

Your privacy is critically important to us. At Cling, we have a few fundamental principles:

- We are thoughtful about the personal information we ask you to provide and the personal information that we collect about you through the operation of our services.
- We store personal information for only as long as we have a reason to keep it.
- We aim to make it as simple as possible for you to control what information on your website is shared publicly (or kept private), indexed by search engines, and permanently deleted.
- We help protect you from overreaching government demands for your personal information.
- We aim for full transparency on how we gather, use, and share your personal information.

Below is our Privacy Policy, which incorporates and clarifies these principles.

### **Who We Are and What This Policy Covers**

This Privacy Policy applies to information that we collect about you when you use:

- Our website including Cling.se
- Our mobile applications (including the Cling mobile app for Android and iOS);
- Our other Cling products, services, and features that are available on or through our websites

This Privacy Policy also applies to information we collect when you apply for a job at Cling. Throughout this Privacy Policy we'll refer to our websites, mobile applications, and other products and services collectively as "Services.". Below we explain how we collect, use, and share information about you, along with the choices that you have with respect to that information.

### **Information We Collect**

We only collect information about you if we have a reason to do so — for example, to provide our Services, to communicate with you, or to make our Services better. We collect this information from three sources: if and when you provide information to us, automatically through operating our Services, and from outside sources. Let's go over the information that we collect.

***Information You Provide to Us*** It's probably no surprise that we collect information that you provide to us directly. Here are some examples:

- **Basic account information:** We ask for basic information from you in order to set up your account. For example, we require individuals who sign up for a cling.se account to provide an email address and password, along with a Company name — and that's it. You may provide us with more information — like your name, phonenumber, address and other information you want to share — but we don't require that information to create a cling.se account.
- **Public profile information:** If you have an account with us, we collect the information that you provide for your public profile. For example, if you have a cling.se account, your Company name and name is part of that public profile, along with any other information you put into your public profile, like a photo or an "About Me" description. Your public profile information is just that — public — so please keep that in mind when deciding what information you would like to include.
- **Payment and contact information:** If you buy something from us, we'll collect information to process those payments and contact you. If you buy something from us — a subscription to a cling.se plan, you'll provide additional personal and payment information like your name, credit card information, and contact information. We also keep a record of the purchases you've made. You may also provide us with financial details to set up a payments integration, like the email address for your Stripe or PayPal account, your bank account information or a tax ID or other identifier so we can process payments to you.
- **Communications with us (hi there!):** You may also provide us with information when you respond to surveys, communicate with our Engineers about a support question, or sign up for a newsletter. When you communicate with us via form, email, phone, cling.se, or otherwise, we store a copy of our communications (including any call recordings as permitted by applicable law).
- **Job applicant information:** If you apply for a job with us — awesome! You may provide us with information like your name, contact information, resume or CV, and work authorization verification as part of the application process.

***Information We Collect Automatically*** We also collect some information automatically:

- **Log information:** Like most online service providers, we collect information that web browsers, mobile devices, and servers typically make

available, including the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information. We collect log information when you use our Services — for example, when you create or make changes to your profile or settings on cling.se.

- **Usage information:** We collect information about your usage of our Services. For example, we collect information about the actions that site administrators and users perform on a site using cling.se — in other words, who did what and when. We also tracks information like number of orders and customers. We also collect information about what happens when you use our Services (e.g., page views, support document, features along with information about your device (e.g., screen size, name of cellular network, and mobile device manufacturer). We use this information to, for example, provide our Services to you, get insights on how people use our Services so we can make our Services better, and understand and make predictions about user retention.
- **Location information:** We may determine the approximate location of your device from your IP address. We collect and use this information to, for example, calculate how many people visit our Services from certain geographic regions. We may also collect information about your precise location via our mobile apps (like when you post a photograph with location information) if you allow us to do so through your mobile device operating system’s permissions.
- **Stored information:** We may access information stored on your mobile device via our mobile apps. We access this stored information through your device operating system’s permissions. For example, if you give us permission to access the photographs on your mobile device’s camera roll, our Services may access the photos stored on your device.
- **Information from cookies & other technologies:** A cookie is a string of information that a website stores on a visitor’s computer, and that the visitor’s browser provides to the website each time the visitor returns. Pixel tags (also called web beacons) are small blocks of code placed on websites and emails. Cling uses cookies and other technologies like pixel tags to help us identify and track visitors, usage, and access preferences for our Services, as well as track and understand email campaign effectiveness and to deliver targeted ads.

