

# PRIVACY POLICY

*Last updated as at: 17.03.2020*

## 1. Personal Data Controller

UNIVERSAL CDN Inc., (referred to hereinbelow as “UCDN”, “we” or “us”) a company registered under the laws of the United States of America, having its registered office and address of management at 2777 North Stemmons Fwy., Suite 1655, Dallas, TX 75207, USA, operates this Website and the blog thereto and respectively is the personal data controller of the personal data provided by you via the contact and information forms placed in the Website, the blog as well as when you register with us, chat to us online and when we provide services to you.

UCDN offers its services to a wide range of potential customers worldwide, including customers residing in or registered under the national legislation of member states of the European Union. UCDN is committed to guarantee its customers’ privacy and the protection of their personal data by adopting this Privacy Policy (referred to hereinafter below as “the Policy”). The Policy is in compliance with the applicable European personal data protection legislation , including but not limited to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter “GDPR”).

We will strive to do everything in our power to ensure your right to privacy. For us, the protection of your privacy during the processing of personal data and the security of all commercial data are important matters which we take into account in our business processes. We treat personal data collected when you use our Website and blog, when you chat with us online, register with us and when we provide services to you as confidential and process it solely in accordance with the statutory provisions of the applicable legislation.

## 2. Contact us

You can contact us in one of the following ways if you have any questions regarding your personal data or the manner by which we process your personal data or when you need to exercise any of your rights under the GDPR:

- in writing, at the following address: 2777 North Stemmons Fwy., Suite 1655, Dallas, TX 75207, USA;
- by e-mail, at the following e-mail address: [support@ucdn.com](mailto:support@ucdn.com).

## 3. Definitions

For the purposes of this Policy:

- “personal data” means any information relating to an identified or identifiable natural person (“data subject”);  
an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- “processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording,

organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

- “consent” of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- “controller” means 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 European Union or Member State law, the controller or the specific criteria for its nomination may be provided for by European Union or Member State law;
- “processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- “third party” means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data; and
- “supervisory authority” means an independent public authority which is established by a Member State.

#### **4. Personal data we collect regarding you and legal basis for their processing**

The use of the Website does not require the provision of personal data on your part. We collect, process and use personal data only if there is a legal basis for doing so, or if you have given your consent for your personal data to be processed for the stated purposes. If you contact us through the Website or register with us or when we already have a contract and are providing services to you then we will have to collect and process some of your personal data which is necessary. We do not collect, process or use sensitive personal data of any kind. The Website contains the following functionalities from which it is possible for UCDN to collect and process your personal data:

4.1. Sending inquiries via “Contact us” contact form or any other form of communication (whether via the Website or sending us an email or letter directly)

When you use the contact form for sending inquiries, or any other form of communication (whether via the Website or sending us an email or letter directly) UCDN collects and processes the following personal data for you, namely: **name, last name, e-mail address and any other personal data you have decided to provide us with in your inquiry.**

- The legal basis for the processing of your personal data in this case is your explicit, voluntary consent, which we assume you gave, by sending us the inquiry. We need this data in order to be able to differentiate your inquiry from any other inquiry we receive and to be able to respond to you directly.

4.2. Use of registered account via “Login” or “Register” button

You can register for an user account on the Website, via the “Register” button and consequently the provided registration feature and you can login to your existing account using the “Login” button. UCDN shall collect and process the following personal data from you, namely: **Username and E mail address** when using these functions. The username in question is chosen by you upon initial registration of your user account. As far as you are a customer of UCDN your personal data shall be processed on the basis of the contract that you have with us and for our own legitimate interests as

appropriate under the GDPR.

4.3 By being a customer of UCDN whereby we provide services to you, in addition to the personal data identified in clause 4.2 above we will also collect and process the following personal data relating to you for the purposes of performing the services contract with you, for the purposes of complying with any legal obligation that binds us, including but not limited to KYC/AML laws and regulations including tax laws, and where the processing is necessary for the purposes of our legitimate interests:

- Address;
- Full name;
- Company name, if you are an authorized representative of a company,
- contact telephone number
- Bank account information or bank card details or any other form of payment used to make the payment for our services which data may be made available to a third party processing the relevant payment and the data shall only be used for these purposes

## **5. Purposes for Processing**

We will use your personal data for the following purposes:

- For the purposes of sending a reply to the inquiry you have sent us and providing you with support services;
- To administer your registered account if you choose to register and to provide the products and services you have requested from us;
- For the purposes of processing your orders and providing the services to you and performing the contract between you and UCDN;
- For customer management and replying to your enquiries to UCDN;
- To contact you with details of other services we provide, including offers and campaigns only where you have specifically consented to being contacted for these purposes.

To the extent that you have consented to being contacted for marketing purposes, we will use your personal data for the purposes of providing you with email newsletters, surveys, offers, campaigns any other communication for the purposes of advertising and marketing of our services as well as providing you with targeted advertisements on our or third party websites. This may involve the disclosure of some of your personal data to third parties for the purposes of preparing such marketing campaigns and to third party service providers where the targeted advertising is made available on a third party's website. You have the right to revoke consent at any time by contacting us at [support@ucdn.com](mailto:support@ucdn.com), or by clicking unsubscribe on the email you will receive from us. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

It should be noted that depending on the reason why the personal data is collected and processed more than one legal basis of processing may apply in each situation.

