

# Your information is kept safe

Last modified: May 06, 2020

Your privacy and information security are important to us. We are committed to maintain and protect the security of our servers and your personal information. Once we receive your personal information, we will undertake all commercially reasonable efforts to ensure its security on our systems. We use industry standard encryption methods to protect personal data. We have established appropriate physical, electronic and management safeguards to secure the information we collect online, to prevent unauthorized access, to maintain data accuracy and to ensure only appropriate use of information. We never sell your data.

## 1. What information we collect and why

### 1.1. Public information

All your public information can be viewed on your public profile, including nickname, unique URL, profile image, website, social profiles, number of followers, as well as all the catalogs that you have created and published publicly. None of these details are mandatory for setting up an account, but we recommend displaying them on your profile, if you have any interest in branding or promoting your content.

You are responsible for the information that you share on your profile and the content of your catalogs, so you should think carefully about what you want to publish publicly. For sensitive information that you wish to keep private or share with a limited group of individuals, we recommend publishing your content [privately](#) on Flipsnack.

If you update your public information on Flipsnack it will automatically be updated on our website.

In addition to displaying your public information and your catalogs on Flipsnack, we also provide technology such as APIs and embeds to give you the option to make your catalogs available on other sites or platforms. Such embed codes and API integrations are not available to other publishers or site visitors of Flipsnack.

### 1.2. CONTACT INFORMATION AND PASSWORD

We use your email address and password to authenticate your account and keep it secure, preventing fraud, abuses and spam. We need your email to set up unique user accounts, to be able to get in touch with you and to send you personalized messages. You can always modify your email address directly from your account and you can reset your password at any time. Your password is non-reversibly encrypted before being saved to the database, for your protection, so it cannot be copied or stolen, even in case of a hacking attack.

We also use your email address to get in touch with you and to send you information about our services and to market to you according to your country's laws. You can check your account settings if you wish to control the type of emails you receive from Flipsnack or to unsubscribe from all email messages.

You can sign up for Flipsnack using another service: a Facebook or Google account. If you do, we will use information from that service to create your account, such as your email address and name. We do not collect any passwords at all for users that are using the Facebook Connect API as well as for those connecting with Google API.

If you email or contact us via live chat we will keep your contact info and message, to be able to send you a reply.

If you fill in a contact form or request to download a resource, you may be asked to provide personal data such as, but not limited to, your full name, your email address and your consent to receive marketing communications and materials. We collect and process this kind of personal data for the purpose of providing the desired service or resource, to study your interests for marketing purposes or for improving our website and platform.

If you leave comments or replies to comments on our [blog](#), you are required to provide your name, your email address and, optionally, your website URL. We require this personal data in order to ensure that you are a real person and to avoid spam.

### 1.3. Payment information

You may provide payment information on our site, when purchasing a premium subscription. We do not store payment information, such as debit/credit card number, CVV code or PayPal address on our database or servers. This information is processed and stored on the servers of our reliable and secure payment processors (Stripe and Braintree) in order to enable recurring payments to us. We will store your billing address, should you require an invoice. We also store the card's expiration date, so that we can send you a notification when your card is about to expire. This way you'll be able to experience uninterrupted premium services and keep your subscription active. If you wish to deactivate recurring payments, or update your billing information, you can do so in [Account Options](#). Your request to deactivate recurring payments will be automatically processed by our payment processors and your recurring payments will stop.

### 1.4. Additional information we receive about you

In addition to the data that you provide to us directly by either typing it in on our site or uploading it, we also use technology to track various aspects of site usage. All the data that we collect or track is needed to operate our services. We do not sell your information and we do not share your private information with anyone, except with trusted 3rd party service providers (listed in this privacy policy under 3rd Party Service Providers), but only if it's necessary for operating our services or because it's required by law.

**Cookies.** A cookie is a small file that is stored on the hard drive of your computer, ready for future access when you return to our site. We use cookies to deliver web content specific to you and to collect website usage data. Cookies contain session identification numbers that allow our systems to recall previous sessions for authentication efforts and assemble information from our gathered data. Cookies cannot pass viruses, harm your computer or pass on private information such as an email address without the user's intervention. You can configure your computer's browser to alert you when a site is attempting to send you a cookie and allow you to accept or refuse the cookie. In addition to cookies, we may use

small bits of computer code called "one-pixel GIFs," "clear GIFs," or "web beacons" embedded in web pages to monitor website activity.

**Location.** We get information about your signup and current location (country and city) from your IP address and device settings. (An IP address is a number that is assigned to your device by your Internet Service Provider when you are accessing the Internet.) You may receive personalized messages based on your location.

