

## Privacy Policy

At CloudMargin, we are committed to protecting and respecting your privacy. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or use our proprietary services and tell you about your privacy rights and how the law protects you.

This Policy explains when and why we collect Personal Information about people who visit our website (cloudmargin.com), (“**Website**”) and use our web-based collateral management software application (“**Service**”) and other interactions (eg, customer service inquiries) you may have with CloudMargin. It also explains how we use it, the conditions under which we may disclose it to others and how we keep it secure.

“**Personal information**” is any information that can be used to identify an individual, and may include things such as your name, physical address, email address, phone number, login information, marketing preferences, company affiliation or geographic location. We may collect Personal Information that is necessary for legitimate business purposes, which will be disclosed to you at the time of collection. CloudMargin will use this information for the purposes for which it was collected. CloudMargin may also collect Personal Information from trusted third-party sources and engage third parties to collect Personal Information to assist us.

We may change this Policy from time to time so please check this page occasionally to ensure that you’re happy with any changes. By using our Website and Service, you’re agreeing to be bound by this Policy.

This Policy does not apply to any third-party applications or software that integrate with the Services through the CloudMargin platform (“**Third-Party Services**”), or any other third-party products, services or businesses. In addition, a separate agreement governs delivery, access and use of the Services (“**Agreement**”), including the processing of any files or other content submitted through Services’ accounts (collectively, “**Customer Data**”). The organization (e.g., your employer or another entity or person) that entered into the Agreement (“**Customer**”) controls their instance of the Service (their “**Account**”) and any associated Customer Data. If you have any questions about specific Account settings and privacy practices, please contact the Customer whose Account you use.

Any questions regarding this Policy and our privacy practices should be sent by email to [info@cloudmargin.com](mailto:info@cloudmargin.com) or by writing to Legal Team, CloudMargin, 4-8 Whites Grounds, London, SE1 3LA, United Kingdom.

## Who are we?

CloudMargin created the world’s first cloud-based collateral management workflow tool, which helps financial institutions globally meet time-critical regulatory deadlines and reduce costs associated with collateral requirements. CloudMargin, we

and us refers to CloudMargin Limited and any of our corporate affiliates. CloudMargin Limited is a Private Limited Company registered in England and Wales with registration number 08431830. The registered address is 4-8 Whites Grounds, London, SE1 3LA.

CloudMargin is the controller and responsible for your Personal Information.

## How do we collect information from you?

We obtain Personal Information, receive Customer Data, other information and data (“**Other Information**”) (together, “**Information**”) in a variety of ways:

- **Customer Data:** Customers or individuals granted access to the Service by a Customer (“Authorized Users”) routinely submit Customer Data to CloudMargin when using the Service.
- **Personal Information and Other Information:** CloudMargin also collects, generates and/or receives Personal Information and Other Information:
  - Account Information: To create or update an Account, you or your Customer supply CloudMargin with an email address, phone number, password, domain and/or similar account details, banking information and/or billing details;
  - Feedback Information: when you give us feedback or contact us;
  - Usage Information:
    - *Service Metadata:* When an Authorized User interacts with the Service, metadata is generated that provides additional context about you the way Authorized Users work. For example, CloudMargin logs the types of files shared and what Third Party Services are used (if any).
    - *Log data:* when you use our Website, for example, when you contact us about services, download our content, or if you register to receive our regular newsletters and corporate communications, our servers automatically collect this and record it in log files. This log data may include the Internet Protocol address, the address of the web page visited before using the Website or Service, browser type and settings, the date and time the Service was used, information about browser configuration and plugins, language preferences and cookie data.

## What type of information is collected from you?

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).

