

ClearIP Privacy Policy

ClearIP's Privacy Policy describes how ClearIP collects, uses, and shares your personal data.

Updated July 4th, 2024



Please take a moment to familiarize yourself with our privacy practices, accessible via the headings below, and contact us if you have questions.

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1. Introduction and Policy Updates

This Privacy Policy, as amended or otherwise changed from time to time (the "Privacy Policy" or "Policy"), explains the manner in which CLEAR IP LIMITED, registry code 757247, IRELAND Dublin 39 Mount Pleasant Square Dublin 2 (hereinafter "CLEAR IP LIMITED" or the "Company") maintains and discloses user information obtained through its website <https://www.clearip.ai> (the "Site"). The terms "we," "us," and "our" refer to the Company. By using the Site, you ("User") consent to the data practices prescribed in this Privacy Policy.

Your Personal Data is processed under this Privacy Policy and in accordance with applicable legislation, including the General Data Protection Regulation (2016/679) ("GDPR") and the applicable national data protection laws ("Data Protection Law"). The Company acts as data controllers of your Personal Data.

On occasion, the Company may revise this Privacy Policy to reflect changes in the law, our personal data collection and use practices, the features on the Site, or advances in technology. If material changes are made to this Privacy Policy, the changes will be prominently posted on the Site.

When we amend this Privacy Policy, we will update the "Effective Date" at the top of this Privacy Policy. We recommend that our users periodically review our Privacy Policy to ensure that they are notified of any updates. If necessary, we may notify users by email of changes to this Privacy Policy.

2. Personal Data ClearIP Collects from You

We collect or use the following information for **service updates, marketing, research and archiving**.

We may collect Personal Data from you, such as:

- first and last name
- e-mail and mailing addresses
- Employment Data
- Data on users' interests and reasons for engaging with Clear IP

If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.

2.1 Some information is collected automatically by our servers:

Our servers (which may be hosted by a third-party service provider) collect information from you, including your **browser type, operating system, Internet Protocol ("IP") address** (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), **domain name**, and/or a **date/time stamp** for your visit.

As is true of most websites, we gather certain information automatically and store in log files. This information includes IP addresses, browser type, Internet service provider ("ISP"), referring/exit pages, operating system, date/time stamp, and clickstream data. Like many online services, we use cookies to collect information. "Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing the website.

We retain information on your behalf, such as transactional data and other session data linked to your account.

We do not collect any **Special Categories of Personal Data** 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).

You are not required to provide the personal data that we have requested. However, if you choose not to do so, in many cases we will not be able to provide you with our products or services or respond to requests you may have.

3. ClearIP's Sharing of Personal Data

It may be necessary to disclose your information to comply with any law, court orders, or government request, defend against claims, investigate or bring legal action against illegal or suspected illegal activities, enforce our Terms, or protect the rights, safety, and security of the Company, our users, or the public.

We may share your Personal Data with third-party service providers to provide you with the services that we offer you through our Site. These third-party service providers are required not to use your Personal Data other than to provide the services requested by you.

3.1 Who we share information with

ClearIP may share personal data with **service providers** who act on our behalf, our **partners, developers, and publishers**, or others **at your direction**. Further, ClearIP does not share personal data with third parties for their own marketing purposes.

3.2 Disclosures to Third Parties

Our main data processor, *HubSpot*, collects and processes various types of personal information on behalf of its customers. This includes information provided by users during interactions with HubSpot's websites and services, such as email addresses, names, and job titles; data gathered during event registrations like INBOUND; account and user information; payment details; and usage data related to how customers interact with HubSpot's products. Additionally, HubSpot processes data collected through integrations with third-party services like Google Workspace and YouTube, and from other sources such as partners and third-party providers, to enhance their services and customer experience.

3.3 Legal Obligations and Disclosures

Other than as stated in this Privacy Policy, the Company does not disclose any of your personal information to third parties unless required to do so by law enforcement, court order, or in compliance with legal reporting obligations.

All third-party service providers that we share your data with shall be requested to only process your data in accordance with instructions from us and comply fully with this Privacy Policy, any applicable data protection laws and any other appropriate confidentiality and security measures. We may also share your personal data with competent authorities when this is necessary to comply with a legal obligation, court order or comparable official order issued by an authorized authority.

3.5 Mergers, Acquisitions, and Asset Sales

We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset.

If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

The Site may contain links to other third-party websites which are regulated by their own privacy policies. The Company is not responsible for the privacy policies of these third-party websites even if they were accessed using the links from our site.

