

Privacy Policy

Your privacy is critically important to us. At Clor.com, we have a few fundamental principles:

- We are thoughtful about the personal information we ask you to provide
- We collect as little information as possible through the operation of our services.
- We store personal information for only as long as we have a reason to keep it.
- We aim for full transparency on how we gather, use, and share your personal information.

Below is our Privacy Policy, which incorporates and clarifies these principles.

Who We Are and What This Policy Covers

We are the folks behind Clor.com, a service to share your YC / startup application with verified investors. Our mission is to help startups answer the important questions about their startups and share easily share that information with investors

This Privacy Policy applies to information that we collect about you when you use our website (including Clor.com);

Throughout this Privacy Policy we will refer to our website, mobile applications and other products and services collectively as “Services.”

Please note that this Privacy Policy does not apply to any of our products or services that have a separate privacy policy.

Below we explain how we collect, use, and share information about you, along with the choices that you have with respect to that information.

Information We Collect

We only collect information about you if we have a reason to do so – for example, to provide our Services, to communicate with you, or to make our Services better. We collect information in three ways: if and when you provide information to us, automatically through operating our Services, and from outside sources. Let’s go over the information that we collect.

Information You Provide to Us

It’s probably no surprise that we collect information that you provide to us. The amount and type of information depends on the context and how we use the information. Here are some examples:

- **Basic Account Information:** We ask for basic information from you in order to set up your account. For example, we require individuals who sign up for a Clor.com account to

provide an email address or twitter handle, and password – and that’s it. You may provide us with more information – like details about your startup – but we don’t require that information to create a Clor account.

- **Transaction and Billing Information:** If you buy something from us – a subscription to a Clor plan, for example – you will provide additional personal and payment information that is required to process the transaction and your payment, such as your name, credit card information, and contact information.
- **Credentials:** Depending on the Services you use, you may provide us with credentials for your Twitter or Hacker News account.
- **Communications With Us:** You may also provide us information when you respond to surveys, support questions, or post a question in our public forums.

Information We Collect Automatically

We also collect some information automatically:

- **Log Information:** Like most online service providers, we collect information that web browsers, mobile devices, and servers typically make available, such as the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information. We collect log information when you use our Services – for example, when you create or make changes to your account on Clor.com.
- **Usage Information:** Other than server bandwidth, we do not collect or log any usage information.
- **Location Information:** We may determine the approximate location of your device from your IP address. We collect and use this information to, for example, calculate how many people visit our Services from certain geographic regions.
- **Information from Cookies & Other Technologies:** A cookie is a string of information that a website stores on a visitor’s computer, and that the visitor’s browser provides to the website each time the visitor returns. Pixel tags (also called web beacons) are small blocks of code placed on websites and emails. Clor.com uses cookies and other technologies like pixel tags to help us identify and track visitors, usage, and access preferences for our Services, as well as track and understand email campaign effectiveness and to deliver targeted ads. For more information about our use of cookies and other technologies for tracking, including how you can control the use of cookies, please see our Cookie Policy.

Information We Collect from Other Sources

We may also get information about you from other sources. For example, if you are invited to join a Clor startup account, we will receive information from that account (such as your email address) via the authorization procedures.

How And Why We Use Information

Purposes for Using Information

We use information about you as mentioned above and for the purposes listed below:

- To provide our Services – for example, to set up and maintain your account or charge you for any of our paid Services;
- To further develop and improve our Services – for example by adding new features that we think our users will enjoy or will help them to create and manage their servers more efficiently;
- To monitor and analyze trends and better understand how users interact with our Services, which helps us improve our Services and make them easier to use;
- To measure, gauge, and improve the effectiveness of our advertising, and better understand user retention and attrition – for example, we may analyze how many individuals purchased a plan after receiving a marketing message or continue to use our Services after a certain length of time;
- To monitor and prevent any problems with our Services, protect the security of our Services, detect and prevent fraudulent transactions and other illegal activities, fight spam, and protect the rights and property of Clor.com. and others, which may result in us declining a transaction or the use of our Services;
- To communicate with you, for example through an email, about offers and promotions offered by Clor.com and others we think will be of interest to you, solicit your feedback, or keep you up to date on Clor.com and our products; and
- To personalize your experience using our Services, provide content recommendations, target our marketing messages to groups of our users (for example, those who have a particular plan with us or have been our user for a certain length of time), and serve relevant advertisements.