We may collect, use, store and transfer different kinds of Personal Information about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, **marital** status, title, date of birth, age and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you and other details of products and 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 the Website and or the Service.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our Website and Service.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Third-Party Services:** Customers can choose to permit or restrict Third-Party Services for their Account. Typically, Third-Party Services are software that integrate with our Service in accordance with the terms of the Agreement. Once enabled, the provider of a Third-Party Service may share certain information with CloudMargin. For example, if a Third-Party Service provider is enabled to provide reference data under a licence or other arrangement procured by the Customer, we may receive user name and email address of Authorised Users, along with additional information that the application has elected to make available to CloudMargin to facilitate the integration. Authorised Users should check the privacy settings and notices in these Third-Party Services to understand what data may be disclosed to CloudMargin. When a Third-Party Service is enabled, CloudMargin is authorised to connect and access Other Information made available to CloudMargin in accordance with our agreement with the Third-Party Service provider.
- **Cookies:** In some instances, CloudMargin and the third parties we engage with may automatically collect and aggregate data using cookies, weblogs, web **beacons**, and other similar applications. This information is used to better understand and improve the usability, performance, and effectiveness of our Service and to help us tailor content or offers for you. Please read the “Cookies” section below for more information.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose.

Aggregated Data could be derived from your Personal Information 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 Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this Policy.

We do not collect any special categories of Personal Information 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). Nor do we collect any information about criminal convictions and offences.

## **IF YOU FAIL TO PROVIDE PERSONAL INFORMATION**

Generally, no one is under a statutory or contractual obligation to provide any Information. However, certain Information is collected automatically and, if some Information, such as Account setup details, is not provided, we may be unable to provide the Service.

### **How is your Information used?**

By your interactions with our Website, Service and company we believe you may be interested in our services and also Service as well as the content we will be sending to you will be helpful for your business success.

We will only use your Personal Information when the law allows us to. Most commonly, we will use your Personal Information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your Personal Information although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us (see above).

If you have consented to our use of Information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your Information because we or a third-party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our Service or receiving further communications from us.

### **Data Retention**

We review our retention periods for Personal Information on a regular basis.

We will only retain your Personal Information 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 Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

If you unsubscribe from our newsletter we may retain your data on a suppression list to ensure you do not receive future email communications.

### **Who has access to your information?**

We will not sell or rent your information to third parties.

Third Party Service Providers determine their own policies and practices for the sharing and disclosure of Information, and CloudMargin does not control how they or any other third-parties choose to share or disclose Information. We will not sell or rent your Information to third parties, but this section describes how CloudMargin may share and disclose Information.

- **Customer's instructions:** CloudMargin will solely share and disclose Customer Data in accordance with a Customer's instructions, including any applicable terms in the Agreement, and in compliance with applicable law and legal process.
- **Displaying the Service:** When an Authorized User submits Personal Information or Other Information, it may be displayed to other Authorized Users in the same or connected Account.
- **Customer Access:** Owners, administrators, Authorized Users and other Customer representatives and personnel may be able to access, modify or restrict access to Other Information. This may include, for example, your employer using Service features to export logs of Account activity or accessing or modifying your profile details.

**Third-party service providers working on our behalf:** We may pass your Information to our Third-Party Service providers, agents, subcontractors and other associated organizations only for the purposes of completing tasks and providing the Service to you on our behalf. However, when we use Third-Party Service providers, we disclose only the Personal Information that is necessary to deliver the Service and we have a contract in place that requires them to keep your Information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your Information to other third parties beyond the CloudMargin network for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

- **Third Party Product Providers – we work in association with:** We work closely with various third-party product providers to bring you a range of quality and reliable services. When you enquire about or purchase one or more of these services, the relevant third -party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. In **some** cases, they will be acting as a data controller of your Information and therefore we advise you to read their Privacy Policy. These third-party product providers will share your Information with us which we will use in accordance with this Privacy Policy. For our email marketing campaigns, we use the Oracle Marketing Cloud (Eloqua) and Salesforce (Sales Cloud).
- **Corporate Affiliates:** CloudMargin may share Information with its corporate affiliates, parents and/or subsidiaries.
- **Aggregated or De-identified Data:** We may disclose or use aggregated or de-identified Information for any purpose.
- **To Comply with Laws:** If we receive a request for Information, we may disclose Information if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation or legal process.
- **To enforce our rights, prevent fraud, and for safety:** We may disclose Information to protect and defend the rights, property or safety of CloudMargin or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.
- **With Consent:** CloudMargin may share Information with third parties when we have consent to do so.

