



# Privacy Policy

Effective January 1, 2022

Clathra LLC  
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Middletown, Delaware 19709  
United States of America

# 1 Introduction

This privacy policy (Privacy Policy) sets out the ways in which Clathra may use your personal data.

In this Privacy Policy:

- 'we', 'us' or 'our' means the Clathra organization.
- 'the site' means the Clathra website you are visiting or engaging with; and
- 'you' and 'your' means you, the person engaging with us.

By subscribing to our services, visiting our site, or otherwise interacting with us, we will process your personal data in accordance with this Privacy Policy and applicable data protection and privacy laws.

## 2 Contact & Complaints

You may contact us by email at [privacy@clathra.com](mailto:privacy@clathra.com) for all your requests and complaints.

## 3 Information We May Collect

### 3.1 Information you may give us:

We collect any information you provide us when you complete registration forms, or when you share your details over the phone, email or other communication channels.

### 3.2 Information we may collect:

We collect information contained in any correspondence between you and us via contact forms on websites, and emails or telephone calls.

Through registration forms we may collect: contact details such as name, email address, postal address, and telephone number; educational, nationality and professional information; interests and business information, such as roles and responsibilities; survey information, comments, feedback, posts and any other content submitted; and payment information, such as a credit or debit card number or bank account details where registering for paid events or services.

We collect information about you visiting our website and how you use it. This may include your IP address, geographical location, device information, browser type, referral source, length of visit, operating system, number of page views, which pages you viewed and similar information. This information may be collected by a third-party website analytics service provider on our behalf. We do not use cookies.

We may collect publicly available information including names, job title, employer, telephone, social media, and business email address contact details to allow us to send you information about our goods and services using our legitimate interest to do so pursuant to relevant data protection legislation. You can request to stop receiving such communications at any moment by using the unsubscribe links in the footer of the email or by contacting us directly.

### **3.3 Information we receive from third parties:**

We may collect information about you from third parties that we work closely with for the purposes of delivering to you the services that you request from us.

We may also receive information about you from third parties where you have consented to such third party sharing your information with us.

### **3.4 Sensitive personal data**

If collecting or storing sensitive personal data such as information relating to health, beliefs or political affiliation, we typically ask for your explicit consent.

### **3.5 Children's personal data**

Our products and services are not intended for children under the age of 13 and we do not knowingly collect personal data from this age group. If any information is collected from a child under the age of 13 without verification of parental consent, it will be deleted.

## **4 How We May Use Information About You**

We may use your information for the following purposes, depending on the relationship we have with you. Prior to submitting your personal data to us, we will provide you more specific information where necessary about how we will use your data and link you to this Privacy Policy.

We may further use the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues

- To provide you with news, special offers and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

## **5 Legal Basis for Processing Personal Data**

If you are from the European Economic Area (EEA), our legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

We may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

## **6 Retention of Data**

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## **7 Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data.

## **8 Disclosure of Data**

### **8.1 Business Transaction**

If we are involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

### **8.2 Disclosure for Law Enforcement**

Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

### **8.3 Legal Requirements**

We may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Clathra
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

### **8.4 Security of Data**

The security of your data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## 8.5 “Do Not Track” Signals

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## 9 Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where we relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

## 10 Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## 11 Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

## 12 Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## 13 Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## **14 Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.