

Privacy Policy

This Privacy Policy (herein referred to as “Policy”) explains how ClearSustain IMS (herein referred to as the “Company,” “we,” “us,” or “our”) processes Personal Data that we collect from you (herein referred to as the “Subscriber”) as a Controller.

1. DEFINITIONS.

- (a) “**Controller**” means the natural or legal person, public authority, agency, or other body, which alone or jointly with others, determines the purposes and means of processing Personal Data.
- (b) “**Personal Data**” means any information relating to an identified or identifiable natural person (“**data subject**”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- (c) “**Service(s)**” means management system consulting services, templates, and documentation.
- (i) “**Subscriber**” means the natural or legal person who has subscribed to the Service(s) by agreeing to the Terms.
- (ii) “**Terms**” means the binding contract between the Company and Subscriber that governs the Subscriber's access and use of the Service(s).

2. DATA COLLECTION.

The Subscriber directly provides the Company with most of the data we collect. The Company collects Personal Data from the Subscriber from the following sources:

Information you enter yourself, data about your consumption of content, and data from third-party platforms you connect with us.

3. PROCESSING OF PERSONAL DATA.

- (a) The Company processes the Subscriber’s Personal Data to provide our Services, communicate with you, troubleshoot issues, secure against fraud and abuse, improve and update our Services,

analyze how people use our Services, serve personalized advertising, and as required by law or necessary for safety and integrity.

(b) The Company will generally collect Personal Data from Subscribers only where it needs to create a contract with the Subscriber, where the processing is in the Company's legitimate interests and not overridden by the Subscriber's data protection interests or fundamental rights and freedoms, or where the Company has the Subscriber's consent. In some cases, the Company may also have a legal obligation to collect Personal Data from the Subscriber.

(c) If the Company processes Personal Data with the Subscriber's consent, the Subscriber may withdraw their consent at any time.

4. SHARING OF PERSONAL DATA.

(a) The Subscriber acknowledges that the Company may share the Subscriber's Personal Data with its group companies and third-party service providers to offer the Subscriber the Company's Service(s) and/or send information or updates about the Service(s).

(b) When the Company processes the Subscriber's order, it may send the Subscriber's Personal Data and use the resulting information from credit reference agencies to prevent fraudulent purchases.

(c) The Company shares Personal Data in the following instances:

- With Service Providers, Contractors, and Agents: We share your data with third-party companies who perform services on our behalf, like payment processing, fraud and abuse prevention, data analysis, marketing and advertising services (including retargeted advertising and affiliate marketing), email and hosting services, and customer services and support.
- With Analytics and Data Enrichment Services: As part of our use of third-party analytics tools and data enrichment services, we share certain contact information or de-identified data. De-identified data means data where we've removed things like your name and email address and replaced it with a token ID. This allows these providers to provide analytics services or match your data with publicly-available database information (including contact and social information from other sources). We do this to communicate with you in a more effective and customized manner and for marketing purposes. (Account Data; System Data; Usage Data; Cookie Data)
- To Administer Promotions and Surveys: We may share your data as necessary to administer, market, or sponsor promotions and surveys you choose to participate in, as required by applicable law, or in accordance with the rules of the promotion or survey. (Account Data; Promotions and Surveys)
- For Advertising: We may use and share certain Cookie Data with third-party advertisers and networks to show general demographic and preference information among our users. We may also allow advertisers to collect Cookie Data through Data Collection Tools, to use this data to offer you targeted ad delivery to personalize your user experience (through

behavioral advertising) and to undertake web analytics. Advertisers may also share with us the data they collect about you.

- For Security and Legal Compliance: We may disclose your data (all data categories) to third parties if we (in our sole discretion) have a good faith belief that the disclosure is:
 - Requested as part of a judicial, governmental, or legal inquiry, order, or proceeding;
 - Reasonably necessary as part of a valid subpoena, warrant, or other legally-valid request;
 - Reasonably necessary to enforce our Terms of Use, Privacy Policy, and other legal agreements;
 - Required to detect, prevent, or address fraud, abuse, misuse, potential violations of law (or rule or regulation), or security or technical issues;
 - Reasonably necessary in our discretion to protect against harm to the rights, property, or safety of the Company, our users, employees, members of the public, or our Services;
 - We may also disclose data about you to our auditors and legal advisors in order to assess our disclosure obligations and rights under this Privacy Policy; or
 - Required or permitted by law.
- During a Change in Control: If the Company undergoes a business transaction like a merger, acquisition, corporate divestiture, or dissolution (including bankruptcy), or a sale of all or some of its assets, we may share, disclose, or transfer all of your data to the successor organization during such transition or in contemplation of a transition (including during due diligence). (All data categories)
- After Aggregation/De-identification: We may disclose or use aggregated or de-identified data for any purpose.
- With Your Permission: With your consent, we may share data to third parties outside the scope of this Privacy Policy. (All data categories)

5. RETENTION OF PERSONAL DATA.

(a) Company retains the Personal Data when an ongoing legitimate business requires retention of such Personal Data.

(b) In the absence of a need to retain Personal Data, the Company will either delete or aggregate it. If this is not possible, the Company will securely store your Personal Data and isolate it from any further processing until it is deleted.

6. SECURITY OF PERSONAL DATA.

The Company uses appropriate technical and organizational measures to protect the Personal Data it collects and processes. These measures are designed to provide a high level of security appropriate to the risk of processing the Subscriber's Personal Data. If you are a Subscriber and have any concerns about the security of your Personal Data, please contact us immediately.

7. MODIFICATION.

The Company keeps this Policy under regular review and may update this webpage at any time. This Policy may be amended at any time, and the Subscriber shall be notified only if there are material changes to this Policy.

8. CONTACT DETAILS.

If you have any concerns about this Policy, please get in touch with us at info@clearsustainims.com.