twindocs

Privacy Policy

Posted: June 28, 2021
Effective: July 1, 2021

You can see the previous Privacy Policy at:

https://www.twindocs.com/en/legal/privacy.2021.1.pdf

This privacy policy is adapted to current Spanish and European regulations on the protection of personal data on the internet, respecting the following rules:

- Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with respect to the processing of personal data and the free movement of these data (GDPR).

- Organic Law 3/2019, of December 5, on the Protection of Personal Data and guarantee of digital rights (LOPD-GDD).

What information we collect about you

We collect information about you when you **provide it to us** or when you **use our service**.

Information you provide to us

Personal data. We collect information about you when you create a user account and when you update your profile or your user settings. For instance, you provide us personal and contact information when you sign-up for our service. We also store your user account settings.

Content you provide through our service. We collect and store the content you store or receive through our service. The content includes the documents you store or receive in your user account. We store those documents as well as the metadata (tags, notes, title, etc.) that you provide with them.

Information you provide through our support channels. When you contact our user support service, you may choose to submit information regarding a problem you are having

with our service. This information may include you contact information, screenshots, and any other data that may help us in solving the issue.

Information we collect automatically when you use our service
We collect information about you when you use our service.

> **Your use of our service.** We collect and store information about your activity when you use our service.   We store when you connect, where you connect from, the actions you perform, and how you use our service.   We also extract basic information from the documents you store in our service, such as the document size, document type or upload/creation date.

> **Device and connection**. We collect information about the device you use to connect to our service, and about the connection itself. This information includes date and time of the connection, device operating system, browser type, connection IP address, or country from where the connection was started.

How we use information we collect

We use the information we collect about you to:

> **Provide our service**. It may seem obvious, but the main reason why we collect any information about you is to allow you to use our service. Without your information, you would not be able to use our service. We use your email address to create your user account and to enable secure authentication. We need to store your documents so that you can access them through our web and our apps. And we store the notes and tags you add to your documents, together with the information we extract from them, to help you keeping your content organized and to allow you to do proper searches.

> **Improve our service**. Knowing how you use our service allows us to develop and improve it, in order to make your experience better and richer every day. If we know how our users use our service we can fix bugs, detect improvements, and do any changes required to keep and improve the quality of our service.

> **Communicate with you**. We use your contact information to communicate with you as an essential part of the service we provide you. Communications such as our service sign-up confirmation, received document notifications, or folder sharing notifications are fundamental for the proper operation of our service.   We will also use your contact information to keep you updated about news and service changes. We will try to bother you as little as possible, though.

> **Provide support**. We use your information to solve any technical issue you may have and give you an answer as soon as possible. This information will also help us in analyzing any errors that may occur in our service, and to fix them and make our service better every day.

Assure and improve security. We use information about you and about your use of our service to verify your account activity and to monitor suspicious or illegal activities, that may be violating the terms of use you accepted when signing-up for our service. Twindocs has implemented an information security management system in accordance with ISO 27001.

Law enforcement and protection of legal interests
We will use information about you when it is required by the law, or if we consider that it is necessary to protect our legal rights.

We use cookies and other similar technologies to provide and maintain our service, and for each of the listed uses described in this section. Cookies are small text files that are stored in your hard disk or in the memory of your device, which help us to improve both our service and your user experience.

Most web browsers accept cookies by default. If you do not want us to use cookies to collect your information, you can configure your browser to delete or reject cookies. Be aware that, if you choose to delete or reject browser cookies, that could negatively affect your user experience while using our service, or even make it impossible to use our service using a browser.

How we share information we collect

You can use our service to store your documents, but you can also share them, send them, receive documents from others, or even share your folders with other users. This implies that it may exist some kind of information sharing with other users. However, you can be sure that **we do not provide nor sell your information to any third-party**.

With other users
By default, after your account has been created, none of your information is shared with other service users. When you decide to use certain collaborative features in our service, we may share certain information about you with other service users. When you share or send documents, or when you share folders, you are sharing content that may have information about you with other users. Also, the users you share content with will be able to see part of your profile information. For instance, when you share a folder with another user, or when you send a document, the recipient will receive an email where your name is displayed as they must know who is sharing that information with them. You must be careful when choosing the people you want to share your content with, as it may include information about you.

With general and service providers
As mentioned above, we are not selling your information to third-parties. However, we need to share your information with some providers that make it possible for us to provide our service. We work with third-parties that provide hosting, storage and maintenance of the infrastructure we need to make our service work. These providers may have physical access to your information, but access to your information will be regulated and protected by the existing data protection laws

and, in the event of information being accessed, access will be performed using procedures and mechanisms that guarantee your data security, integrity and privacy.

