is limited to specific instances, with a clear purpose and defined data requirements. This data may include your name, e-mail address, postal address and post code, telephone number and company name, depending on the reason for collecting the personal data. This may include personal data:

- necessary for the performance of certain services we provide;
- needed to communicate updates or new you have opted to receive from us;
- required when you report a problem with our site, or when we need to notify you about changes to our site;
- required to ensure our website's content is displayed in the most effective manner for you and your device.

**(d)** If you contact us directly (e.g. via e-mail) we may keep a record of that correspondence.

**(e)** The personal data we collect will be limited to what is necessary to process your request or fulfill service requirements. In some cases, we may request additional information in order to provide the response you need or to send you further details. Any such additional information, will be clearly indicated. During our business relationship, we may collect various types of personal data about you, including:

- identification data such as your first name, last name, any previous names, marital status, title, and, where legally required, ID card and passport numbers, nationality, place and date of birth, gender, photograph;
- contact information such as your postal address, e-mail-address and phone number;
- financial and transactional data such as bank account details, money transfers, statements of debts and expenses;
- tax status, if relevant;
- employment data such as your employer's name and job title;
- details of criminal convictions where legally permitted.

**(f)** We do not typically request or collect sensitive information – also known as special category data - through the website or otherwise, but we may do so in exceptional circumstances. This includes data relating to race or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health, sexual life or criminal matters, biometric and genetic data.



(g) Your IP (Internet Protocol) address reveals the location of your computer on the internet. We may collect information about your device, including its IP address, operating system and browser type, for system administration, system security, troubleshooting, and to ensure our website meets users' needs. This information is stored only for a limited period and is not linked to any personally identifiable data. Additionally, we may compile aggregate statistical data on users' browsing behaviours and patterns, which does not identify individuals.

(h) Our website uses cookies (text files stored in your browser) and web beacons (tools that track visits to our website or specific pages). These cookies collect data on website usage, such as pages visited and links clicked. All collected information is aggregated and **cannot be used to identify you**.

These cookies are provided exclusively by Google's third-party analytics service: **Google Analytics 4 (GA4)**

Google Analytics measures how users interact with our website content. This information can lead to a better user experience and helps us to continuously improve our website's functionality. These cookies will be retained on your browser for a maximum period of two years.

GA4 cookies used on our website include:

- `_ga` (This cookie distinguishes users from one another and expires after 2 years)
- `_ga_  
<container-id>` (This cookie is used for session state data and expires after 2 years)
- `_gid` (This cookie registers a unique ID that is used to generate statistical data on how a visitor uses the website. This cookie expires after 24 hours.)

(i) We do not use any tracking tools for advertising purposes.

(j) You can block cookies by adjusting your browser settings to refuse all or some cookies. However, if you block all cookies (including essential cookies) you may not be able to access certain parts of our website or some of our services.

## 2. How we use your personal data

(a) The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases :

- i. the performance of a contract with you: where we need to perform the contract we are about to enter into or have entered into with you;
- ii. legitimate interests: we may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and to give you the best and most secure customer experience. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law)



- iii. legal obligation: we may use your personal data where it is necessary for compliance with a legal obligation that we are subject to, for example handling claims and legal disputes.
- iv. consent: we rely on consent only where we have obtained your active agreement to use your personal data for a specific purpose, for example to communicate with you if you subscribe to a receive updates or newsletters from us.

**(b)** If you request information relating to our services or if you ask us to contact you, we will use the personal data you provide to contact you and provide the information you have requested, or which we consider may be of interest to you.

**(c)** If you wish to unsubscribe from our communications, you may do so at any time. Please refer to the information below for more details on how to unsubscribe.

### **3. Disclosures of your personal data**

We may share your personal data with third parties where necessary for the purposes set out above.

**(a)** We may share your personal data with companies within the CLdN Group.

**(b)** We may engage third-party service providers to process data on our behalf as required for the purpose for which it was provided. We do not share, sell or distribute personal data to third parties in any other manner.

**(c)** We do not provide your personal data to third parties for their own marketing purposes.

**(d)** We may disclose, transfer, sell or assign any of your personal data to third parties in connection with, in preparation for, the sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation of a company with the CLdN Group. By using this website or supplying or receiving services you consent to such disclosure, transfer, sale or assignment and acknowledge the new owners may use your personal data in the same way as set out in this privacy policy.

**(e)** We may disclose your personal data to law enforcement, regulatory, or other government agencies, or to other third parties, as needed to comply with our legal or regulatory obligations.

**(f)** By providing your personal data to us, you consent to the disclosures described above, except where your consent is explicitly required.

