

Privacy Policy

Last Updated: February 14th, 2018

CloudCapital provides a marketing platform that allows clients to reach their customers, to understand how their customers interact with those communications and other content, and to customize marketing based on their customers' interests. This Privacy Policy explains how CloudCapital collects, uses, and discloses information from its clients and business contacts when they use our website and other online products and services (collectively, the "Services") or when they otherwise interact with us. This policy does not apply to the information that our clients import into our Services, such as the email addresses of their customers. For information about our practices with respect to handling our information imported into the Services by our clients, please consult our terms of service.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you an email notification). We encourage you to review the Privacy Policy whenever you access the Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy.

Collection of Information

Information You Provide to Us

We collect information you provide directly to us. For example, we collect information when you create an account, participate in any interactive features of the Services, fill out a form, interact with message board, apply for a job, request customer support, or otherwise communicate with us. The types of information we may collect include your name, email address, postal address, phone number, and any other information you choose to provide. We or a designated third party may collect payment and credit card information when you subscribe to our paid Services or purchase additional services.

Information We Collect Automatically When You Use the Services

When you access or use our Services, we automatically collect information about you, including:

- **Log Information:** We log information about your use of the Services, including the type of browser you use, access times, pages viewed, your IP address, your general location, and the page you visited before navigating to our Services.
- **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers and mobile network information.
- **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers use various technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see "Your Choices" below.

Integrations with Other Services

You may have the option of integrating our Services with other services, technologies or platforms on your desktop, permitted websites and/or your mobile phone. For example, we may offer you widgets that have countdowns to various launches. These integrations may require you to input personal information or access or use personal information. These integrations may (i) check for updates automatically and transmit your information to their server and/or engine; (ii) send information entered into or accessed by the technology to its server and/or engine; and (iii) be visible to the public if embedded on publicly available webpages (such as social networking webpages), depending on the policies of that website.

Information We Collect From Other Sources

We may also obtain information from other sources and combine that with information we collect through our Services. For example, we may collect information about you from third parties, including but not limited to social media sites, identity verification services, credit bureaus, mailing list providers and publicly available sources.

Use of Information

We may use information about you for various purposes, including to:

- Provide, maintain, customize, and improve our Services;
- Provide and deliver the products and services you request, process transactions and send you related information, including confirmations and invoices,
- Send you technical notices, updates, security alerts and support and administrative messages;
- Respond to your comments, questions and requests and provide customer service;
- Communicate with you about products, services, offers, promotions, rewards, and events offered by CloudCapital and others, and provide news and information we think will be of interest to you;
- Monitor and analyze trends, usage and activities in connection with our Services; and
- Carry out any other purpose for which the information was collected.

CloudCapital is based in the United States and the information we collect is governed by U.S. law. By being an CloudCapital customer and otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries.

Sharing of Information

We may share information about you as follows or as otherwise described in this Privacy Policy:

- With vendors, consultants and other service providers who need access to such information to carry out work on our behalf;
- In response to a request for information if we believe disclosure is in accordance with any applicable law, regulation, or legal process, or as otherwise required by any applicable law, rule or regulation;
- If we believe your actions are inconsistent with the spirit or language of our user agreements or policies, or to protect the rights, property and safety of CloudCapital or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company; and
- With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

Data Retention

The time periods for which we retain your personal information will depend on the purposes for which we use it. We will retain your personal information for so long as is necessary to provide the Services, unless applicable law requires we either dispose of it or keep it longer. We may also continue to store your personal information to allow us to resolve disputes, enforce our agreements, comply with legal obligations and/or for other legally permissible purposes consistent with this Privacy Policy.

Advertising and Analytics Services Provided by Others

We may allow others to serve advertisements on our behalf across the Internet and to provide analytics services. These entities may use cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by CloudCapital and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices.

Access

You can view and update the personal information associated with your account at any time by logging into your account. If you need assistance accessing or modifying your personal information or wish to delete your personal information, please email us at martinbartels@cloudcapital.it

Security

CloudCapital takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

EU-US Privacy Shield

In connection with CloudCapital's processing of personal data it receives from the EU ("EU Data"), CloudCapital adheres to the EU-U.S. Privacy Shield Framework Principles issued by the U.S. Department of Commerce (the "Principles"). For more information about the Principles, please visit the Department of Commerce's [Privacy Shield website](https://www.privacyshield.gov).

Please direct any inquiries or complaints regarding our compliance with the Principles to the point of contact listed in the "Contact Us" section below. If we do not resolve your complaint, you may submit your complaint free of charge to JAMS using this link: <https://www.jamsadr.com/eu-us-privacy-shield>, ActiveCampaign's designated Privacy Shield dispute resolution provider. Under certain conditions specified by the Principles, you may also be able to invoke binding arbitration to resolve your complaint. ActiveCampaign is subject to the investigatory and enforcement powers of the FTC. If ActiveCampaign shares EU data with a third-party service provider that processes the data solely on ActiveCampaign's behalf, then Company will be liable for that third party's processing of EU Data in violation of the Principles, unless can prove that it is not responsible for the event giving rise to the damage.

Contact Us

If you have any questions about this Privacy Policy, please contact us at:
martinbartels@cloudcapital.it