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PRIVACY AND SECURITY POLICY FOR KLAUD9.COM

Theobald  **Associates**

Tel: +44 (0) 20 7397 8434
Fax: +44 (0) 20 7397 8400

1. INTRODUCTION

- 1.1 This constitutes the Privacy and Security Policy of Clicksmart Consultancy Pte Ltd, a company incorporated and registered in Singapore with company registration number 201606979C whose registered office is at 51 Lim Ah Woo Road, #03-10 The Amarelle, Singapore 438129, trading as 'Klaud9' ("Klaud9"), the owner of <http://www.klaud9.com> (the "Website").
- 1.2 If you continue to browse and use our Website, you are agreeing to comply with and be bound by the following Privacy and Security Policy in full, which together with our [\[hyperlink to:\] Terms of Use](#) govern the relationship between us and you in relation to your use of our Website. If you disagree with any part of this Privacy and Security Policy, you must not use our Website.
- 1.3 We are committed to safeguarding the privacy of our Website users; this policy sets out how we will treat your personal information.
- 1.4 Our Website uses cookies. We will ask you to consent to our use of cookies in accordance with the terms of this Privacy and Security Policy when you first use our Website.

2. WHAT INFORMATION IS COLLECTED

- 2.1 If you are merely visiting the public areas of our Website we do not collect any personal data about you; however, we may automatically collect information about your visits, such as user traffic patterns and site use. Information collected in this way does not reveal your contact details or any type of personal data. This information is only used in aggregate form to analyse, manage, develop and improve our Website and is not linked to any individual.
- 2.2 We collect personally identifiable information only when voluntarily submitted by you. If you choose to partake in certain activities including but not limited to, filling out a survey or applying for an offer, you will be asked to supply some information about yourself, including but not limited to your name, address, phone number and email address.
- 2.3 We collect the details provided by you on registration together with information we learn about you from your use of our Website. We also collect information about the transactions you undertake including details of payment cards used.
- 2.4 We may also collect additional information in connection with information you provide when giving us feedback or completing profile forms.

3. HOW INFORMATION IS COLLECTED

- 3.1 We collect data from information supplied by you. When you give us your email address, you are asked to let us know how it can be used. You may 'opt in' to receive regular email newsletters that contain information we believe to be of value to you, specifically regular content updates, events, special discounts and offers selected by our marketing department.

- 3.2 All marketing emails will contain a link to opt out of further communications from us. If you make a purchase via our Website the assumption may be made that you will be interested in similar products and you may receive emails with information about these products. All marketing emails will contain a link to 'opt out' of further communications from us. Alternatively, you can send an email to contactus@klaud9.com.
- 3.3 We may also use cookie and tracking technology depending on the features offered. Cookie and tracking technology are useful for gathering information such as browser type and operating system, tracking the number of and activities of users of our Website. Cookies can also help customise our Website for users. We use cookies to track user usage on our Website. From time to time, we may use ad servers (such as DoubleClick) to serve advertisements on our Website. Ad servers use cookies to help target relevant ads to users.
- 3.4 Personal information cannot be collected via cookies and other tracking technology; however, if you previously provided personally identifiable information, cookies may be tied to such information. "Cookies" are small pieces of information sent by a web server to a web browser, which enables the server to collect information from the browser.
- 3.5 We may also use cookies for a number of other purposes, for instance to enable us to simplify the logging on process for users who have created an account ("**Customers**"), to help ensure the security and authenticity of Customers, to provide the mechanisms for improving and monitoring experiences and to enable traffic monitoring.
- 3.6 Users of the Website who have not created an account are sent anonymous cookies to keep track of their browsing patterns and build up a demographic profile. In addition, any user who has clicked on a klaud9.com advertisement on another site that links to the Website will be sent anonymous cookies that will allow us to analyse advertising effectiveness and manage our relationship with affiliate sites.
- 3.7 Whilst you do not need to allow your browser to accept cookies in order to browse the majority of our Website, you must have cookies enabled if you wish to shop online or access any areas reserved for Customers. Most browsers allow you to turn off the cookie function. If you want to know how to do this please look at the help menu on your browser.
- 3.8 Cookies on our Website cannot be used by themselves to identify you and you have the ability to accept or decline cookies by modifying the settings in your browser.