Legal Bases for Collecting and Using Information

A note here for those in the European Union about our legal grounds for processing information about you under EU data protection laws, which is that our use of your information is based on the grounds that:

- (1) The use is necessary in order to fulfill our commitments to you under our Terms of Service or other agreements with you or is necessary to administer your account – for example, in order to enable access to our website on your device or charge you for a paid plan; or
- (2) The use is necessary for compliance with a legal obligation; or
- (3) The use is necessary in order to protect your vital interests or those of another person; or
- (4) We have a legitimate interest in using your information – for example, to provide and update our Services, to improve our Services so that we can offer you an even better user experience, to safeguard our Services, to communicate with you, to measure, gauge, and improve the effectiveness of our advertising, and better understand user retention and attrition, to monitor and prevent any problems with our Services, and to personalize your experience; or
- (5) You have given us your consent—for example before we place certain cookies on your device and access and analyze them later on, as described in our Cookie Policy.

Sharing Information

How We Share Information

We do not sell our users' private personal information.

We share information about you in the limited circumstances spelled out below and with appropriate safeguards on your privacy:

- **Legal Requests:** We may disclose information about you in response to a subpoena, court order, or other governmental request. For more information on how we respond to requests for information about Clor.com users, please see our Legal Guidelines.
- **To Protect Rights, Property, and Others:** We may disclose information about you when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of Clor.com, third parties, or the public at large. For example, if we have a good faith belief that there is an imminent danger of death or serious physical injury, we may disclose information related to the emergency without delay.
- **Business Transfers:** In connection with any merger, sale of company assets, or acquisition of all or a portion of our business by another company, or in the unlikely event that Clor.com goes out of business or enters bankruptcy, user information would likely be one of the assets that is transferred or acquired by a third party. If any of these events were to happen, this Privacy Policy would continue to apply to your information and the party receiving your information may continue to use your information, but only in a manner consistent with this Privacy Policy.
- **With Your Consent:** We may share and disclose information with your consent or at your direction. For example, we may share your information with third parties with which you authorize us to do so.
- **Aggregated or De-Identified Information:** We may share information that has been aggregated or reasonably de-identified, so that the information could not reasonably be used to identify you. For instance, we may publish aggregate statistics about the use of our Services and we may share a hashed version of your email address to facilitate customized ad campaigns on other platforms.
- **Published Support Requests:** And if you send us a request (for example, via a support email or one of our feedback mechanisms), we reserve the right to publish that request in order to help us clarify or respond to your request or to help us support other users.

Information Shared Publicly

Information that you choose to make public is disclosed publicly.

That means, of course, that information like your public profiles, posts, other content that you make public, and your "Likes" and comments on other websites, are all available to others.

How Long We Keep Information

We generally discard information about you when we no longer need the information for the purposes for which we collect and use it – which are described in the section above on How and Why We Use Information – and we are not legally required to continue to keep it.

For example, we keep the web server logs that record information about a visitor to Clor.com, such as the visitor’s IP address, browser type, and operating system, for approximately 30 days. We retain the logs for this period of time in order to, among other things, analyze traffic to Clor.com and investigate issues if something goes wrong.

Security

While no online service is 100% secure, we work very hard to protect information about you against unauthorized access, use, alteration, or destruction, and take reasonable measures to do so, such as monitoring our Services for potential vulnerabilities and attacks.