**Link clicks.** In order to operate our service we keep track of how you interact with our site and what links you decide to click on. This includes links on the website, blog, help center, emails, ads, and live chat support.

**Log activity.** We receive information every time you view or interact with content on our site, even if you don't have an account. Log activity information covers a variety of data that is available to Flipsnack either through 3rds party service providers or collected directly by us: browser information, OS type, device used, IP, chat activity, date, time and duration for each site visit, referring web page, page visits, search terms, location, cookies, clicks, views and session duration for all site pages. We generally analyze sets of data to make sure our services are fully functional, to ensure a reliable and secure performance. We also use such information to better understand user needs, to improve our site performance, and to send relevant marketing messages that match your interests.

**Embeds.** If you view catalogs integrated on 3rd party websites via embed codes or white labeled URLs, we may receive log data regarding your activity (what page you visited, session information and how you interacted with the embedded flipbook). This type of data does not contain any personally identifiable information and is reported as an aggregate to us. We make this data available directly in the publisher's account under statistics and in Google Analytics (for premium users who are using the Analytics integration). This type of information is important for our users who need to understand how their publications are performing in order to be able to optimize them or refine their marketing strategies.

#### 1.5 Automated decision-making, including profiling

As a responsible Service, we do not use any automated decision-making or profiling.

#### 1.6 Legal basis for processing

If you are a resident of the European Economic Area (EEA), all the processes undertaken by Flipsnack are in accordance with European laws and regulations such as the General Data Protection Regulation (GDPR). The GDPR governs how Flipsnack may process your information and as well your rights in relation to it.

Flipsnack will collect and use your personal data only where:

- We need it in order to fulfill our contractual obligations when delivering you the Service
- It is in our legitimate interest for developing and improving the Service
- You have given us consent
- It is necessary for compliance with our legal obligations

Providing the personal data mentioned above is a contractual requirement. Without it is not possible for you to enter into a contract with our company and subsequently to start using Flipsnack. If you need any clarification regarding the provision of personal data - whether it is required by law, or by a contract, or whether it is necessary for your usage of Flipsnack, please contact our Data Protection Officer.

### 1.7 Children's Privacy & Flipsnack for Education

Our Service is not intended for people under the age of 13. If you are under the age of 13, please do not submit any personal information. If we become aware that any such information has been submitted, we will promptly delete such information and terminate the children's account.

Flipsnack for Education: Children under the age of 13 may use Flipsnack service under the supervision of the teacher or school representative. Educational Institutions are required to obtain parental consent regarding student data processing for the purposes mentioned in the present privacy policy. Educational institutions are granted full rights regarding students data therefore, to exercise these rights, please contact us at [dpo@flipsnack.com](mailto:dpo@flipsnack.com). In order to protect children's data and privacy, Flipsnack will use reasonable means to verify Educational Institution's identity before granting access to personal data. Upon termination of the Educational Account, all the information will be deleted including information held by any sub-processor. Flipsnack for Education is compliant with the Student Online Personal Information Protection Act (SOPIPA).

## 2. Who gets access to your data and why

All data collected on Flipsnack is safe and secure. We will not make public any private information or content published privately on our site. We may, however, disclose your private personal data to a few, reliable 3rd party service providers (processors), solely for the purpose of operating our services: to help us provide, analyze, and improve the service, including data storage, maintenance services, database management, web analytics, payment processing, and improvement of the site's functionality. These third parties have access to your information only for the purpose of performing these tasks on our behalf and under obligations similar to those in this Privacy Policy. If you are a EU resident, you need to be aware that the personal data that we collect about you may be transferred to and processed by recipients that are located outside the European Economic Area, some of which are certified under the EU-US Privacy Shield, and some not. We have taken all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. All these 3rd party apps that have access to your data have a privacy policy that is GDPR compliant, and they will only use your data on our behalf and pursuant to our instructions.

We collect and share as little personal data as possible to function. Whenever you delete your account we will initiate a process that will remove your data from all these processors, if possible. In some cases it is physically impossible to distinctly identify specific users, when data is used collectively for research and statistical purposes, or it may be needed for accounting purposes.

### 2.1. List of 3rd party service providers

We use trusted third party companies from the USA, UK, Ireland, Romania and other countries:

**Development** – Flipsnack has been developed and is maintained by Smartware SRL, for Smartketer LLC, which acts as seller. Smartware employees have to have access to some user data, as it is needed for the purpose of operating, maintaining and updating the Flipsnack service, offering support and running marketing campaigns. Employees access to user data is controlled and limited.

