

# Privacy Policy

Effective Date: Jan-26-2018



This Privacy Policy describes the policies and procedures of Xpanso Technologies Pvt. Ltd. and its affiliates ("**Xpanso**", "**CloudOptimo**", "**We**", "**Our**" or "**Us**") on the collection, use and disclosure of your information, including any Personal Information (as below), on [www.cloudoptimo.com](http://www.cloudoptimo.com) (the "**Website**") and the services, features, content or applications we offer to users of our Website (collectively with the Website, the "**Services**") This Privacy Policy, which is incorporated into and subject to the Xpanso Terms of Service, does not apply to information our Subscribers or customers may collect about individuals when using our Website, our Services, or any other functionality, product, or service offered by CloudOptimo.

We may collect and receive information about users of our Website and/or Services ("**Users**", "**You**" or "**Your**") from various sources, including: (i) through Your user account on the Services (your "**Account**") if You register for the Website and the Services; (ii) Your use of the Services and (iii) from third party websites and services such as through one of Our referral programs or reselling partners, or sign in to one of Our products through an authentication service provider who passes Your credentials to Us. When You access or use the Services, You are consenting to the collection, transfer, management, arrangement, storage, transmission, processing, disclosure and other uses of Your information, including any Personal Information (as defined hereinafter), as set out in this Privacy Policy.

Please read this Privacy Policy carefully. Should You have any questions about this Privacy Policy or CloudOptimo's data collection, use and disclosure practices, please contact Us as set forth below.

## What Does This Privacy Policy Cover?

This Website is hosted by Xpanso Technologies Pvt. Ltd., a company registered under the applicable laws of India. This Privacy Policy explains Our practices for gathering and disseminating information We collect when You visit Our Website and associated web pages or avail Our Services after subscribing the same.

This Privacy Policy also covers Our treatment of any Personal Information that Our business partners share with Us or that We share with Our business partners. You can navigate the majority of the website without giving Us any Personal Information about yourself. However, we may track the technical information (see "Information Collected Using Cookies" below) provided to Us by your browsing the Website to improve the navigation, content and design of Our Website.

This Privacy Policy does not apply to the privacy practices of third parties that we do not own or control, including but not limited to any third party websites, services, applications, online resources to which this Website may link, frame or otherwise reference (collectively "Third Party Services") that You may access through the Services. We take no responsibility for the content or privacy practices of those Third Party Services. We encourage You to carefully review the privacy policies of any Third Party Services You access.

## What Information Do We Collect And Why?



We collect the following information from You:

- (a) When You visit Our Website, use Our Services, We automatically log some basic information such as how You got to the Website, where You navigated within it, and what features and settings You use. We use this information to improve Our Website and Services and to drive new product development;
- (b) home address, billing address, or other physical address email address, phone number (so we may contact You);
- (c) Aadhar number (if required); date of birth;
- (d) certain information about Your computer or other device that You use to access the Website, including IP address ("IP"), geolocation information, unique device identifiers, browser type, browser language, and other transactional information; or
- (e) log certain information about Your use of the Website(e.g., log files, clickstream data, a reading history of the pages You view, Your search terms and search results) and additional traffic data (e.g., time of access, date of access, software crash reports, session identification number, access times), and in more details described herein below.

(collectively "**Personal Information**")

You may voluntarily provide additional information about Yourself to enable Us to provide the information or Services You are requesting. We store, processes, transmit the Personal Information You provide in order to provide You with the information or Services You request. Such information, with the exception of any Personal Information, is typically stored for the lifetime of the database unless You request that it be removed. The information You provide Us about yourself will be shared with Our employees or contractors to the extent necessary to accommodate your request. We will obtain your consent in order for Us to share your Personal Information with third parties in a manner that is not permitted under the terms of this Privacy Policy. Unless otherwise described below, we will not use Personal Information provided to Us online for purposes other than those You have requested without also providing You an opportunity to agree to or otherwise limit such uses.

We may collect the following types of information from Our users, some of which will be Personal Information and some of which will not be Personal Information.

#### User Content and Account Information:

Some features of the Services may allow You to provide content to the Services that is not Personal Information. All such content submitted by You to the Services may be retained by Us as long as necessary according to the applicable law, even after You terminate Your Account. We may continue to disclose such content to third parties in an anonymized manner that does not reveal Personal Information, as described in this Privacy Policy.

As part of your Account information, CloudOptimo collects and stores information, including the full name, company name, billing address, email address, IP address, landing page, and referring URL, for all users upon registration and use of the Services. You acknowledge that this information may be personal to You, and by creating an Account on the Services and providing Personal Information to Us, You allow Us, Our affiliates, Our service providers and Our contractors to identify You and, therefore, Your use of the Services may not be anonymous.



