



PRIVACY POLICY

WHO WE ARE ?

ClearGlass respects your privacy and takes its obligations to protect your personal information very seriously. This Privacy Policy (“the Policy”) describes how we use your personal data to comply with the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

Your personal information is collected by ClearGlass Analytics Limited (“ClearGlass”) (company number 11561505) (“we”/“us”/“our”). ClearGlass is a wholly independent legal entity and is not a subsidiary or affiliate of any other company.

TO WHOSE PERSONAL INFORMATION DOES THIS POLICY APPLY?

This Policy describes our practices when using the personal information of individuals who use the ClearGlass dashboard (for example, employees or representatives of Asset Managers or Asset Owners). “Asset Manager” and “Asset Owner” are defined in the ClearGlass Terms and Conditions.

DATA COLLECTION AND USAGE ?

We will collect, store and use your personal information as set out in more detail in this section. Personal information we collect will be limited, including a dashboard user’s name, professional contact details, login details for authentication and, in certain circumstances, payment details.

How we use the personal information we collect about ClearGlass dashboard users

We use personal information from ClearGlass dashboard users for certain activities, including:

1. to decide whether to accept any individual as a dashboard user and to set up an account for a dashboard user;
2. to process payments and keep a record of purchases;
3. to verify dashboard user login details;
4. to provide, manage and administer our dashboard services;
5. to provide support and assistance with dashboard user accounts; and
6. to develop and improve our services based on the feedback you provide.

Why we use the personal information of ClearGlass dashboard users

We use this information because:

1. it is necessary to enter into or perform our contract with you;
2. it is necessary to comply with legal or regulatory requirements;
3. it is necessary for the purposes of our or a third party's legitimate business interests. We have legitimate business interests to use your information in:
 - a. providing the ClearGlass dashboard services;
 - b. monitoring, investigating and reporting any attempts to breach the security of the dashboard;
 - c. improving the performance and user experience of the dashboard;
 - d. performing our obligations under our contracts with our users;
 - e. managing our business and brand by responding promptly to complaints; and
 - f. building and maintaining ongoing relationships with Asset Owners and Asset Managers who use the dashboard.

If you have any questions at any time you can contact us at **support@clearglass.com**

In certain circumstances, if dashboard user does not provide personal information which is required we will not be able to perform our obligations under the contract with them or comply with our legal requirements. We will make it clear if and when this situation arises and what the consequences of not providing the information will be for the dashboard user.

Recipients of ClearGlass dashboard user information

We may disclose ClearGlass dashboard user information as follows:

1. to third parties who work on our behalf to service or maintain the dashboard, and systems processing account information, such as supplier systems supporting the dashboard;
2. to our professional advisers or suppliers (such as auditors and lawyers);
3. to competent authorities such as tax authorities, courts, regulators and security or police authorities where required or requested by law or where we consider it necessary;
4. if we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
5. if we are defending a legal claim your information may be transferred as required in connection with defending such claim.

HOW LONG DO WE KEEP YOUR INFORMATION ?

We will retain your information as long as is necessary to comply with legal, accounting or reporting requirements. If you would like more information on our data retention periods, please contact us using the contact details below.

YOUR RIGHTS

You have certain rights in relation to your information, as set out in more detail below.

Access: you are entitled to ask us if we are processing your information and, if we are, you can request access to your personal information.

Correction: you are entitled to request that any incomplete or inaccurate personal information we hold about you is corrected.

Erasure: you are entitled to ask us to delete personal information.

Restriction: you are entitled to ask us to suspend the processing of your personal information, for example if you want us to establish its accuracy.

Transfer: you may request the transfer of your personal information to another party.

Objection: you have a right to object to us processing your information.

You also have a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where you are habitually resident, where we are based in the UK or where an alleged infringement of data protection law has taken place. In the UK you can make a complaint to the Information Commissioner's Office (Tel: 0303 123 1113 or at www.ico.org.uk).

Some of these rights will only apply in certain circumstances. If you would like to exercise, or discuss, any of these rights, please contact us on the contact details below.

CHANGES TO THIS POLICY

This policy will be changed from time to time. If we change anything important about this policy (the information we collect or how we use it) we will contact you prior to the change taking effect and highlight those changes at the top of the policy for a reasonable length of time following the change.

CONTACT DETAILS

ClearGlass' contact details are as follows:

If you have any questions at any time you can contact us at support@clearglass.com. You can also contact us using the Live Chat feature on the ClearGlass dashboard.