

# Privacy Policy

This Privacy Policy amends the Terms of Service which governs your use of CloudKarafka (the Service) provided by 84codes AB. This Privacy Policy was last revised on May 18, 2018.

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## Introduction

The Service is provided by 84codes AB with its address at Sveavägen 98, 113 50 Stockholm, reg. no. 556898-0782 ("84codes AB," "we," or "us"). Capitalized terms that are not defined in this Privacy Policy have the meaning given to them in the Service's Terms of Service.

84codes AB is the Data Controller in respect to the personal information collected from you when you start using the Service (e.g. your email address). This means that it is our responsibility to ensure that all processing of your personal information is conducted in a secure manner and in compliance with applicable laws and regulations.

84codes AB knows that you care how information about you is used and shared. This Privacy Policy explains what information of yours will be collected by 84codes AB when you use the Service or attends meetups or a conference organized by us. This Privacy Policy displays how the information will be used, and how you can control the collection, correction and/or deletion of information. Our basic principles are:

- We won't spam you or sell your personal information to others.
- You control how we send most messages to you.
- You control whom you share your Subscriptions with.
- We will not use or share your information with anyone except as described in this Privacy Policy.
- We will only collect, use, and share your information as we describe in this Privacy Policy or as you give us express permission to do. This Privacy Policy does not apply to information we collect by other means (including offline) or from other sources.

For general questions regarding personal information, please contact us at [compliance@84codes.com](mailto:compliance@84codes.com).

The collection, use, and sharing of personal information are collectively also referred to as “Processing”.

## Information We Collect

We have categorized each type of data that we may collect from you as follows:

- **Account data:** We collect your email address and password when you sign up for the service. We also collect your preferences, feedback and survey responses. If you correspond with us by email, we may retain the content of your email messages, your email address, and our responses.
- **Billing data:** If you sign up for a paid subscription of the Service, we will collect your credit card information, or other payment information, which we store in encrypted form. The billing data also includes details about previous transactions (such as payments) made by you. We will collect your company name and address if you sign up for a paid subscription. If you're a non-business customer and doesn't have a company name or address, we will collect your name and home address for billing purposes.
- **Usage data:** We store the information you provide us through the Content and Application(s) you post to the Service until it is consumed or removed by you.
- **Referral data:** If you use our invitation service to invite another user to the Service, we will ask you for that person's email address and automatically send an email invitation. 84codes AB stores the information to send invitation email, to register the other user for the Service if your invitation is accepted, and to track the success of our invitation service. The invited user may contact us to request that we remove this information from our database at [compliance@84codes.com](mailto:compliance@84codes.com).
- **Technical data:** Your login data, browser information, time zone setting and location, operating system and platform, internet protocol (IP) address and other technology on the devices you use to access this website.
- **Marketing data:** Your preferences in receiving marketing-related content.
- **Conference/meet-up data:** includes information about your name and last name, email address, job title, and things like your t-shirt size and if you have any dietary requirements.

Information about other data we may collect about you is declared as follows:

## Cookies Information:

- When you visit the Service, we may send one or more cookies - a small text file containing a string of alphanumeric characters - to your computer that uniquely identifies your browser and lets 84codes AB help you log in faster and enhance your navigation through the site.

- A cookie may also convey anonymous information to us about how you browse the Service.
- A cookie does not collect personal information about you.
- A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the site. Persistent cookies can be removed by following your web browser's directions.
- A session cookie is temporary and disappears after you close your browser.
- You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Service may not function properly if the ability to accept cookies is disabled.

#### **Log File Information:**

- Log file information is automatically reported by your browser each time you access a web page.
- When you use the Service, our servers automatically record certain information that your web browser sends whenever you visit any website.
- These server logs may include information such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, and other such information.

#### **Clear Gifs Information:**

- When you use the Service, we may employ clear gifs (also known as web beacons) which are used to track the online usage patterns of our users anonymously.
- The information is used to enable more accurate reporting, improve the effectiveness of our marketing, and make the Service better for our users.
- No personally identifiable information from your account (created to use the Service) is collected using these clear gifs. In addition, we may also use clear gifs in HTML-based emails sent to our users to track which emails are opened by recipients.

