

Cloudbolt Software Privacy Policy

Last modified: October 27, 2022

Introduction

CloudBolt Software, Inc. ("**Company**" or "**we**") respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide to the Company's technology platform, its website www.cloudbolt.io, and all products, services, content, and functionality, offered on or through such website or platform (collectively, "**CloudBolt**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On CloudBolt;
- In email, text, and other electronic messages between you and CloudBolt.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website, application, platform, etc. operated by Company or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on CloudBolt.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. This Privacy Policy is incorporated into our legal agreements for your use of our products and services located at www.cloudbolt.io/legal/ ("**Legal Agreements**"). By signing or checking your acceptance of our Legal Agreement, you accept this Privacy Policy. **If you do not agree with our policies and practices, your choice is not to use CloudBolt.**

Information Covered by this Privacy Policy

This Privacy Policy only applies to personal information (as defined below). This policy **excludes** the following categories of information:

- Publicly available information from government records.
- Deidentified or aggregate consumer information.
- Deidentified or aggregate patient information.
- Protected health information, which is governed by HIPAA.

Personal Information We Collect About You and How We Collect It

We collect several types of information from and about CloudBolt users, including information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or

device ("**personal information**"). In particular, CloudBolt may collect the following categories of personal information (note: some information may overlap in multiple categories:)

CATEGORY	Information	Sources
Identifiers and Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, email address, user/account identification; credit card number, debit card number, or any other financial information,	Directly from you; indirectly from you through third-party authenticator
Internet or other similar network activity	Browsing type; time spent viewing webpages; pages visited; network location and IP address; log data; server location; operating system;	Indirectly from our third-party business associates

We collect the information detailed above:

- Directly from you when you provide it to us or with your consent (e.g. when you create an account with us; place an order; subscribe to our newsletter; request support; respond to a survey).
- Automatically as you navigate through CloudBolt including traffic data, location data, and other communication data. Information collected automatically may also include usage details, details of your visit to CloudBolt, IP addresses, and information collected through cookies and other tracking technologies.
- From third party authenticators. If you use a third party, like Facebook, Google, or Apple to log in to CloudBolt, then you authorize the third party to share your personal information with us, including your name, email address, and any other information you agree to share.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of CloudBolt. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to CloudBolt.
- **Flash Cookies.** Certain features of CloudBolt may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on CloudBolt. Flash cookies are not managed by the same browser settings as are used for browser cookies.

- **Web Beacons.** Pages on CloudBolt and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

How We Use Your Personal Information

We may use, or disclose the personal information we collect for one or more of the following business purposes:

- To provide, support, personalize, improve, and develop CloudBolt;
- To create, maintain, customize, and secure your account with us
- To process your requests, purchases, transactions, and payments and prevent transactional fraud;
- To respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses
- To run a promotion, contest, survey or other Cloudbolt feature;
- To deliver content and product and service offerings relevant to your interests, including targeted offers through CloudBolt and via email or text message (with your consent, where required by law);
- To send periodic emails.
- To fulfill or meet the reason you provided the information (e.g. create an account to provide you with CloudBolt);
- To help maintain the safety, security, and integrity of CloudBolt;
- For testing, research, analysis, and product development, including to develop and improve CloudBolt;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

Disclosure Sharing, and the (Non)Sale of Your Personal Information

We may share your personal information by disclosing it to a third party for a business purpose.

- To contractors, service providers, and other third parties we use to support our business and CloudBolt.

- To fulfill the purpose for which you provide it.
- With your consent. For example, with your consent, we will share your personal information with third parties to send you promotional emails.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

We provide a brief summary of the sharing of your personal information below:

Type of Personal information	Business Purpose Disclosures to Third Parties
Identifiers and Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Identity verification; facilitate payment processing; data analytics; marketing purposes;
Internet or other similar network activity	Identity verification; facilitate payment processing; data analytics; marketing purposes

We do not sell personal information.

Data Security

We use measures intended to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. For example, we always use **commercially reasonable efforts** to follow industry best practices for authorization, encryption and access controls. Toward that end, all information you provide to us is stored on secure servers behind firewalls such as Google Cloud. In addition, your personal information may be stored by third parties who provide services to us, which third parties will be required to maintain such information securely.

Please note that the safety and security of your information also depends on you. Because CloudBolt requires registered users to provide unique identifiers such as their username and password, **you are responsible** for keeping such username and password information confidential. You should not therefore share your username or password information with anyone.

