FolderIT

Privacy and Cookie Policy

As of June 1, 2015

Content

1. What is covered with this Policy 3
2. Your consent for processing your personal data 3
3. Data controller 3
4. Collection and use of information 4
Personal information 4
Sensitive personal data 4
Automatically collected information 4
5. Storing of information 4
6. Sharing and disclosing of information 5
7. Security 5
8. Cookies 6
9. Your rights regarding personal data processing 6
10. Changes to the Policy 7
11. Contact 7

1. What is covered with this Policy

FolderIT ("we", "us" or "our") respects the privacy rights of users and understands the importance of protecting and handling information collected about you in accordance with both the law and best practice.

This Privacy and Cookie Policy ("Privacy Policy") tells you how your information, including your personal information, is collected, used, stored and disclosed by FolderIT as well as provides you information about your rights regarding your personal data and its processing by FolderIT.

This Privacy Policy applies to information we collect when you use or access our services available at our website www.folderit.com ("Site"), products, services or applications (collectively, the "Services"), or when you otherwise interact with us.

2. Your consent for processing your personal data

YOU AGREE THAT BY ACCESSING AND USING OUR SITE OR SERVICES YOU CONSENT TO COLLECTION, RECORDING, STORAGE, DISCLOSURE, ERASURE AND DESTRUCTION OF YOUR PERSONAL DATA AS WELL AS TO PROCESSING OF YOUR PERSONAL INFORMATION IN ANY OTHER WAYS TO THE EXTENT AND FOR THE PURPOSES PROVIDED IN THIS PRIVACY POLICY.

You can withdraw your consent at any time; however withdrawal of your consent has no retroactive effect.

Please bear in mind that in case you withdraw your consent for processing your personal data, we may not able to provide you the agreed Services and are forced to terminate the Contract with you; except when you withdraw only the consent for using your data for direct marketing, which has no influence to the Contract or ability to use our Services.

In cases provided by law, we are entitled to process your personal data without your consent (e.g. for performance or for ensuring the performance of the Contract with you).

If you are providing information about another person you confirm that this other person has authorized you to act for them and consent to the processing of their personal data and that you have informed them of this Privacy Policy according to which their personal information will be processed.

3. Data controller

If you have an individual account with us, then the chief processor (i.e. data controller) of your personal data is Folderit OÜ with registered address at Uus-Tatari 2a-10 Tallinn, Republic of Estonia (company registration number 12653434; e-mail: privacy@folderit.com).

Please be aware that where FolderIT provides services to an enterprise, then the relevant enterprise will be the "data controller" and responsible for ensuring compliance with data protection law. Please contact the relevant enterprise for further information and to exercise your data protection rights.

4. Collection and use of information

Personal information

When you register an Account with us, as well as when you change your user profile or the use of our Services, we may ask you to provide us personal information about you such as your name, e-mail address, phone number, postal address and zip code, birth date, gender, occupation, field of activity, employer's name, job title and credit card or other billing information (together "personal information" or "personal data").

Your personal information is necessary to enter into and to perform the Contract with you, to identify you and authorize your access to the Site and the Services as well as to communicate with you regarding the Services and the Contract (e.g. to send you technical notices, updates, security alerts, support and administrative messages, purchase confirmations and invoices, respond to your comments, questions, and requests and provide customer service and support). We also use your personal data for statistical and analytical purposes, in order to develop our business processes and Services accordingly.

We may need to use your personal data also in order to investigate and prevent fraudulent transactions, unauthorized access to the Services or any other illegal activities.

Where you have agreed or where the law permits, we use your personal data also for marketing purposes, e.g. for informing you periodically about the services and features, newsletters, offers, events and other news or information about us and our partners.

Sensitive personal data

FolderIT does not intentionally collect or process your sensitive personal data such as data about your health or disability, political opinions, religious or philosophical beliefs, your ethnic origin etc. In case you yourself provide us your delicate data, we cannot take responsibility for processing this information differently from your usual personal information.

Automatically collected information

We monitor user activity in connection with our Services and thus may collect and log information about any actions taken in connection with the access and use of your Content in our Services, including information about the applications and features you use, the websites you visit and the files or folders you upload, download, share or access while using our Services, your IP address, Internet Service Provider, access times to the Services, browser type and language and device you use to access and use the Services.

We use various tracking technologies (e.g. cookies) to collect information and distinguish you from other users of our Site. For more information about cookies and other tracking technologies please see the Cookies section below.

5. Storing of information

FolderIT is based in the Republic of Estonia; however, in order to provide you with the Services, we may store and process your personal data and content in locations around

the world, including outside your country. Information may be stored also locally on the devices that you use to access our Services.

