# l agree

This site uses cookies to personalize content and to make it easier to use. We also share some information with third parties for analytics purposes. To find out more, read our Privacy Policy of CloudSY and Cookie Policy of CloudSY.

# **CloudSY Privacy Policy**

Thank you for visiting cloudsy.partners website (the "Website") of Virtuaalinfra OU and its subsidiaries ("CloudSY" or "We"). At CloudSY we take your privacy seriously. Please read the following to learn more about CloudSY's privacy policy (this "Privacy Policy").

Please note: By visiting the Website or interacting with us with regard to CloudSY's products or services you indicate that you have read this Privacy Policy and agree to be bound by and comply with its terms.

This Privacy Policy applies only to information collected by CloudSY from purchasers of CloudSY's products or services, from visitors of the Website, or from persons who contact us offline and online.

If you have any questions or suggestions about this Privacy Policy, please feel free to contact us through the Website or write to us at info@CloudSY.partners

# ACCEPTABLE USE AND CONDUCT

You are solely responsible for your conduct while using the Website, and for ensuring that your use complies fully with the provisions of this Privacy Policy and all applicable laws, ordinances, rules, and regulations.

# COLLECTION OF INFORMATION

CloudSY may gather the following types of information about you:

# Personal Information

Personal Information is individually identifiable information, namely information that identifies an individual or which may, with reasonable effort, identify an individual. We gather the following types of Personal Information:

- Technical information: We collect specific types of connection details and information with regard to their device, software or hardware that may identify them, such as online identifiers, device unique identifiers (e.g. UDID, MAC address), IP address and geolocation.
- Name, email address, company name and other contact information: we ask for and at your option—collect your contact data from you when you submit web forms on our Website, including filling out the contact us form and opportunities to sign up for and agree to receive email communications from us.
- Voluntary information: we collect Personal Information that you provide us voluntarily. For example, when you respond to communications from us, or when you share additional information through your use of the Website.

Payment information: In order for you to enjoy all of the functions which we offer, we collect
payment information from you, including your credit card number and bank account details.
Please note that your billing information, to the extent provided by you, is forwarded directly to a
third party billing or clearing company engaged by us and is not kept by us.

#### Non-personal Information

Non-personal Information is non-identifiable information that, when taken alone, cannot be used to identify you. As such, we are not aware of the identity of the user from which the Non-personal Information was collected.

We may anonymize or de-identify the information collected by the Website or via other means so that the information cannot, on its own, personally identify you. We also collect aggregate user data regarding your use and activity on our Website and Services. Our use and disclosure of such aggregated or de-identified information is not subject to any restrictions under this privacy policy, and we may disclose it to others without limitation and for any purpose.

For the avoidance of doubt, if we combine Personal Information with Non-personal Information (e.g. analytics data), the combined information will be treated as Personal Information as long as it remains combined.

## **USE OF "COOKIES"**

CloudSY uses cookies, IP addresses, URL information, and similar technologies to improve and further develop its services and the Website and to and save your preferences for future visits. The information collected by such cookies or similar technologies may include your IP address, your operating system, the browser language, browser type and version, the requested page and the time of the access. If you choose to provide Personal Information to us, then this Personal Information may be linked to data stored in the relevant cookies or similar technologies. For more information, please see our cookie policy.

# TRANSFER OF INFORMATION OUTSIDE THE EEA (FOR EU DATA SUBJECTS)

Since we operate globally, it may be necessary to transfer data, including Personal Information, to countries outside the EEA. In these instances, we will transfer your Personal Information only to such countries as approved by the European Commission as providing adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection.

#### MARKETING

We may use your Personal Information, such as your full name, email address, etc., ourselves or by using our third-party partners for the purpose of providing you with promotional materials, concerning our Website, products or services.

At any time, you may request to unsubscribe and discontinue receiving marketing offers by sending us a blank message with the word "remove" to the details listed above.

Please note that even if you unsubscribe from our marketing mailing list, we may continue to send you service-related updates and notifications.

## WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We work with other companies who help us run our business ("Service Providers"). These companies provide services to help us store information (such as cloud storage companies), deliver customer support, monitor and analyze the performance of our Website and services, as well as provide marketing support, and otherwise operate and improve our Website and services. These Service Providers may only process Personal Information pursuant to our instructions and in compliance both with this Privacy Policy and other applicable confidentiality and security measures and regulations.

