

## **Privacy policy - CloudLabs Group of Companies**

We at, CloudLabs Group of companies ("CloudLabs") which includes CloudLabs, Inc. and its affiliate companies, understand that your privacy is important to you. We are committed to respecting your privacy and protecting your personal data, which is any information that can identify you as an individual person. This Privacy Policy describes how we handle and protect your personal data in connection with our business activities, like conferences and events, and client services, and on websites, applications, and communications that post a link to this Privacy Policy, in our capacity as data controllers.

#### Information we collect:

CloudLabs collects personal data during its normal business activities or while performing certain client services. We also collect personal data on certain areas of the sites when you register for or apply for jobs through our website recruitment section, create a user profile, register for CloudLabs newsletters, surveys, etc. The personal data collected varies and may include information that you provide, such as your name, mailing address, e-mail address, telephone number, fax number, and background information required to apply for a job. We may also automatically collect information about the devices you use to interact with our sites. The information we automatically collect may include IP address, device identifier, web browser, and browsing information collected through cookies, web beacons, pixels, clear gifs, and other similar technologies (collectively "Cookies and Other Tracking Technologies") on our sites. We may also automatically collect information about how you use the sites, such as what you have searched for and viewed on the sites. The information automatically collected may be associated with a unique identifier as well as with any other personal data you have provided.

We may also collect personal data about you from third parties, such as data brokers or aggregators, during regular business activities or while performing certain client services. This data includes demographic, professional, and other information that is publicly available online, including information you choose to make public through social media platforms and other public online forums. We may combine this data with the existing information we have about you or use it independently, for the purposes of our benchmarking and data analytics activities (e.g., analysis of recruiting practices across the industry, detecting fraud patterns in connection with financial transactions, foot traffic in retail environments). We will always seek to confirm that the third-party has provided transparent information about its use of this data, including its disclosure to third parties like CloudLabs, in compliance with applicable law.

CloudLabs uses your personal data to fulfill your requests for information, process your requests to participate in conferences and events, personalize the content that you view or receive on our website, evaluate and improve our services, distribute newsletters and alerts to you, recruit and evaluate job applicants, analyze the sites' performance and functioning, publish your letters to an editor or comments, prevent fraud, enforce our terms of use, comply with all applicable laws and corporate reporting obligations, enforce CloudLabs' agreements, and accomplish other purposes you may initiate or request. In some situations, the collection of personal data may be required for the operation of the sites, or we may use it during our regular business activities, including those that are in connection with providing certain client services, for example, our benchmarking products. We may combine and/or analyze personal data to evaluate and offer content and services most relevant to you. We may keep any of your personal data on file and use it to contact you.

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CloudLabs and its service providers may use first and third-party cookies and other tracking technologies, including web beacons, to manage our sites and our services and collect analytics about how you use them. CloudLabs and its service providers may collect information about whether you open or click any links in the knowledge, research, or event communications that we send to you. The information provided throughout this Privacy Policy about cookies also applies to these other tracking technologies. Please refer to our cookie settings for more details regarding our use of cookies and other tracking technologies.

Our sites do not track you by collecting personal data about your other online activities over time and across third-party websites or online services. Accordingly, we do not alter our data collection and use practices in response to "do not track" signals transmitted from web browsers.

Our processing of your personal data for the purposes mentioned above is based:

- in part, on our legitimate interests in promoting and protecting CloudLabs, building and maintaining relationships. recruitment, and providing our services.
- in part, on your consent, for example, if you create a user profile, register for our newsletters or alerts, or for business purposes that support web operations such as understanding and enhancing the quality of your experience on our websites.
- in part, to comply with the law, when certain information is necessary to comply with any legal or regulatory obligations.