Our providers have security and quality certifications that comply with our Privacy Policy, and are located within the European Union and the United Kingdom, so access to your information will always be regulated, respectively, by the GDPR regulation of the European Union and by the Data Protection Act 2018 of the United Kingdom (which in turn includes and respects the EU GDPR regulation).

More on information security and data protection of our providers:

https://www.rackspace.com/security
https://aws.amazon.com/compliance/eu-data-protection

International data transfers
Your data may travel or be stored in the infrastructure offered by our provider in the UK. This transfer is made based on the technical and contractual measures adopted by our provider, which include standard data protection clauses of the European Union approved by the Commission.

Compliance with Laws; Enforcement of our rights.
In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect Twindocs, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person..

How we store and secure information we collect

Information storage and security
We use data hosting and storage providers within the European Union and the UK to store the information we collect, and we use technical security measures to protect your information. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others. We will respond to requests about this within a reasonable timeframe.

How long we keep information
How long we keep information we collect about you depends on the type of information. After such time, we will either delete or anonymize your information or, if this is not possible (for

example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

> **Account information**. We will store your account information until you delete your account. In addition, we will store the information necessary to comply with our legal obligations, resolve disputes, comply with our agreements, sustain our business model, and continue to develop and improve our service. When we store information for the improvement and development of our service, we will eliminate the information that directly identifies you, and we will only use the information that allows us to have a global vision about the use of our service, we will not analyze the personal characteristics of your use of the service.

> **Information you share on the service**. If your account is deleted or deactivated, the information you have shared (documents or folders) will not be available to users with whom you have shared it and will be deleted with the rest of your account information.

How to access and control your information

You have several options available about your information. Below is a summary of the options, how to carry them out and their limitations. We will respond to these requests within a reasonable period of time, always within the legal requirements.

Your options

You have the right to request a copy of your information, to oppose the use we make of it, to request the deletion or restriction of your information, or to request your information in an electronic and structured format. You can exercise some of the options by accessing the service and using the available settings in the service or in your user account. For any other request you can contact us using the contact form you will find on the web of our service or by sending an email to **info@twindocs.com**.

Your request and options may be limited in certain cases: for example, if executing your request would reveal information about another person, or if you ask us to delete information that we are authorized to maintain by law or in our own interest. If you have any questions, you have the right to formalize a complaint with the data protection authority of your country of residence or work, or where you think your rights have been violated.

> **Access and update your information**. Our service allows you to access and modify part of the information we collect about you. For example, from your user account you can access your profile information, and search for documents that contain information about you using the search tools provided. You can modify your profile information and modify the content (documents, tags, notes, etc.) that contain information about you.

> **Deleting your information**. Our service allows you to delete certain information about yourself from within the service. For example, you can delete documents that contain information about you from the web application or mobile applications, as well as modifying

or deleting tags and notes from documents. You can also delete information from your profile. Anyway, you have to keep in mind that we need to keep certain information that allows us to have a record of the activity of our service or to comply with our legal obligations.

Ask us to stop using your information. In some cases, you can ask us to stop accessing, using, processing and storing your information if you think we have no right to do so. For example, if you think that an account was created for you without your permission and you are no longer an active user, you can request that we delete that account. If you gave us your consent to use your information for a specific purpose, you can contact us to withdraw your consent, although this will not affect any processing of the information that was carried out before then. When you make this type of request, we will need time to investigate and process your request. If there is any delay or dispute to discern whether we have a right to use your information, we will restrict the use of your information until the request has been answered or until the dispute has been resolved.

Stop receiving communications. If you want to stop receiving our promotional communications you can do so by using the "Unsubscribe" link that you will find in each email you receive, or by contacting us directly so that we can remove you from our list of recipients of promotional communications. Once we eliminate you from the list of recipients of promotional communications, you will continue to receive transactional messages from our service, such as notices of new documents, user account renewal, and various alerts regarding the operation of the service.

Data portability. Data portability is the ability to obtain your information in a format that you can move from one service provider to another (for example, when you transfer your phone number to another operator). Depending on the context, this applies to some of your information, but not to all of your information. If you request it, we will send you the information of your account and that of your documents, notes, tags and folders in electronic format.

Other important privacy information

Changes in our Privacy Policy
We may change our privacy policy from time to time. The updated privacy policy will always be available at:

https://www.twindocs.com/en/legal/privacy.pdf

If the changes are significant, we will notify you when you use the service, or via email.

We will keep the previous versions of our privacy policy in our archives. We recommend that you review our privacy policy when you use our service to stay informed about what we do with your data.

If you do not agree with any changes to this privacy policy, you will have to stop using our service and cancel your account.

Data Protection Officer

For any subject related to the collection and processing of your data, you can contact our Data Protection Officer sending an email to **privacy@twindocs.com**