Unfortunately, the transmission of information over the Internet is not completely secure at all times. Although we do our best to protect your personal information, **we cannot guarantee the security** of such personal information transmitted 100% of the time. Any transmission of such information is therefore at your own risk. We are **not responsible for the circumvention** of any privacy settings or security measures on CloudBolt.

Data Retention

We will retain your information for as long as your account is active with CloudBolt. If you no longer want to use CloudBolt, you may [close your account](#). However, after closing your account, we may retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our obligations and agreements.

[Deleting Your Personal Information](#)

You may also request that we delete any personal information that we have collected from or about you. We will evaluate your request and delete the information subject to applicable law. However, we need certain types of information so that we can provide our services. **If you ask us to delete it, you may no longer be able to access or use CloudBolt.**

Notwithstanding the above, we may [retain personal information as authorized under applicable law or regulation](#). For example, personal information will be retained (i) to comply with federal, state, or local laws, rule, or regulations; (ii) to comply with civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, local or other governmental authorities; (iii) to cooperate with law-enforcement agencies concerning conduct or activity that are reasonably and in good faith believed to violate federal, state, or local laws, rules, or regulations; (iv) to debug to identify and repair errors that impair existing intended functionality; (v) to exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided by law; or (vi) to enable solely internal uses that are reasonably aligned with the expectations of the consumer based on your relationship with us.

To exercise your deletion requests subject to applicable law, please submit your request via email to legal@cloudbolt.io with the subject heading "DELETION REQUEST" (or else your request may be delayed or inadvertently ignored). Please also specify your name and your state (or states) of residence within the past twelve months. For security purposes, we may request additional information from you to verify your identity.

[FOR CALIFORNIA CITIZENS – Your Rights and Choices](#)

The California Consumer Privacy Act of 2018 ("**CCPA**") provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

PLEASE NOTE THAT THE EXERCISE OF YOUR RIGHTS DEPENDS ON WHETHER WE ARE A "COVERED BUSINESS" UNDER THE CCPA. CURRENTLY WE ARE NOT A COVERED BUSINESS. WE WILL HONOR YOUR RIGHTS BELOW WHEN WE BECOME A COVERED BUSINESS.

CA'S RIGHT TO KNOW AND DATA PORTABILITY

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity, we will disclose to you:

- The categories of personal information we collected about you.

- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

CA's Right to Correct

You have the right to request that we correct any inaccurate personal information maintained about you.

CA's Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your, we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
7. Comply with a legal obligation.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Your CA Rights to Know, Correct, or Delete

To exercise your rights to know or delete described above, please submit a request by:

- Emailing us at legal@cloudbolt.io

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. You may also make a request to know or delete on behalf of your child.

You (or your guardian acting on your behalf) may only submit a request to know twice within a 12-month period. The request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include your or your parent's legally authorized driver's license or passport.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

RESPONSE TIMING AND FORMAT

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please [contact support@CloudBolt.io].

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If we cannot reply with a request, we will explain the reasons for refusing your request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of CloudBolt, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to CloudBolt. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the CloudBolt.

NO DISCRIMINATION FOR EXERCISING CA RIGHTS

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting CloudBolt and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: legal@cloudbolt.io.

CloudBolt GDPR Privacy Policy

EU General Data Protection Regulation Privacy Notice

Introduction

This Privacy Notice applies to CloudBolt and is intended to comply with the European Union's ("EU") General Data Protection Regulation ("GDPR"). This Privacy Notice applies to Personal Data that CloudBolt Inc. ("**Company**" or "**we**") collects or processes through CloudBolt about a user ("**Data Subject**" or "**you**") while the Data Subject is located in the EU, regardless of whether the Data Subject is a citizen or permanent resident of an EU country. "**Personal Data**" means any information relating to an identified or identifiable Data Subject.

This Privacy Policy a contract between you and us. It is incorporated into our Legal Agreements. By accepting our Legal Agreement, you hereby accept this Privacy Policy. **If you do not agree with this policy, please do not accept our Legal Agreement and cease use of CloudBolt.** Capitalized words used herein but not defined are defined in our Legal Agreement.

Lawful Basis or Bases for Collecting and Processing Personal Data

CloudBolt is a professional tool that aims to assist you with your software issues. As such, CloudBolt collects, processes, and uses Personal Data to review and process the information to enable use by the Data Subject and render services.

