



# PRIVACY POLICY

Last Modified: May 24<sup>th</sup>, 2018

## INTRODUCTION

This Policy provides our policies and procedures for collecting, using, and disclosing your information.

All the different forms of data, content, personal data and information described below are collectively referred to as "information".

This Policy applies to SMART GOVERNANCE Website, SMART GOVERNANCE official Social Media Channels and marketing actions conducted exclusively by CAVEDIGITAL.

Our Social Media Channels include Facebook, LinkedIn, Instagram, Twitter and our Blog at WordPress.com.

## THE INFORMATION WE COLLECT AND STORE

We may collect and store the following information when accessing CAVEDIGITAL website:

**Information You Provide:** when you request a SMART GOVERNANCE demonstration, we collect some personal information, such as your name, phone number, and email address.

**Log Data:** when you use the Service, we may automatically record information from your Device, its software, and your activity using the Service. This may include the Device's Internet Protocol ("IP") address, browser type, the web page visited before you came to our website, information you search for on our website, locale preferences, identification numbers associated with your Devices, your mobile carrier, date and time stamps associated with transactions, system configuration information, metadata concerning your Files, and other interactions with the Service.

**Cookies:** we also use "cookies" to collect information and improve our Services. A cookie is a small data file that we transfer to your Device. We may use "session ID cookies" to enable certain features of the Service, to better understand how you interact with the Service and to monitor aggregate usage and web traffic routing on the Service. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of the Service.

## HOW WE USE PERSONAL INFORMATION

**Personal Information:** while using the Service, we may collect personal information that can be used to contact or identify you ("Personal Information").

Personal Information is or may be used:

- (i) to promote an in-person or online meeting demonstration of the product and its add-ons;
- (ii) to announce software updates, product launches, or any other marketing content related exclusively to our products and services; and
- (iii) to share CAVEDIGITAL promoted events, our presence in national and international fairs, expositions, job opportunities.

**Analytics and Website Messaging:** we also collect some information using logging and cookies, such as IP address, which can sometimes be correlated with Personal Information. We use this information to study the attractiveness and efficacy of our website layout, marketing campaigns and social media contents. As of the date this policy went into effect, we use Google Analytics. To learn more about the privacy policy of Google Analytics, click [here](#), and to learn how to opt out of that service click [here](#).

For website messaging, as of the date this policy went into effect, we use Intercom. To learn more about the privacy policy of Intercom, click [here](#).

**Geo-Location Information:** some devices allow access to real-time location-based information (for example, GPS). We may use this information to better serve you content that may be more relevant to you, such as notify you with a message on our website that we'll be visiting your city or participate on a specific event near you or suggest to introduce you to a local partner.

## INFORMATION SHARING AND DISCLOSURE

WE DO **NOT** SELL YOUR PERSONAL INFORMATION TO ANY THIRD PARTIES.

**Compliance with Laws and Law Enforcement Requests; Protection of CAVEDIGITAL's Rights:** we may disclose the collected information to parties outside CAVEDIGITAL when we have a good faith belief that disclosure is reasonably necessary to:

- (i) comply with a Law, regulation or compulsory legal request;
- (ii) protect the safety of any person from death or serious bodily injury;
- (iii) prevent fraud or abuse of CAVEDIGITAL SMART GOVERNANCE or its users; and
- (iv) protect CAVEDIGITAL's property rights.

**Business Transfers:** if we are involved in a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred as part of that transaction, but we will notify you (for example, via email and/or a prominent notice on our website) of any change in control or use of your Personal Information or Files, or if either become subject to a different Privacy Policy. We will also notify you of choices you may have regarding the information.

**Non-private or Non-Personal Information:**

We may use aggregated or disclose non-private non-personal information for statistical and analytical purposes of our website,

We may disclose your non-private, aggregated, or otherwise non-personal information, such as usage statistics of our Service.

## ACCESSING AND CHANGING YOUR INFORMATION

**Right of Access:** you have the right to access to your personal data and the categories of personal data concerned. We shall provide a copy of your requested personal data undergoing processing. For any further copies requested by the data subject, CAVEDIGITAL may charge a reasonable fee based on administrative costs.

**Right to Rectification:** you may request rectification if your personal information is inaccurate.

**Right to be Forgotten:** you may request that your personal information is erased in certain situations. However, in the following situations data erase will not proceed:

- (i) for exercising the right of freedom of expression and information;
- (ii) for compliance with a legal obligation under the European Union, Member State or any Official Authority Entity;
- (iii) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or
- (iv) for the establishment, exercise or defence of legal claims.

You can exercise your rights above using our email address [privacy@cavedigital.com](mailto:privacy@cavedigital.com) where you can request access, edition and deletion of your personal information, as well as limit or opt-out of the collection and use of your information in accordance with applicable law.

## DELETING YOUR INFORMATION

If you no longer wish to receive communications from us, please follow the "unsubscribe" instructions provided in any of those communications. Or you can send an email to [privacy@cavedigital.com](mailto:privacy@cavedigital.com) with "UNSUBSCRIBE" in the subject of the email.

If your personally identifiable information changes, or if you no longer desire our service, you may update or delete it by contacting us.

For questions about your Personal Information, please contact [privacy@cavedigital.com](mailto:privacy@cavedigital.com). We will respond to your inquiry within 30 days.

## DATA RETENTION

CAVEDIGITAL has the right to have personal data concerning him or her rectified and a 'Right to be Forgotten' where the retention of such data infringes the General Data Protection (GDP) Regulation or Union or Member State law to which CAVEDIGITAL is subject.

You have the right to have your personal data erased and no longer processed where:

- (i) the personal data are no longer necessary in relation to the purposes for which they are collected or otherwise processed;
- (ii) the data subject has withdrawn his or her consent or objects to the processing of personal data concerning him or her; or
- (iii) the processing of your personal data does not otherwise comply with the GDP Regulation.

We may retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Consistent with these requirements, we will try to delete your information quickly upon request.

## COMMUNITY

Our Site includes links to other Websites whose privacy practices may differ from those of CAVEDIGITAL. If you submit personal information to any of those sites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any Web site you visit.

## CONTACTING US

If you have any questions about this Privacy Policy, please contact us at [privacy@cavedigital.com](mailto:privacy@cavedigital.com).

If you no longer wish to receive communications from us, please follow the "unsubscribe" instructions provided in any of those communications. Or you can send an email to [privacy@cavedigital.com](mailto:privacy@cavedigital.com) with "UNSUBSCRIBE" in the subject of the email.

## CHANGES TO OUR PRIVACY POLICY

This Privacy Policy may change from time to time. By continuing to use our website after those changes become effective, you agree to be bound by the revised Privacy Policy.