



Privacy Policy

Effective as of: 01/20/19

Your privacy is important, so Clust Technologies S.A.S., a French corporation ("Clust"), has created the following Privacy Policy to let you know what information we collect when you visit our Site, why we collect it and how it is used.

This Privacy Policy explains the data collection and use practices of Clust. The terms "You," "Your," "Yours" and "User" refer to the entity/person/organization utilizing our Site.

The terms "Clust," "We," "Us," and "Our" refer to Clust and its subsidiaries and affiliates.

This Privacy Policy is governed by our Terms of Use / Terms of Service.

The terms "Site", "Website", "Application", "Product", and "Service" refer to the web site and services provided by Clust. This Privacy Policy does not apply to any third-party websites and apps that you may use, including any that are linked to in our Services. You should review the terms and policies for third-party websites and apps before clicking on any links.

Clust provides on-demand Document Collection services, which includes the ability to request, collect, display, receive, share and acknowledge documents from Third -parties. We also have application programming interfaces (APIs) that allow you to build seamless embedded Document requests services into your website, application and other properties.

Section 1: Information we collect

1.1 INFORMATION WE ASK YOU TO PROVIDE

When registering for or using the Clust Service, we collect personal information from you. For example, when you create a Clust account, we ask for your email address and a password. We may also collect information such as your phone number (for online demos), your age (to make sure you're allowed to use our Service) or your address for billing purposes.

You may also provide us with personal information about other individuals when you use our Services, such as when you send a Document Request, share information about such this specific transaction, or ask others to send you information, documents or files during a Free Trial Account or Paid Account.

1.2 INFORMATION THAT WE COLLECT AUTOMATICALLY

We collect information from you and about your device. This includes data about your software, the operating system version you use when accessing our service, your

Internet Protocol address, precise geolocation information, unique device identifiers, and your usage data (such as weblogs, time spent on a URL, etc.).

We also collect data related to requests/transactions such as names, email addresses of individuals who are part of an Document request, Requests IDs, and the history of such (e.g. sent date/time, when Document Request was opened, reviewed, returned etc.).

1.3 INFORMATION THAT WE COLLECT FROM THIRD PARTIES

We may share and/or collect additional information about you from third parties primarily to assist us in understanding how we can maintain and improve the services we offer to better serve you. For example:

Analytics

We use services like Google Analytics and Heap, which use cookies and other tracking technologies to gather usage data that allows us to improve our products and services.

Google Analytics (Google LLC)

The services contained in this section enable Clust to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

1.4 INFORMATION WE HAVE TO PROCESS AND COLLECT ON BEHALF OF YOU

As a reminder, the use of information collected through our service shall be limited to the purpose for which you have engaged Clust.

When you use our Services, **you require us to process and store certain information on your behalf as a Data processor.**

For example, when a Recipient uploads a document on your Document Request, we act as a data processor and process information on Your behalf and in accordance with Your instructions.

In this situation, You are the data controller and **You are responsible for most aspects of the processing of the information.**

Clust acknowledges that anyone involved in a Document request has the right to access their personal information.

However, as Clust has no direct relationship with the individuals whose personal data is processed, an individual who seeks access, or who seeks to correct, amend, or delete data (Documents, information, Name, email of clients, suppliers, partners, employees collected by the Controller using Clust) should direct their questions to You (the data controller).

You'll be able to delete their information directly from their account.

Note for Clust Recipients (Clust Users' clients, suppliers, candidates, borrowers etc)

If requested to remove data we will respond within a reasonable timeframe. If you have any questions or concerns about how information is processed in these cases, including how to exercise your rights as a data subject, we recommend contacting **the Sender of the Document Request.**

Cookies

Cookies are small text files stored by your browser on your computer when you visit our Site. We use cookies to improve our Site and make it easier to use.

Cookies permit us to recognize users and avoid repetitive requests for the same information.

Cookies from our Site cannot be read by other Sites.

Most browsers will accept cookies unless you change your browser settings to refuse them.

Clust and its partners use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Website or Service.

Cookies categories	Description
Authentication	They help us to show you the right information and customize your experience when you are logged in.
Security	They allow us to implement and maintain security features as well as to help us detect malicious activities.
Preferences, features and services	They help us to remember your favorite language and can make it easier for you when filling out forms on our site.
Marketing	<p>We can use these cookies to carry out marketing campaigns and to track their performance (for example, a user visited our support Center and then subscribed to a subscription).</p> <p>Similarly, our partners (e.g. chat) may have this type of cookies to provide us with information about your interactions with their services, but the use of these third-party cookies will be subject to the service provider's policies.</p>
Performances, analysis et research	They help us to know if our Sites and Services are working well. They are also used to create records and registers when you access our Sites and Services from different devices such as your desktop or mobile device.

2. How we use your information

We may use the information we collect through our products for a number of reasons, including to:

- provide, operate, optimize and maintain our products and services;
- set your account(s);
- send you records of your use of the service, including for purchases or other events;
- understand how you use our products and customize your experience;
- record details about your Document Requests, workflows and other transactions (such as when they were opened, when information was returned, and when/where this took place);
- provide customer support and send you email about new features or products;
- respond to with your enquiries and requests;
- fix issues or problems with our products and services;
- prevent abuse of the products and services we offer; and
- carry out other legitimate business purposes, such as to improve our products and services, as well as other lawful purposes about which we will notify our users and clients.

We will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate business interests.

In some cases, we may also have a legal obligation to collect personal information from you.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the 'How to contact us' heading below.

