

CAULDRON CLOUD Privacy Policy

1. Introduction

BITERGIUM SLL ("Bitergia") owner of Cauldron Cloud (hereinafter, "Cauldron Cloud") and the website at cloud.cauldron.io (hereinafter, the "Website") is committed to protecting the personal data of users ("User/s") who use the Website and provide their personal data through it.

Through this Privacy Policy, and in compliance with Regulation (EU) 2016/679 ("GDPR") and Law 3/2018 of 5 December on the Protection of Personal Data and guarantee of digital rights ("LOPDPGDD"), Cauldron Cloud informs Users who communicate with Cauldron Cloud through the Website about how their personal data may be collected and processed by the Data Controller in order for Users to decide, freely and voluntarily, if they wish to provide the requested information.

2. Data Controller

The Data Controller for processing personal data on cloud.cauldron.io and in communications with us is **BITERGIUM SLL**, with address at Av Gregorio Peces Barba 1, Room 1.1C24, 28919 Leganés, Madrid, Spain whose privacy policy is available [here](#). All communications regarding the processing of personal data by Cauldron Cloud shall be directed to our email address: contact@cauldron.io

3. Purpose, data collected, legal basis and data retention

Purpose	Data collected	Legal basis	Data retention
Cauldron Cloud subscription registration	email, user, name, surname, address	Execution of the terms and conditions	This personal data will be retained for as long as the Cauldron Cloud subscription is active and, thereafter, will be blocked and retained by Cauldron Cloud in accordance with the periods established in current legislation for the purpose of dealing with any legal liabilities that may arise from the use of Cauldron Cloud. Once these legal periods have expired, they will be deleted from Cauldron Cloud's databases.
To provide support to the User in the event of any questions and/or incidents related to the	User contact details	Legitimate interest to resolve any questions and/or incidents and to provide an	During the time necessary to answer the question and/or solve the incident indicated by the User.

provision of the Service.		adequate Service to the User.	
To notify the User in relation to the Services, as well as to carry out marketing communications.	Email address	Consent The User should note that even if you opt out of receiving promotional communications, Cauldron Cloud may continue to send you non-promotional emails and other types of communications, as permitted by law, such as service emails related to our ongoing business relationship. Service emails contain service-related information that affect the User's Account, such as subscription sign-up confirmations, invoice sending, payment updates, password or User Account security incidents, etc.	This data will be used for as long as the User remains subscribed to the newsletter. If the User chooses to unsubscribe, all personal data collected for this function will be deleted immediately.

4. Data sharing and international transfers

Cauldron Cloud processes your personal data in strict confidence in accordance with applicable law. However, we will disclose any personal or other data you provide to us in compliance with a legal obligation or in order to provide our Cauldron Cloud subscription services or comply with other obligations under applicable law. Cauldron Cloud will ensure that your identity is kept strictly confidential and is not passed on to any third party other than as set out and agreed herein.

Cauldron Cloud uses third party technology services to ensure the operation of this Website, which may process your personal data collected through the forms on the Website, as data processors. These entities may be located in jurisdictions that may not provide adequate safeguards in relation to the processing of personal data:

- **Copper Inc (“Copper”)**: Cauldron Cloud uses Cooper's CRM tool in the provision of its services which may perform international transfers for which it has implemented appropriate safeguards (including SCC). For more information, please visit its privacy policy: <https://www.copper.com/privacy>
- **Digital Ocean LLC (“Digital Ocean”)**: Cauldron Cloud uses Digital Ocean’s hosting services which may perform international transfers for which it has implemented appropriate safeguards (including SCC). For more information, please visit its privacy policy: <https://www.digitalocean.com/legal/privacy-policy/>

- **The Rocket Science Group (“Mailchimp”)**: Cauldron Cloud uses Mailchimp’s marketing automation platform to send newsletters and which may perform international transfers for which it has implemented appropriate safeguards (including SCC). For more information, please visit its privacy policy: <https://mailchimp.com/legal/privacy/>

5. Security Measures

Cauldron Cloud undertakes to adopt the necessary technical and organizational measures in accordance with current regulations so as to ensure the security of personal data and prevent accidental or unlawful destruction, loss or alteration of personal data transmitted, stored or otherwise processed, or unauthorized communication or access to them. Personal data shall be processed as confidential by the Data Controller, who undertakes to inform and to ensure by means of a legal or contractual obligation that such confidentiality is respected by its employees, associates, and any other person to whom it makes the information accessible.

6. Data subject rights

The User has the following rights under data protection laws in relation to its personal data: (i) **Request access** to its personal data (commonly known as a "data subject access request"), (ii) **Request correction** of its personal data, **Request erasure** of its personal data (iii) **Object to processing** of its personal data where are relying on a legitimate interest (or those of a third party),(iv) **Request restriction of processing** of its personal data, (v) **Request the transfer** of its personal data to the User or to a third party (right to data portability) (vi) **Withdraw consent at any time** where Cauldron Cloud is relying on consent to process your personal data, (vii) **Submit a complaint to the competent authority**, in this case the Spanish Data Protection Agency (www.aepd.com), C/. Jorge Juan, 6, 28001 Madrid, Spain.

The aforementioned rights may be effective by contacting us at contact@cauldron.io or at **Bitergium SLL** with address at Av Gregorio Peces Barba 1, Room 1.1C24, 28919 Leganés, Madrid, Spain, provided that you include a digital copy of your identification document such as your ID card or passport.

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