

Clovity Privacy Policy

Effective Date: January 1, 2025

1. Who We Are

Clovity, Inc. (“Clovity”, “we”, “us”, “our”) is a technology solutions and software company headquartered in California, USA. We deliver services, products and applications (including Atlassian Marketplace Apps) worldwide.

Clovity, Inc.

11501 Dublin Blvd, Suite 200

Dublin, California, USA

Email: support@clovity.com

We are committed to protecting your privacy and handling data in a secure and transparent manner.

2. Scope and Definition of Personal Information

This Privacy Policy applies to:

- Visitors to our websites (e.g., clovity.com)
- Participants in our events, webinars, or marketing campaigns.
- Customers of our software applications, including but not limited to **Atlassian Marketplace Apps** for Jira, Confluence and Jira Service Management.
- Clients of our consulting and professional services.

For the purposes of this Privacy Policy, “Personal Information” (also referred to as “Personal Data”) means any information that identifies, relates to describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly with a particular consumer, household or individual, as defined by applicable data protection laws (including GDPR and CCPA).

3. Data We Collect

We may collect and process the following categories of information:

- **Contact and profile data:** name, email address, phone number, employer, role, account ID, or other identifiers you provide.
- **Website usage data:** IP address, browser type, device information, referral source, cookies, and analytics.
- **Product and service data:** metadata, project configurations, issue keys, workflows, permissions, or backlog items when using our apps.
- **Interaction data:** support requests, surveys, event registrations, or communications with our teams.
- **Export or generated data:** when you request reports (e.g., PDFs, CSVs) from our apps.
- **Data from third-party sources:** where legally permitted, we may obtain aggregated or non-personal data from trusted third-party partners (e.g., Atlassian, event organizers, or business directories) for business analysis or marketing purposes.

We do not collect payment card details directly; billing for Atlassian Marketplace Apps is handled by **Atlassian**.

4. How We Use Data

We use collected data to:

- Provide and operate our websites, products, and services.
- Deliver app functionality (audits, reports, AI-driven insights).
- Communicate with you about updates, support, or marketing (where legally permitted).
- Improve security, performance, and reliability.
- Meet legal, contractual, and compliance obligations.

We do not sell or rent personal information.

5. Atlassian Marketplace Apps

All Clovity Atlassian Marketplace Apps are built on Atlassian Forge or Atlassian-supported hosting frameworks.

When using our Atlassian Apps:

- **Data collected** may include Atlassian account IDs, display names, email addresses (if required), issue/project metadata, workflows, permissions and user queries/prompts.
- **Data usage** is limited to delivering app functionality (e.g., license optimization, audits, workflow analysis, QA retros, backlog checks).
- **Data storage** remains within Atlassian Cloud. Temporary logs may be stored (≤ 90 days) for troubleshooting and security purposes.
- **AI-related data:** prompts and related data may be processed by integrated AI providers (e.g., AWS Bedrock, OpenAI) solely for the purpose of generating AI-driven insights. Such data is not retained and contracts with providers prohibit long-term storage or secondary use.
- **Role clarification:** when you use our Atlassian Marketplace Apps, Clovity acts as a **Data Processor** of your company's data, while your company remains the **Data Controller**. We process data strictly on your behalf and in accordance with your instructions.
- **Sub-processors:** in addition to Atlassian, we may rely on trusted infrastructure providers (e.g., AWS). All sub-processors are subject to annual audits by Clovity to ensure compliance.
- **Transparency:** a current list of our sub-processors is available at: <https://www.clovity.com/subprocessors>.

6. Legal Basis for Processing

Where privacy laws such as the GDPR, UK GDPR, CCPA, or other regulations apply, Clovity relies on:

- **Consent:** when you opt in to newsletters, provide prompts, or allow optional features.

- **Contractual necessity:** to deliver app functionality or services under agreements.
- **Legitimate interests:** improving apps, troubleshooting, and ensuring security.
- **Legal obligations:** compliance with applicable laws or audits.

7. Data Retention

- **Website analytics cookies:** retained as per browser/session settings
- **Customer support and service records:** retained for up to **7 years after termination of a contract** or as required by law.
- **Marketplace app logs:** retained for up to **90 days for troubleshooting and security purposes.**
- **AI prompts:** processed transiently and not retained.

8. International Transfers

As a U.S.-based company, Clovity may transfer data internationally. Safeguards are applied, including:

- **EU Standard Contractual Clauses (SCCs).**
- **UK Addendum** for UK data protection.
- **U.S. Data Privacy Framework** participation, where applicable.

9. Your Rights

Depending on your location, you may have the right to:

- Access, correct, or delete your personal data.
- Restrict or object to certain processing.
- Opt out of non-essential data use. To exercise this, email support@clovity.com with the subject line **"Data Use Opt-Out."**
- Receive a copy of your data in portable format.
- File a complaint with your local supervisory authority.

CCPA/CPRA compliance: To exercise your right to opt out of the sale or sharing of personal information, please use the “Do Not Sell or Share My Personal Information” link on our website homepage or email us at support@clovity.com.

Clovity will respond to verified requests within legally required timeframes.

10. Cookies and Tracking

Our website uses cookies and analytics tools to improve your browsing experience. You can manage or disable cookies in your browser settings. For details, see our Cookie Notice.

11. Children

Our services and apps are not directed to children under 16, and we do not knowingly collect data from minors.

12. Data Breach Notification

Clovity maintains an incident response plan. In the event of a personal data breach:

- Users and regulators will be notified within **72 hours** (GDPR/UK GDPR) or **10 days** (CCPA/CPRA), as required by law.
- Notifications will include the nature of the breach, likely consequences and remedial actions taken.

13. Changes to this Policy

We may update this Privacy Policy periodically to reflect changes in law, technology, or our services. Updates will be published at <https://www.clovity.com/privacy-statement>.

14. Contact Us

For any questions about this Privacy Policy or how your data is handled:

Clovity, Inc.

11501 Dublin Blvd, Suite 200

Dublin, California, USA

Email: support@clovity.com

You may also submit a request through our dedicated Privacy Request Form at <https://www.clovity.com/privacy-request>.