



CLARITY GLOBAL INC

PRIVACY POLICY

2024



YOUR PRIVACY IS RESPECTED HERE

We aim to be transparent. We care so much about our business, and you are key to it. That is why we do not hide behind complex wording and fine print. Read our Privacy Policy below to understand what we use your data for.

Who we are

Company legal name	CLARITY GLOBAL INC.
Company address	125 9 AVENUE SE, SUITE 2000 , CALGARY, AB, Canada
Privacy queries email	info@clarityglobalinc.com
Name of DPO	Alexey Ivaschenko

Our Role

When we provide our services to our Customers, we are acting on their behalf as their service provider and processor. If you are a user that is using our service on behalf of one of our customers, your personal data is processed in accordance to:

- data protection legislation
- instructions given to us from the Customer
- the section in our privacy policy that talks about our Website Visitors, Leads, Customers and
- the privacy policy of the Customer, which is made available by them (normally on their website)

Information we collect about you

These are the categories of data we may process:

- Contact Details: examples include name, email address, telephone number, address.
- Activity and Behavioural: examples include friend list, interests, tagged media.
- Personal Characteristics: examples include sex, nationality, gender, date of birth, cv information, academic qualifications.
- Aggregated Data: examples include such as statistical or demographic data for any purpose.
- Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will 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.

This is just an overview, please see the next section to see in more detail, exactly what we use.



How we use your data if you are one of our Customers

PERSONAL DATA

PURPOSE	PERSONAL DATA CATEGORY	LEGAL JUSTIFICATION
Customer Relationship Management (CRM)	Activity and Behavioural, Contact Details, Personal Characteristics	Legal Obligations

WHEN ACTING AS A PROCESSOR

When functioning as a processor, we undertake information processing based on explicit directives provided by our Customers, who serve as the Data Controllers in this context. For additional insights regarding our data usage as a processor, you can request access to our Data Processing Agreement, or alternatively, refer to our Customer's privacy policy.

In the capacity of a processor, there might be instances where we handle Special Category Data pertaining to our Customer's Users. While it is infrequent for us to regularly process such specialized data, it's important to note that any such processing would strictly adhere to the permissions and exemptions established by the respective Customer acting as the Data Controller.

How we use your data if you are one of our Leads

PERSONAL DATA

PURPOSE	PERSONAL DATA CATEGORY	LEGAL JUSTIFICATION
Customer Relationship Management (CRM)	Activity and Behavioural, Contact Details, Personal Characteristics	Legal Obligations

WHEN ACTING AS A PROCESSOR

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How we use your data if you are one of our Website Visitors

WHEN ACTING AS A PROCESSOR

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In the capacity of a processor, there might be instances where we handle Special Category Data pertaining to our Customer's Users. While it is infrequent for us to regularly process such specialized data, it's important to note that any such processing would strictly adhere to the permissions and exemptions established by the respective Customer acting as the Data Controller.

How your personal data is collected

We use different methods to collect data from and about you including through:

Direct interactions - you may give us information on your Contact Details, Identifiers, Financial Data... (all the categories that come through direct interactions) by filling in forms or by corresponding with us by post, phone, email, via our website or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account with us;
- subscribe to publications;
- request marketing to be sent to you; or
- give us feedback or contact us.
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Automated technologies or interactions. - As you interact with our website and services, we will automatically collect Technical, Profile and Usage Data about your equipment, browsing actions, and patterns.

Third parties or publicly available sources. - We might receive personal data about you from various third parties or publicly available sources like the ones set below.

- Work-related data from services like AngelList or recruiting websites.
- Identity and Contact Data from publicly available sources such as Crunchbase or other registries.

Third Parties & Sub-Processors

We might store or send personal data about you to various third parties set out below.

THIRD PARTY	ENCRYPTION	DATA RESIDENCY
Google Tag Manager	Encryption in Transit, Encryption at Rest	United States
Google Analytics	Encryption in Transit, Encryption at Rest	United States
Freshsales	Encryption in Transit, Encryption at Rest	United States



International Transfers

Some of our external third parties are based outside the UK and EEA so their processing of your personal data will involve a transfer of data outside the UK and EEA. Whenever we transfer your personal data out of the UK and EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- the country to which personal data is being transferred has been deemed to provide an adequate level of protection for personal data by the European Commission; or
- we use specific contracts approved by the European Commission which give personal data the same protection it has in the UK and Europe.

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.

Where you have chosen a password that enables you to access certain parts of our applications, you are responsible for keeping this password confidential. We ask you not to share the password with anyone.

Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized 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, regulatory, tax, accounting, or other requirements.

Your Legal Rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.



Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise, or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Make a complaint you have the right to make a complaint at any time to the relevant regulator

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 fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

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 concerning your request to speed up our response.

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

Third-Party Links

This website 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 website, we encourage you to read the privacy policy of every website you visit.