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## Privacy Statement for Paper and Paste

WeTransfer, B.V. (“WeTransfer,” or “we”) wants you to be familiar with the type of information we collect from you, and how we use it. Through this Privacy Statement for Paper and Paste, we describe the information we collect in connection with our Services. The “Services” include our “Paste” web application, the “Public Stream” content sharing platform of Paper, the Mobile Apps, bywetransfer.com, pasteapp.com, paste.app, our customer service system, and any related services or digital tools, applications or platforms we provide to you connected with the above. The Mobile Apps are our Paper mobile application and our Paste mobile application. The Services also interact with FiftyThree, Inc. “Pencil” digital stylus in a way that may transmit information to us. By using the Services, you agree that you are accepting the practices that we have outlined in this Statement, and that you consent to having your data transferred to and processed in the United States, where our Paper and Paste facilities are located. This Privacy Statement describes the information we collect through the Services, how we may use that information, and with whom we may share it. This Privacy Statement is organized according to the sections below:

- Information We Obtain
- How We Use the Information We Obtain
- Sharing of Information
- General

### INFORMATION WE OBTAIN

There are three ways in which we may obtain personally identifying information from you: you may submit it; we collect it automatically through our online Services; or we collect it automatically through our Mobile Apps. Different types of information may be collected through each channel, and you should understand both how we do this and what types of information we collect on each channel.

- 1. Information You Submit** You may choose to provide us with personal information through the Services, such as through forms, account portals, interfaces, and interactions with other customer support portals and channels:
  - a. Contact information, such as your name and email address.
  - b. Other information about yourself, such as your age, gender, location, date of birth, language preference or interests.
  - c. Your photograph.
  - d. Information related or connected to an account with a third-party service that you use to sign up or log in to the Services, or when you associate that account with the Services. For instance, when you associate your Slack



account or Facebook account with our Services, we may receive your public profile (name, profile picture, age range, gender, language, country and other public information), your friend list, your contacts, and your email address. If you sign up, log in with, or connect the Services with accounts you may have with other third-party services, such as Twitter, Instagram, or Tumblr, we may obtain similar information from those platforms.

- e. You may also submit original content to us, which is covered under licenses set forth in our Terms of Service of Paper and Paste, describing other rights that you grant to us and other users.

**2. Information We Collect by Automated Means Through the Services** We also may collect certain information from you by automated means, using technologies such as cookies, Web server logs, Web beacons and JavaScript.

- a. Cookies are files that websites send to your computer or other Internet-connected device to uniquely identify your browser or to store information or settings on your device. Our Site may use HTTP cookies, HTML5 cookies and other types of local storage (such as browser-based or plugin-based local storage). Your browser may tell you how to be notified when you receive certain types of cookies and how to restrict or disable certain cookies. Please note, however, that without cookies you may not be able to use all of the features of the Services or other websites and online services.
- b. In conjunction with the gathering of information through cookies, our Web servers may log information such as your device type, operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. The Web server logs also may record information such as the address of the Web page that referred you to our Site and the IP address of the device you use to connect to the Services. They also may log information about your interaction with this Site, such as which pages you visit. To control which Web servers collect information by automated means, we may place tags on our Web pages called “Web beacons,” which are small files that link Web pages to particular Web servers and their cookies. We also may send instructions to your device using JavaScript or other computer languages to gather the sorts of information described above and other details your interactions with the Site.
- c. We may use third-party Web analytics services in connection with providing the Services, including but not limited to Google Analytics, Amplitude, Segment, Papertrail and Intercom. These service providers use the technology described above to help us analyze how our users use the Site. The information collected by the technology (including your IP address) will be disclosed to or collected directly by these services providers, who use the information to evaluate your use of the Site. To learn about opting out of Google Analytics, [click here](#). To learn about opting out of Intercom, [click here](#). To learn about opting out of Segment, [click here](#). To learn about opting out of Amplitude, [click here](#).
- d. Our Paste service provides the ability to deeply integrate Paste with third-party instant messaging services (“Messaging Services”) such as Slack, in order to provide rich messaging functionality within Paste. If, when using Paste, you integrate with a Messaging Service, we will connect that service with Paste. Upon integration, Paste and the Messaging Service will share certain of your account information and content between them. For example, if you post a message to a Paste deck that is associated, through the integration, with the Messaging Service Slack, that message will be transmitted to Slack, and will appear in the corresponding “channel” in Slack. The first time you integrate Paste with the Messaging Service, you may be asked by the Messaging Service to authorize the sharing of your information between the Messaging



Service and Paste. Please note that even though you may be able to use your login credentials from a Messaging Service to log into Paste, we do not receive or store your password from that Messaging Service.

