

15th January 2015

Clever Voice Limited - Privacy Policy

Clever Voice Limited is committed to preserving the privacy of all Users.

This policy (together with our Terms <http://www.clevervoice.com/terms-and-conditions> and any other documents referred to on it) sets out the basis on which any personal data CleverVoice collects from Users, or that Users provide to CleverVoice, will be processed by CleverVoice. Please read the following carefully to understand CleverVoice's views and practices regarding Users personal data and how CleverVoice will treat it. For the avoidance of doubt this policy relates to personal data about the User not 'Personal Data' as defined in the Terms.

For the purpose of the Data Protection Act 1998 (the "Act"), the data controller is Clever Voice Limited of 12 Centrus, 7 Felsham Road, Putney, London SW15 1AX (ICO No. Z2849595).

1. INFORMATION THAT WE COLLECT FROM YOU

CleverVoice may collect and process the following data about Users:

- Information that Users provide by filling in forms on the web site www.clevervoice.com (the "Web Site"). This includes information provided at the time of registering to use the Web Site, creating an Account, posting material or requesting further services. CleverVoice may also ask Users for information when they report a problem with the Web Site.
- If a User contacts CleverVoice, CleverVoice may keep a record of that correspondence.
- CleverVoice may also ask Users to complete surveys that CleverVoice use for research purposes, although Users do not have to respond to them.
- Details of transactions Users carry out through the Web Site and of the fulfilment of Users orders.
- Details of Users visits to the Web Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that Users access.

2. IP ADDRESSES

CleverVoice may collect information about Users computers, including where available Users IP addresses, operating system and browser type, for system administration and to report aggregate information to CleverVoice's advertisers. This is statistical data about Users browsing actions and patterns, and does not identify any individual.

3. COOKIES

For the same reason, CleverVoice may obtain information about Users general internet usage by using a cookie file which is stored on the User's browser or the hard drive of the User's computer. Cookies contain information that is transferred to the User's computer's hard drive. They help CleverVoice to improve the Web Site and to deliver a better and more personalised service. Some of the cookies CleverVoice use are essential for the Web Site to operate.

If a User registers with CleverVoice or if a User continues to use the Web Site, that User agrees to CleverVoice's use of cookies.

Cookies are widely used in order to make web sites work, or work more efficiently, as well as to provide information to the owners of the web sites.

Please note that our advertisers may also use cookies, over which CleverVoice have no control.

Users block cookies by activating the setting on the User's browser which allows the User to refuse the setting of all or some cookies. However, if Users use their browser settings to block all cookies (including essential cookies) that User may not be to access all or parts of the Web Site. Unless Users have adjusted their browser setting so that it will refuse cookies, CleverVoice's system will issue cookies as soon a User visits the Web Site.

Google Analytics

The Web Site uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies, to help the Web Site analyse how Users use the Web Site. The information generated by the cookie about a User's use of the Web Site (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating the User's use of the Web Site, compiling reports on Web Site activity for web site operators and providing other services relating to web site activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate a User's IP address with any other data held by Google. Users may refuse the use of cookies (as above). By using the Web Site, the User consents to the processing of data about that User by Google in the manner and for the purposes set out above.

4. WHERE WE STORE YOUR PERSONAL DATA

The data that CleverVoice collect from Users may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for CleverVoice or for one of their suppliers. Such staff maybe engaged in, among other things, the fulfilment of a User's order, the processing of a User's payment details and the provision of support services. By submitting their personal data, a User agrees to this transfer, storing or processing. CleverVoice will take all steps reasonably necessary to ensure that Users data is treated securely and in accordance with this privacy policy.

