

## **Privacy Policy**

QCommission Statement of Privacy

This document was last updated August 07, 2019.

At QCommission, we are committed to protecting your privacy and to developing technology that gives you the most powerful and secure online experience. You can travel through most of our site without giving us any information about yourself. But sometimes we do need information to provide services that you request, and this statement of privacy explains data collection and use in those situations. Please read the complete QCommission statement of privacy.

### **About this policy**

This is the Privacy and Cookies Policy ("Policy") for the websites operated by or on behalf of QCommission and hosted at <https://www.qcommission.com>

This Policy also describes how we collect information about you, what we do with that information, and what controls you have over that information in relation to your use of our Site and Services. By visiting and using QCommission's website and/or mobile site or using our Services, you acknowledge you have read and understood this Policy.

### **1. Collecting your Personal Information**

Users can generally visit the Site without revealing any personally identifiable information. However, in certain sections of the Site, QCommission may need information that personally identifies you or allows us to contact you. Generally, this information is requested when you are asked to complete a registration form, while contacting us for inquiries or feedback or subscribing QCommission services. Personal information collected by QCommission is often limited to contact data such as your name, email address, phone number and company information, but may include other information when needed to provide a service you requested.

#### **Information provided directly by you**

Information (such as your name, company name, email address, telephone number and other details that you provide by completing forms on the Site or using the Service, including information about you if you register as a user of the Site or subscribe to a Service, information about you that you upload or submit to the Site or Service, or information you provide to us when requesting information or material from us;

#### **Information that we may collect from you when you use our Site**

We may automatically collect certain information about the computer or other devices that you use to access the Site or use the Services, including mobile devices, through commonly-used information-gathering tools, such as cookies from your visit. We may also collect information when you access the Site or use our Services such as: (i) location information (as described in the next section below), unique device identifiers and other information about your mobile phone or other mobile device(s) such as your Internet Protocol ("IP") address, browser types, browser language, operating system, the state or country from which you accessed the Services; and (ii) information related to the ways in which you interact with the

Services, such as referring and exit pages and URLs, platform type, the number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the date and time you used the Services, error logs, and other similar information.

### **Information about you collected from third parties**

When you access the QCommission via a third party social media provider such as Facebook, we may collect and store personal and non-personal information which is available on that third party social media provider, such as your Facebook name, your profile picture or its URL, your Facebook ID and other public data of your friends, provided that you have expressly agreed to the use of Facebook within the QCommission. We will also receive technical data in order to ensure the QCommission connect to the correct Facebook account.

QCommission will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on QCommission or the site; (b) protect and defend the rights or property of QCommission and its family of Web sites, and, (c) act in urgent circumstances to protect the personal safety of users of QCommission, its Web sites, or the public.

## **2. How we use your information**

We collect and use your information for the following purposes:

**To communicate with you about the Services:** We use your contact information to send transactional communications via email and within the Services, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages.

**To market, promote and drive engagement with the Services:** We use your contact information and information about how you use the Services to send promotional communications that may be of special interest to you, including by email and by displaying QCommission ads on other companies' websites and applications, as well as on platforms like Facebook and Google. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new product offers, promotions and contests. You can control whether you receive these communications as described below under "Optout of communications."

**Customer support:** We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services.

**For safety and security:** We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

**To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

**With your consent:** We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

### 3. Cookies

A cookie is a small piece of data (text file) that a website – when visited by a user – asks your browser to store on your device in order to remember information about you, such as your language preference or login information. When you come to our Site and Platforms, our web server may send a cookie to your computer. Cookies are files that web browsers place on a computer’s hard drive and are used to tell us whether customers and visitors have visited the Site previously. The use of cookies by our partners, affiliates, tracking utility company, or service providers on the Site is not covered by this Policy. We do not have access or control over these cookies.

### 4. Sharing your information

We do not share your personal information outside of QCommission except in certain circumstances, including:

When you allow us to share the information, such as when you:

- Elect to share your personal information with third party partners and providers listed on our Sites, so they can send you information, offers and promotions about their products and services;
- Choose to share your personal information with third parties or their sites or platforms, such as when you share one of our blog posts to your social media feed;
- Publish information publicly on our Site or the QCommission Services. Any such personal information will be available to others; or
- Use third-party features on our Site or the QCommission Service, such as commenting features run by third-parties;

(Please note that once personal information is shared with another company, the information received by the other company becomes subject to its privacy policies and practices).

- We may use third-party web analytics services such as Google Analytics. These service providers use your information to help us analyze how users use the Services, including by noting the third-party website from which you arrive. The information collected by the technology (including your IP address) will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Services. We also use Google Analytics for certain purposes related to advertising, as described in the following section. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-Out Browser Add-On.
- To receive a list of the agents, partners or contractors assisting us in the processing of your information please send your request to [info@cellarstone.com](mailto:info@cellarstone.com). This list may change and will be updated from time to time.