## **6. Retention period**

UCDN will retain the personal data it processes for you for a term as long as necessary for the respective purpose of processing:

- For the personal data collect through the contact form - for the time necessary to prepare and send a reply to your inquiry and within 1 month of our last correspondence with you unless you become our customer in which case the relevant provisions of the Terms of Service or/ and the respective agreement signed between us shall apply regarding the processing of your personal data;
- For the purpose of sending you marketing communication for presenting and promoting our services – provided you initially consented explicitly to this and as long as you do not object to it or until you have unsubscribed from receiving such communication;
- For the purpose of your registration and creation of user account through “Login” or “Register” button – as agreed in the agreement signed with us or in the Terms of Service, when they are applicable;
- We will also retain your personal data relating to the contract between UCDN and you for the duration of the contract and for as long as is necessary thereafter to comply with legal obligations and applicable laws.

The above mentioned terms shall be applied as far as there are no longer terms are provided by applicable legislation.

## **7. Non-Provision of Personal Data**

The provision of your personal data via the contact and information forms of the Website is entirely voluntary. In case you do not want to provide us your personal data, you will not be able to receive the desired services - we will not be able to reply to your inquiry or administer your registered user account on the Website.

## **8. Transfer of Personal Data to Third Parties**

UCDN being a US incorporated entity is outside of the EEA and it may provide your personal data to the following categories of recipients:

- Affiliate entities, part of the UCDN group for the purposes of administering the services agreement between you and UCDN and for the purposes of providing you with support services and addressing your inquiries;. Some of these entities may be outside of the EEA but in this situation we ensure a similar degree of protection is afforded to it and that all third parties respect the security of your personal data and treat it in accordance with the law;
- State authorities, institutions and persons, to which we shall be obliged to transfer the personal data by virtue of the law;
- Third parties, to which we assign different services – support of equipment, software and hardware used for the processing of the personal data, marketing services, programming, data hosting etc., and with which we have agreements for confidentiality and protection of personal data. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **How We Protect and Store Personal Information**

We endeavor to protect the security of your personal data. We use a variety of security technologies and procedures to try to protect your personal data from unauthorized access, use, or disclosure. For example, we store the personal data you provide on computer servers with limited access that are located in controlled facilities.

## 9. Rights of Data Subjects

In connection with the processing of your personal data by UCDN you have the following rights:

**(a) right to access** – you have the right to confirmation as to whether or not UCDN processes your personal data and, where UCDN does, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Provided that the rights and freedoms of others are not affected, UCDN will provide you with a copy of its personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee;

**(b) right to rectification** – you have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed;

**(c) right to erasure** – you have the right to the erasure of your personal data without undue delay in the following circumstances: 1) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; 2) you withdraw your consent to consent-based processing; 3) you object to the processing under certain rules of applicable data protection law; 4) the processing is for direct marketing purposes; and 5) the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: 1) for exercising the right of freedom of expression and information; 2) for compliance with a legal obligation; or 3) for the establishment, exercise or defense of legal claims;

**(d) right to restriction of the processing** – Where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms. You also have the right to object where we are processing your personal data, for direct marketing purposes. This also includes profiling in as much is related to direct marketing.

If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

**(e) right to objection to the processing** – you have the right to object to UCDN's processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for one of the following: 1) the performance of a task carried out in the public interest or in the exercise of any official authority vested in Us; or 2) the purposes of the legitimate interests pursued by Us or by a third party. If you make such an objection, UCDN will cease to process your personal data unless We can demonstrate compelling legitimate grounds for the processing which have priority over your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims;

**(f) right to data portability** – you have the right to receive your personal data from Us in a structured, commonly used and machine-readable format;

**(g) right to lodge a complaint with a supervisory authority** – if you consider that UCDN's processing of your personal data infringes data protection laws, you have a legal right to lodge a complaint with the supervisory authority

of one of the EU Member States, responsible for data protection. You may do so in the EU Member State of your habitual residence, your place of work or the place of the alleged infringement. You may find the contact details of the relevant Member States' supervisory authorities here: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm); and

**(h) right to withdraw the given consent** – to the extent that the legal basis for UCDN's processing of your personal data is consent, you have the right to withdraw that consent at any time. Such withdrawal will not affect the lawfulness of any processing performed before it. You may withdraw your consent by contacting us at the following e-mail address: [support@ucdn.com](mailto:support@ucdn.com).

You may exercise any of your rights hereunder in relation to the processing of your personal data by written notice to UCDN at the address specified hereinabove or via e-mail at the following e-mail address: [support@ucdn.com](mailto:support@ucdn.com).

We shall do our best to reply to you without undue delay.

## **10. Use of Social Plug-ins and Buttons**

On our web-site we have links to the following social networks and platforms: Facebook, Youtube, Pinterest, LinkedIn and Instagram, which may collect their own personal data and cookies and their own privacy and cookies policies shall apply in those instances. For more detailed information regarding the used cookies and their specifics, please refer to the Cookies Policy.

## **11. Use of External Links**

The UCDN Website may contain links to Websites of third-party providers with which we have no association. After you have clicked the link, we have no further control over the collection, processing and use of any of the personal data (such as IP address or URL of the page containing the link) transmitted to the third party when the link is clicked, since the conduct of third parties is clearly beyond our control. UCDN assumes no responsibility for the processing of such personal data by third parties.

## **12. Policy Changes**

UCDN is dedicated to providing the best content delivery network service possible to every one of our customers. We are also dedicated to staying on top of available technology. While UCDN strives to provide our customers with reasonable notification, UCDN reserves the right to change its policy at any time to meet the needs of our customers, changing laws and new technology. Please, refer to the date at the beginning of this Policy regarding the date of its last update.

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