***Information We Collect from Other Sources*** We may also get information about you from other sources. For example, if you create or log in to your cling.se account through another service (like Google) or if you connect your website or account to a social media service (like Twitter), we’ll receive information from that service (e.g., your username, basic profile information,

friends list) via the authorization procedures for that service. As another example, if you use our Payment service, we'll receive information relating to your Stripe account, such as your email address and phone number. The information we receive depends on which services you use or authorize and what options are available. Third-party services may also give us information, like mailing addresses for individuals who are not yet our users (but we hope will be!). We use this information for marketing purposes like postcards and other mailers advertising our Services.

***Purposes for Using Information*** We use information about you for the purposes listed below:

- **To provide our Services.** For example, to set up and maintain your account, host your data, backup and restore your data, provide customer service, process payments and orders, and verify user information.
- **To ensure quality, maintain safety, and improve our Services.** For example, by providing automatic upgrades and new versions of our Services. Or, for example, by monitoring and analyzing how users interact with our Services so we can create new features that we think our users will enjoy and that will help them work more efficiently or make our Services easier to use.
- **To place and manage ads** For example, to place ads on our users and some of our own sites and understand ad performance.
- **To market our Services and measure, gauge, and improve the effectiveness of our marketing.** For example, by targeting our marketing messages to groups of our users (like those who have a particular plan with us or have been users for a certain length of time), advertising our Services, analyzing the results of our marketing campaigns (like how many people purchased a paid plan after receiving a marketing message), and understanding and forecasting user retention.
- **To protect our Services, our users, and the public.** For example, by detecting security incidents; detecting and protecting against malicious, deceptive, fraudulent, or illegal activity; fighting spam; complying with our legal obligations; and protecting the rights and property of Cling and others, which may result in us, for example, declining a transaction or terminating Services.
- **To fix problems with our Services.** For example, by monitoring, debugging, repairing, and preventing issues.
- **To customize the user experience.** For example, to personalize your experience by serving you relevant notifications and advertisements for our Services.

- **To communicate with you.** For example, by emailing you to ask for your feedback, share tips for getting the most out of our products, or keep you up to date on Cling; or calling you to share offers and promotions that we think will be of interest to you. If you don't want to hear from us, you can opt out of marketing communications at any time. (If you opt out, we'll still send you important updates relating to your account.)
- **To recruit and hire new Employees.** For example, by evaluating job applicants and communicating with them.

***Legal Bases for Collecting and Using Information*** A note here for those in the European Union about our legal grounds for processing information about you under EU data protection laws, which is that our use of your information is based on the grounds that: (1) The use is necessary in order to fulfill our commitments to you under the applicable terms of service or other agreements with you or is necessary to administer your account — for example, in order to enable access to our website on your device or charge you for a paid plan; or (2) The use is necessary for compliance with a legal obligation; or (3) The use is necessary in order to protect your vital interests or those of another person; or (4) We have a legitimate interest in using your information — for example, to provide and update our Services; to improve our Services so that we can offer you an even better user experience; to safeguard our Services; to communicate with you; to measure, gauge, and improve the effectiveness of our advertising; and to understand our user retention and attrition; to monitor and prevent any problems with our Services; and to personalize your experience.

## Sharing Information

***How We Share Information*** We share information about you in limited circumstances, and with appropriate safeguards on your privacy. These are spelled out below, as well as in the section called [Third party service providers]

- **Subsidiaries and independent contractors:** We may disclose information about you to our subsidiaries and independent contractors who need the information to help us provide our Services or process the information on our behalf. We require our subsidiaries and independent contractors to follow this Privacy Policy for any personal information that we share with them.
- **Third-party vendors:** We may share information about you with third-party vendors who need the information in order to provide their services to us, or to provide their services to you. This includes vendors that help us provide our Services to you (like Stripe, Amazon cloud storage services, Mailchimp email delivery services that help us stay in touch with you, Intercom customer chat and email support services that help us communicate

with you; Facebook & Google which assist us with our marketing efforts (e.g., by providing tools for identifying a specific marketing target group or improving our marketing campaigns, and by placing ads to market our services); those that help us understand and enhance our Services (like analytics providers); those that make tools to help us run our operations (like programs that help us with task management, scheduling, word processing, email and other communications, and collaboration among our teams); other third-party tools that help us manage operations.

