



Privacy Policy

Version 1.4

27/03/23





Summary

CloudPass is committed to complying with the UK's Data Protection law and the EU General Data Protection Regulation (GDPR) for the protection of personal data, as well as the principles of data security in the configuration of our services. If you have any questions about this privacy notice or how we use your personal data, please contact our compliance team:

In Writing:

CloudPass (c/o Paradox IT Ltd)
Chichester Business Centre
Chichester Street
Rochdale
OL16 2AU

By Email: legal@cloudpass.com

What data is being collected and processed?

In order to enter into an agreement with CloudPass, we will collect, store and use elements of your personal data. The processing of this personal data is a contractual requirement and is necessary by CloudPass in order to administer your account and to provide the products and services you have requested from us.

When you approach CloudPass to engage in our services, we will ask your consent to collect and process your personal data. Failure to provide this consent and/or personal data may mean we will be unable to execute the contract and will result in termination of our services.

When engaging CloudPass services, you will usually need to disclose to us the following:

- First Name
- Surname
- Email Address
- Contract Telephone number(s)
- Business Address

We will also monitor, record, store and use any telephone, email or other electronic communications with you for training purposes so that we can check any instructions given to us and to improve the quality of our customer service.

Any personal data we collect from you will not be transferred outside the European Economic Area.



Direct Marketing Communications

If you have chosen to opt-in to our direct marketing communications, we will use your information to tell you about products and services available from us which may be of interest to you. We may also use your information to tell you about products and services which we can introduce from selected businesses.

To help make our emails more interesting and relevant, we often receive a confirmation when you open an email from CloudPass if your computer supports such capabilities.

You have a right to opt-out of our direct marketing communications at any time. You can opt-out by following the Unsubscribe instructions at the bottom of the communication or by emailing marketing@cloudpass.com.

Links to websites of other providers third parties

Please note that this data privacy notice only applies to CloudPass and we are not responsible for, and have no control over, information that is submitted to or collected by third parties, such as those where our website may provide links and banner advertisements to third party sites. Since we do not control those websites, you are responsible for reviewing and abiding by the privacy policies of these third-party sites to ensure they comply with the applicable data protection regulations.

How long will the data be stored for?

Where possible, CloudPass will take steps to erase any personal data that is no longer necessary for the purposes for which it is collected or otherwise processed, or if you have withdrawn consent for its processing and retention.

As a general rule, if you enter into or took steps to enter into a contract with CloudPass, we will store the data for period of seven years for compliance with our general legal obligations and for the exercise or defence of any legal claims.

Under the GDPR, you have the right to 'block' or request the deletion or removal of personal data to prevent further processing. This right to erasure is also known as 'the right to be forgotten'. Specific circumstances in which you can request the deletion or removal of personal data includes:

- Where the personal data is no longer necessary for the purposes for which it is collected or otherwise processed
- Where you withdraw consent
- When you object to the processing and there is no overriding legitimate interest for continuing the processing
- Where the personal data was unlawfully processed (i.e. otherwise in breach of the GDPR)



- Where the personal data has to be erased in order to comply with a legal obligation
- In case a deletion is not possible due to legal, statutory or contractual retention periods, or if it requires disproportionate efforts or prejudices your legitimate interests, the data will be blocked instead of deleted.

Sharing of data with other data controllers & processors

CloudPass take privacy seriously and the information we hold about you is confidential. We will only disclose it outside CloudPass when:

- you have given us your consent to do so
- it is necessary for the performance of an agreement/contract of which you will be made aware
- in order to obtain professional advice (e.g. legal advice)
- we or others need to investigate or prevent crime (e.g. to fraud prevention agencies)
- the law permits or requires it
- regulatory or governmental body requests or requires it, even without your consent, or
- there is a duty to the public to reveal the information

In order to administer your contract, we may need to share some of your personal information with other data controllers & processors. This processing is necessary for the purposes of delivering specific services to you.