### Disclosure of personal data: data recipients and international data transfers:

Personal data collected in the course of our business activities, including in connection with certain client services, as well as on the sites may be transferred from time to time to CloudLabs subsidiaries and affiliates and their personnel across our global organization, as well as to our third-party service providers located throughout the world, including in countries where the local law may grant you fewer rights than you have in your own country. Additionally, the sites may be viewed and hosted by CloudLabs and our third-party service providers anywhere in the world. Where required by law, we have put in place legal mechanisms designed to ensure adequate data protection of your personal data that is processed by our subsidiaries, affiliates, and third-party service providers, including the transfer of your personal data to countries other than the one in which you reside. If you would like more information about these legal mechanisms, which may include the EU's Standard Contractual Clauses, please contact us by clicking this link. By using any of the sites and providing information on any of them, you voluntarily consent to the transborder transfer and hosting of such information.

CloudLabs will not intentionally disclose or transfer (and will take reasonable steps to prevent the unauthorized or accidental disclosure of) your personal data to third parties without your consent or as otherwise permitted by law, whether for such third parties' own marketing purposes or otherwise, except as follows. CloudLabs may provide access to your personal data to third-party service providers engaged by CloudLabs to provide services related to the sites as well as other services in the normal course of business for CloudLabs including certain client services, in the manner agreed upon in our client services agreements. We maintain processes designed to ensure that any processing of personal data by third-party service providers is consistent with this Privacy Policy and protects the confidentiality, availability, and integrity of your personal data.

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We also may share your personal data with third-party service providers who perform services and functions on our behalf to support our interactions with you, including, for example, processing recruitment materials, administering surveys or contests, or communicating with you. In addition, we may disclose information about you:

- If we are required to do so by law or legal process.
- To law enforcement authorities or other government officials.
- When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity.
- If disclosure is necessary to protect the vital interests of the company.
- To enforce our Terms of use.
- To protect our property, services, and legal rights.
- To prevent fraud against CloudLabs, our subsidiaries, affiliates, and/or business partners.
- To support auditing, compliance, and corporate governance functions; or
- To comply with all applicable laws and regulations.

In addition, we may disclose or transfer your personal data in the event of a reorganization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

### **User forums**

You should be aware that whenever you publicly disclose information online, that information could be collected and used by others. CloudLabs is not responsible for any action or policies of any third parties who collect information that users publicly disclose in any such forums on the sites.

#### Link to third-party sites

CloudLabs may provide links to third-party websites or information as a service to our users. If you use these links, you will leave the CloudLabs website. Such links do not constitute or imply an endorsement, sponsorship, or recommendation by CloudLabs of the third-party, the third-party website, or the information contained therein, and CloudLabs shall not be responsible or liable for your use thereof. Such use shall be subject to the terms of use and privacy policies applicable to those sites.

#### Social Networking

The sites may allow you to sign into and associate your social network accounts including, but not limited to, Twitter, LinkedIn, Facebook, and YouTube, with CloudLabs. The sites also may allow you to log in to a CloudLabs account using certain social network account credentials. By associating your social network account with CloudLabs or logging in to a CloudLabs account using your social network account credentials, you give us permission to access information that you have made available in your public profile for that social network account. The information available in your public profile varies based on the social network and your settings but may include your email address, real name, profile picture, gender, and location. We may use the information we receive from your social network account in accordance with the social network's terms of use and this Privacy Policy. Please refer to the privacy settings in your social network account for information about what data will be shared with CloudLabs and other connected applications and to manage the data that is shared through your account, including information about your activities using our sites. If you would like to disconnect a social media account from us, refer to the settings of that social network account and its provider.



# Security

CloudLabs has implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, alteration, or destruction. Only authorized CloudLabs personnel and contracted third-party service providers are provided access to personal data, and these employees and service providers are required to treat this information as confidential. Despite these precautions, however, CloudLabs cannot guarantee that unauthorized persons will not obtain access to your personal data.

#### Data retention

CloudLabs retains personal data, as necessary, for the duration of the relevant business relationship. We may also retain personal data for longer than the duration of the business relationship should we need to retain it to protect ourselves against legal claims, use it for analysis or historical record-keeping, or comply with our information management policies and schedules. If you request that we delete your personal data, CloudLabs will make reasonable attempts to delete all instances of the information in its entirety. For any access, corrections, or deletion requests, please feel free to contact us by clicking <a href="here.">here.</a>