BY ACCESSING OR USING OUR SERVICES OR OTHERWISE PROVIDING INFORMATION TO US, YOU CONSENT TO THE PROCESSING AND TRANSFER OF INFORMATION IN AND TO THE REPUBLIC OF ESTONIA AND OTHER COUNTRIES AND TERRITORIES, WHICH MAY HAVE DIFFERENT PRIVACY LAWS FROM YOUR COUNTRY OF RESIDENCE.

6. Sharing and disclosing of information

Folderit does not share or disclose your personal data to third persons, unless disclosure of the data is allowed or required by law or this Policy.

Please think carefully how you decide to adjust your account settings regarding privacy issues, as your personal information is displayed **to our other users** in your user profile page as well as elsewhere on the Service according to the preferences you made in your account settings.

When you use our **collaboration features** that support sharing information with third parties, we will disclose and share your information (including your name, email address, your photo and other profile information, content that you decide to share), to the persons that you collaborate with. Please consider that persons collaborating with you may also modify and supplement the content that you have shared with them, but also share such content outside our Services and provide other third parties with rights to view the content you have shared.

We may use **cooperation partners** to carry out or to assist us with some of our activities, in which case we may authorize these partners ("authorized processor") by a contract to process your data, including personal data. These third parties will access your information only to perform certain tasks on our behalf and in accordance with this Policy. List of authorized personal data processors is published on our website.

We may also disclose your information **to any member of our group**, which means any company which controls, is controlled by or is under common control with FolderIT.

We may share your personal information with third parties **for marketing purposes** only if this is in accordance with your marketing preferences.

We may share your information with a **third party application**, if you have chosen to access our Services through such application or give such application access to your information and account. In this case, please make sure that you trust this application and that it's privacy policy is acceptable for you, as we are not responsible for your data processing by a third party application.

7. Security

We take reasonable efforts to safeguard your personal data, but we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers.

Therefore, you should take any measures you feel appropriate and necessary to secure your Account, its content and transmission of your data (e.g. encrypting your data and using secure encrypted connection to communicate with the Services). Also, it is your responsibility to keep your password and any other identification mean confidential and not to disclose them to any other person.

Additionally, you must always logout and close your browser when you finish your session. Please note that we will never ask you to disclose your password in an unsolicited phone call or email.

You should notify us immediately of any unauthorized use of your password or Account or any other breach of security that is known or suspected by you (privacy@folderit.com).

8. Cookies

Cookies are small data files sent to your browser and stored on a hard drive of your computer when you visit a website.

We use **functionality cookies** to enable the Site work the way you expect. Some functionality cookies are necessary to enable you to move around our Site and to use the Services. Other functionality cookies help us recognize and remember you and your preferences (such as your language and region or logged in state).

We use **analytics cookies** to help us to understand how you use our Site. Analytics tools do not provide us with any personal information that reveals your actual identity. They tell us things like how you arrived at our Site, if you have visited before, how long you stay on the Site, and which pages on the Site you visited. They can also provide us with general information about where in the world a user may be located.

You can prevent saving cookies to your device, by changing privacy settings of your web browser.

Please consider that blocking all cookies may help protecting your privacy, but at the same time this may limit your ability to use our Services.

9. Your rights regarding personal data processing

If you are an individual user, you as a data subject have certain rights guaranteed by Personal Data Protection Act of Estonia.

You have the right to obtain information about processing your personal data as well as about personal data relating to you, unless such right is restricted by law.

In case your personal information in outdated or incorrect for any other reason, you have the right to demand the correction of inaccurate personal data concerning you.

In case processing of your personal data is not permitted on the basis of law, you have the right to demand termination of the processing of your personal data as well as deletion or closure of the collected personal data.

You have the right to withdraw the consent given to us for personal data processing at any time, including your right to prohibit, at all times, the processing of your personal data for the purposes of research of consumer habits or direct marketing, and communication of data to third persons who intend to use such data for the research of consumer habits or direct marketing. However, the withdrawal of the consent has no retroactive effect. Also, the withdrawal does not exclude our right to continue processing of your personal data for meeting the requirements of legal acts or for performing the contract concluded with you.

If you feel that your rights in the processing of personal data have been violated, you shall address your questions, comments and requests to FolderIT by e-mail privacy@folderit.com.

In case you are not satisfied with the informal solution proposed by FolderIT, you have the right to seek help from the Estonian Data Protection Inspectorate or a court, unless a different procedure for contestation is provided by law.

This section does not exclude any other rights of a data subject that might be provided in applicable obligatory legal acts.

10. Changes to the Policy

We may change this Privacy Policy from time to time. The most current version of the Privacy Policy is available on our Site together with the date of last update. In case of material changes we will notify our users about the upcoming changes through our Site and/or via e-mail.

If you are not happy with the modified Privacy Policy, you should discontinue the use of our Services and cancel the Contract by sending an e-mail notice to privacy@folderit.com.

11. Contact

If you have any questions, comments or requests regarding this Privacy Policy, please write us to privacy@folderit.com.