

CG-DPR-GUI-001	PRIVACY NOTICE
Rev 01	WEBSITE PRIVACY NOTICE

1 PURPOSE

This website is owned by Clinglobal Ltd and its Partner Companies, hereinafter collectively referred to as (“the Company”). This Notice outlines our data protection practices concerning the Personal Data of our valued website visitors, where we act as the data Controller.

We have separate Privacy Notices for our clients and their representatives, suppliers, employees, and job candidates.

We are committed to protecting your Personal Data. The intention of this Privacy Notice is to inform you regarding the way we would use your Personal Data, as required by the European Union General Data Protection Regulation (hereafter the “GDPR”) and to the relevant local legislation in the country where Clinglobal Ltd or the Partner Companies are respectively incorporated (herein collectively referred to as the “Data Protection Laws”). other applicable legislation. We recommend you read this Privacy Notice so that you understand our approach towards the use of your Personal Data.

Our Website Privacy Notice sets out the types of Personal Data we collect, how we collect and process that data, who we may share this information with and the rights you have in this respect. As a data controller, we determine the purposes and means of processing of that Personal Data.

By using our website, you acknowledge that you have read and understood the terms of this Website Privacy Notice.

In this Notice, "we", "us" and "our" refer to Clinglobal and its Partner Companies.

2 SCOPE

The DPO is responsible to implement appropriate policies, practices and procedures to support all the Articles listed, supported by members of the Data Protection Team (DPT).

This Privacy Notice forms part of- and ensures that the Data Protection and Privacy Policy is actioned through detailed measures and controls that the Company takes to protect Personal Data.

3 DEFINITIONS

Cookies	Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any data stored on your computer or your files. When a server uses a web browser to read cookies, they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.
Controller	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; where the purposes and means of such processing are determined by Union or Member State law, the Controller or the specific criteria for its nomination may be provided for by Union or Member State law.
Data Protection Laws	The relevant local data protection legislation in the country where Clinglobal Ltd or the Partner Companies are respectively incorporated.
Partner Company	Any Company or entity that is associated with Clinglobal Ltd by means of common shareholding.

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Personal Data / information	For the definition of "Personal Data" as used in the GDPR, please see the text of the GDPR.
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4 PROCEDURES/USE

4.1 The Data We Collect

4.1.1 Collection of Personal Data

Personal Data is any data from which you can be identified, and which relates to you. It includes (but is not limited to) your name, email address, date of birth, national identification number, bank details and sensitive personal data.

The type of data we collect will depend on the purpose for which it is collected and used. We will only collect data that we need for the purpose outlined in Section 4.3.

We may collect your personal data in the following ways:

- When you give it to us directly for e.g., you correspond with us and provide us with your information, when we appoint you as consultant or when you visit our premises.
- When you browse and/or interact on our website.

The types of Personal Data that are collected and processed may include:

Categories of Personal Data:	Details:
Contact details	First name, surname, address, email address, mobile number
Individual details	Gender (male/female), nationality, date of birth, qualifications, photographs.
Identification details	Identification numbers issued by government bodies or agencies such as your identity card number, passport number
Information Technology Information	Internet Protocol addresses, browser type and version, access time and length of access, page views, user activity
Financial information	Tax details, and bank details.
Other	Complaints, enquiries, and other correspondence with you

4.2 Cookies

We use cookies on our website. Insofar as these cookies are not strictly necessary for the proper functioning of our website and for the provision of our services, we will ask you to consent to our use of cookies when you first visit our website.

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4.2.1 What are cookies?

- Cookies are small data files that are placed on your computer, mobile phone or tablets by websites that you visit. They are widely used to help websites work more efficiently, as well as provide information to the website owner.
- Cookies are used on our website to recognize you from other users. This enables us to offer you a positive browsing experience while also allowing us to improve our website. By continuing to use our website, you agree to our use of cookies in accordance with the conditions of this notice.

Further information on all aspects of cookies is available at www.allaboutcookies.org. Please note that Clinglobal has no affiliation with or responsibility for this third-party website.

4.2.2 How are third party cookies used?

The third-party service providers we have contracted with use cookies and those cookies may be stored on your computer when you visit our website. They are required for some of the functions within our website.

The third-party providers on our website are:

- Hubspot
- Cloudflare

4.2.3 Managing cookies?

We request your consent before placing cookies on your device. Since consent must result from a positive action, the cookie category checkboxes are unchecked by default for you to expressly opt-in to cookie use except for strictly necessary cookies which do not require your consent.

