

PRIVACY POLICY

Thank you for visiting our website.

We are committed to protecting and respecting your privacy. This section contains information about our policy governing the collection and use of your personal information as well as guidance on your rights (and areas where your assistance would be useful).

Any updates to our Privacy Policy (as may be the case from time to time) will be posted in this section, and we invite you to visit this page occasionally.

MAIN POINTS

- This Privacy Policy applies to your information or data that we may collect or receive and may use.
- Your information or data relates to you and could allow us to identify you, either directly or in combination with other information that we may hold.
- Your personal information may be collected automatically when you visit this website or collected and read by us if you request our services (for instance, data you provide us, including your name and contact details). In such cases, your data will only be used for the limited purposes / performance of certain services you require us to provide to you.
- In order to provide you the services required or to receive your services, you acknowledge, 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 use those data.
- This website uses cookies limitedly in order to provide you with specific services, as described in our [Cookie Policy](#).
- Your information will not be shared with third parties for marketing services.
- You are entitled to know about and review the personal information we hold about you. You are also entitled to ask us to update, change or delete any of this information.

You can do this by contacting us by e-mail at 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 company that deals with your data.
- Our Privacy Policy varies, and is therefore adapted from time to time.

By using this website you are agreeing to the use of your information as set out in further detail below:

1. Information collected when you visit the website and collected via other channels

- (a) Registration or additional personal information is required to access certain areas or services offered via this website; however, no registration or additional personal information is required to be submitted simply to navigate or browse this website.
- (b) When you visit the website, our web server logs your IP address for limited purposes (such as access logging, error logging and audit trails) and for a limited time as described in more detail in (h) below). We may also temporarily collect information on the connection data of the computer connecting to our website for security purposes. We may also keep track of the web pages that you visit within this site, the date and duration of your visit, the website through which you linked to our site, the identification data of the type of browser and operating system used for analytical purposes. In any event, the data is not used to identify any particular individual(s) by us unless you refer to us in order for us to troubleshoot.
- (c) Those instances where personal information is required are limited and are clear as to the purpose and type of data required. Such information may consist of, for instance, your name, e-mail address, postal address and post code, telephone number professional contact information and company name, depending on the purpose for which your personal information is being collected during **your visit of our website**, namely:

- information required for the performance of certain services;
 - information required for the communication of information or news you may have opted to receive from us;
 - information required when you report a problem with our site, or to notify you about changes to our site;
 - information required to ensure that the content from our site is presented in the most effective manner for your and for your computer or device;
- (d) If you contact us directly (e.g. via e-mail) we may also keep a record of that correspondence.
- (e) The personal information required will be limited to what is strictly necessary to perform your request or service requirements. Additional information may be requested to enable us to provide the response you require or to send you additional information. In such instances, the required additional information will be indicated as such.

Personal information we may collect **during our business relationship** include various types of personal data about you, including:

- identification information like name and, if legally required, ID card and passport numbers, nationality, place and date of birth, gender, photograph, IP address;
 - contact information like postal address, e-mail-address and phone number at work;
 - banking, financial and transactional data like bank account details, money transfers, debts and expenses;
 - tax status if relevant;
 - employment information such as employment, employer's name, job title;
 - criminal convictions and offences if we are required by law to collect these.
- (f) We do not process sensitive information – also known as special category data – through the website or otherwise. Sensitive information 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 indicates the location of your computer on the internet. We may collect information about your computer, including where available your IP address, operating system and r type, for system administration, system security and troubleshooting purposes, or to ensure that the website reflects the needs of our users. Such information is held for a limited period only and is not linked to anything personally identifiable. We may also compile statistical data in aggregate form. Statistical data about our users' browsing actions and patterns does not identify any individual.

2. How your personal information may be used

- (a) Your personal information will only be used for:
- i. the performance of certain services provided by or to our company including accounting; and/or
 - ii. the communication to you of information or news you may have opted to receive from us; and/or
 - iii. claims handling and legal disputes.
- (b) If you request information relating to our services or if you ask someone to contact you, we will use your personal information (as supplied by you) to contact you with information you require, or which we believe may be of interest to you.
- (c) Please note that your personal information may also be used to protect our rights or property and that of our users and, where appropriate, to comply with legal process.
- (d) If you wish to unsubscribe from communications sent by us, you may do so at any time unsubscribing. Please see the final section below for more information on how to do this.

3. Disclosure of your information

- (a) Where (and to the extent) necessary, we may communicate your personal information to any relevant companies within our groups of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries.

