# California Privacy Notice (CPRA) – Cloudginny GmbH (B2B Service)

**Last Updated:** January 2, 2026
**Applies to:** California residents (including employees/contractors/representatives of business customers or prospects) interacting with our website and/or services.

This California Privacy Notice ("Notice") supplements our main Privacy Policy and applies only to "Personal Information" as defined by the California Consumer Privacy Act as amended by the CPRA ("CPRA"). If there is a conflict between this Notice and the main Privacy Policy for California residents, this Notice controls.

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## 1) Roles and Scope (Business vs. Service Provider)

- **Cloudginny as a "Business":** We act as a Business for our **website**, **marketing**, and **administrative** activities.
- **Cloudginny as a "Service Provider/Processor":** When we process Personal Information within the product **on behalf of a business customer**, we do so as a Service Provider/Processor under customer instructions (where applicable).

This Notice does **not** cover employment/applicant data (separate notices may apply).

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## 2) Notice at Collection (What we collect, why, sources, retention)

We collect the categories of Personal Information below. We use and retain information only as reasonably necessary for the purposes described (and as required by law).

**2.1 Categories of Personal Information**

1. **Identifiers & Professional/Business Contact Information**
   Examples: name, business email, business phone, employer, job title/role, account identifiers.
2. **Internet / Network Activity Information**
   Examples: IP address, device identifiers, browser and OS info, page views, referrer URLs, timestamps, cookie identifiers, interaction events.
3. **Commercial Information**
   Examples: subscription plan, invoices, billing history, transactions (payment card details are typically handled by our payment processor).
4. **Customer Communications & Support Data**
   Examples: messages you send us, support requests, meeting notes, email correspondence.

5. **User Content (if you input it into the service)**
   Examples: text or files you upload; prompts, requests, and outputs generated in the service.
6. **Inferences** (primarily from product/website usage)
   Examples: feature adoption/usage patterns, aggregated insights used for improving the service or marketing measurement.
7. **Sensitive Personal Information ("SPI")**
   We do **not** intend to collect SPI such as government IDs, precise geolocation, or health data. If SPI is incidentally provided (e.g., in free-text), we treat it as Personal Information and restrict use.

## 2.2 Sources

- Directly from you (or your employer) when you create an account, request a demo, contact support, subscribe, or use the service
- Automatically from your device/browser when you visit or use our website/services (cookies, logs, event data)
- From service providers (e.g., payment, analytics, hosting)
- From advertising/measurement partners where enabled (e.g., Meta technologies)

## 2.3 Business / Commercial Purposes

We use Personal Information to:

- Operate, maintain, and secure our services and website
- Create and manage accounts and provide customer support
- Process payments and manage subscriptions
- Measure performance, conduct analytics, and improve products
- Communicate with customers/prospects (service messages, support, updates)
- Marketing and advertising measurement (including targeted advertising where enabled)
- Debugging, fraud prevention, and compliance with legal obligations

## 2.4 Retention (high-level)

- **Website/server logs:** generally short retention (e.g., up to ~14 days) unless needed for security incidents.
- **Account and service data:** for the life of the account, then deleted or de-identified unless legal retention applies.
- **Billing/contract records:** retained as required by applicable law.
- **Marketing preferences:** retained until you opt out / withdraw consent.

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# 3) Disclosures (Who we share with)

We disclose Personal Information to:

- **Service providers / contractors** (hosting, analytics, security, email delivery, payments, authentication, AI processing)
- **Advertising/measurement partners** (only where enabled; see Section 4)
- **Authorities/third parties** when required by law, to protect rights/safety, or to enforce agreements
- **Business transferees** in a merger, acquisition, financing, or asset sale (subject to confidentiality and lawful basis)

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## 4) Sale / Share of Personal Information & Targeted Advertising

**4.1 "Sale"**

We do **not** sell Personal Information for money.

**4.2 "Share" for Cross-Context Behavioral Advertising (Targeted Advertising)**

Because we use the **Meta Pixel** (and related Meta advertising technologies), some disclosures of identifiers and online activity to Meta may qualify as **"sharing"** under CPRA for cross-context behavioral advertising.

**Categories typically shared (when enabled):**

- Identifiers (online identifiers/cookie IDs)
- Internet/network activity (events, page views, device data, IP address)
- Inferences (campaign performance / audience measurement)

**4.3 Your Right to Opt-Out ("Do Not Sell or Share")**

You can opt out of sharing for cross-context behavioral advertising by:

- Using a persistent **"Do Not Sell or Share My Personal Information"** link on our website, and/or
- Adjusting your **cookie preferences** (marketing/advertising cookies), and/or
- Sending a request to **service@cloudginny.com** (see Section 7), and/or
- Using the **Global Privacy Control (GPC)** signal (see Section 8).

We will not discriminate against you for exercising this right.

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## 5) Sensitive Personal Information ("SPI")

We do not use or disclose SPI for purposes other than those permitted by CPRA (e.g., service delivery, security, short-term transient use, debugging, compliance).
If our processing ever exceeds permitted purposes, we will provide a **"Limit the Use of My Sensitive Personal Information"** control.

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## 6) Service Providers (Examples)

Depending on your use and consent choices, we may use vendors such as:

- **Hosting / infrastructure:** Google Cloud; Vercel
- **Security / anti-spam:** Friendly Captcha
- **Email & communications:** Brevo (Sendinblue)
- **Analytics & tag management:** Google Analytics; Google Tag Manager; Brevo Analytics
- **Payments:** Stripe
- **Advertising & measurement:** Meta Ads / Meta Pixel; Meta Graph API
- **Authentication:** Firebase Authenticator
- **AI / cloud APIs:** OpenAI API; Google Cloud Vertex AI; Google Merchant API

We contractually require service providers to process Personal Information only for specified business purposes, with appropriate security and confidentiality.

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## 7) CPRA Rights for California Residents

Subject to legal exceptions, you have the right to:

- **Know / Access**: categories and specific pieces of Personal Information collected; sources; purposes; recipients; retention
- **Delete** Personal Information we collected from you
- **Correct** inaccurate Personal Information
- **Opt-Out** of sale/share (as applicable) and targeted advertising
- **Limit** use/disclosure of SPI (as applicable)
- **Data Portability**
- **Non-Discrimination** for exercising your rights

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## 8) How to Exercise Your Rights (Requests, Verification, Agents, GPC)

### 8.1 Submit a request

Email: **service@cloudginny.com**

### 8.2 Verification

We verify your identity using commercially reasonable methods (e.g., account login, one-time verification, or signed authorization).

### 8.3 Authorized Agents

An authorized agent may submit requests on your behalf with proof of signed permission or power of attorney, plus verification as required.

**8.4 Global Privacy Control (GPC)**

Where applicable, we honor GPC browser signals as an opt-out of sale/share.

**8.5 Response timing**

We respond within **45 days** (may be extended once by an additional 45 days with notice).

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# 9) Minors

Our service is intended for business users and is not directed to minors. We do not knowingly process Personal Information of consumers under 18 in the product; if we learn we have done so, we will delete it.

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# 10) Security

We maintain reasonable administrative, technical, and organizational measures appropriate to the nature of Personal Information processed.

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# 11) International Transfers

If we transfer Personal Information outside the U.S./EEA, we use appropriate safeguards (e.g., Standard Contractual Clauses, Data Privacy Framework where applicable, or comparable mechanisms), consistent with our main Privacy Policy.

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# 12) Contact (California Privacy)

**Cloudginny GmbH**
Tassiloweg 42, 85399 Hallbergmoos, Germany
Email: **service@cloudginny.com**