We may use of collected information for, including without limitation, for following purpose:

1. To communicate with You (such as through email) about the Services that You have subscribed to and signed up for, changes to the Terms of Service, or important notices, if any required, and for billing purpose;
2. To keep You posted on new products and services, upcoming events, offers, promotions and other information that We think will be of interest to You;
3. To ask You to participate in surveys, or to solicit feedback on Our services;
4. To set up and maintain Your account, and to do all other things required for providing Our Services; and to provide customer support, and to analyze and improve our interactions with customers;
5. To understand how users use Our services, to monitor and prevent problems, and to improve Our services;
6. Fraud Detection,
7. Customer analytics, to analyze trends, administer Our Websites, and track visitor navigations on Our Websites to understand what visitors are looking for and to better help them;
8. Marketing, including for the purpose to monitor and improve marketing campaigns and make suggestions relevant to the user.

CloudOptimo may process or store Your Personal Information outside the jurisdiction in which You reside and, if it does so, Your Personal Information will be governed by the privacy laws of the jurisdiction in which it is processed or stored and government and law enforcement agencies of that jurisdiction may be able to access such Personal Information without Your consent. =Wherever We are required to transfer Your Personal Information, regardless of where this occurs, We will strive to take steps to ensure that Your information is treated securely and in accordance with this Privacy Policy. Please note that Your submission of information or use of Our Services will be deemed by Us to signify explicit consent on Your part to such transfer of information to any part of the world, as long as We adhere to the applicable law.

#### Email Communications:

In addition to any information You convey in emails to Us, We may also receive a confirmation when You open an email from Us. We collect and use this information to improve Our customer Service.

#### Financial Information:

We use third party payment processing companies ("**Payment Processors**") who collect and store financial information, such as Your payment method (valid credit card number, type, expiration date or other financial information), and their use and storage of that information is governed by the Payment Processors' applicable terms of service and privacy policy. Collected billing information is used for the purposes of processing billing payments and fraud detection.

#### IP Address Information and Other Information Collected Automatically:

We may automatically receive and record information from Your web browser when You interact with the Services, including your IP address. An IP address is a number assigned to You by Your internet service provider so You can access the Internet. We receive IP addresses in the normal course of the



operation of Our Website. We may automatically collect and record information about Your use of features of Our Services, about the functionality of Our Services, and other information related to Your interactions with the Services. We use the information We automatically collect and record to analyze trends, to administer, monitor and improve the Website and Services, to track users' use of the Website and Services, and to gather broad demographic information for aggregate use. We do not use IP addresses to identify You personally or disclose them to others. This information is used for fighting spam/malware and also to facilitate collection of data concerning your interaction with the Services (e.g., what links You have clicked on).

Generally, the Services may automatically collect usage information, such as the number and frequency of visitors to the Website. We may use this data in aggregate form, that is, as a statistical measure, but not in a manner that would identify You personally. This type of aggregate data enables Us and third parties authorized by Us to figure out how often individuals use parts of the Services so that We can analyze and improve them.

#### Information Collected Using Cookies:

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. To collect this information, when You visit Our Website, a "cookie" may be set on Your computer. Cookies contain a small amount of information that allows Our web servers to recognize You whenever You visit. We store information that We collect through cookies, log files and/or clear gifs to create "settings" regarding your preferences.

We use cookie information to analyze trends, administer the website, track users' movements and gather demographic information for aggregate use. CloudOptimo also may use cookies to enable Our servers to recognize Your web browser and tell Us how and when You visit the Website and otherwise use the Services through the Internet.

CloudOptimo also uses Google Analytics, an analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to collect non-identifying information, which may be transmitted to and stored by Google on servers in the United States. Google provides some additional privacy options described at <http://www.google.com/policies/privacy/partners/> regarding Google Analytics cookies.

Many browsers have an option for disabling cookies, which may prevent your browser from accepting new cookies or enable selective use of cookies. A user who does not accept cookies from Our Website may not be able to access certain areas of the Website.

#### Information Related to Advertising:

To support and enhance the Services, we may serve advertisements, and also allow third parties advertisements, through the Services. These advertisements are sometimes targeted and served to particular users. CloudOptimo may partner with third parties to display advertisements targeted to visitors of the Services. To do so, CloudOptimo stores a cookie for visitors for the purpose of displaying advertising.



### Aggregate Information:

We may collect statistical information about how users use the Services ("**Aggregate Information**"). Some of this information may be derived from Personal Information. This statistical information is not Personal Information.

### Children's Privacy:

Protecting the privacy of children is especially important. For that reason, we do not collect or maintain information at Our Website from those We know are under 18 years of age, and Our Website is a general audience of the Website not intended for users under the age of 18.

