

Kluster Intelligence Privacy Policy

Last Reviewed: 15/12/2017

Policy

Kluster Intelligence Ltd ("Kluster Intelligence", or "us", "our", "we") provides a predictive analytics and reporting platform (the "Platform"). Kluster Intelligence respects your right to privacy. Your ability to make informed choices about the uses of your information is important to us. This privacy policy details how we collect, use and store information and data that we receive. If you have any comments or questions about our privacy policies, please contact us at info@kluster.com.

As used in this privacy policy, "you" means any individual or entity that uses the Platform, and "Personal Information" means information that can be directly associated with a specific natural person such as a name, address, telephone number, or e-mail address.

This privacy policy applies to users of the Platform and those browsing our website, kluster.com. For the purpose of the data protection laws applicable to us, the data controller is Kluster Intelligence Ltd, whose registered office is at Priory Close, St Mary's Gate, Lancaster, United Kingdom, LA1 1XB.

Information We Collect

We will collect and process information about you that you give us by filling in forms on our website or by corresponding with us by phone, e-mail, live chat or otherwise. It includes information you provide when you register to use the Platform, and when you report any issues with the Platform. The information you give us may include your name, address, e-mail address and phone number and the name of your business. This information is referred to in this Policy as "Account Information".

In order to use the Platform, you will be required to provide certain information from your CRM database, which may include customer leads, customer accounts, customer opportunities, customer contact information and details of specific transactions ("Customer CRM Information"). It is your decision whether you should provide us with any specific data or information.

We also collect information when you make use of the Platform, including your comments and feedback. The Platform may also record certain technical information automatically, such as your IP address, system of your mobile device or computer, operating system and browser ("Log Information").

How We Use Information

We will not disclose any Personal Information you provide or your Customer CRM Information to third parties without your explicit permission, except when required by law, regulation, subpoena or court order or as otherwise expressly set forth herein. We may use Log Information, Account Information and anonymised Customer CRM Information for the purposes of maintaining and improving our services - for example, to improve our algorithms, to help diagnose problems with our servers and to make the Services more advanced for you and for our other customers.

By analysing all information we receive, including Customer CRM Information, we may compile statistical information across a variety of users ("Statistical Information"). Statistical

Information does not identify any specific entity, individual or transaction or item of Customer CRM Information. We use the Statistical Information compiled from data across all users of the Platform in order to deliver useful information and comparisons to our customers. Statistical Information is also used to provide you with insights regarding your own Customer CRM Information. In addition, we use Statistical Information to help us internally understand trends and customer needs so that new services can be considered and to tailor the Services and associated products and services for our customers.

Sharing Your Information

You agree that we have the right to share your personal information with our hosting partner, Microsoft Azure.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Kluster Intelligence Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of service and other agreements; or to protect the rights, property, or safety of Kluster Intelligence Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection

How We Protect Information

We follow accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive it, employing the highest security protocols and utilising the most advanced infrastructure services (see our OAuth procedure document for data syncing). However, no method of transmission over the Internet, or method of electronic storage is 100% secure. Therefore, while we continue to invest in the best technology available, we cannot guarantee its absolute security.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We hold your Personal Information only as long as necessary for each purpose we use it as set out in this Policy, unless there is a requirement to hold that information for a longer period - for example, we may have be subject to a statutory obligation to keep hold of your information. If you request that we have no further contact with you, we will keep some basic information in order to avoid sending you unwanted materials in the future and to ensure that we don't accidentally duplicate information. If there is a possibility that you may have a legal claim against us, then we will hold your information for the duration of any statutory limitation period associated with such legal claims.

What Is The Legal Basis On Which We Rely To Process Personal Information?

On some occasions, we may process personal information with consent (for example, when you agree to receive email updates about the service). You have the right to withdraw your consent at any time by contacting us on the email address below.

On other occasions, we may process personal information when we need to do this to fulfil a contract (for example, to make available the Platform services to you) or where we are required to do this by law.

We also process your personal information when it is in our legitimate interests to do this and when we consider these interests are not overridden by your data protection rights. Those legitimate interests include using your information for the purposes of improving the Platform, which we aim to do in a way that works to your benefit and those of other users.

Third Party Sites and Services

We are not responsible for the use of any data by third parties, and we cannot vouch for the privacy policies of any third party. Our website may contain links to third party sites. We have no control over third-party sites or services, and all use of third-party sites or services is at your own risk. We cannot accept responsibility for the privacy policies of any such sites. We are not responsible for content available by means of such sites or services. We do not endorse any services or offered by third parties and we urge our users to exercise caution in using third-party sites or services.

Children

We do not knowingly collect Personal Information from children under the age of 16.

Other Uses or Transfer of Your Information

We will fully cooperate with any law enforcement authorities or court order requesting or directing us to disclose the identity or behaviour of any user suspected to have engaged in illegal behaviour.

We also use your Personal Information in the following ways:

- to provide you with the Platform, and any information, products and services that you request from us;
- to provide you with information about other services we offer that are similar to those that you or the business you work for have already used or enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing user, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to Kluster Intelligence. Otherwise, we will contact you by electronic means only if you have consented to this.
- to notify you about changes to the Platform;
- as part of our efforts to keep our site safe and secure.

We may use subcontractors that are located in countries other than your own, and send them information we receive. For example, we may send your information to any countries outside the United States, Canada or the European Union. All our subcontractors will be subject to nondisclosure and non-use obligations, and we rely on adequacy decisions, data transfer agreements or other EU approved mechanisms for such transfers. Nevertheless, some countries may have levels of protection of personal and other information which are not as high as in your country of residence or business.

We may transfer our databases containing information if we sell our business or part of it.

Your Rights

You have the right to ask us not to process your Personal Information for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@kluster.com.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

If you are in the European Union, data protection legislation gives you the following rights:

- to access information held about you;
- to require rectification or erasure of your information; and
- to object to as well as the right to our use of your data to carry out automated profiling in respect of you.

These rights can be exercised in accordance with applicable data protection laws. To exercise your rights, please email us at info@kluster.com.

If you make a complaint to us and think we have not dealt with it to your satisfaction, you may send your complaint to the Information Commissioner for investigation. For more information on the Information Commissioner, and how to make a complaint, please visit their website at www.ico.org.uk.

Changes To Our Privacy Policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Comments and Questions

If you have any comments or questions about our privacy policy, please contact us at info@kluster.com.