All information Users provide to CleverVoice is stored on their secure servers. Any payment transactions will be encrypted using SSL technology. Where CleverVoice have given a User (or where a User has chosen) a password which enables the User to access certain parts of the Web Site, the User is responsible for keeping this password confidential. CleverVoice ask Users not to share passwords with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although CleverVoice will do their best to protect Users personal data, CleverVoice cannot guarantee the security of Users data transmitted to the Web Site; any transmission is at the User's own risk. Once CleverVoice have received a User's information, CleverVoice will use strict procedures and security features to try to prevent unauthorised access.

5. USES MADE OF THE INFORMATION

CleverVoice use information held about Users in the following ways:

- To ensure that content from the Web Site is presented in the most effective manner for the User and for the User's computer.
- To provide User's with information, products or services that the User request from CleverVoice or which CleverVoice feel may interest the User, where the User has consented to be contacted for such purposes.
- To carry out CleverVoice's obligations arising from any contracts entered into between the User and CleverVoice.
- To allow the User to participate in Interactive Services or CleverVoice Services, when a User chooses to do so.
- To notify Users about changes to CleverVoice's services, including the Interactive Services or the CleverVoice Services.
- To administer, support, improve and develop CleverVoice's business and the services they offer.

CleverVoice may also use a User's data to provide the User with information about goods and services which may be of interest to the User and CleverVoice may contact the User about these by post or telephone.

If the User is an existing customer, CleverVoice will only contact the User by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to the User.

If a User does not want CleverVoice to use their data in this way, or to pass the User's details on to third parties for marketing purposes, the User should tick the relevant box situated on the form on which CleverVoice collect the User's data or contact CleverVoice at info@clevervoice.com.

CleverVoice do not disclose information about identifiable individuals to their advertisers, but they reserve the right to provide them with aggregate information about Users. CleverVoice may also use such aggregate information to help advertisers reach the kind of audience they want to target. CleverVoice may make use of the personal data they have collected from Users to enable them to comply with their advertisers' wishes by displaying the advertisers' advertisement to that target audience.

6. DISCLOSURE OF YOUR INFORMATION

CleverVoice may disclose Users personal information to any member of their group, which means their subsidiaries, their ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

CleverVoice may disclose Users personal information to third parties:

- In the event that CleverVoice sell or buy any business or assets, in which case CleverVoice may disclose Users' personal data to the prospective seller or buyer of such business or assets.

- If Clever Voice Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If CleverVoice are under a duty to disclose or share a User's personal data in order to comply with any legal obligation, or in order to enforce or apply the Terms <http://www.clevervoice.com/terms-and-conditions> and other agreements; or to protect the rights, property, or safety of Clever Voice Limited, their customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7. DATA RETENTION

CleverVoice will retain Users' information for a reasonable period or as long as the law requires.

8. YOUR RIGHTS

Users have the right to ask CleverVoice not to process their personal data for marketing purposes. CleverVoice will usually inform Users (before collecting their data) if CleverVoice intend to use the User's data for such purposes or if CleverVoice intend to disclose a User's information to any third party for such purposes. User's can exercise their right to prevent such processing by checking certain boxes on the forms CleverVoice use to collect your data. User's can also exercise the right at any time by contacting us at info@clevervoice.com.

The Web Site may, from time to time, contain links to and from the web sites of CleverVoice's partner networks, advertisers and affiliates. If a User follows a link to any of these web sites, they should note that these web sites have their own privacy policies and that CleverVoice do not accept any responsibility or liability for these policies. Users should check these policies before submitting any personal data to these web sites.

9. ACCESSING AND UPDATING

The Act gives Users the right to access information held about them. A User's right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet CleverVoice's costs in providing the User with details of the information they hold about the User.

10. CHANGES TO OUR PRIVACY POLICY

Any changes to this privacy policy in the future will be posted to the Web Site and, where appropriate, through e-mail notification.

11. CONTACT

All comments, queries and requests relating to this privacy policy are welcomed and should be addressed to Data Controller,

by post at:

CleverVoice Limited, 12 Centrus, 7 Felsham Road, London SW15 1AX

or by email to:

info@clevervoice.com