4. USE OF INFORMATION

- 4.1 Personal information submitted to us via our Website will be used for the purposes specified in this Privacy and Security Policy or in relevant parts of our Website.
- 4.2 We may use your personal information to:
 - 4.2.1 administer our Website;
 - 4.2.2 enable your use of our Website;

- 4.2.3 send statements and invoices to you, and collect payments from you;
 - 4.2.4 send you general (non-marketing) commercial communications;
 - 4.2.5 send you email notifications which you have specifically requested;
 - 4.2.6 send to you our newsletter and other marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you by email or similar technology (you can inform us at any time if you no longer require marketing communications);
 - 4.2.7 deal with enquiries and complaints made by or about you relating to our Website; or
 - 4.2.8 keep our Website secure and prevent fraud.
- 4.3 Where you submit personal information for publication on our Website, we will publish and otherwise use that information in accordance with the licence you grant to us.
- 4.4 We may use your information to send you offers and news about our products and services. Your information may be passed to and used by all Klaud9 licensees and affiliates.
- 4.5 From time to time we will be entering into commercial agreements with third party suppliers to provide additional features, goods or services via our Website. Those third party suppliers may provide all or part of our service to you. Unless you expressly opt out, any personal data that you provide when signing up on a co-branded page will be shared with the third party supplier in question.
- 4.6 We may also use and disclose information in aggregate (so that no individual users are identified) for marketing and strategic business purposes and aggregate cookie and tracking information may be shared with third parties.
- 4.7 We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

5. DISCLOSURE OF INFORMATION

- 5.1 We may disclose information about you to any of our employees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes as set out in this Privacy and Security Policy.
- 5.2 In addition, we may disclose your personal information:
- 5.2.1 to the extent that we are required to do so by law;
 - 5.2.2 in connection with any legal proceedings or prospective legal proceedings;
 - 5.2.3 in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
 - 5.2.4 to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
 - 5.2.5 to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or

authority would be reasonably likely to order disclosure of that personal information.

- 5.3 Except as provided in this Privacy and Security Policy, we will not provide your information to third parties.

6. INTERNATIONAL DATA TRANSFERS

- 6.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this Privacy and Security Policy.
- 6.2 Information which you provide may be transferred to countries (including but not limited to the United States, Japan, Canada, Australia, New Zealand, South Africa and China) which do not have data protection laws equivalent to those in force in the European Economic Area.
- 6.3 In addition, personal information that you submit for publication on our Website will be published on the internet and may be available, via the internet or across mobile applications, around the world. We cannot prevent the use or misuse of such information by others.
- 6.4 You expressly agree to such transfers of personal information.

7. SECURITY OF INFORMATION

- 7.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- 7.2 Of course, data transmission over the Internet is inherently insecure, and we cannot guarantee the security of data sent over the Internet.
- 7.3 You are responsible for keeping your password and user details confidential. We will not ask you for your password (except when you log in to our Website).

8. AMENDMENTS

- 8.1 We may update this Privacy and Security Policy from time-to-time by posting a new version on our Website. You should check this page occasionally to ensure you are happy with any changes.
- 8.2 We may also notify you of changes to this Privacy and Security Policy by email.

9. YOUR RIGHTS

You may instruct us not to process your personal information for marketing purposes, by sending an email to us. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal information for marketing purposes.

10. THIRD PARTIES

The Website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

11. UPDATING OF INFORMATION

Please let us know if the personal information which we hold about you needs to be corrected or updated.

12. CONTACT

If you have any questions about this Privacy Policy or our treatment of your personal information, please write to us by email to contactus@klaud9.com