**(g)** In addition, you acknowledge and accept, for yourself and on behalf of your affiliates, subsidiaries, employees, agents, subcontractors or other partner entities about whom you pass on personal data, and subject to any applicable legislation, that we may use this data in order to provide you with or receive services.



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**(h)** Before disclosing your personal data or that of any other data subject, you confirm that you have made the data subjects aware of this data protection policy.

**(i)** We expect you to handle any personal data that you share with us in accordance with legal requirements. In the event of a breach, we will hold the defaulting party liable.

**(j)** Where you require us to provide location data or we require you to consent to the use of such location data, we disclaim any liability should such data become personal data. You agree to hold us harmless from any action, claims, liability or loss arising in this regard during the performance of services.

**(k)** This website may contain links to external websites, blogs, forums, wikis, business networking platforms or other social media services that allow you to view or share content with other users. Any personal or other information that you contribute to such sites or social media platforms may be read, collected, and used by other users of those sites or services, over whom we have little or no control. We are not responsible for any user's use, misuse, or misappropriation of any personal information or other information that you contribute to any social media applications or services.

#### **4. Data retention**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

#### **5. International transfers**

**(a)** The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") or the United Kingdom. It may also be processed by staff operating outside the EEA who work for us or our suppliers. Such staff may be engaged in, among other things, the provision of support services.

**(b)** We will take all steps reasonably necessary to ensure that your data is processed securely and in accordance with this Privacy Policy.

#### **6. Data security**

**(a)** We have in place appropriate technology and operational security measures to protect our IT systems and to prevent your personal data from being accidentally lost, used, altered, disclosed or accessed in an unauthorised way. However, no data transmission over the internet can be guaranteed as entirely secure or virus-free. We will always use reasonable endeavours to protect your personal data, but we do not guarantee that any information you submit to us will be free from unauthorised third party use or intrusion, or the security of your personal data when using our website.



(b) We cannot guarantee that the website is free from viruses or malicious codes. You must satisfy yourself that your own information technology, equipment, operating systems, devices used to access or download from the website are sufficiently protected against such viruses and/or malicious codes.

(c) All CLdN employees and principals are required to keep personal data confidential, and only authorised personnel have access to personal data.

(d) We collect personal data when you set up an account with us for certain services. We store this personal data on our secure servers, which you will be able to access using a username and password. You must keep this password confidential. You should not share your password with anyone.

(e) You are responsible for keeping our personal data confidential. We ask you not to share our information with anyone, unless we agree otherwise.

(f) If you use third party websites or platforms to do business with us please note that these websites have their own privacy policies. We cannot accept any responsibility or liability for third party policies.

(g) We have in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. Monitoring of emails

We may monitor and/or keep records of e-mail or other electronic communications processed on our systems. If you communicate using our systems you consent to such monitoring.

## 8. Your legal rights including to access and manage your personal data

You have a number of rights under data protection laws in relation to your personal data.

(a) You have the right to request access to the personal data we hold about you. You also have the right to request to update, amend, delete or transfer your personal data in certain circumstances. You can do this by following the procedure using the following link: [here](#).

- I. You have the right to request the restriction of processing of your personal data and to object to the processing of your personal data where we are relying on a legitimate interest. If you make such a request, we will consider your request and respond accordingly. Please note that there may be circumstances where we are legally entitled to continue processing your data despite your objection or request for restriction.
- II. We will provide access to your personal data free of charge. However, if your request is unfounded, repetitive, or excessive, we reserve the right to charge a reasonable fee to cover the administrative costs of providing the information. In such cases, we will inform you of the fee before processing your request. Additionally, we may refuse to comply with your request if it is manifestly unfounded, repetitive, or excessive.



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III. We aim to respond to all legitimate requests within one month. If your request is particularly complex or you have made multiple requests, it may take us longer to respond. In such cases, we will notify you and keep you updated on the progress of your request.

(b) We assume responsibility for keeping an accurate record of your personal data from the date you submit it to us. Please keep us informed if your personal data changes during your relationship with us, for example if you change your email address.

(c) If you have any comments or questions about this Privacy Policy, about the use of your personal data or you want to exercise the rights set out above, please contact our Data Protection department by email on [gdpr@cldn.com](mailto:gdpr@cldn.com).

(d) You have the right to make a complaint at any time to the relevant supervisory authority (For [EU](#) or [UK](#)). We would, however, appreciate the chance to deal with your concerns before you approach the relevant supervisory authority, so please contact us in the first instance.

## 9. General information on this Privacy Policy

(a) This Privacy Policy is incorporated into the terms and conditions of our business relationship.

(b) We keep our Privacy Policy under regular review and may amend it from time to time.

You can find more information about how we process your personal data in the EU in our EU Privacy Notice in [English](#).

You can find more information about how we process your personal data in the UK in our UK Privacy Notice in [English](#).