#### **How We Use Your Information**

We use each data category we may collect from you as follows:

- **Account data:** to provide you the possibility to log in to our console, to send you Service-related notices (including any notices required by law), to send you other informational messages, such as newsletters or changes to features of the Service.
- **Billing data:** for invoicing and to fulfill our obligations towards you pursuant to the Terms of Service.
- **Usage data:** to operate, maintain, and provide the features and functionality of the Service, and to analyze how the Service is used, diagnosing service or technical problems.

- **Referral data:** to provide you with the opportunity to invite other users to use your service.
- **Technical Data:** To use data analytics to improve our website, customer relationships and experiences, products, and services.
- **Marketing data:** to provide you with information about things such as promotions etc.
- **Conference/meet-up data:** to register you to our events, and provide you with correct promotional merchandise and food (according to your dietary requirements). Send promotional information if you have opted-in for that.

We use cookies, clear gifs, and log file information to:

- remember information so that you will not have to re-enter it during your visit or the next time you visit the Service;
- provide custom, personalized content and information;
- monitor the effectiveness of our Service;
- monitor aggregate metrics such as activity, traffic, and demographic patterns;
- diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses;
- help you efficiently access your information after you sign in; and
- track Content and users to the extent necessary to comply as a service provider with the Digital Millennium Copyright Act.

84codes AB reserves the right, but has no obligation, to monitor or remove the Content you post on the Service if in our sole opinion such Content violates, or may violate, any applicable law or our Terms of Service, or to protect or defend our rights or property or those of any third party. 84codes AB also reserves the right to remove Content upon the request of any third party.

You have the right to withdraw consent to marketing emails etc. at any time by contacting us at [compliance@84codes.com](mailto:compliance@84codes.com) or opt out from our emails. However, we will still keep the personal data in the other categories of data if we have a business relationship with you (e.g. you're a customer of our service or an attendee of our events).

## **How We Share Your Information with Third-Parties**

### **Personally Identifiable Information:**

84codes AB will not rent or sell your personally identifiable information to others. 84codes AB may share your personally identifiable information with third parties solely for the purpose of providing the Service to you (for instance, to process your credit card transactions). If we do this, we demand that such third parties' use the same security measures as we do according to the section "How We Protect Your Information" below.

In addition to what is stated above, we may share your information with:

- Professional services providers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services. Other services such as email service providers, payment processors, ticket sales providers, and tools for collecting customer satisfaction ratings and feedback.
- Authorities or other third party if required to do so by law or subpoena or if we believe that such action is necessary to:
  - I. conform to the law, comply with legal process served on us or our affiliates, or investigate, prevent, or take action regarding suspected or actual illegal activities;
  - II. to enforce our Terms of Service, take precautions against liability, to investigate and defend ourselves against any third-party claims or allegations, to assist government enforcement agencies, or to protect the security or integrity of our site; and
  - III. to exercise or protect the rights, property, or personal safety of 84codes AB, our users or others.
- Other users, if you use our service to invite others to share your Subscription. We will share the Subscription and associated Content with that user. You can change your Subscription sharing settings at any time in your account page in our console. Any Content that you voluntarily disclose for posting to public areas of the Service becomes available to the public. If you remove information that you posted to the Service, copies may remain viewable in cached and archived pages of the Service, or if other users have copied or saved that information.

### **Non-Personally Identifiable Information:**

We may share non-personally identifiable information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain 84codes AB services.

### **International Transfers**

We have some external third parties, which are based outside the European Economic Area (EEA). This means that their processing of your personal data will involve a transfer of data outside the EEA.

We ensure a similar degree of protection when international processing are made to third-party countries, as if the processing would have taken place in the EEA.

By accepting this Policy, you specifically consent that your personal data may be shared with third parties established in a non-EEA country.

### **How We Store Your Information**

**Please note that the information below about how we store and transfer Personal Data concerns the data of which we are considered the Data Controller. In other words, it concerns the data you enter about your company, such as your company name and address, and email addresses, etc. However, concerning the data of which we are considered the Data Processor (or the Subprocessor, depending on**

**the relationship you have with your customer), and you as our Customer are considered the Data Controller (or the Data Processor, depending on the relationship you have with your customer), you decide for yourself where that data is stored, and we will never transfer it anywhere unless you choose to do so yourself.**

The personal data we collect about you will be processed both within and outside the European Economic Area ("EEA"). In that work, your data will be handled by staff working for both 84codes AB and our partners.

