

# **Cloud Artisans Ltd Privacy Policy**

## **Summary of Privacy Notice**

Cloud Artisans will make every effort to protect the personal information that you provide us and are committed to respecting your right to privacy. By personal information we mean your name, contact details and any other information you give us.

- Our services are not designed for use by those aged under 16. You must have parent, guardian or carer permission to use our services & register any personal information with us.
- Please keep your personal details accurate and up-to-date in your cahost.co.uk account
- We only collect personal information from you when you register with us or enter in to a contract for services
- We do not sell your personal details on. We may share this information only with organisations we hire to run our services, or where we are required to do so by law.
- We do not use 'remarketing' and do not promote adverts to you elsewhere on the internet based on how you use our site.
- We may contact you occasionally for monitoring, evaluation, or marketing purposes but you can control whether to receive mass email communications in your online services account.
- We use cookies - little bits of computer code that help personalise your experience of the website. They do not give us access to your computer or personal details but we do use them to associate your IP address / login for the purposes of security, website monitoring and analysis.
- This Privacy Policy forms part of our Terms of Service and covers all our websites including but not limited to cloudartisans.co.uk, cahost.co.uk and cloudtele.co.uk and your communication with our presence on third party websites such as facebook.com or twitter.com, called "the Websites". It also covers all contracts for services we hold with you unless there is an agreed written contract with differing terms – that contract will take priority in the event of any differences.
- It describes how Cloud Artisans LTD ("we", "us" or "our") collects, protects and uses the personal information we collect on our Websites and to deliver our contracts. The data controller for the Websites is Cloud Artisans Ltd who can be contacted on [support@cloudartisans.co.uk](mailto:support@cloudartisans.co.uk).

You can also find out about controlling your cookies at <http://www.youronlinechoices.com/uk/>.

If you have any requests concerning your personal information or any queries as to how we use your personal information please contact us.

# The Privacy Notice

This is privacy notice by Cloud Artisans LTD covering all communication users & customers may have with us through our websites (cloudartisans.co.uk, cahost.co.uk & cloudtele.co.uk) and social media channels on which we operate. It also covers all customers, suppliers & clients who engage with us on a contract.

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to let you know how we look after your personal data. We'll also tell you about your privacy rights and how the data protection laws protect you.

Our privacy notice is provided in sections as below. We may update this notice from time to time and we will let you know any significant changes through notifications on our site.

- 1. WHO WE ARE AND IMPORTANT INFORMATION**
- 2. THE PERSONAL DATA WE COLLECT ABOUT YOU**
- 3. HOW WE COLLECT YOUR PERSONAL DATA**
- 4. HOW WE USE YOUR PERSONAL DATA**
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## **1. WHO WE ARE AND IMPORTANT INFORMATION**

### **What is the purpose of this privacy notice?**

This privacy notice aims to give you information on how we collect and process your personal data through your use of any of our websites, including any data you may provide when you register for an account, or interact with us.

Our services & websites are not intended for children and we require that anyone under the age of 16 gain consent to register on the website from their parent, carer or guardian who has had the opportunity to read and understand our privacy policies and the terms and conditions of use. If you register with us and are under 16, you confirm that you have gained this consent.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## Data controller

Cloud Artisans LTD is the controller and responsible for your personal data (collectively referred to as "COMPANY", "we", "us" or "our" in this privacy notice). Our contact details are [support@cloudartisans.co.uk](mailto:support@cloudartisans.co.uk) or you can write to us at Cloud Artisans Ltd, Suite 1934, 109 Vernon House, Friar Lane, Nottingham, NG1 6DQ.

## Third-party links outside our control

This website and emails we send you may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our websites, we encourage you to read the privacy notice of every website you visit.

## 2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes the personal characteristics, name, and information submitted to us on our user registration / profile page.
- **Contact Data** includes email addresses and any postal or contact telephone numbers you provide us when registering with us or making contact in any mode (such as email, phone call or tweets).
- **Usage Data** includes information about the pages you visit on our website and the platforms you came from to our website.
- **Financial Data** includes your bank account or payment method information ONLY when you make payments to us or request that we make a payment to you.

