

# Privacy Policy

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

- We are thoughtful about the personal information we ask you to provide and the personal information that we collect about you 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.

This Privacy Policy applies to information that we collect about you when you use:

- Our websites;
- Our content management system (CMS) and other services.

Throughout this Privacy Policy we'll refer to our websites, the websites we produce and our content management system collectively as "Services." 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 two ways: if and when you provide information to us and from third parties.

## 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 personal information (name and email address) in order to set up your account on our content management system.
- **Billing and Contact Information:** We do not save your payment details in our platform. Our one off payments are due by bank transfer so details are not held on record. Regular payments are billed by Direct Debit (using our accounting system Quickbooks and online Direct Debit specialist GoCardless - who safely store your details and process your payment on our behalf) or in rare cases, by Standing Order (in which case we provide you with our bank details and you set up the payment date and amount).
- **Ecommerce Site Information:** If we have integrated your site with a third party (to enable you to sell products or services through your site, or to

register bookings etc) you will have to register and log details with the relevant third party (and agree to the third party's privacy policy).

- Content Information: We store both draft and published content for your website, so you may provide us with personal information when updating your website. For example, if you write something on your website that includes biographic information about you, we will have that information, and so will anyone with access to the Internet if you choose to publish the post publicly. This might sound obvious, but it's not to everyone.
- Credentials: Depending on the Services you use, you may provide us with credentials for your website (like SSH, FTP, SFTP username and password, Domain Registrar login, Shopify login etc). We will use the details that you provide us with once, and then delete them. They are not held on record.
- Communications with Us: You may also provide us information when you respond to surveys, communicate with us about a support question, or sign up for a newsletter. When you communicate with us via form, email, phone, or otherwise, we store a copy of our communications (including any call recordings as permitted by applicable law).

## **Information We Collect Automatically**

We also collect some information automatically:

- Log Information: We use Google Analytics to collect information that web browsers, mobile devices, and servers typically make available, such as the browser type, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information. For backup purposes we keep a history of changes that you've made to your website.
- Usage Information: We collect information about your usage of our Services. For example, we collect information about the actions that you perform on a site using Google Analytics – in other words, who did what, when and to what thing on a site (e.g., [Username] deleted “[module name]” at [time/date]). We also track information in our content management system, like your email address, the settings that you've selected and information about your device (e.g. screen size, name of cellular network, and mobile device manufacturer). We use this information to, for example, provide our Services to you, as well as get insights on how people use our Services, so we can make our Services better.
- 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. We sometimes use cookies and other technologies like pixel tags to help us identify and track visitors, usage, and access preferences for our Services. If you want to find out more about our use of cookies, please read our Cookie Policy.

# 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, host your website, backup and restore your website etc.
- To further develop and improve our Services – for example by adding new features that we think our clients will enjoy or will help them to create and manage their websites more efficiently;
- To monitor and analyse trends and better understand how users interact with our Services, which helps us improve our Services and make them easier to use;
- To monitor and prevent any problems with our Services, and to protect the security of our Services; and
- To communicate with you. For example, we may email you to solicit your feedback, share tips for getting the most out of our products, or keep you up to date. If you don't want to hear from us, you can opt out of marketing communications at any time. (Please keep in mind that even if you opt out, we'll still send you important updates relating to your account).

## GDPR for Collecting and Using Information

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 the applicable 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 (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 understand our user retention and attrition; and to monitor and prevent any problems with our Services.

## 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:

- **Subsidiaries, Employees, and Independent Contractors:** We may disclose information about you to our subsidiaries, our employees, and individuals who are our independent contractors that need to know the information in order to help us provide our Services or to process the information on our behalf. We require our subsidiaries, employees, and independent contractors to follow this Privacy Policy for personal information that we share with them.
- **Third Party Vendors:** We may share information about you with third party vendors who need to know information about you in order to provide their services to us, or to provide their services to you or your site. This group includes vendors that help us provide our Services to you (like payment providers you use for your ecommerce operations, registrars and registries), and those that help us understand and enhance our Services (like analytics providers), who may need information about you in order to, for example, provide technical or other support services to you. We use Cloudflare, GoCardless and Google Analytics, so we have to adhere to their privacy policies in relation to our storage of personal information.
- **Legal and Regulatory Requirements:** We may disclose information about you in response to a court order, or other governmental request. For more information on how we respond to requests for information about our users, please get in touch.
- **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 Pink Pigeon, 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 Pink Pigeon 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 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 authorise us to do so, such as the social media services that you connect to your site.
- **Anonymised 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.
- **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 clients.

## **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. There is more information relating to the length of time that we keep your content management system access and website data in the Terms and Conditions documentation that you sign when you register your account with us.

## **Security**

While no online service is 100% secure, we work very hard to protect information about you against unauthorised 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..
- **Opt-Out of Marketing Communications:** You may opt out of receiving promotional communications from us. Just follow the instructions in those communications or let us know. If you opt out of promotional communications, we may still send you other communications, such as those about your account and legal notices.
- **Set Your Browser to Reject Cookies:** At this time, Pink Pigeon 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 our websites, with the drawback that certain features of our 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 contract in line with the Terms and Conditions documentation that you agreed to when we first built your website. Please keep in mind that we may continue to retain your information after closing your account--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 speak to us about one of your other rights, please [get in touch](#). EU individuals also have the right to make a complaint to a government supervisory authority.

## Other Things You Should Know

### Third Party Software and Services

If you’d like us to integrate your website with services or software provided by third parties, please keep in mind that when you interact with them you may provide information about yourself (or your site visitors) to those third parties. For example, some third party services may request or require access to your (yours, your visitors’, or customers’) data, for example, via a pixel or cookie. Please note that if you use the third party service or grant access, your data will be handled in accordance with the third party’s privacy policy and practices. We don’t own or control these third parties, and they have their own rules about collection, use, and sharing of information, which you should review before using the software or services.

### Visitors to Our Users’ Websites

We also process information about visitors to our users’ websites, on behalf of our users and in accordance with our user agreements. Please note that our processing of that information on behalf of our users for their websites isn’t covered by this Privacy Policy. We encourage our users to post a privacy policy that accurately describes their practices on data collection, use, and sharing of personal information.

We can assume no responsibility for the accuracy, completeness and/or legality of the content or its suitability for your website, or for the respective business offering. We advise all users to consult a qualified solicitor or data protection

expert in order to ensure that the legal texts of your website meet all legal requirements.

### **Privacy Policy Changes**

Although most changes are likely to be minor, we may change our Privacy Policy from time to time. Pink Pigeon encourages visitors to frequently check this page for any changes to our Privacy Policy. If we make changes, we will notify you by email. Your further use of the Services after a change to our Privacy Policy will be subject to the updated policy.