**Analytics** – In order to understand the use of our service we need to allow site analytics tools to access some information regarding your site usage. These tools are Google Analytics and Hotjar. The information we collect through these third-party services includes your IP address, your device type and Operating System, your Internet browser, your location, the pages on our website you have visited, the actions you've performed on these pages (including recordings of your interactions, such as movements, mouse clicks), and actions you've performed in our online app (such as number of flipbooks you have created, upload and download history).

**Advertising** – We engage advertising tools and platforms (Google Ads, Bing Ads, Facebook Ads, Capterra and G2Crowd) to run interest-based ads for Flipsnack and for brand promotion. In order to run ads, we need to allow advertisers to get information about site visits and visitors, through the use of cookies and other tracking methods, including Google Tag Manager. In order to measure the effectiveness of ad campaigns we allow Supermetrics to access data regarding the performance of our ad campaigns. To opt out of Google's use of cookies, please visit the [Google Advertising opt-out page](#). To opt out of targeted Facebook advertising, please visit [this page](#). Please note however this does not opt you out of being delivered advertising. You will continue to receive generic ads.

**CRM and email providers** – Our business email addresses are managed by Google, so every email that you send to any employee will be accessed through Google Mail. We send out automated transactional emails (emails regarding account registration and payments) through Mailgun, which has access to email addresses of end users. For CRM and for promotional emails we use Intercom. In order to perform its marketing automation functions and customer relationship management tool, Intercom has to have access to various metrics and information regarding our users, including actions performed on our site. Intercom collects publicly available contact and social information related to you, such as your email address, company, job title, social network handles and physical location, to optimize your user experience. For more information, please visit [this page](#). If you would like to opt out of having this information collected by or submitted to Intercom, please contact us.

**Payment processors and reports** - We share your payment info with payment service providers (Stripe and Braintree) to process payments, to prevent, detect and investigate frauds and for dispute resolutions (chargebacks, claims, refunds). We also use a 3rd party payment analytics tool (ChartMogul) to keep track of our business growth. ChartMogul has access to orders from Stripe, but it does not have access to credit card details.

**Server storage and management** - We use Amazon Web Services (AWS) for cloud services, database backup and storage. All the data that Flipsnack collects directly through

its service and all the content uploaded or created by users on Flipsnack are hosted on AWS.

Other than those who act on our behalf and except as explained in this Policy, information you provide on Flipsnack will not be transferred to unrelated third parties, unless we have your permission to do so. We allow you to control the disclosure of your non-public personal information to third parties for the marketing of third-party products and services (i.e., your consent is required for disclosure).

## 2.2. Change of ownership or business transfers

If all or part of the company is sold, merged or transferred to another entity, the personal information you have provided to us may be transferred as part of that transaction. However, we will take steps to ensure that your personal information is used in a manner consistent with the provisions of our Policy. Additionally, you will be informed about any business transfer in a timely manner and you will have the option to remove your personal data before it is transferred to another entity.

## 2.3. Legal entities

We must disclose information, when requested, to comply with court orders, judicial or other government subpoenas, warrants, orders, laws, regulations or legal processes, to protect the safety of any person, to protect the safety or integrity of the platform, including the prevention of spam, abuse, malicious actors on our site, to explain why we have removed content or accounts from our site, to prevent fraud, technical issues or to protect the rights of our users.

# 3. How to manage your data on Flipsnack

We will retain your personal data that we collect as described in the previous sections of this Privacy Policy as long as necessary to provide you with our service. However, we provide you all the tools and options you need to access, update, manage or delete the data associated with your account.

## 3.1. How to access and update your personal data

All your personal account information, as well as your public profile data can be easily updated from [Account Options](#) by you, directly.

You can ask us at any time whether or not we collect or process personal data about you, and, if we do, to request access to your personal data. You can also check this Privacy Policy to find out what personal data we collect from users and from site visitors, the purpose of the collection and who else has access to your data. If you have any questions regarding this or if you wish to make any changes to your personal data and are unable to do so directly, for any reason, please [contact us](#) to help. At your request, we will rectify inaccurate personal data concerning you within 30 days of your request, but you will be asked to provide proof of identity before we do so.

## 3.2. Data retention & how to delete your data from Flipsnack

We will retain your personal data as long as your account is active. If you wish to delete all of your data from Flipsnack, you should simply delete your account. Please note that this request means you will have to delete your existing account and everything else that is stored in your account (flipbooks). This action is irreversible. Once you delete your Flipsnack account, we will take steps to remove your personal data from our systems and from 3rd party processors, within 30 days from the date of the account deletion. This does not apply to the extent needed to comply with legal or regulatory obligations to which Flipsnack is subject (e.g. taxation purposes).