We store personal information in a location outside the direct control of 84codes AB (on servers in the cloud) in the following non-EEA countries:

- USA (at our cloud platform provider, Amazon Web Services, which are being part of the Privacy Shield Framework)

By accepting this Policy, you specifically consent that your personal data is stored in a non-EEA country.

### **How We Protect Your Information**

84codes AB uses commercially reasonable physical, managerial, and technical safeguards to preserve and protect the integrity and security of your personal information and implement your Application sharing settings. These safeguards are defined as Technical and Organizational Measures (TOMS) and specified in section 4 of the Security Policy. However, we cannot warrant the security of any information you transmit to 84codes AB or store on the Service. In case of a Security Incident, we will contact you immediately. As a customer, you are responsible for ensuring that you use the Service in a secure manner.

To protect your privacy and security, we take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information at all times.

### **Retention Period**

Your personal data are only retained for the time period necessary to fulfill our obligations to you, and for the purposes of satisfying any legal, accounting, or reporting requirements.

Following termination or deactivation of your account, 84codes AB may retain your Account data, Content, and Subscription for a period of maximum 6 months for backup, archival, or audit purposes. Furthermore, 84codes AB may retain and continue to use indefinitely all Content contained in your communications to other users or posted to public or semi-public areas of the Service after termination or deactivation of your account.

### **Compromise of Personal Information**

In the event that personal information is compromised as a result of a breach of security, 84codes AB will promptly notify those persons whose personal information has been

compromised, in accordance with the notification procedures set forth in this Privacy Policy, or as otherwise required by applicable law.

### **Your Rights About Your Information**

By agreeing to this Privacy Policy during sign-up, you consent to us using your information in the manner described in this Privacy Policy. You may at any time withdraw your consent. Withdrawal of consent does not affect the lawfulness of the Processing performed before withdrawal of consent.

If you no longer wish that your personal information is used for a specific purpose or you want us to limit a certain part of the processing, you may at any time contact us and inform us about this, for example by sending a message to [compliance@84codes.com](mailto:compliance@84codes.com).

In case you oppose any Processing that is necessary for us to provide the Service to you, we will inform you about this and you will then have the option to terminate your account instead.

You may update or correct your account information and email preferences at any time by logging in to your account for the Service.

In addition to the above stated, you are entitled to request and receive information on our use and Processing of your personal information. If you think any information is incorrect or misleading, please contact us directly and let us know, and we can change or erase the information.

You can review and correct the information about you that 84codes AB keeps on file by contacting us directly at [compliance@84codes.com](mailto:compliance@84codes.com).

### **Children's Privacy**

Protecting the privacy of young children is especially important. For that reason, 84codes AB does not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register as Members. No one under age 13 is allowed to provide any personal information to or on 84codes AB. In the event that we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at [compliance@84codes.com](mailto:compliance@84codes.com).

### **Links to Other Websites**

We are not responsible for the practices employed by websites linked to or from the Service, nor the information or content contained therein. Please remember that when you use a link to go from the Service to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including those that have a link on our website, is subject to that website's own rules and policies. Please read over those rules and policies before proceeding.

### **Notification Procedures**

It is our policy to provide notifications, whether such notifications are required by law or are for marketing or other business related purposes, to you via email notice, written or hard copy notice, or through conspicuous posting of such notice on the Service, as determined by 84codes AB in its sole discretion. We reserve the right to determine the form and means of providing notifications to you, provided that you may opt out of certain means of notification as described in this Privacy Policy.

### **Changes to Our Privacy Policy**

We reserve the right to update and change our Privacy Policy. If we change our privacy policies and procedures, we will post those changes on the Service to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it. Changes to this Privacy Policy are effective when they are posted on this page.

If there are any major changes that are inconsistent with the purpose for which the data was collected, we will ask for a renewed consent.

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this website, please contact us at [compliance@84codes.com](mailto:compliance@84codes.com).