Other data processors which we may share this information with may include:

- Credit reference agencies
- Claims handling and fraud prevention agencies (to investigate or prevent crime)
- Third parties whose software we are using to process your tax returns or payroll information

Fraud Prevention

If you give us false or inaccurate information and fraud (in any form) is identified, details will be passed to the fraud prevention agencies. We and other organisations may also share, access and use this information to prevent fraud and money laundering, for example when:

- managing credit and credit related accounts or facilities
- recovering debt
- checking any details that may be provided to us during the course of engaging in business with us
- In addition, law enforcement agencies may access and use this information.



Protecting your privacy

In order to protect the personal data collected from you by CloudPass against accidental or deliberate manipulation, loss, destruction or the access of unauthorised persons, technical and organisational security measures are constantly improved as part of our technological development. In addition, our employees, subcontractors and other support staff are obligated to observe confidentiality and data privacy.

Any access to your data that is stored at our company only takes place through an encrypted connection. By using the most up-to-date firewall systems, we provide the best possible protection for your data. Our website, as well as our internal Customer Management System (CMS) is encrypted using a SSL/TSL (Secure Sockets Layer/ Transport Layer Security) connection. SSL is an industry standard and is used by millions of websites in the protection of their online transactions with their customers.

Wherever possible, we have tried to create a secure and reliable website for our users. However, you recognise that your use of the Internet and our website is entirely at your own risk and we have no responsibility or liability for the security of personal information transmitted via the Internet.

All passwords and usernames allocated to you must be kept secret and must not be disclosed to anyone without our prior written authorisation. You must not use any false identity in email or other network communications and you must not attempt or participate in the unauthorised entry or viewing of another user's account or into another system.

Breaches

If at any time we become aware that your data has been compromised, or that a breach of our systems and controls has occurred, which has an impact on the security of your data, we will notify the Information Commissioner's Office, and you within the timescales defined within our security statement.

Subject Access Requests

You have the right to request access to a copy of the personal information that we hold about you. This is also known as a 'Subject Access Request'. This information is provided to you free of charge however, we can refuse to respond or charge a 'reasonable fee' of £10 inc VAT when a request is manifestly unfounded, excessive or repetitive.

We will provide this information in a structured, commonly used and machine-readable form such as a CSV file or PDF file where possible. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to



usability. Where possible, we will provide this information via remote access to a secure self-service system, such as our customer account area, which would provide you with direct access to your information.

If you would like to submit a Subject Access Request, please contact our compliance team in writing to:

Compliance Officer
CloudPass (c/o Paradox IT Ltd)
Chichester Business Centre
Chichester Street
Rochdale
OL16 2AU

Email: legal@cloudpass.com

We will respond to your request without delay and at the latest, within 1 month of receipt of your request.

Rectifying or updating personal data

If you believe the personal data we hold about you is inaccurate or incomplete, you have the right to rectification. You can let us know about any changes to. Where possible, we will also inform any third parties to whom we have disclosed the personal data in question to so they can rectify their records.

We will typically respond to your request within one month, although this can be extended by two months if your request for rectification is complex.

Withdrawing Consent

If we are processing any of your data by using consent as the lawful basis for processing, you have the right to withdraw your consent for us to collect, process and store this data at any time. If you wish to withdraw your consent, please confirm this in writing to our Data Protection Officer:

Compliance Officer
CloudPass (c/o Paradox IT Ltd)
Chichester Business Centre
Chichester Street
Rochdale
OL16 2AU

Email: legal@cloudpass.com



Please note, by withdrawing consent, CloudPass may be unable to execute the contract that you have entered into with us and will result in termination of our services. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Version	Change	Author	Date
1.0	Original draft	David Hawkins	08/05/17
1.1	GDPR Updates	David Hawkins	25/04/18
1.2	Annual review	Darren Oliver	23/04/19
1.3	Annual review	Chris Stoddard	09/03/20
1.3	Annual review	Chris Stoddard	19/03/21
1.3	Annual review	Chris Stoddard	11/03/22
1.4	Updated addresses	Chris Stoddard	27/03/23