- (b) We may utilise the services of third-party service providers that handle information on our behalf as necessary and justified for the performance of the purpose for which it was provided; however, we do not otherwise share, sell or distribute personal information to or with third parties.
- (c) Specifically, your information is not provided to third parties for their own marketing purposes.
- (d) We may disclose, transfer, sell or assign any of your information collected as described above, including personally identifiable information, to third parties, as a result of or in preparation for the sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation of a relevant company within our groups of companies, as the case may be. By using this website you consent to such disclosure, transfer, sale or assignment.
- (e) Personal information may also be disclosed to law enforcement, regulatory, or other government agencies, or to other third parties, in each case as limitedly required to comply with legal or regulatory obligations or requests.
- (f) By providing information through this website or otherwise, you are informed of the disclosures described above, except where your consent is explicitly required.
- (g) You hereby 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 use those data in order to provide you the services required or for you to provide us the services required. Therefore, "you" and "your" also relates to the personal data of any of above-mentioned affiliates, subsidiaries, employees, agents, subcontractors or other partner entities.
- (h) Before disclosing any personal data in relation to you or any other data subject, you undertake and warrant that you have brought to the attention of the data subjects this data protection policy, and acknowledge that we and/or any company as set out in article 3. (a) may process the data subject's personal data as set out in this Privacy Policy.
- (i) We expect you to handle any personal data that may be shared with the greatest of care. All our contacts are expected to be GDPR-compliant. If any damage would result from non-compliance with applicable data protection legislation by one of our contacts, all damage will be recovered from the defaulting contact.
- (j) This website may contain links to other sites, blogs, fora, wikis, business networking or other social media services that allow you to view or share content with other users. Any personal information or other information that you contribute to any other site or social media applications or services can be read, collected, and used by other users of those sites, social media applications or services over whom we have little or no control. Therefore, under no case will our company be responsible for any other user's use, misuse, or misappropriation of any personal information or other information that you contribute to any social media applications or services.

4. Retention of your information

- (a) Your information is only kept for the period required for fulfilling your request or the service(s) you require, and for a reasonable period of time thereafter for our administration and book-keeping purposes, or for the minimum time required by law in the relevant jurisdiction. It is relevant to note that your information may be retained for a short, medium or long term, depending on the nature and duration of the business relationship with you.
- (b) The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") in particular Switzerland or the United Kingdom. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of support services.
- (c) We will take all steps reasonably necessary to ensure that your data is treated securely and lawfully in accordance with this Privacy Policy.

5. How secure is your information?

- (a) We implement recognised and generally accepted standards of technology and operational security to protect our IT systems and your personal information from loss, misuse, alteration and destruction. We will always use reasonable endeavours to protect your personal information, 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 information as a result of your use of the website.
- (b) We cannot guarantee that the website is free from viruses or malicious codes. You agree that it is your responsibility to satisfy yourself that your own information technology, equipment, operating systems,

devices used to access or download from the website are protected against such viruses and/or malicious codes.

- (c) As a general rule and policy, all our employees and principals are instructed and required to keep personal information confidential, and only authorised personnel have access to this information.
- (d) Certain services we provide require your information to set up your account. This information is stored on our secure servers, for which we have given you (or you have chosen) a password which enables you to access relevant parts of our site. You are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- (e) Certain services we provide or you provide require our information to set up an account on an online platform or similar. This information must be stored on secure servers, for which you have given us or we have chosen a password which enables to access relevant parts of your site. You are responsible for keeping our data confidential. We ask you not to share our information with anyone unless agreed upon differently.
- (f) If you use another website or platform to do business with us please note that these websites have their own privacy policies and that we cannot accept any responsibility or liability for these policies.

6. Monitoring of emails

- (a) We may monitor and/or keep records of e-mail communications entering and leaving our systems. If you communicate through our systems you will be deemed to have consented to such monitoring.

7. Accessing / managing your personal information

- (a) You are entitled to know about and review the personal information we hold about you. You are also entitled to ask us to update, change, delete or transfer any of this information. You can do this by contacting us by e-mail at gdpr@cldn.com.
- (b) We assume responsibility for keeping an accurate record of your personal information as it is submitted. However, without your assistance, we cannot ensure the ongoing accuracy of your personal information after it has been submitted. Please help us keep your personal information current and accurate by contacting us if your personal information becomes out of date.
- (c) If you have any comments or questions about this Privacy Policy please email our Data Protection Department on gdpr@cldn.com.
- (d) You are entitled to lodge a complaint with a supervisory authority.

8. General information on this Privacy notice

- (a) This Privacy Policy is incorporated in any terms and conditions of our business relationship.
- (b) This Privacy Policy can be amended from time to time.

You can find more detailed information on how we process personal data [here](#).