

# **CacheGuard Privacy Policy - V1.1**

## 1 - Contact details

Name: CacheGuard Technologies Ltd. Address: 71-75 Shelton Street, London WC2H 9JQ United Kingdom Contact: <u>https://www.cacheguard.com/contact-cacheguard/</u>

## 2 – Collected information

We currently collect and process the following personal information: first and last name, contact email, shipping and billing postal addresses, phone numbers VAT numbers.

In addition, we collect the following technical information: your public IP addresses and your hardware or virtual machine MAC addresses on which you install our software.

## 3 – Information collection reasons

Most of collected information we process is provided to us directly by you for one of the following reasons: download our software, register our products, deliver license keys, grant your access to our services, shipping and billing products that you purchase from us.

Under the UK General Data Protection Regulation (UK GDPR), the lawful base we rely on for processing this information is because we have a contractual obligation to provide you with our products and services.

#### 4 – Collected information storage

The information we collect is securely stored in our electronic private Data Bases. We keep your information during your subscription period. We will then dispose your information by deleting them 1 year after the end of your subscription period.

## 5 – Processed information by CacheGuard-OS

All network appliances developed by CacheGuard Technologies Ltd run under an Operating System called CacheGuard-OS. Data processed by CacheGuard-OS remain under the client's responsibility and CacheGuard Technologies Ltd. has absolutely no access to those data, unless expressly permitted by the client.

Processed data by CacheGuard-OS can be volatile (in RAM) or be stored on a storage device attached to the machine on which CacheGuard-OS runs. Data can be but not limited to browsed Web contents, access logs, authentication tokens or passwords. None sensitive data like browsed Web contents are stored in clear while others like passwords are stored using AES (Advanced Encryption Standard).



CacheGuard-OS may be configured to decrypt initially encrypted data in order to detect and eradicate suspicious contents such as malware before forwarding them to end-users. Forwarded data are re-encrypted before being transmited to end-users. To do so, CacheGuard-OS uses cryptography methods in the OpenSSL library. The re-encryption is done using an RSA private key known by the client only and CacheGuard Technologies Ltd. has absolutely no access to that private key, unless expressly permitted by the client.

## 6 – Your data protection rights

Under data protection law, you have rights including:

- Access: you have the right to ask us for copies of your personal information.
- Rectification: you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Erasure: you have the right to ask us to erase your personal information in certain circumstances.
- Processing restriction: you have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Processing object: you have the the right to object to the processing of your personal information in certain circumstances.
- Data portability: you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

## 7 – How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at by sending us an email. You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address: **Information Commissioner's Office** Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF Helpline number: +44 303 123 1113 website: <u>https://www.ico.org.uk</u>