## How, and With Whom, Is My Information Shared?

### Summary of Information Sharing:

Except as described in this Privacy Policy, CloudOptimo will not transfer, transmit, sell, or rent individual Personal Information with anyone except in accordance with the applicable laws of India.

Information submitted to Us is only available and utilized by Our employees and systems responsible for providing services to Our customers and to contracted service providers for the purposes of providing Services relating to Our communications with You.

CloudOptimo may share Your information with contracted service providers if sharing Your information is necessary to provide a Service You have requested, as part of a joint sales promotion or to pass sales leads to one of Our distribution partners, or to keep You up-to-date on product announcements, software updates, special offers or other information. If Your information is shared with third parties, We will strive to only provide the information they need to deliver the Service. We will aim to restrict these companies from using Your information for any other purpose, and You may choose not to have Your information given to such a third party.

CloudOptimo's employees and contracted service providers have been trained to handle such data properly and in accordance with Our security protocols and strict standards of confidentiality. Although We cannot guarantee against any loss, misuse, unauthorized disclosure, alteration or destruction of data, we take reasonable precautions to prevent such unfortunate occurrences.

We will not otherwise use or disclose any of Your Personal Information, except as described in this Privacy Policy, including, to the extent reasonably necessary: to correct technical problems and malfunctions and to technically process Your information; to protect the security and integrity of Our Website; to protect Our rights and property and the rights and property of others; to take precautions against liability; to the extent required by law or to respond to judicial process; or to the extent permitted under other provisions of law, or to effectuate the sale, merger, bankruptcy, or similar disposition of CloudOptimo or its assets. CloudOptimo also may be required to disclose Your Personal Information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.



### Public Information About Your Activity on the Services:

Some of Your activity on and through the Services may be public, such as content You post publicly on the Website or otherwise through the Services. By posting such information on the Website, You agree that it may be viewed and used by other users or otherwise. Please also remember that if You choose to provide Personal Information using certain public features of the Services, then that information is governed by the privacy settings of those particular features and may be publicly available. Individuals reading such information may use or disclose it to other individuals or entities without Our control and without Your knowledge, and search engines may index that information.

### IP Address Information:

While We may collect and store IP address information, We do not make that information public. We may at times, however, share this information with Our partners and service providers for the purposes and as specified in this Privacy Policy.

### Information You Elect to Share:

You may access other Third Party Services through the Services, for example by clicking on links to those Third Party Services from within the Website. We are not responsible for the privacy policies and/or practices of these Third Party Services, and You are responsible for reading and understanding those Third Party Services' privacy policies. This Privacy Policy only governs Your Personal Information and other information collected on the Services.

### Aggregate Information:

We may share Aggregate Information with Our partners, service providers and other persons with whom We conduct business. We share this type of statistical data so that Our partners can understand how and how often people use Our Services and their services or websites, which facilitates improving both their services and how Our Services interface with them. In addition, these third parties may share with Us non-private, aggregated or otherwise non Personal Information about You that they have independently developed or acquired.

### Email Communications with Us:

CloudOptimo may send occasional promotional materials to You via email. We try to respect your time and attention by controlling the frequency of Our mailings. Each email sent contains an easy way for You to cease receiving email from Us. If You wish to do this, simply follow the instructions found at the end of any email. If You have received unwanted, unsolicited email sent via this system or purporting to be sent via this system, please forward a copy of that email with your comments to [contact@cloudoptimo.com](mailto:contact@cloudoptimo.com). Regardless, we reserve the right to contact You for informational or account-related purposes when we believe it is necessary.

### Access to Payment Processor Information:

As stated above, we use Payment Processors to collect and store financial information. However, we may from time to time request and receive some of your financial information from Our Payment



Processors for the purposes of completing transactions You have initiated through the Services, protecting against or identifying possible fraudulent transactions, and otherwise as needed to manage Our business.

#### Information Shared with Our Service Providers:

We employ and contract with people and other entities that perform certain tasks on Our behalf (Our "**Service Providers**"). We may need to share Personal Information with Our Service Providers in order to provide products or services to You. Our Service Providers do not have any right to use Personal Information or other information we share with them beyond what is necessary to assist Us in order to provide the products or services requested by You.

#### Information Disclosed Pursuant to Business Transfers:

Information about Our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of Our business assets. You acknowledge that such transfers may occur, and that any acquirer of Us or Our assets may continue to use your Personal Information as set forth in this Privacy Policy.

#### Information Disclosed for Our Protection and the Protection of Others:

We also reserve the right to access, read, preserve, and disclose any information as we reasonably believe is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request, (ii) enforce this Privacy Policy and Our Terms of Service, including investigation of potential violations hereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, (iv) respond to user support requests, or (v) protect Our rights, property or safety, Our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

#### Information We Share With Your Consent:

Except for data sharing described in this Privacy Policy, You will be notified when your Personal Information may be shared with third parties, and will be able to refuse the sharing of such information.