Please note that if you participate in a discussion forum or provide comments related to CloudMargin on a social media or other platform, the information you provide will be made available to others who may contact you and send you unsolicited messages for purposes neither you nor CloudMargin have control over. Those forums and platforms are not controlled by CloudMargin and additional rules and conditions may apply to them. CloudMargin is not responsible for the Personal Information or any Other Information you choose to submit on those forums or platforms. The platforms may offer you're the ability to share Personal Information through a social networking site (such as Facebook or Twitter) using an integrated tool (such as the "Like" button on Facebook). Depending on the settings you have for that social networking site, using such integrated tools enables you to share Personal Information about yourself with others or the public. For more information, please visit the privacy policies of the entities providing those forums and platforms.

## Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about our Service, you can use the unsubscribe link in each email communication or contact us at [info@cloudmargin.com](mailto:info@cloudmargin.com) to be removed.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent, or we believe that there is a legitimate interest. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email: [info@cloudmargin.com](mailto:info@cloudmargin.com) or telephone on +44 (0) 20 3397 5670.

## **How you can access and update your Information**

While Personal Information is maintained by CloudMargin, you may access your Personal Information to the extent required by law to review, update, and correct inaccuracies. Upon request made to the contact listed below, we will provide you with reasonable access to the Personal Information we collect about you. Because Personal Information—for example, your email address—is required to use the Platform, we retain Personal Information for so long as your account is active.

Please note that some Information may remain in our records even after you request deletion of your Information. For example, files may be retained on backup storage systems because, given the limitations of the permanent destruction of electronic data located on information technology systems, it is not reasonably practical for them to be deleted. Additionally, there may be limits to the amount of Information we can practically provide. For example, we may limit access to Personal Information where the burden or expense of providing access would be disproportionate to the risks to an individual's privacy or where doing so would violate others' rights.

The accuracy of your Information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: [info@cloudmargin.com](mailto:info@cloudmargin.com), or write to us at: CloudMargin, 4-8 Whites Grounds, London, SE1 3LA, United Kingdom. Alternatively, you can telephone +44 (0) 20 3397 5670. You have the right to ask for a copy of the information CloudMargin hold about you.

## **Security precautions in place to protect the loss, misuse or alteration of your Personal Information**

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Profiling**

We may analyze your Personal Information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional Information about you when it is available from external sources to help us do this effectively. We may also use your Personal Information to detect and reduce fraud and credit risk.

## **Use of 'cookies'**

Like many other websites, the CloudMargin website uses cookies. 'Cookies' are small pieces of information sent by an organization to your computer and stored on your hard drive to allow that website to recognize you when you visit. They

collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better, more personalized service.

It is possible to switch off cookies by setting your browser preferences.

## **Links to other websites**

Our website may contain links to other websites run by other organizations. This Policy applies only to our Website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website. In addition, if you linked to our website from a third -party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third -party site and recommend that you check the policy of that third-party site.

## **16 or under**

We do not knowingly collect Personal Information from children under 16. If we become aware that a child under 16 has provided us with Personal Information, we will take steps to delete such information. If you become aware that a child has provided us with Personal Information, please contact us at [info@cloudmargin.com](mailto:info@cloudmargin.com).

## **Transferring your information outside of Europe the EEA**

As part of the Service offered to you, the Information which you provide to us may be transferred to countries outside the European Union (“EU”). These countries may not have similar data protection laws to the UK. By submitting your personal data, you are agreeing to this transfer, storing or processing. If we transfer your Information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy. If you use our Services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those Service.

## **YOUR LEGAL RIGHTS**

You have the right to:

- **Request access** to your Personal Information (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the Personal Information 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 Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information 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 Information 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 Information. This enables you to ask us to suspend the processing of your Personal Information 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 Information to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Information 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 Information. 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.

## **Review of this Policy**

We keep this Policy under regular review and may change this policy from time to time so please check this page occasionally to ensure that you are happy with any changes. By using our Website, you are agreeing to be bound by this Policy.

This Policy was last updated in August 2018.