You can withdraw your consent at any time through an opt-out option where you can enable or disable particular cookies as per as your choices in the 'Cookie Settings' or by deleting your cookies using your internet browser settings. You can further manage cookies as you wish, by changing your browser settings or by clearing your browsing history. For more details on how to manage cookies, you may visit <https://www.aboutcookies.org.uk>.

Any inaction or action other than a positive one, is considered a refusal, and non-strictly necessary cookies cannot be placed. For instance, an action like scrolling does not mean implied consent since it does not constitute an adequate affirmative action which provides clear consent.

4.3 How We Use Your Data

Clinglobal will only use your Personal Data for the purposes for which it was collected or agreed with you. We will not use your Personal Data for any automated individual decision-making which will have a significant impact on you.

We have set out below the legal basis for the purpose of processing data. Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your Personal Data.

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Purpose of processing	Legal basis
To analyze the use of our website and services	Legitimate interest
To monitor compliance with our policies and standards	Legitimate interests, namely of monitoring and improving our website, business and services
To ensure the security of our website	Legitimate interests, namely the proper administration of our website and business
To confirm and verify your identity when you request to access, rectify, restrict, or delete the information we hold on you	For compliance with a legal obligation to which we are subject to, that is, to verify the identity of a data subject who makes a subject rights request
To reply to any requests, complaints, comments, or enquiries you submit to us regarding our services and notify you about changes to our service	Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. Legitimate interests namely for proper administration of our business and communication with users.
For payment and billing	Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract

In addition to the above-mentioned specific purposes for which we may process your Personal Data, we may also process any of your Personal Data where such processing is necessary for compliance with legal and regulatory requirements which apply to us, or when it is otherwise allowed by law, or when it is in connection with legal proceedings.

4.4 Disclosure of Personal Data

We may need to share your Personal Data with third parties which assist us in fulfilling our responsibilities regarding our business relationship with you and for the purposes listed above. Clinglobal may disclose your Personal Data to Partner Companies.

We may also make certain Personal Data available to third party service providers and agents who provide services to us (such as our cloud service providers). When we share with these third parties, we do so on a need-to-know basis and under clear contractual terms and instructions for the processing of your Personal Data.

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We may also be required to disclose your Personal Data to other third parties such as lawyers, bankers, consultants, insurers, auditors, as well as public and government authorities for purposes mentioned in Section 4.3 or where:

- We have a duty or a right to disclose in terms of law or for national security and/or law enforcement purposes.
- We believe it is necessary to protect our rights.
- We need to protect the rights, property or personal safety of any member of the public or a customer of our Company or the interests of our Company.
- You have given your consent.

We require our service providers and other third parties to keep your Personal Data confidential and that they only use the Personal Data in furtherance of the specific purpose for which it was disclosed. We intend to have written agreements in place with our processors to ensure that they comply with these privacy terms.

4.5 International Transfers

Our Company may need to transfer Personal Data internationally for the purposes mentioned above. We utilize the services of trusted cross-border recipients who are EU GDPR compliant companies. These cross-border recipients have implemented appropriate security measures to safeguard your Personal Data and maintain its confidentiality.

If you would like more detailed information regarding the specific transfer of your Personal Data internationally, we encourage you to reach out to our DPO. The DPO will be able to provide you with comprehensive details about the data transfer processes, the safeguards in place, and address any additional concerns you may have.

Please note that contacting our DPO will ensure that you receive accurate and up-to-date information that is tailored to our Company's data processing practices and policies.

4.6 Personal Data Security

We prioritize the legal obligation to provide adequate protection for the Personal Data we hold. To prevent any accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to your Personal Data, we have implemented robust security measures.

Our Company has established appropriate security measures and procedures to address data security breaches effectively. In the event of a suspected breach, where legal requirements dictate, we will promptly notify both you and the Data Protection Office.

We maintain a continuous review process for our security controls and related processes, ensuring the ongoing security of your Personal Data. Our comprehensive security policies and procedures encompass the following areas:

- Access to Personal Data: We strictly control access to Personal Data, ensuring that only authorized personnel can handle it.
- Encryption: We employ encryption methods to safeguard data.

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- Computer and network security: Our systems and networks are secure using the latest technologies and industry best practices to prevent unauthorized access.
- Data backup: Regular data backups are performed to ensure data integrity and availability in case of any unforeseen incidents.
- Incident management: In case of any security incidents, we have well-defined procedures to mitigate their impact and take necessary corrective actions.
- Responsible use of IT assets: Our employees undergo training to ensure the responsible use of IT assets and protect sensitive information.
- Physical security: Physical access to our data and premises is strictly controlled to prevent unauthorized entry.
- Protection of physical records: Physical records containing Personal Data are stored securely and access is restricted.