**3. Information We Collect by Automated Means Through our Mobile Apps and Other Tools** If you use our Mobile Apps, we may collect the following information by automated means:

- a. The type of device you use and its operating system.
- b. Identification details of your device, such as any unique device identifier such as an IDFA (for iOS) or MAC address.
- c. IP address of your device.
- d. Other information about your device, such as your device hardware model, operating system version, or mobile network information.
- e. Information about your use of Paper.
- f. Any data associated with and identifying the stylus or other hardware or tools you are using in connection with our Services, including how you use that stylus to interact with Paper and our Services. This might include, for instance, information about service usage, frequency of usage, content placed or accessed, and communications you make available through your use of the Services.
- g. If we collect device-based, precise geo-location information, we will provide notice to you of that collection and our purpose for doing so.

**4. Information We Obtain in Connection with Customer Support**

- a. On rare occasions, you may encounter a technical problem that could require troubleshooting by our customer support staff. If this should become necessary, you may be asked to share with us information about your use of Paper that is more detailed than the information we collect by automated means. For example we may ask you to provide specific documents and files associated with the Services or with Pencil. Some of these files may contain personally identifying information. If you provide such additional information, it will only be used in connection with our efforts to diagnose and solve your technical problem, and to improve the Services and Pencil, and will be treated in accordance with this Privacy Statement.

## HOW WE USE THE INFORMATION WE OBTAIN

We may use the information we obtain through the Services to provide the Services and fulfill the immediate purpose for which it was requested, as well as for other purposes. These purposes are:

- Providing, administering and communicating with you about products, services, events and promotions. The legal base for processing is the legitimate interest of WeTransfer.
- Performing diagnostics and analysis to evaluate how our Services operate, and how people are using them. Legal base for this processing activity is the performing of the contract, which in this case are the services we offer through WeTransfer, on web and through our mobile and desktop apps, and the accompanying Terms of Service.
- Processing, evaluating and responding to your requests, inquiries and applications. Legal base for this processing activity is the performing of the contract, which in this case are the services we offer through WeTransfer, on web and through our mobile and desktop apps, and the accompanying Terms of Service.
- Managing our customer information databases. Legal base for this processing activity is the performing of the contract, which in this case are the services we offer through WeTransfer, on web and through our mobile and desktop apps, and the accompanying Terms of Service.
- Customizing your experience with the Services. Legal base for this processing activity is the performing of the contract, which in this case are the services we offer through



WeTransfer, on web and through our mobile and desktop apps, and the accompanying Terms of Service.

- Operating, evaluating, and improving our business (including developing new products and services; managing our communications; performing market research, data analytics, and data appends; determining and managing the effectiveness of our advertising and marketing; analyzing our products and Services; and performing accounting, auditing, billing, reconciliation, and collection activities).
- Protecting against and preventing fraud, unauthorized transactions, security issues, claims and other liabilities, and managing risk exposure and quality. These processing activities are to comply with our legal obligation. In case of a violation or when we need to uphold our Terms, for example, we need to be able to search or share (some of) your personal data.
- Complying with and enforcing applicable legal requirements, industry standards and our policies and terms, such as our Terms of Service. These processing activities are to comply with our legal obligation. In case of a violation or when we need to uphold our Terms, for example, we need to be able to search or share (some of) your personal data.
- Providing customer support and diagnostic assistance, for instance, by reviewing information collected from the Services and from the Pencil stylus or other hardware and tools you use. The legal base here is the performing of our contract. We will only process your personal data when you need us to assist you. If we need additional information or data, we will explicitly ask for permission from you.

## **SHARING OF INFORMATION**

We may share or allow you to share personal information as part of the Services. For example your user name and other account details may be associated with content and comments you post on or through the Services. We may allow you to post information to your social network account if your settings allow for such sharing. When you do this, Information you submit to a third-party widget or plugin on our Services, such as the Twitter widget in Paper, is collected directly by the provider of that widget or plugin and is not subject to our Privacy Statement.