Choices

You have several choices available when it comes to information about you:

- **Limit the Information that You Provide:** If you have an account with us, you can choose not to provide the optional account information, profile information, and transaction and billing information. Please keep in mind that if you do not provide this information, certain features of our Services may not be accessible.
- **Opt-Out of Electronic Communications:** You may opt out of receiving promotional messages from us. Just follow the instructions in those messages. If you opt out of promotional messages, we may still send you other messages, like those about your account and legal notices.
- **Set Your Browser to Reject Cookies:** At this time, Clor.com does not respond to “do not track” signals across all of our Services. However, you can usually choose to set your browser to remove or reject browser cookies before using Clor.com websites, with the drawback that certain features of Clor.com’s websites may not function properly without the aid of cookies.
- **Close Your Account:** While we’d be very sad to see you go, if you no longer want to use our Services, you can cancel your Clor.com account. Please keep in mind that we may continue to retain your information after closing your account, as described in How Long We Keep Information above – for example, when that information is reasonably needed to comply with (or demonstrate our compliance with) legal obligations such as law enforcement requests, or reasonably needed for our legitimate business interests.

Your Rights

If you are located in certain countries, including those that fall under the scope of the European General Data Protection Regulation (AKA the “GDPR”), data protection laws give you rights with respect to your personal data, subject to any exemptions provided by the law, including the rights to:

- Request access to your personal data;
- Request correction or deletion of your personal data;

- Object to our use and processing of your personal data;
- Request that we limit our use and processing of your personal data; and
- Request portability of your personal data.

You can usually access, correct, or delete your personal data using your account settings and tools that we offer, but if you aren't able to do that, or you would like to contact us about one of the other rights, scroll down to 'How to Reach Us' to find our contact information.

EU individuals also have the right to make a complaint to a government supervisory authority.

Controllers and Responsible Companies

Clor.com Services are worldwide. Different Clor.com companies are the controller (or co-controller) of personal information, which means that they are the company responsible for processing that information, based on the particular service and the location of the individual using our Services. Depending on the Services you use, more than one company may be the controller of your personal data. Generally, the "controller" is the Portal Cloud Inc. company that entered into the contract with you under the Terms of Service for the the product or service you use. In addition, Portal Cloud Inc., our US-based company, is the controller for some of the processing activities across all of our Services worldwide.

The chart below explains the controllers for processing your personal information. We use the term "Designated Countries" to refer to Australia, Canada, Japan, Mexico, New Zealand, and all countries located in the European continent.

If you reside outside of the Designated Countries

Portal Cloud Inc.
1220 Tasman Dr. #418
Sunnyvale, CA 94089

If you reside in the Designated Countries

Portal Cloud Inc.
1220 Tasman Dr. #418
Sunnyvale, CA 94089

How to Reach Us

If you have a question about this Privacy Policy, or you would like to contact us about any of the rights mentioned in the Your Rights section above, please contact us.

Other Things You Should Know (Keep Reading!)

Transferring Information

Because Clor.com's Services are offered worldwide, the information about you that we process when you use the Services in the EU may be used, stored, and/or accessed by individuals operating outside the European Economic Area (EEA) who work for us, other members of our group of companies, or third party data processors. This is required for the purposes listed in

the How and Why We Use Information section above. When providing information about you to entities outside the EEA, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this Privacy Policy as required by applicable law. These measures include:

- In the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the [EU-US Privacy Shield](#); or
- In the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them.

You can ask us for more information about the steps we take to protect your personal information when transferring it from the EU.

Privacy Policy Changes

Although most changes are likely to be minor, Clor.com may change its Privacy Policy from time to time. Clor.com encourages visitors to frequently check this page for any changes to its Privacy Policy. If we make changes, we will notify you by revising the change log below, and, in some cases, we may provide additional notice (such as adding a statement to our homepage or blog, or sending you a notification through email or your dashboard). Your further use of the Services after a change to our Privacy Policy will be subject to the updated policy.

That's it! Thanks for reading.

Change log

- *November 25, 2018*: Published Privacy Policy