- **Legal and regulatory requirements:** We may disclose information about you in response to a subpoena, court order, or other governmental request
- **To protect rights, property, and others:** We may disclose information about you when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of Cling, third parties, or the public at large. For example, if we have a good faith belief that there is an imminent danger of death or serious physical injury, we may disclose information related to the emergency without delay.
- **Business transfers:** In connection with any merger, sale of company assets, or acquisition of all or a portion of our business by another company, or in the unlikely event that Cling goes out of business or enters bankruptcy, user information would likely be one of the assets that is transferred or acquired by a third party.
- **With your consent:** We may share and disclose information with your consent or at your direction. For example, we may share your information with third parties when you authorize us to do so for example when you connect Cling to another service via API or using Zapier.
- **Aggregated or de-identified information:** We may share information that has been aggregated or de-identified, so that it can no longer reasonably be used to identify you. For instance, we may publish aggregate statistics about the use of our Services, or share a hashed version of your email address to facilitate customized ad campaigns on other platforms.
- **Published support requests:** If you send us a request for assistance (for example, via a support email or one of our other feedback mechanisms), we reserve the right to publish that request in order to clarify or respond to your request, or to help us support other users.

We have a long-standing policy that we do not sell our users' data. We aren't a data broker, we don't sell your personal information to data brokers, and we don't sell your information to other companies that want to spam you with marketing emails. Under a new California law, the California Consumer Privacy Act ("CCPA"), some personalized advertising you see online and on our services might be considered a "sale" even though we don't share information that identifies you personally, like your name or email address.

***Information Shared Publicly*** Information that you choose to make public is — you guessed it — disclosed publicly. That means information like your public profile. For example, the photo that you upload to your public profile, or a default image if you haven't uploaded one. Public information may also be indexed by search engines or used by third parties. Please keep all of this in mind when deciding what you would like to share publicly.

## **How Long We Keep Information**

We generally discard information about you when it's no longer needed for the purposes for which we collect and use it — described in the section above on How and Why We Use Information — and we're not legally required to keep it. For example, we keep the web server logs that record information about a visitor to one of Cling's websites, like the visitor's IP address, browser type, and operating system, for approximately 180 days. We retain the logs for this period of time in order to, among other things, analyze traffic to Cling's websites and investigate issues if something goes wrong on one of our websites. As another example, when you delete a Customer, proposal or other entry this deleted content are removed from your account but it may remain on our backups and caches until purged.

## **Security**

While no online service is 100% secure, we work very hard to protect information about you against unauthorized access, use, alteration, or destruction, and take reasonable measures to do so. We monitor our Services for potential vulnerabilities and attacks.

## **Choices**

You have several choices available when it comes to information about you:

- **Limit the information that you provide:** If you have an account with us, you can choose not to provide the optional account information, profile information, and transaction and billing information. Please keep in mind that if you do not provide this information, certain features of our Services may not be accessible.
- **Limit access to information on your mobile device:** Your mobile device operating system should provide you with the option to discontinue our ability to collect stored information or location information via our mobile apps. If you choose to limit this, you may not be able to use certain features.

- **Opt out of marketing communications:** You may opt out of receiving promotional communications from us. Just follow the instructions in those communications or let us know. If you opt out of promotional communications, we may still send you other communications, like those about your account and legal notices.
- **Set your browser to reject cookies:** At this time, Cling does not respond to “do not track” signals across all of our Services. However, you can usually choose to set your browser to remove or reject browser cookies before using Cling’s websites, with the drawback that certain features of Cling’s websites may not function properly without the aid of cookies.
- **Close your account:** While we’d be very sad to see you go, you can close your account if you no longer want to use our Services by for example contacting us through support chat or support@cling.se. Please keep in mind that we may continue to retain your information after closing your account, as described in How Long We Keep Information above — for example, when that information is reasonably needed to comply with (or demonstrate our compliance with) legal obligations such as law enforcement requests, or reasonably needed for our legitimate business interests.

## Your Rights

If you are located in certain parts of the world, including California and countries that fall under the scope of the European General Data Protection Regulation (aka the “GDPR”), you may have certain rights regarding your personal information, like the right to request access to or deletion of your data.

***European General Data Protection Regulation (GDPR)*** If you are located in a country that falls under the scope of the GDPR, data protection laws give you certain rights with respect to your personal data, subject to any exemptions provided by the law, including the rights to:

- Request access to your personal data;
- Request correction or deletion of your personal data;
- Object to our use and processing of your personal data;
- Request that we limit our use and processing of your personal data; and
- Request portability of your personal data.

You also have the right to make a complaint to a government supervisory authority.

***California Consumer Privacy Act (CCPA)*** The California Consumer Privacy Act (“CCPA”) requires us to provide California residents with some additional information about the categories of personal information we collect and share, where we get that personal information, and how and why we use it. The CCPA also requires us to provide a list of the “categories” of personal information we collect, as that term is defined in the law, so, here it is. In the last 12 months, we collected the following categories of personal information from California residents, depending on the Services used:

- Identifiers (like your name, contact information, and device and online identifiers);
- Commercial information (your billing information and purchase history, for example);
- Characteristics protected by law (for example, you might provide your gender as part of a research survey for us);
- Internet or other electronic network activity information (such as your usage of our Services)
- Geolocation data (such as your location based on your IP address);
- Audio, electronic, visual or similar information (such as your profile picture, if you uploaded one);
- Professional or employment-related information (for example, your company and team information, or information you provide in a job application); and
- Inferences we make (such as likelihood of retention or attrition).