As mentioned above, our Paste service provides the ability to deeply integrate Paste with Messaging Services. If you integrate Paste with a Messaging Service, we will connect that service with Paste, and Paste and the Messaging Service will share certain of your account information and content associated with each service between them.

We only share personal information we collect through the Services with trusted third-party service providers, to help provide customer or technical support, billing support, shipping and order fulfillment, marketing and email services, data support and services, and other operational services that help us provide our own Services to you.

We also may disclose information about you: (i) if we are required to do so by law, regulation or legal process, such as a court order or subpoena; (ii) in response to requests by government agencies, such as law enforcement authorities; or (iii) when we believe disclosure is necessary or appropriate to prevent physical, financial or other harm, injury or loss; or (iv) in connection with an investigation of suspected or actual unlawful activity. We also may disclose aggregated or non-identifiable information to third parties in a manner that does not identify particular users.

If we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation), then the information we have collected from you will likely be part of that transfer, as well.

## **GENERAL**

### **1. Your Choices**



- a. Where applicable, you may amend your preferences regarding how we communicate with you or cancel your account within your profile settings in the Services. You also may use certain settings in the Paper app to modify certain preferences regarding the sharing functionality of the app. You may unsubscribe from marketing-oriented emails by clicking on the “unsubscribe” link in those emails.

## **2. Stripe**

- a. We use third-party payments processor Stripe, Inc. to process payments for the Services. Your payment and transaction data is stored in Stripe’s data storage. When you make a payment for the Services, Stripe stores your credit card data, and is required to follow Payment Card Industry (PCI) rules, such as those regarding encryption and deletion of purchase transaction information. For more information about Stripe, you may also want to read Stripe’s Checkout User Terms of Service and Privacy Statement.

## **3. Policy to California Customers**

- a. Subject to certain limitations under California Civil Code § 1798.83, if you are a California resident, you may ask us to provide you with (i) a list of certain categories of personal information that we have disclosed to certain third parties for their direct marketing purposes during the immediately preceding calendar year and (ii) the identity of certain third parties that received personal information from us for their direct marketing purposes during that calendar year. We do not, however, share your personal information with marketers, subject to the above statute.

## **4. Security**

- a. Although we may take certain precautions that we believe may help protect against unauthorized access to the Services or related systems, no security is perfect. We make no promises regarding the security, integrity, availability or retention of the information collected or handled by our Services or related systems. For more details, please refer to the “Disclaimers” section of our Terms of Service.

## **5. Accessing or Changing Your Account Information**

- a. If you need to change or delete any personal information comprising your account (such as your name or email address), you may do so in your account settings in the Services, or you may contact us at [legal@wetransfer.com](mailto:legal@wetransfer.com). Please note that we may retain (and may be required to maintain) certain information for a period of time, for legal, accounting, or anti-fraud purposes.

## **6. Updates to Our Privacy Statement**

- a. This Privacy Statement may be updated periodically and without prior notice to you to reflect changes in our personal information practices or relevant laws. To inform you of any material changes, we will post the updated Privacy Statement on our Site for a period of time and indicate somewhere in the Privacy Statement when it was updated.

## **7. Users From Outside the United States**

- a. The Services are provided, supported, and hosted in the United States. Use of the Services is governed by United States law. If you are using the Services from outside of the United States, please be aware that any information we collect under this Statement may be transferred to, stored, and processed in the United States. The data protection and other laws of the United States are not always as comprehensive as those in other countries. By using the Services, you consent to your information being transferred to and processed by our facilities.

## **8. Users Under Thirteen Years of Age**

- a. The Services are not intended for users under thirteen years of age, and if you are under thirteen years of age, you may not use the Services, or provide us with any information. Any commentary about the Services provided by any third party will have no bearing on this restriction.



**9. Users Between Thirteen and Eighteen Years of Age Outside the United States**

- a. If you are between thirteen and eighteen years of age, and are located outside the United States, applicable law in certain countries may require your parents or guardians to consent with your use of the Services and with the associated processing of personal data. The relevant age limit may vary from country to country. Please check the rules that apply in your country. When in doubt, please do not use the Services or provide us with any information.

**10. No Third Party Rights**

- a. This Privacy Statement does not create rights enforceable by third parties.

**11. How to Contact Us**

- a. If you have any questions or comments about this Privacy Statement, or if you would like us to update information we have about you or your preferences, please send a detailed message to [legal@wetransfer.com](mailto:legal@wetransfer.com). Thank you.