Historical non-personal information used in reports, such as aggregated information like the number of visitors on a page will not be affected by the deletion of an account, because it's needed for business purposes and it does not have any impact on the privacy of an individual.

### 3.3. How to opt out of email communications

You can adjust your email subscription or opt out of receiving marketing emails at any time by logging into your account and changing your settings in the Account Options - Notifications. We will, however, continue to send you emails with updates about major changes that may severely affect the way you use the platform, changes in your account status, payment failures and successes.

### 3.4. How to opt out of personal information sharing with our partners

You can delete cookies from your computer at any time. You can set your Internet browser so that it will not allow cookies to be stored on your device. This may reduce functionality of Flipsnack and may mean that certain features or content will not be available to you. Further information on how to prevent cookies from being stored on your device can be found on [www.allaboutcookies.org](http://www.allaboutcookies.org) under the 'manage cookies' section. Alternatively, you can access further information by going to the help menu within your Internet browser. To opt out of being tracked by Google Analytics on the Flipsnack website visit <http://tools.google.com/dlpage/gaoptout>. We use multiple Google products (Google Analytics, Google Suite, Google Tag Manager, Google Ads) throughout our site and in iframe embed codes. Here is a link to [Google's Privacy Policy page](#) where you'll also find more information on how to opt out of being tracked by Google.

### 3.5. How to object, restrict or withdraw consent

When you sign up with Flipsnack, you implicitly agree to our Terms of Service and Privacy Policy, including to how we collect, process and use your personal data. If at any moment after that you wish to withdraw or limit your consent, you can do that with future effect. If you wish to withdraw or restrict your consent regarding the collection of any type of personal data, please email us at [privacy@flipsnack.com](mailto:privacy@flipsnack.com) with your request, and we will get back to you with a solution within 30 days from the date of your email, or through your Account Details page. You have the right to obtain from us restriction of processing of your personal data. In such case, we will only process your data for certain purposes that are mandatory by law. Please keep in mind, however, that certain personal data is absolutely necessary for us to be able to manage your account, so its deletion may be conditioned by the deletion of your Flipsnack account.

### 3.5. How to download and port your files

You can make a request for a file containing all your uploads on Flipsnack, for the purpose of data portability. You may have to wait for up to 30 days for us to honor your request. The download file will contain all of your PDFs which are currently in our archives. Please address your requests to [privacy@flipsnack.com](mailto:privacy@flipsnack.com)

## 4. Privacy Shield, additional information and assistance

If you have questions or if you need assistance regarding any information listed in this Privacy policy, please contact our data protection officer at [dpo@flipsnack.com](mailto:dpo@flipsnack.com) or write to us via mail:

Flipsnack LLC  
Attn: Privacy Policy Inquiry  
2701Troy Center Dr Suite 255  
Troy, Michigan, 48084.

If you are located in the European Union you can confidently contact our appointed representative: SC SMARTWARE SRL with an office at Saldabagiu de Munte, str. Petofi Sandor, nr. 345, Comuna Paleu, jud. Bihor, 417167, Romania

or you can raise a concern with your local supervisory authority.

Flipsnack LLC complies with the EU-US Privacy Shield principles and the SW-US Privacy Shield principles regarding the collection, use, sharing, and retention of personal data from the European Union and Switzerland.

If you have a Privacy Shield-related complaint, please [contact us](#). As part of our participation in Privacy Shield, if you have a dispute with us about our adherence to the Principles, we will seek to resolve it through our internal complaint resolution process, alternatively through the EU Data Protection Authority or Swiss Data Protection Authority as an independent dispute resolution mechanism, and under certain conditions, through the [Privacy Shield arbitration process](#).

Privacy Shield participants are subject to the investigatory and enforcement powers of the US Federal Trade Commission and other authorized statutory bodies. Under certain circumstances, participants may be liable for the transfer of personal data from the EU to third parties outside the EU. Learn more about the EU-US Privacy Shield [here](#).

## 5. Change to our privacy policy

We may on occasion update our Policy. If we make any material changes to our Policy, we will post a notice about the change at a prominent location on our site and/ or email to the email address associated with your account. We encourage you to periodically review our site and this Policy for any changes. By continuing to access and use our service after you have received notification about these changes and after they become effective, you agree to be bound by our revised Privacy Policy.

Questions or comments regarding the site should be sent by e-mail to [Flipsnack.com](mailto:Flipsnack.com) support or by U.S. mail to Flipsnack LLC, 2701 Troy Center Dr, Suite 255, Troy, Michigan, 48084.