You can find more information about what we collect in the Information We Collect section above. We collect personal information for the business and commercial purposes described in the How and Why We Use Information section. And we share this information with the categories of third parties described in the Sharing Information section. If you are a California resident, you have additional rights under the CCPA, subject to any exemptions provided by the law, including the right to:

- Request to know the categories of personal information we collect, the categories of business or commercial purpose for collecting and using it, the categories of sources from which the information came, the categories of third parties we share it with, and the specific pieces of information we collect about you;
- Request deletion of personal information we collect or maintain;
- Opt out of any sale of personal information; and
- Not receive discriminatory treatment for exercising your rights under the CCPA.

***Contacting Us About These Rights*** You can usually access, correct, or delete your personal data using your account settings and tools that we offer, but if you aren't able to or you'd like to contact us at [support@cling.se](mailto:support@cling.se). When you contact us about one of your rights under this section, we'll need to verify that you are the right person before we disclose or delete anything. For example, if you are a user, we will need you to contact us from the email address associated with your account. You can also designate an authorized agent to make a request on your behalf by giving us written authorization. We may still require you to verify your identity with us.

## **Controllers and Responsible Companies**

Cling's Services are worldwide. Different Cling companies are the controller (or co-controller) of personal information, which means that they are the company responsible for processing that information, based on the particular service and the location of the individual using our Services. Depending on the Services you use, more than one company may be the controller of your personal data. Generally, the "controller" is the Cling company that entered into the contract with you under the Terms of Service for the product or service you use. In addition, Cling Group AB, our Swedish based company, is the controller for some of the processing activities across all of our Services worldwide.

## **How to Reach Us**

If you have a question about this Privacy Policy, or you would like to contact us about any of the rights mentioned in the Your Rights section above, please contact us via our support chat that you find on <https://cling.se> or via email [email](mailto:support@cling.se). Which is the fastest ways to get a response to your inquiry, but you can also contact us by telephone at +46 850 119 885

## **Other Things You Should Know (Keep Reading!)**

***Transferring Information*** Because Cling's Services are offered worldwide, the information about you that we process when you use the Services in the EU may be used, stored, and/or accessed by individuals operating outside the European Economic Area (EEA) who work for us, other members of our group of companies, or third-party data processors. This is required for the purposes listed in the [How and Why We Use Information section](#) above. When providing information about you to entities outside the EEA, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this Privacy Policy as required by applicable law. These measures include:

- In the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the [EU-US Privacy Shield](#); or
- In the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them.

You can ask us for more information about the steps we take to protect your personal information when transferring it from the EU.

***Third party service providers*** Other parties may also provide analytics services via our Services. These ad networks and analytics providers may set tracking technologies (like cookies) to collect information about your use of our Services and across other websites and online services. These technologies allow these third parties to recognize your device to compile information about you or others who use your device. This information allows us and other companies to, among other things, analyze and track usage, determine the popularity of certain content, and deliver ads that may be more targeted to your interests. Please note this Privacy Policy only covers the collection of information by Cling and does not cover the collection of information by any third-party advertisers or analytics providers.

For EU and EEA users, visitors and end customers (recivers of proposals and invoices) the [Integritetspolicy is applicable](#)

***Third-Party Software and Services*** If you'd like to use third-party plugins please keep in mind that interacting with them may mean providing information about yourself (or your customers) to those third parties. For example, some third-party services may request or require access to your (yours, your visitors', or customers') data via a pixel or cookie. Please note that if you use the third-party service or grant access, your data will be handled in accordance with the third party's privacy policy and practices. We don't own or control these third parties, and they have their own rules about information collection, use, and sharing, which you should review before using the software or services.

**Customers to Our Users** We also process information about Customers to our users, on behalf of our users and in accordance with our user agreements and this privacy policy.

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## **Privacy Policy Changes**

Although most changes are likely to be minor, Cling may change its Privacy Policy from time to time. Cling encourages visitors to frequently check this page for any changes to its Privacy Policy. If we make changes, we will notify you email and in some cases, we may provide additional notice (like adding a statement to our homepage or the cling.se Blog. Your further use of the Services after a change to our Privacy Policy will be subject to the updated policy.

That's it! Thanks for reading.