When engaging third-party services, we strictly impose security, privacy, and confidentiality obligations on them. This ensures that any Personal Data for which we are responsible remains secure. We only collaborate with trusted third parties who agree to treat your Personal Data with the same level of protection mandated by our obligations.

By adhering to these practices, we strive to maintain the highest level of security for your Personal Data throughout its lifecycle.

4.7 Your data protection rights

Under the GDPR and relevant Data Protection Laws, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

4.7.1 Your right to erasure of your Personal Data

You have the right to ask us to delete your Personal Data in certain circumstances:

- When we no longer need your Personal Data.
- If you initially consented to the use of your Personal Data but have now withdrawn your consent.
- If you have objected to us using your Personal Data, and your interests outweigh ours.
- If we have collected or used your Personal Data unlawfully; and
- If we have a legal obligation to erase your data.

When we collect Personal Data for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. Upon the determined expiry date, we will securely destroy your Personal Data. When we delete data from our servers, no residual copies remain on our servers. Data from our backup tapes are also deleted depending on the next scheduled backup overwrite which may be on a weekly, monthly, or yearly basis in accordance with its configuration.

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4.7.2 Your right of access to your Personal Data

You have the right to request a copy of the Personal Data we hold about you. To do this, simply contact our DPO (refer to Section 4.11) and specify what data you would like. We will take all reasonable steps to confirm your identity before providing details of your Personal Data.

You will not have to pay a fee to access your Personal Data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

4.7.3 Your right to rectification of your Personal Data

You have the right to ask us to update or correct your Personal Data if you think it is inaccurate or incomplete. We will take all reasonable steps to confirm your identity before making changes to the Personal Data we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal Data accurate and up to date by notifying us of any changes, we need to be aware of.

4.7.4 Your right to restriction of processing

You have the right to ask us to limit how we use your data. If necessary, you may also stop us from deleting your data. To exercise your right to restriction, simply contact our DPO (refer to Section 4.11), say what data you want to be restricted and state your reasons. You may request us to restrict the processing of your Personal Data in the following circumstances:

- If you have contested the accuracy of your Personal Data, for a period to enable us to verify the accuracy of the data.
- If you have made an objection to the use of your Personal Data.
- If we have processed your Personal Data unlawfully but you do want it deleted.
- If we no longer need your Personal Data but you want us to keep it in order to create, exercise or defend legal claims.

4.7.5 Your right to object to processing

You also have the right to object to us processing your Personal Data where your data is being used:

- For a task carried out in the public interest.
- For our legitimate interests.
- For scientific or historical research, or statistical purposes.
- For direct marketing.

We currently process Personal Data for our legitimate interests and upon receiving consent only. You should contact our DPO (refer to Section 4.11) to inform us that you object to any more processing of your Personal Data and state in your objection why you believe we should stop using your data in this way. Unless we believe we have strong legitimate reasons to continue using your data in spite of your objections, we will stop processing your data as per the objection raised.

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4.7.6 Your right to data portability

The right to data portability allows you to ask for the transfer of your Personal Data from one organization to another, or to you. The right only applies if we are processing information based on your consent or performance of a contract with you, and the processing is automated. You can exercise this right with respect to the information you have given us by contacting our DPO. We will ensure that your data is provided in a way that is accessible and machine-readable.

4.7.7 Your right to withdraw consent

To the extent that the legal basis for our processing of your personal information is our consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

If you wish to exercise any of the rights set out above, please contact our DPO.

4.8 Retention of Personal Data

Clinglobal will retain your data in compliance with the GDPR and in compliance with other Data Protection Laws.

4.9 Automated Decision Making

Clinglobal does not use Automated Decision Making in connection with your Personal Data.

4.10 Changes to this Notice

We may update this Notice from time to time to reflect best practices in data management, security and control and to ensure compliance with any changes or amendments made to the DPA and any laws or regulations thereof. The latest version of this Website Privacy Notice will be available on <https://www.clinglobal.com>

4.11 How to Contact Us

The primary point of contact for questions relating to this Privacy Notice, including any requests to exercise your legal rights, is our DPO who can be contacted:

- by post, to B03/04, The Tamarin Commercial Hub, Jacaranda Avenue Tamarin MU, 90903
- by telephone, on (+230) 483 5674
- by email, at dpo@clinglobal.com.

If you believe we have not handled your request in an appropriate manner, you have the right to complain to the supervisory authority.