

Thank you for visiting Claé Creatives. Claé Creatives ("Claé", "Claé Creatives, "we", "us", or "our") respect your privacy. We are GDPR compliant. This Privacy Policy has been created to serve those who are concerned by how we use their Personal Data.

Please read our Privacy Policy carefully for a clear understanding of how we collect, use, protect or otherwise handle your Personal Data in accordance with our website.

By using or purchasing any of our services, you confirm you have agreed to our <u>Terms</u> and have read and understood this Privacy Policy.

1. KEY TERMS

1.1. In our Privacy Policy, when we refer to "Users", we refer to visitors to our website and our customers who use our Services. "Personal data" refers to information that directly or indirectly allows for personal identification.

2. WHAT DOES THIS PRIVACY POLICY APPLY TO?

2.2. This Privacy Policy explains what Personal Data we collect, why we collect it, and how and where it is stored, for what length of time.

3. WHAT PERSONAL DATA DO WE COLLECT?

- 3.1. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 3.2. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
- Identity Data includes first name, last name, username or similar identifier. When you email, phone, live chat or otherwise, we may collect information such as your first name, last name, email address and phone number.

- Contact Data: includes billing address, invoicing address, email address and telephone numbers.
- Financial Data: includes bank account and payment card details.
- Transaction Data: includes details about payments and other details of our Services you have purchased from us.
- Technical Data: includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website.
- Profile Data: includes your username and password, reservations made by you, your interests, preferences, feedback and survey responses.
- Usage Data: includes information about how you use our Website and Services.
- Marketing and Communications Data: includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Interaction Data: includes any information that you might provide to any discussion forums on the Website.
- Correspondence Data: We will only use your email address to contact you regarding your purchase in order to fulfil our service. We will keep your correspondence for up to 1 year after service has been fulfilled is incase you need additional assistance. After 1 year your correspondence will be permanently deleted. We do not keep a record of email addresses from users who have purchased from us or emailed us. We will never send your newsletters or marketing materials unless you have opted-in.
- Third Parties and Information we receive from other sources: We may receive information about you if you use any of the other websites we operate or through the Services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on our Website. We are also working closely with third parties (including, for example, business partners, suppliers, sub-contractors, advertising networks, analytics providers, and search information providers) and may receive information about you from them.

- Analytics includes third-party analytics services (such as Google Analytics) to evaluate your use of the Website, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to our Website and internet usage. These third parties use cookies and other technologies to help analyse and provide us the data. By accessing and using the Website, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.
- 3.3. 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 Policy.
- 3.4. Where we do collect Special Categories of Personal Data about you (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) and it is necessary to do so for our business, we will obtain your specific consent, unless we have another lawful basis to do so.

4. HOW DO WE COLLECT PERSONAL DATA?

- 4.1. Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights.
- 4.2. You have given consent to the processing of your personal data for one or more specific purposes;
- Processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract;
- Processing is necessary for compliance with a legal obligation to which we are subject;
- Processing is necessary to protect the vital interests of you or of another natural person;

- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or
- Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party such as our financial payments, except where such interests are overridden by the fundamental rights and freedoms of the data subject, in particular where the data subject is a child.

5. DISCLOSING YOUR INFORMATION

- 5.1. We are allowed to disclose your information in the following cases:
- If we want to sell our business, or our company, we can disclose it to the potential buyer.
- We can disclose it to other businesses in our group.
- We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety or rights.
- We may contract with third parties to supply services to you on our behalf. These may include payment processing, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. These are the third parties that have access to your information:
 - 1. Google
 - 2. <u>Google Analytics</u>
 - 3. <u>PayPal</u>
 - 4. WeTransfer
 - 5. <u>Facebook</u>
 - 6. <u>Instagram</u>
 - 7. Pinterest

- Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under GDPR and the law.

6. YOUR RIGHTS

- 6.1 When you submit information via our Website, you may be given options to restrict our use of your data. We aim to give you strong controls on our use of your data (including the ability to optout of receiving emails from us which you may do by unsubscribing using the links provided above in this Privacy Policy.
- 6.2. Under the GDPR, you have the right to:
- request access to, deletion of or correction of, your personal data held by us at no cost to you;
- request that your personal data be transferred to another person (data portability);
- be informed of what data processing is taking place;
- restrict processing;
- to object to processing of your personal data; and
- complain to a supervisory authority
- 6.3 You also have rights with respect to automated decision-making and profiling as set out in section 7 below.
- 6.4 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.
- 6.5 To enforce any of the foregoing rights or if you have any other questions about our Website or this Privacy Policy, please contact us at support@claedesign.com

7. LINKS TO OTHER SITES

7.1 Please note that our terms and conditions and our policies will not apply to other websites that you get to via a link from our Website. We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

8. CHANGES

- 8.1 If we change our Privacy Policy, we will post the changes on this page. If we decide to, we may also email you.
- 8.2 In the event that we use personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on you, you have the right to challenge to such decisions under GDPR, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from us.
- 8.3 The right described in section 8.1 does not apply in the following circumstances:
- the decision is necessary for the entry into, or performance of, a contract between the you and us;
- the decision is authorised by law; or
- you have given you explicit consent.
- 8.4 Where we use your personal data for profiling purposes, the following shall apply:
- Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- Appropriate mathematical or statistical procedures will be used;
- Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and

- All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling.

9. TERMS

9.1 Please also visit our <u>Terms & Conditions</u> section establishing the use, disclaimers, and limitations of liability governing the use of our Website.

10. YOUR CONSENT

10.1 By using our Website and by way of acknowledgment, you consent to our Privacy Policy.

11. SUBJECT ACCESS REQUESTS AND RIGHT TO ERASURE

- 11.1. You may have the right to access, update, change or delete your Personal Data where applicable law requires. If you would like to know what Personal Data we hold relating to your identity, or would like us to erase your Personal Data from our records at info@claedesign.com to request these changes.
- 11.2. We will ask you to confirm your identity by checking your information against our records. If your identity can be verified, we will erase your Personal Data from our records within 48 hours.

12. PRIVACY OF CHILDREN

12.1. Our services are not intended for children under age 18. We do not knowingly collect or distribute Personal Data from anyone under the age of 18. If a parent or guardian becomes aware that their child has provided us with information without their consent, they should contact us immediately.

13. UPDATES

- 13.1. This Privacy Policy will be regularly updated to reflect changes within our business operations, and in technology or law.
- 13.2. When changes are make, we will update the "Effective Date" at the top of this Privacy Policy page and will notify you by displaying a notice of change on our homepage.

13.3. Please check our Privacy Policy regularly. This will help you to ensure that you understand your relationship with us and how we process your Personal Data.

14. HOW TO CONTACT US

14.1. If you have any questions regarding our Privacy Policy, you may contact us using the information below.

info@claedesign.com +977 01 5361121, +977 1 5361116