CloudBolt's lawful basis or bases for collecting and processing Personal Data include the following:

- Processing is necessary for the legitimate interests in processing your Personal Data.
 - We need your Personal Data to provide you with CloudBolt.
 - We need your Personal Data to create your profile.
 - We need your Personal Data to provide, support, personalize, improve, and develop CloudBolt.
 - We need your Personal Data to process your requests, purchases, transactions, and payments and prevent transactional fraud.
 - We need your Personal Data to create, maintain, customize, and secure your account with us.
 - We need your Personal Data to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
 - We need your Personal Data to personalize the CloudBolt experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and through CloudBolt and via email or text message (with your consent, where required by law).
 - We need your Personal Data to help maintain the safety, security, and integrity of CloudBolt.
 - We need your Personal Data for testing, research, analysis, and product development, including to develop and improve CloudBolt.
 - We need your Personal Data to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- Emailing you or sending notifications to your account with offers on products and services we think you may like.

[Types of Personal Data Collected/Processed and Purpose](#)

CloudBolt collects and processes the following categories of Personal Data in order to enable creation of a profile to facilitate suitable course recommendations.

Personal Identifiers:

Name, email address, user/account identification, and any purchase information.

Internet or Other Similar Network Activity

Browser type, device type, operating system, web pages viewed, pages clicked, IP address, frequency of visits; time spent viewing webpages, date/time of access, connection speed; device identification.

Sharing of Personal Data

The Personal Data that we collect is only shared with our data processors in order to provide CloudBolt and who have agreed to protect the confidentiality of your Personal Data.

If you have specific questions regarding the collection and use of your Personal Data, please contact us at legal@cloudbolt.io.

How We Collect Your Personal Data

We receive your Personal Data (i) directly from you or (ii) it is automatically collected from third-parties, who are our data processors, using cookies and analytical tools.

Your Individual Rights as a Data Subject under the GDPR

This notice serves to **inform** you of your privacy rights pursuant to the GDPR. You as a Data Subject also have the right to:

- Request from us **access** to and **rectification** or **erasure** of your Personal Data or limit the processing of your Personal Data, the right to object to processing and the right to portability of Personal Data;
- Withdraw consent at any time, without affecting our right to process Personal Data based upon consent before its withdrawal;
- The right to file a complaint with a supervisory authority appointed by an EU member state for the purpose of receiving complaints;
- Additional notice of the existence of automated decision-making, including profiling;
- If the Personal Data is going to be further processed for a purpose other than that for which it was collected, then notice of the purpose and basis or bases for the further processing;
- If Personal Data is collected for our legitimate interests or for a task carried out in the public interest, then the Data Subject has the **right to object**, on the grounds of his or her particular situation, to the processing of Personal Data concerning him or her (including profiling);
- Where Personal Data are processed for direct marketing purposes, the right to object at any time to **processing** Personal Data concerning him or her for such marketing; and

- Not to be subject to a decision based solely on **automated processing**, including profiling; provided, however, that this right does not apply if the decision is (a) necessary for entering into, or performance of, a contract between you and us; or (b) is based upon your consent.

If you wish to exercise any of the above-mentioned rights, you may do so by contacting us at legal@cloudbolt.io.

Cookies

Cookies are files that many websites transfer to users' web browsers to enable the site to deliver personalized services or to provide persistent authentication. The information contained in a cookie typically includes information collected automatically by the web server and/or information provided voluntarily by the user.

We also process **automatically-gathered information**. Cookies that are necessary to display content or perform other functions you have requested, or that are necessary for the security or basic operation of our website, are turned on by default and cannot be turned off. We request your consent for the use of other cookies.

Transfer of Personal Data Outside of the European Economic Area (EEA)

Our main administrative offices are based in the USA and that's where we process Personal Data collected through CloudBolt. When you provide Personal Data to us, we request your consent to transfer that Personal Data to the USA. The USA does not have an adequacy decision from the European Commission, which means that the Commission has not determined that the laws of the USA provide adequate protection for Personal Data. Although the laws of the USA do not provide legal protection that is equivalent to EU data protection laws, we safeguard your Personal Data by treating it in accordance with this GDPR Privacy Notice. We take appropriate steps to protect your privacy and implement reasonable security measures to protect your Personal Data in storage. We use secure transmission methods to collect Personal Data through our website. We also enter into contracts with our data processors that require them to treat Personal Data in a manner that is consistent with this Notice.

Retention Period for Personal Data

How long we retain Personal Data varies according to how long you maintain an account with us. We delete Personal Data within a reasonable period after it is clear you are no longer active on CloudBolt or we no longer need to use it for the purpose for which it was collected (or for any subsequent purpose that is compatible with the original purpose). This does not affect your right to request that we delete your Personal Data before the end of its retention period. We may archive Personal Data (which means storing it in inactive files) for a certain period prior to its final deletion, as part of our ordinary business continuity procedures.