Specifically, we do not permit our Service Providers to use any Personal Information we share with them for their own marketing purposes or for any other purpose than in connection with the services they provide to us.

In addition to sharing with Service Providers as described above, we may also share your Personal Information with others in the following circumstances:

- Internal concerned parties we share your information with companies in our group, as well as our employees, in order to operate our Website and to provide you with our products or services.
- Business partners we share your information with business partners, such as storage and analytics providers who help us provide you with our Service. These third parties may have access to your Personal Information so that they may perform these tasks on our behalf, but they are obligated to comply with this Privacy Policy and may not use your Personal Information for any other purpose.
- Compliance with laws and law enforcement entities we cooperate with government and law
  enforcement officials and private parties to enforce and comply with the law. We will disclose any
  data about you to government or law enforcement officials or private parties as we, in our sole
  discretion, believe necessary or appropriate to respond to claims and legal process (including but
  not limited to subpoenas), to protect our or a third party's property and rights, to protect the safety
  of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a
  risk of being, illegal, unethical, inappropriate or legally actionable. We also may be required to
  disclose an individual's Personal Information in response to a lawful request by public authorities,
  including meeting national security or law enforcement requirements.
- Merger and acquisitions we may share your Personal Information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your Personal Information in accordance with the terms of this Privacy Policy.
- As you may otherwise consent from time to time.

#### SECURITY

CloudSY takes commercially reasonable security measures, applying physical, electronic and procedural safeguards, to maintain the confidentiality and protect against the loss, misuse, and alteration of the information collected pursuant to this Privacy Policy. We allow only authorized personnel to access your Personal Information, on a need-to-know basis. Although CloudSY makes good faith efforts to store the collected Personal Information in a secure operating environment that is not available to the public, CloudSY cannot guarantee absolute security. You understand and agree that all such collected Personal Information is at your own risk and is subject to the provisions and disclaimers of this Privacy Policy.

#### LINKS TO THIRD PARTY SITES

The Website may contain links to other sites that are not under CloudSY's control. These websites have their own policies regarding privacy. You are encouraged to review those policies before visiting such websites. CloudSY has no responsibility for linked websites, and it provides these links solely for the convenience and information of its Website's visitors.

## RETENTION OF INFORMATION

We will retain your Personal Information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing personal data, trading information, account opening documents, communications and anything else as required by applicable laws and regulations.

## DISCLAIMER OF WARRANTIES

The Website and all content, material, information, and postings found on the Website are provided on an "as is" basis without warranties of any kind, either express or implied, including, but not limited to, warranties of title, implied warranties of merchantability, and fitness for a particular purpose.

# RIGHTS YOU MAY HAVE

Certain jurisdictions provide individuals with certain statutory rights to their Personal Information. You may have the right to certain actions to your Personal Information such as: the right to request access to your Personal Information, that it be erased, that its processing be restricted, or that any inaccurate Personal Information be rectified. You may also have the right to object to the processing of your Personal Information, and under certain circumstances to obtain a copy of the Personal Information in machine readable format (portability right). Any such request may be submitted in writing to us at <u>info@cloudsy.partners</u> However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements. You may also have the right to lodge a complaint with a supervisory authority located in the EU.

## MINORS

We do not knowingly collect or solicit Personal Information from anyone under the age of consent (as determined under the applicable laws where the individual resides; "Age of Consent"). By accessing, using or interacting with our Websites, products or services, you certify to us that you are not under the Age of Consent. In the event that we learn that we have collected Personal Information from an individual under the Age of Consent without verification of parental consent, we will delete that information upon discovery. If you believe that we might have any information from or about an individual under the Age of Consent, then please contact us through the contact details available above.

## REVISIONS TO THIS PRIVACY POLICY

From time to time, CloudSY may update this Privacy Policy, and your continued use of the Website will signify agreement to such changes. The revised Privacy Policy will promptly be posted to the Website and CloudSY will post a notice on the Website informing you of such changes. You agree to accept posting of a revised Privacy Policy electronically on the Website as actual notice to you. CloudSY encourages you to periodically check back and review this Privacy Policy.