4. Where do we store your Personal Data?

The information we collect is primarily stored on secure servers Ireland. We will take all steps reasonably necessary to ensure that personal information is treated securely and in accordance with this Privacy Policy and that any third parties that we share your information with are bound to employ similar organizational and technical measures to ensure your information's security.

4.1 How long do we store your personal data?

We keep the data you have provided to us on your user account for the whole period of your customer relationship and as long as it is necessary with regard to the purposes of the processing described above.

5. Your Legal Rights with ClearIP

5.1 What legal rights do you have in relation to your information?

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- **Right to Access:** You have the right to request a copy of the Personal Data we hold about you.
- **Right to Rectification:** You have the right to request that we correct any inaccuracies in your Personal Data.
- **Right to Erasure (Right to be Forgotten):** You have the right to request that we delete your Personal Data, subject to certain legal exceptions.
- **Right to Object:** You have the right to object to the processing of your Personal Data for certain purposes.
- **Right to Restriction of Processing:** You have the right to request that we restrict the -processing of your Personal Data in certain situations.
- **Right to Data Portability:** You have the right to request that we transfer your Personal Data to you or a third party in a structured, commonly used, and machine-readable format. This right is limited to data you initially provided with your consent or data we used to perform a contract with you.
- **Right to Withdraw Consent:** Where we rely on your consent to process your Personal Data, you have the right to withdraw your consent at any time. However, this withdrawal will not affect the lawfulness of any processing conducted before you withdrew your consent.

Withdrawing consent may also impact our ability to provide certain products or services. We will inform you of these potential consequences at the time you

withdraw your consent. Please note that, in some instances, we may still be able to process your data even after you withdraw consent if another legal basis for processing applies.

You also have the right to lodge a complaint with a Data Protection Authority (“DPA”) if you think that your Personal Data is being processed incorrectly or your rights have been violated by the Company.

5.2 No fee is usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data 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 data. 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. Please note that in certain circumstances it may be still lawful for us to continue processing your information even where you have withdrawn your consent if one of the other legal bases is applicable.

5.3 How to Opt-Out of Data Collection, Use or Disclosure

We provide the following specific opt-out method for the forms of collection, use, or disclosure of your personal data specified below:

You can opt-out of the use of your personal data for marketing emails. You can opt-out by clicking "**unsubscribe**" on the bottom of any marketing email.

6. Children and Personal Data

ClearIP does not knowingly collect or use personal data from children under 16 years of age. If we learn that we have collected personal data from a child under 16 years of age, the personal data will be deleted as soon as possible. If a child under 16 years of age has provided us with personal data, their parent or guardian may contact us.

7. Cookies and Other Technologies

7.1 Definition and Use

A cookie is a small file, stored on a user's hard drive by a website. Its purpose is to collect data relating to the user's browsing habits.

You can choose to be notified each time a cookie is transmitted. You can also choose to disable cookies entirely in your internet browser, but this may decrease the quality of your user experience.

We use the following types of cookies on our Site:

Analytical cookies allow us to improve the design and functionality of our Site by collecting data on how you access our Site, for example data on the content you access, how long you stay on our Site, etc; and

Third-party cookies are created by a website other than ours. We may use third-party cookies to achieve the following purposes:

- HubSpot tracks visitors using browser cookies. Every time a visitor lands on your website, HubSpot will check for an existing tracking cookie.

If you prefer that ClearIP not use cookies, we provide you with the means to disable their use. If you are using a specific browser, check with your provider to find out how to disable cookies.

8. Transfer of Personal Data Between Countries

Personal data collected by ClearIP is generally stored by ClearIP Inc. in Ireland. Regardless of where your personal data is stored, ClearIP maintains the same high level of protection and safeguarding measures.

9. Privacy Questions

9.1 Complaints Regarding Privacy Practices

Where your complaint indicates an improvement could be made in our handling of privacy issues, we will take steps to make such an update at the next reasonable opportunity. In the event that a privacy issue has resulted in a negative impact on you or another person, we will take steps to address that with you or that other person.

You may at any time — including if you are not satisfied with ClearIP’s response — refer your complaint to the applicable regulator. If you ask us, we will endeavour to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

9.2 How can you send requests regarding your information?

You can make a request regarding your information by emailing team@clearip.ai.

Unless you have made a corresponding request, we will retain your information for as long as your account has not been closed or as needed to provide you access to your account.

9.3 Account Closure

If you wish to close your account, please contact support team via e-mail. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our Terms.