



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.

PRIVACY POLICY

MAIN POINTS

- This Privacy Policy applies to you and 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 is not collected automatically when you visit this website, but may be collected and read by us if you opt to get in touch (for instance, data you provide when you e-mail 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.
- You acknowledge and accept, for yourself and on behalf of your affiliates, subsidiaries, employees, agents, subcontractors or other partners 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 to receive your services.
- You acknowledge and accept, for yourself and on behalf of anyone else we use personal data of within the framework of our business relationship that you have informed the individuals concerned regarding the processing by us and that you shall obtain their consent if necessary.
- This website neither uses nor logs cookies.
- 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 and / or otherwise being in relation with us, 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) No registration or personal information is required to be submitted as a pre-requisite to access or navigate this website. Registration may be required to access certain services via other websites, where applicable privacy policies are available.
- (b) When you visit this website, our web server only logs your IP address for limited purposes (such as technical logging and audit trail purposes, as described in more detail in (g) below), but not to keep track



of the web pages that you visit within this site or the date and duration of your visit or the website through which you linked to our site is not logged.

- (c) Those instances where your personal information is communicated to us are limited and would be a result of your e-mailing us (with data such as your e-mail address, name, address, postcode, telephone number and company name, as may be applicable) in relation to: a particular service we offer; information you may opt to receive from us or reporting of a problem with our website.
- (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 necessary to enable us to deal with your request or service requirements. If additional information is required to enable us to provide the response you request, then this will be indicated as such.
- (f) Sensitive information – also known as special category data - is never required or collected through this website. 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 this information but only for technical logging, system administration, audit trails and troubleshooting purposes, to ensure that the website reflects the needs of our users. We do not collect information about your computer, operating system and browser type, nor do we compile statistical data about our users' browsing actions and patterns. We do not attempt to identify any individual. In other words, IP addresses are not used to track your session and are not linked to anything personally identifiable.
- (h) This website does not use cookies (text files stored in your browser) or web beacons (tools to count visits on this website or its individual pages). We do not use any tracking tools for online targeted advertising purposes.

2. How your personal information may be used

- (a) Your personal information will only be visible and used if you communicate it to us in respect of:
 - i. the performance of certain services provided by or to our company including accounting; and/or
 - ii. the communication to you of information you request to receive from our company; and/or
 - iii. claims handling and legal disputes.
- (b) In other words, if you request information relating to our services or if you ask someone to contact you, our relevant employees may view and 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.

3. Disclosure of your and our information

- (a) Where (and to the extent) necessary, we may communicate your personal information to any relevant company 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 data 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 or supplying or receiving services 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, our company e-mail addresses or via other channels, you are consenting to 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) Where you require us to provide you with location data for your goods or we require you to accept the use of location data, we exclude any liability in case of these data becoming personal data. You warrant to hold us harmless from any action, claims, liability or loss in respect of the performance of the services.
- (k) This website may host or 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.
- (l) This website does not host any blogs, fora, wikis and other social media applications or services that allow you to 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 United Kingdom or European Economic Area ("EEA") or the area where we have originally collected the data. 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. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

5. How secure is your information?

- (a) We implement generally accepted standards of technology, operational security and policies to protect our IT systems and your personal information from loss, misuse, alteration and destruction. 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 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 or 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 or other electronic communication 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 Policy

- (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](#).