- From time to time, QCommission may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly-offered product or service from QCommission, QCommission may share information about you collected in connection with your purchase or expression of interest with our joint promotion partner(s). If you do not want your information to be shared in this manner, you may email [info@cellarstone.com](mailto:info@cellarstone.com). However, we do not control our business partners' use of the information that we share with them about you that we collect, and their use of the information will be in accordance with their own privacy policies.
- **Data About Attendees:** QCommission does not share Data About Attendees with business partners unless: (i) you specifically opt in to such sharing via an event registration form; or (ii) you attend a QCommission event and have your attendee badge scanned by a business partner. If you do not want your information to be shared, you may email [info@cellarstone.com](mailto:info@cellarstone.com). If you choose to share your information with business partners in the manners described above, your information will be subject to the business partners' respective privacy policies.
- **To protect QCommission and Others:** We may disclose any of your information to: (i) comply with legal process; (ii) enforce any agreements that you entered into with us; (iii) respond to claims that any content violates the rights of third parties; (iv) respond to your requests for customer service; and/or (v) the extent necessary for the purposes of the legitimate interests pursued by us or by the third party or parties to whom the data are disclosed, except where such interests are overridden by the interests for fundamental rights and freedoms of the data subjects. We may also disclose information to law enforcement agencies in emergency circumstances, where the disclosure of such information is consistent with the types of emergency disclosures permitted or required by law.

## **5. Customer Testimonials**

QCommission posts a list of Customers and testimonials on the Company's Web sites that contain information such as Customer names and titles. QCommission obtains the consent of each Customer prior to posting any information on such a list or posting testimonials.

## **6. Security**

QCommission takes substantial precautions to protect data and information under its control from misuse, loss or alteration. The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received.

We have appropriate physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access and maintain data security of, and to use correctly, the information we collect online. These safeguards vary based on the sensitivity of the information that we collect and store.

All information you provide to us is stored on our secure servers. Unfortunately, no system can ensure complete security, and QCommission disclaims any liability resulting from use of the Site. If you have any questions regarding security on our Site, you can contact us at [info@cellarstone.com](mailto:info@cellarstone.com).

## 7. Transfer of information overseas

The personal information about you that we collect is sent to and stored on secure servers located as noted below or in the systems of the third parties that we use, where applicable. Such storage is necessary in order to process the information. Please email us at [info@cellarstone.com](mailto:info@cellarstone.com) to know more about third parties.

## 8. GDPR

The General Data Protection Regulation (GDPR) is a European privacy law that took effect on May 25, 2018. This law is an important step forward in streamlining data protection requirements across the European Union.

QCommission is compliant with the requirements of GDPR and able to demonstrate compliance.

## 9. Retention

We will only keep your information as long as it remains necessary for the identified purpose(s) for which it was originally collected and for a minimum period of six (6) years following the end of the financial year in which you placed your order, afterwards or otherwise permitted by local laws, or as required for our business operations or by applicable laws.

**Correspondence and enquiries:** when you make an enquiry or contact us by email or via our contact form, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for 6 further month(s), after which point, we will delete your information.

**Mailing list:** we retain the information you used to sign up for our newsletter for as long as you remain subscribed (i.e. you do not unsubscribe) or if we decide to cancel our newsletter service, whichever occurs first.

## 10. Your Rights

This section provides details about your rights in relation to your personal information.

You may ask us to:

Access all the personal information about you held by us, including where applicable, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. On request, we will provide you with a copy of this information. You can exercise your right of access to your personal information by emailing us at [info@cellarstone.com](mailto:info@cellarstone.com).

## 11. Linked sites and advertisements

The Site or Services may contain links to third-party websites. We are not responsible for the privacy practices or the content of those third-party websites. Any information you provide via those services is subject to the applicable third-party privacy policies and is not covered by this Policy.

## **12. Children**

Our Sites and Services do not target and are not intended to attract children under the age of 16. QCommission does not knowingly solicit personal information from children under the age of 16. Should we learn or be notified that we have collected information from users under the age of 16, we will immediately delete such personal information. If you are under 16 in your country of residence, please ask your parent or guardian to provide their information for you.

## **13. How you can access and update your information**

You may review and update certain user profile information by logging in, as applicable, to the relevant portions of the Site or Services where such information may be updated, or by contacting [info@cellarstone.com](mailto:info@cellarstone.com)

## **14. Changes to this Policy**

QCommission reserves the right to change this Policy from time to time. Please check this page periodically for changes. If we make any material changes to this Policy, we will notify you before they take effect either through the Site or by sending you a notification. Any such material changes will only apply to personal information collected after the revised Policy took effect.

## **15. Contact us**

Have additional privacy questions or need further info? This section is about how to contact us.

If you have any questions, comments, or concerns regarding this Policy or QCommission's privacy practices, they may be submitted via email to [info@cellarstone.com](mailto:info@cellarstone.com), or in writing by addressing your inquiries to:

### **CellarStone**

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