

## Privacy Policy

We at 2046 Labs, Inc (the **Company**) are committed to meeting our data protection obligations and ensuring that any personal information we collect is collected and stored in accordance with generally applicable data protection laws and best practices.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, the procedures in place to safeguard your privacy and how you can manage personal information that has been provided to us.

The Company is a data controller as defined by the General Data Protection Regulations (**GDPR**) and our registered office address is at 6001 Brookline Dr, Rowlett, Texas 75089, United States of America.

### What types of data do we collect and hold?

When you access our website, we will collect your IP address and cookie information (see "Cookies") section below. This allows our basic customer relations management (**CRM**) and analytics software to function.

When you make inquiries by email, we collect the following information:

- Identifying information such as your name and organization which you provide to us; and
- Your email address which you provide to us.

We do not collect, nor do we intend to collect, any special categories of data also known as sensitive personal data.

Our website and services are not intended for use by children and we do not knowingly collect data relating to children.

### How and why do we collect and process your personal data?

When you visit our website, the software we use automatically collects IP address and cookie information. This information is used in one of two ways. Secondly, it allows us to monitor website traffic and activity using services such as Google Analytics in order to optimize our website and service offering.

When you subscribe to our mailing list, we collect the personal data you provide to us in order to deliver newsletters and updates to you by email and we therefore require this information in order to achieve this.

When you make inquiries by email or via our web form, we collect the personal data you provide to us in order to address you and to respond to your inquiries by email.

### Sharing your information with third parties

We use services provided by Microsoft Azure and Amazon Web Service as part of our business model, as well as Azure Application Insights on our website.

## Storing and Retaining Personal Information

We will hold your personal data only for as long as necessary to fulfil the purposes for which it is collected.

When you subscribe to our mailing list, we will hold your personal data until you end your subscription to our mailing list. When your subscription to our mailing list ceases, we will delete all personal data after a period of 30 days.

Data relating to any enquiries made to us, such as the enquirer's name, contact details and subject matter of the enquiry will be kept by us for a period of three months so that we can process, respond to and update you on the subject matter of your enquiry.

Notwithstanding the above, we will retain personal data to the extent we are under a legal obligation to do so. For example, we will retain your personal data if applicable laws oblige us to do so. We will also retain your personal data if we have a legitimate interest in doing so. For instance, we will retain your personal data if we reasonably believe that we may be involved in legal proceedings with you in connection with services provided to you.

## How we protect your information

We treat all personal data as strictly confidential. We will not use your personal data for any purposes other than those stated in this privacy policy. All information recorded electronically will be safeguarded by appropriate security and technical measures such as secure passwords and encryption.

All our files and databases are hosted by two third party cloud-services providers, namely Microsoft Azure and Amazon Web Services. Their data security policies can be found on their website at <https://azure.microsoft.com/en-us/explore/trusted-cloud/privacy> and <https://aws.amazon.com/compliance/data-protection/>.

We also use Microsoft Azure Front Door and AWS CloudFront to protect personal data using encryption and firewalls.

To the extent we keep any personal data on any physical medium, such medium will be kept in secure premises accessible only by authorised individuals and destroyed promptly as soon as the purposes for which it is used have been fulfilled.

## Your rights under data protection laws

We take our data protection obligations and your data privacy rights seriously. The GDPR accords rights to EU citizens and residents which we are committed to respecting and upholding. Your rights under the GDPR include:

- The right to request information about what personal data we process and the rationale for such processing;
- The right to request access to your own personal data;
- The right to request modifications to your personal data in the event you believe that data we hold on your is inaccurate;
- The right to withdraw consent for us to process your personal data;
- The right to request that we delete or destroy your personal data;
- The right to request that we do not use your personal data for certain purposes;

- The right to request transfer of your personal data to you or another data controller you may nominate; and
- The right to request that we do not use your personal data in an automated decision-making process (although we do not, and have no intention to, rely on such processes in the provision of our services).

The GDPR represents the global best practices on data protection and privacy. As part of our commitment to best practices, we observe these rights across all our users regardless of nationality or location.

You may exercise these rights by sending in a request by email to ***hello@clique.social*** Please provide sufficient details allowing us to identify you, as well as the scope and nature of your request. We will respond to you within one month of your request. We will not charge a fee for responding to your request (as long as it is not unfounded, vexatious, repetitive or excessive).

## **Cookies**

Cookies are small pieces of information which are stored by your browser on your computer's hard drive. We use cookies such as Google Analytics to help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. Google Analytics may give us your computer's IP address but in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

By using our website you consent to the use of cookies but you control the use of cookies in your browser and can change these at any time (visit [www.aboutcookies.org](http://www.aboutcookies.org) for more information).

## **Third Party Websites**

From time to time, we may provide links to third party websites that are not controlled or managed by us and which do not operate under this privacy policy. You should check the privacy policies for any third-party websites that you visit in order to stay informed on how your personal data is being collected, stored and processed.

## **Data Breaches**

In the event of a data breach, we will immediately work to identify the extent and cause of the breach and whether any personal data has been compromised. If we find that your personal data may have been compromised, we will immediately inform you so that you may take the necessary steps to protect yourself from potentially malicious actors.

## **Changes to this privacy notice**

Any changes we may make to our privacy policy in the future will be posted on this page and notified to all subscribers to our services via email. Please check back frequently to stay informed of any updates or changes to our privacy policy.

This policy is effective from 17/10/23.