

# **Website Privacy Policy**

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# Introduction

Cloud Design Box Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, **www.clouddesignbox.co.uk** and **www.tonyishere.co.uk** ("Our sites"). We will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our sites. If you do not accept and agree with this Privacy Policy, you must stop using our sites immediately.

# **Definitions and Interpretation**

In this Policy the following terms shall have the following meanings:

"Account" means an account required to access and/or use

certain areas and features of our sites;

"Cookie" means a small text file placed on your computer or

device by our sites when you visit certain parts of our sites and/or when you use certain features of our sites. Details of the Cookies used by our sites are set

out in the Our Use of Cookies section of this

document;

"Cookie Law"

means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;















"personal data"

means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via our sites. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and

"We/Us/Our"

Means Cloud Design Box Ltd, a limited company registered in England under company number, whose registered address is Unit 2.07, C4di @ The Dock 31-38 Queen Street, Hull, East Yorkshire, United Kingdom, HU1 1UU.

### **Information About Us**

Our sites are owned and operated by Cloud Design Box Ltd, a limited company registered in England under company number 09655303, whose registered address is Unit 2.07, C4di @ The Dock 31-38 Queen Street, Hull, East Yorkshire, United Kingdom, HU1 1UU and whose main trading address is Unit 2.07, C4di @ The Dock 31-38 Queen Street, Hull, East Yorkshire, United Kingdom, HU1 1UU

Our VAT number is **GB217848091**.

Our Data Protection Officer is Michael Curran, and can be contacted by email at dataprotection@clouddesignbox.co.uk.











# **What Does This Policy Cover?**

This Privacy Policy applies only to your use of our sites. Our sites may contain links to other websites. Please note that 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.

#### 1) Your Rights

- a) As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:
  - i) The right to be informed about our collection and use of personal data;
  - ii) The right of access to the personal data We hold about you;
  - iii) The right to rectification if any personal data We hold about you is inaccurate or incomplete;
  - iv) The right to be forgotten i.e. the right to ask Us to delete any personal data We hold about you. We only hold your personal data for a limited time, as explained in the How do we use your data section of this document. But if you would like Us to delete it sooner then please contact Us sing the details provided in the Contacting Us section;
  - v) The right to restrict (i.e. prevent) the processing of your personal data;
  - vi) The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
  - vii) The right to object to Us using your personal data for particular purposes; and viii) Rights with respect to automated decision making and profiling;
- b) If you have any cause for complaint about our use of your personal data, please contact us using the details provided in the Contacting Us section and We will do our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office;











c) For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau;

#### 2) What data do we collect?

Depending upon your use of our sites, we may collect some or all of the following nonpersonal data:

- a) IP address;
- b) web browser type and version;
- c) operating system;
- d) a list of URLs starting with a referring site, your activity on our sites, and the site you exit to;
- e) general location and network information;
- f) your email address (when signing up for emails);
- g) telephone number (when using contact form);
- h) your name (when using contact form);
- i) your message (when using contact form);

### 3) How do we use your data?

- a) All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the at all times. For more details on security see the How and where do we store your data section of this document;
- b) Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, We may use your data for the following purposes:
  - i) Providing and managing your access to our sites;













- ii) Supplying our products and services to you. Please note that We require your personal data in order to enter into a contract with you;
- iii) Replying to emails from you;
- iv) Supplying you with emails that you have opted into. You may unsubscribe or optout at any time by clicking on the unsubscribe button at the bottom of the email;
- v) Analysing your use of our sites to enable Us to continually improve our Site and your user experience;
- c) With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email or telephone or post with information, news and offers on our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003;
- d) You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it;
- e) We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
  - i) 3 Years, unless you have unsubscribed or notified us that you no longer wish to be contacted:

## 4) How and where do we store your data?

- a) We only keep your personal data for as long as We need to in order to use it as described in the How do we use your data section of this document, and/or for as long as We have your permission to keep it;
- b) Your data will only be stored within the European Economic Area ("the EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein;
- c) Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through our sites;