#### Is Information About Me Secure?

CloudOptimo is committed to protecting Personal Information. To do so we employ a variety of security technologies and measures intended to protect Our information from unauthorized access, use, or disclosure. CloudOptimo has a corporate policy in place that requires all personnel not to disclose Personal Information to any third party that is not entitled to have that information. If You have any questions about the security at Our Website, You can send an email to [contact@cloudoptimo.com](mailto:contact@cloudoptimo.com). Please note, however, that CloudOptimo cannot fully eliminate security risks associated with the collection, disclosure and storage of your information and that mistakes and





security breaches may occur. We do not guarantee or warrant that such techniques will prevent unauthorized access to information about You that we store, Personal Information or otherwise.

## How Can I Access, Correct, Amend or Delete my Personal Information?

You have the right to access and correct, amend or delete your Personal Information held by CloudOptimo.

If You are a registered user, You can access information and ask for correction of your information, if necessary, that is associated with your Account by logging into the Services. Registered and unregistered users can access and delete cookies through their web browser settings.

Registered users can delete Personal Information through their Accounts. Such deleted Personal Information will no longer be stored in CloudOptimo's databases, with the exception of: email address, network logs or cases where fraudulent or otherwise illegal activity has been deemed to have occurred as determined by law enforcement or CloudOptimo, in which case such information may remain in CloudOptimo's database for the purposes of addressing any such fraudulent or otherwise illegal activity.

If You terminate your Account, any association between your Account and information we store will no longer be accessible through your Account. However, any public activity on your Account prior to deletion will remain stored on Our servers and will remain accessible to the public.

To further request access, correction, amendment or deletion of your Personal Information, You can also directly email CloudOptimo at [contact@cloudoptimo.com](mailto:contact@cloudoptimo.com)

## What Choices Do I Have Regarding My Information?

You can use some of the features of the Services without registering, thereby limiting the type of information that we collect.

You can always opt not to disclose certain information to Us, even though it may be needed to take advantage of some of Our Services' features.

You have the right to object to the processing and use of your Personal Information as well as the disclosure of your Personal Information to third parties. Please email CloudOptimo at [contact@cloudoptimo.com](mailto:contact@cloudoptimo.com) to make such a request. Please note that opting-out of receiving promotional email will not affect delivery of service-related, transactional, or legal communication.

To protect your privacy and security, we may also take reasonable steps to verify your identity before updating or removing your information. The information You provide Us may be archived or stored periodically by Us according to backup processes conducted in the ordinary course of business for disaster recovery purposes. Where permitted by law, your ability to access and correct Personal Information will be temporarily limited where access and correction could: inhibit CloudOptimo's ability to comply with a legal obligation; inhibit CloudOptimo's ability to investigate, make or defend legal claims; result in disclosure of Personal Information about a third party; or result in breach of a contract or disclosure of trade secrets or other proprietary business information belonging to CloudOptimo or a third party.

## What Happens When There Are Changes to this Privacy Policy?

This Privacy Policy may be modified from time to time, so please review it frequently. Changes to this Privacy Policy will be posted on the Website and we recommend that You review the Privacy Policy to ensure You are aware of any changes made to it. A user is bound by any changes to the Privacy Policy when he or she uses the Services after such changes have been first posted. In the event that the modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify You of the change. For example, we may send a message to your email address, if we have one on file, or generate a pop-up or similar notification when You access the Services for the first time after such material changes are made. Please check the Privacy Policy each time You use Our Website for the most current information.

## International Data Transfers

CloudOptimo is a global business. We may transfer Personal Information to countries other than the country in which the data was originally collected. These countries may not have the same data protection laws as the country in which You initially provided the information. When we transfer your Personal Information to other countries, we will protect that information as described in this Privacy Policy and the applicable laws of the India.

## Complaints

In case of any complaint You may contact Us on email address provided in Terms of Services.

## What If I Have Questions or Concerns?

Xpanso Technologies Pvt. Ltd. is responsible for the processing of your Personal Information. If You have any further questions or concerns regarding privacy using the Services, or if You'd like to exercise your rights or choices as specified above, including the right to withdraw your consent, please send Us a detailed message to [contact@cloudoptimo.com](mailto:contact@cloudoptimo.com).

Please note the name of the Website or other online resource to which You provided the information, as well as the nature of the information that You provided. We will use reasonable efforts to respond promptly to requests, questions or concerns You may have regarding Our use of Personal Information about You. Except where required by law, CloudOptimo cannot ensure a response to questions or comments regarding topics unrelated to this Privacy Policy or Our privacy practices.

## Effective Date

This Privacy Policy became effective on: January 26, 2018.