We also collect, use and share **aggregated data** such as statistical or demographic data for any purpose. 'Aggregated data' may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you on our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you work for us we may ask you to volunteer this information at your will and we will store and process this data on a separate system to our customer facing website, using strict internal procedures. Financial data you provide to allow us to pay you is also treated with the strictest of privacy and is again subject to our internal procedures.

### **If you fail to provide personal data**

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with web development services). In this case, we may have to cancel the contract but we will notify you if this is the case at the time. We do require enough information to

ensure that we are working with a reputable entity and can serve any court summons or requests for payments not made where necessary.

### 3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you. These methods include:

- **Directly.** You may give us your Identity or Contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Create an account on our website
  - Request information about our services
  - Register for any of our further services.
- **Directly within a financial transaction.** When you send us your details to make payments, or you make a payment to us.
- **Indirectly.** When you log in to our websites we may record the pages visited (please note we ONLY track usage on our own websites and do not follow you to other platforms or sites).

### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **To enable you to use our websites.** We require you to log in to some websites to manage your account. We also collect your email address to enable you to receive system notifications from our websites. We also use Cookies and IP addresses to keep you logged in, to help keep the site secure, enable you to perform searches on the site and help us to identify any functional problems.
- **To send you information** about maintenance, system information, migrations or password resets. You can opt in to further communications from us beyond the standard system notifications above. You can always unsubscribe from our emails or opt out of them at any time in your user profile.
- **Performance of Contract** which means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract (for example, you've requested we build a website or provide a VoIP telephone system).
- **Legitimate Interest** which means our interest in conducting and managing our business to enable us to give you the best service and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Please contact us if you would like further information about how we assess our legitimate interests against any potential impact on you.
- **To comply with a legal or regulatory obligation** This means processing your personal data where it is necessary for us to comply with a legal or regulatory obligation that we are subject to.

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal basis we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing data and useful information
To register you for using our websites & online service portals	(a) Identity (b) Contact	Consent given when you actively register. You can request deletion of your account or modify any data at any time by contacting us or using available self-serve options.
To monitor the performance of our websites and analyse how they are used	(a) Usage	Performance of our contracts.
To send information about upcoming maintenance, greetings or offers.	(a) Contact	Consent given on registration and/or in your user profile. You can withdraw consent anytime.
To communicate with you about any queries you send us – via email, phone or any other method	(a) Contact	Legitimate Interest. In order for us to reply to you we must know how to communicate with you. This information may be stored with our service providers for email, telephone and similar services. We can delete this information when requested to do so if you tell us what data you want removed.
To process financial transactions	(a) Financial (b) Contact (c) Identity	Performance of a contract – for us to receive a payment from you or make a payment to you. This data will typically be held for the purpose of auditing and legal compliance.
Verifying your access to discounts through partners	a) Identity	Legitimate Interest. We may check your identity data with partners from whom you're claiming a collective discount.
To operate our website efficiently and enable you to use it	(a) Usage	Consent. To enable our website to operate and for us to keep it secure we use certain cookies and monitoring of IP addresses.

### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may send you email communications about our opportunities and offers.

### Third Party Data Sharing

We never sell your personal data or provide access to a third party for their own purposes. Third parties may have access to data only where they are under contract with us to provide a service for us, and they may not use it for any other purpose. For example, some of our suppliers currently include:

Who	Why / What data
Stripe Payments Europe Ltd & GoCardless Ltd	To process payments you make to us for services. Financial data is stored with them on PCI compliant servers.
Stablepoint Ltd	All information stored on the websites is hosted on servers run by Stablepoint Ltd who will not contact you directly.
Google Inc, Wildbit LLC and Helpmonks LLC	Emails you send us and we send you may be stored and processed by our email inbox & transactional service providers.
Google Inc, Dropbox Inc, Evernote Corporation, & Slack Technologies Limited	Storage of our project files and data which enables us to run our organisation and provide our services.
Atech Media Ltd & group companies like Dial 9 Ltd	Data which enables us to deliver our services for you including server deployments, VoIP telephone services and project management.
Nominet Group & Enom LLC	We must register your identity & contact data with those responsible for managing domain names. For UK domains we register directly with the UK Registry – Nominet. For all other domains we register with Enom LLC.
Google Inc	If you request any services through us with Google – Gsuite or Adwords for example. We need to register your identity & contact data with them. You are opting to using their services.
Google Inc, Functional Software Inc, Cloud Flare Inc & Solarwinds LLC	Usage data only. Our website & service monitoring providers will collect data including using Cookies and through IP addresses.