- d) Steps We take to secure and protect your data include:
  - i) Multi Factor Authentication where possible;
  - ii) Encrypted local computers and devices;
  - iii) Secure Socket Layer connections to all data services;
  - iv) Staff security training and internal policies;

#### 5) Do we share your data?

- a) We will not share any of your data with any third parties for any purposes, except:
  - i) In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.
  - ii) We may compile statistics about the use of our sites including data on traffic, usage patterns, user numbers, sales, and other information. **All such data will be anonymised** and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law;

### 6) What happens if our business changes hands?

- a) We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business.
- b) Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.











#### 7) How can you control your data?

- a) In addition to your rights under the GDPR, set out in the Your Rights section of this document, when you submit personal data via our sites, you may be given options to restrict our use of your data. In particular, We aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).
- b) You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving;

#### 8) Your right to withhold information

- a) You may access certain areas of our sites without providing any personal identifiable data at all. However, to receive news, product information or contact us on our sites, you may be required to submit or allow for the collection of certain data;
- b) You may restrict our use of Cookies. For more information, see our policy on cookies in the Our Use of Cookies section of this document.

## 9) How can you access your data?

a) You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at dataprotection@clouddesignbox.co.uk, or using the contact details in the Contacting Us section below.

## 10) Our Use of Cookies

 a) Our sites may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us.
We use Cookies to facilitate and improve your experience of our sites and to provide and improve our products and services. We have carefully chosen these Cookies











and have taken steps to ensure that your privacy and personal data is protected and respected at all times;

- b) All Cookies used by and on our sites are used in accordance with current Cookie Law;
- c) If we decide to collect personal identifiable data, we may use Cookies placed on your computer or device. You will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our sites may not function fully or as intended;
- d) Certain features of our sites depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed below. But please be aware that our sites may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them;
- e) The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
PartnerAgreement	Remembers your cookie consent choice	Yes

f) The following third party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Provider
_ga	Google Analytics - Used to distinguish users using anonymised data	Google
_gid, _gat	Google Analytics - Used to distinguish users using anonymised data	Google











personalization_id	ersonalization_id Cookie used to embed Twitter/X feed	
lang	Twitter Cookie used to embed twitter feed	Twitter/X
_ifa	Leadfeeder Cookie – Used to distinguish users	Leadfeeder

- g) Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how our Site is used. This, in turn, enables Us to improve our Site and the products and services offered through it. You do not have to allow Us to use these Cookies however, whilst our use of them does not pose any risk to your privacy or your safe use of our Site, it does enable Us to continually improve our Site, making it a better and more useful experience for you;
- h) The analytics service(s) employed by our Site use(s) Cookies to gather the required information;
- i) The analytics service(s) employed by our Site(s) use(s) the following Cookies:

Name of Cookie	Purpose	Provider
_ga	Google Analytics - Used to distinguish users using anonymised data	Google
_gid	Google Analytics - Used to distinguish users using anonymised data	Google

j) In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device;









- k) You can choose to delete Cookies on your computer or device at any time however you may lose any information that enables you to access our sites more quickly and efficiently including, but not limited to, login and personalisation settings;
- It is recommended that you keep your internet browser and operating system up-todate and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings;

# **Contacting Us**

If you have any questions about our sites or this Privacy Policy, please contact Us by email at info@clouddesignbox.co.uk, or by post at Cloud Design Box Ltd, Unit 2.07, C4di @ The Dock 31-38 Queen Street, Hull, East Yorkshire, United Kingdom, HU1 1UU. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you. We can only respond to clear specific requests and we do not respond to generic or spam emails.

# **Changes to our Privacy Policy**

We may change this Website Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our sites and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our sites following the alterations. We recommend that you check this page regularly to keep up-to-date.











End of Document











# **Version Control**

Version	Date	Modified By	Approved By	Version Notes
1.0	11/12/2023	Darren Hemming	Darren Hemming 13/12/2023	First Version