3. How we may share your information

We may use your personally identifiable information as described below:

3.1 VENDORS AND OTHER THIRD-PARTY SERVICE PROVIDERS

We may share your information with third parties that we use to provide and support our Services. These parties provide services such as authentication, billing and collections, customer support, or data storage.

Google Drive account access (Google LLC)

This service allows Clust to connect with your account on Google Drive, provided by Google LLC.

Clust users can save the requested documents to the cloud folders of their choice.

To activate that feature, they need to login with their Google account and grant Clust the rights to upload the documents to their folders. Clust will never read or write folders out of the Clust folder in the user's cloud account.

DropBox

This service allows Clust to connect with your account on DropBox, provided by DropBox, Inc.

Clust users can save the requested documents to the cloud folders of their choice.

To activate that feature, they need to login with their DropBox account and grant Clust the rights to upload the documents to their folders. Clust will never read or write folders out of the Clust folder in the user's cloud account.

Box

This service allows Clust to connect with your account on Box, provided by Box, Inc.

Clust users can save the requested documents to the cloud folders of their choice.

To activate that feature, they need to log in with their Box account and grant Clust the rights to upload the documents to their folders. Clust will never read or write folders out of the Clust folder in the user's cloud account.

One Drive, SharePoint

This service allows Clust to connect with your account on OneDrive and SharePoint, provided by Microsoft Corp, Inc.

Clust users can save the requested documents to the cloud folders of their choice. To activate that feature, they need to log in with their One Drive and SharePoint account and grant Clust the rights to upload the documents to their folders. Clust will never read or write folders out of the Clust folder in the user's cloud account. We enter into legally binding agreements with these third-party service providers that protect your personal information and are not permitted to use your information for their own purposes.

3.2 COMPLIANCE WITH LAW, SAFETY, SECURITY, BUSINESS TRANSACTIONS

We may also disclose your information to third parties:

(a) where required by law or regulatory requirement, court order or other judicial authorization,

(b) in response to lawful requests by public authorities, including for the purposes of meeting national security and law enforcement requirements;

(c) in connection with the sale, transfer, merger, bankruptcy, restructuring or other reorganization of a business;

(d) to protect or defend our rights, interests or property, or that of third parties;
(e) to investigate any wrongdoing in connection with our products and services;
and

(f) to protect the vital interests of an individual.

To other persons with your consent (e.g. fulfilling your Document Requests)

4. How we protect your information

The [security of your personal information](#) is important to us. For the last several months, we've worked diligently to ensure all GDPR compliance requirements were met by our Company. Read more about our GDPR Commitment on our Help Center.

5. We are here for you

Upon your written request, We will provide you with information about whether we hold any of your personal information. You may access, correct, or request deletion of your personal information by logging into your account, or by contacting us using the contact form in your account. We will respond to your request within a reasonable timeframe.

5.1 ACCESS

If you wish to access your personal information that Clust collects, you can do so at any time through the Service or by contacting us using the contact details provided below.

5.2 CORRECTION, UPDATE OR DELETION

You can correct, update or request deletion of your personal information through the Service interface, or by contacting us using the contact details provided below.

5.3 OBJECT TO PROCESSING

When we reply on your consent to process your personal information, you may withdraw consent at any time by contacting us using the contact details provided below. This will not affect the lawfulness of processing prior to the withdrawal of your consent.

5.4 DATA PROTECTION AUTHORITY

You have a right to raise questions or complaints with your local data protection authority at any time.

6. How we protect children

This site and our Services are not intended for or directed to persons under the age of 18. We do not knowingly collect or ask for information from minors. We do not knowingly allow minors to use our Services.

Any person who provides their information to Clust through the Account Login page for new customers, Signup Page, or any other part of the Clust Site represents to Clust that they are 18 years of age or older.

We will delete any information we discover is collected from a minor. Please contact us using the contact details below if you believe we might have information about a minor.

7. Changes to this policy

If we change our privacy policies and procedures materially, we will post those changes to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it.

Changes to this Privacy Policy are effective when they are posted on this page.

When we change the policy in a material manner we will update the 'effective date' at the top of this page, and we may also notify you of the change via email or other prominent notice posted on this site or the Service.

8. Website edition

The site clustdoc.com is published by the company Clust Technologies S.A.S, registered with Paris Trade and Companies Register under the N° 844 644 807.

9. Host Headquarters

Amazon Services Europe S.à r.l, Société à responsabilité limitée, 5 Rue Plaetis, L2338 Luxembourg

Share Capital: EUR 37,500

Registered in Luxembourg

RCS Luxembourg No: B 93815

Business Licence Number: 1 100416

Luxembourg VAT Registration Number: LU 19647148

10. CNIL

The collection and processing of personal data by the company has been the subject of a simplified declaration with the French Authority for the protection of personal data (the National Commission for Informatics and Freedom -CNIL) (No. 2093325).

You have the right to access and rectify the information that concerns you, which you can exercise by contacting the CNIL head of the company at the following postal address (or electronic): 39 BD Auguste Blanqui, 75013 Paris (contact@clustdoc.com).

You may also, for legitimate reasons, oppose the processing of your data.

11. How to contact us

For questions or concerns regarding the collection, use, or disclosure of your information, you can contact us by sending an email to [**contact@clustdoc.com**](mailto:contact@clustdoc.com) or by contacting us at: Clust Technologies, 18 rue Clairaut 75017 Paris, France.