We will tell you explicitly if we need to pass any other data to another third party for processing in order to perform a contract we may have with you.

### Opting out

You can ask us to stop sending you marketing messages at any time by unchecking the box in your user profile.

Where you opt out of receiving these marketing messages, this will not apply to the personal data you have provided us for managing your account and financial transactions – any purposes for which we might need to hold your data to comply with the law, keep you safe or fulfil a contract for any service you have with us.

### Cookies

A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. You can find out more about the use of cookies on <http://www.allaboutcookies.org/>. We use cookies to identify you when you visit the Websites and to keep track of your browsing patterns and build up a demographic profile. We also use cookies to analyse who has seen which of the pages on the Websites and to determine the most popular areas of the Websites so that we can improve and develop them.

Our use of cookies also means that we can give registered users a personalised version of the Websites and access to information about their account.

No personal information is stored in the cookie that is issued by the site. The value stored in the cookie is an anonymous identifier, which is not linked to any other personal information you may give us during your visit.

If you do not wish to receive these cookies you can disable them in your browser, though doing so may affect the functionality of our website. Please refer to your browser instructions or help screen to learn more about how to do this. However, should you decide to disable any cookies we place on your computer you may not be able to use certain services or facilities on the Websites.

You can also find out more about controlling your cookies at <http://www.youronlinechoices.com/uk/>.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how we may process data for a new purpose that is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will contact you and explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. WHO WE SHARE YOUR PERSONAL DATA WITH**

We may have to share your personal data with the parties set out below as outlined in section 4 above.

- Suppliers to us in managing our websites and services as identified in section 4 above.
- Other third parties may access your data when working with us in these circumstances:
  - Providers acting as processors in an administrative and IT capacity which may change from time to time. We have contracts with everyone and have identified their privacy policies in an internal audit undertaken in May 2018.
  - Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK who provide services that allow us to comply with our legal duties, especially those in relation to our accounting and banking provision.
  - HM Revenue and Customs, regulators and other authorities acting as processors based in the United Kingdom (or who comply with UK privacy laws) who require reporting of processing activities in certain circumstances.
  - To provide you with an emergency service. For all customers of our VoIP products it is required that numbers have an associated physical location in the event of a call being made to the Emergency Services – although please be aware that remote users of the service may not have the correct location sent.
- Third parties to whom we may choose to sell, transfer, or merge parts of our operations or our assets. Alternatively, we may seek to acquire other organisations or merge with them. If a change happens to our organisation, then the new controllers may use your personal data in the same way as set out in this privacy notice and will inform you of such a change.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL TRANSFERS

Some of our providers are based outside of Europe. All suppliers are subject to the conditions we've specified in section 5 and we have undertaken a full audit to identify the location of suppliers and ensure they have the appropriate and compliant mechanisms in place for handling the data we store with them.

## 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To decide the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers who engage with us in financial transactions for the period specified by the UK tax authorities. We must also keep a record of certain details provided on registration forms for ownership / licence purposes for our products & services sold by us or whilst acting as agents selling the products & services of another organisation.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information. This includes information you share in your user profile.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate or out of date
- The right to request that your personal data is erased where it is no longer necessary to retain such data
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller (known as 'the right to data portability'), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests or in performance of a task in the public interest/exercise of official authority; direct marketing or processing for the purposes of scientific/historical research and statistics).



If you wish to exercise any of the rights set out above, please contact us.

### **No fee required – with some exceptions**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version of the privacy notice was last updated on 8<sup>th</sup> October 2021. We recommend that you save a copy from the day you have read and agreed to this policy.

We may update this policy from time to time, especially where specified data processors change or we collect new or other information. Updates will be made to this policy and you can check the notice date here. We will post on our knowledgebase or website any changes which materially affect our relationship with you and how we treat or process your data.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

## **11. QUERIES, REQUESTS OR CONCERNS – HOW TO CONTACT US**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact us on [support@cloudartisans.co.uk](mailto:support@cloudartisans.co.uk) or by post at Cloud Artisans Ltd, Suite 1934, 109 Vernon House, Friar Lane, Nottingham, NG1 6DQ. The person responsible for data protection is Emrys Green.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.