

Escrivo Limited - Privacy Policy

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Thank you for your interest in Escrivo Limited (“Escrivo”, “we,” or “us”), our web site at <https://www.escrivo.com> (“our site” or “our website”), and other services provided by us and on which a link to this Privacy Policy is displayed, and all other communications with individuals though from written or oral means, such as email or phone (collectively, together with our website, our “Service” or “Services”).

This Privacy Policy (“Policy”) describes the information that we gather on or through the Service, how we use and disclose such information, and the steps we take to protect such information. By visiting our website, or by purchasing or using our Services, you accept the privacy practices described in this Policy.

This Policy is part of, and is subject to, the Escrivo Terms of Service.

1. Definitions

“Client” means a customer of Escrivo.

“Client Data” means personal data, reports, addresses, and other files, folders or documents in electronic form that a client or user of our Service stores within the Service.

“Personal Data” means any information relating to an identified or identifiable natural person.

“Public Area” means the area of the Service that can be accessed both by Users and Visitors, without needing to log in.

“Restricted Area” means the area of the Service that can be accessed only by Users, and where access requires logging in.

“User” means an employee, agent, or representative of a Client, who primarily uses the restricted areas of the Service to access the Service in that capacity.

“Visitor” means an individual other than a User, who uses the public area, or who in general terms is a “business contact”, but is not a User and who has no access to the restricted areas of the Service.

2. The information collected from operating our Service

We collect different types of information from or through the Service. The legal bases for Escrivo’s processing of personal data are primarily that the processing is necessary for providing the Service in accordance with Escrivo’s Terms of Service and that the processing is carried out in Escrivo’s legitimate interests, which are further explained in the sections “How we use the information we collect” and “Lawful bases for processing Personal Data” of this Policy. We may also process data upon your consent, asking for it as appropriate.

Type of Data	Description
User-provided Information	<p>A Visitor, User or Client may provide, and we may collect, Personal Data. Examples of Personal Data include names, email addresses, postal address, phone numbers. Personal Data may also include other information, such as geographic area or preferences, when any such information is linked to information that identifies a specific individual.</p> <p>You may provide us with Personal Data in various ways. For example, when you send us a customer service -related request, or when you provide contact details on a phone call, a contact form, or by providing a business card.</p>
Information collected by Clients	<p>A Client or User may store, or upload into the Service, Client Data. Escrivo has no direct relationship with the individuals whose Personal Data it hosts as part of Client Data., and in this respect operates as a Data Processor rather than a Data Controller.</p> <p>As described in our Data Processing Agreement, each Client is responsible for providing notice to its customers and third parties concerning the purpose for which Client collects their Personal Data and how this Personal Data is processed in or through the Service as part of Client Data.</p>
Information collected automatically	<p>When a User or Visitor uses the Service, we may automatically record certain information from their device by using various types of technology, including cookies and "web beacons".</p> <p>This "automatically collected" information may include IP address or other device address or ID, web browser and/or device type, the web pages or sites visited just before or just after using the Service, the pages or other content the User or Visitor views or interacts with on the Service, and the dates and times of the visit, access, or use of the Service.</p> <p>We also may use these technologies to collect information regarding a Visitor or User's interaction with email messages, such as whether the Visitor or User opens, clicks on, or forwards a message.</p>
Information from other sources	<p>We may obtain information, including Personal Data, from third parties and sources other than the Service, such as our partners, advisors, and credit rating agencies.</p> <p>If we combine or associate information from other sources with Personal Data that we collect through the Service, we will treat the combined information as Personal Data in accordance with this Policy.</p>

We do not purchase "lists" of data from data vendors. We do not process any special categories (racial or ethnic origin; political, religious or philosophical beliefs; trade union membership; genetic, biometric, health or sexual information) of Personal Data.

3. How we use the information we collect

We use the information that we collect in a variety of ways in providing the Service and operating our business, including the following:

Purpose	Description
Service provision	<p>We use the information, other than Client Data, to</p> <ul style="list-style-type: none"> operate, maintain, enhance and provide all features of the Service, to provide the services and information that you request, to respond to comments and questions and to provide support to users of the Service. <p>We process Client Data solely in accordance with the directions provided by the relevant Client or User.</p>
Improvements	<p>We use the information, to understand and analyse the usage trends and preferences of our Visitors and Users, to improve the Service, and to develop new products, services, feature, and functionality.</p> <p>Should this purpose require Escrivo to process Client Data, then the data will only be used in anonymized or aggregated form.</p>
Communications	<p>We may use a Visitor's or User's email address or other information – other than Client Data – to contact that Visitor or User</p> <ul style="list-style-type: none"> for administrative purposes – such as customer services, support services, or billing notifications regarding their use of the Service, for contractual purposes – such as notification to existing Clients of changes or enhancements to the Service, and for marketing purposes – such as updates on promotions and events, relating to products and services offered by us and by third parties we work with. You can opt-out of receiving any marketing communications of this nature as described below under "Your Choices."
Cookies and Tracking Technologies	<p>We use automatically collected information and other information collected on the Service through cookies and similar technologies to:</p> <ul style="list-style-type: none"> personalize our Service, such as remembering a User's or Visitor's information so that the User or Visitor will not have to re-enter it during a visit or on subsequent visits, provide customized advertisements, content, and information, monitor and analyze the effectiveness of Service and third-party marketing activities, monitor aggregate site usage metrics such as total number of visitors and pages viewed, and track your entries, submissions, and status in any promotions or other activities on the Service. <p>You can obtain more information about cookies by visiting http://www.allaboutcookies.org.</p>
Analytics	<p>We use Google Analytics to measure and evaluate access to and traffic on the Public Area of the Site.</p> <p>Google operates independently from us and has its own privacy policy, which we strongly suggest you review. Google may use the information collected through Google Analytics to evaluate Users' and Visitors' activity on our Site. For more information, see Google Analytics Privacy and Data Sharing https://support.google.com/analytics/answer/6004245.</p> <p>We take measures to protect the technical information collected by our use of Google Analytics. The data collected will only be used on a need to know basis to resolve technical issues, administer the Site and identify visitor preferences, and in this case, the data will be in non-identifiable form. We do not use any of this information to identify Visitors or Users.</p>

We do not undertake any profiling of Personal Data we collect.

4. Lawful bases for processing Personal Data

Type of Data	Description
User-provided Information	Escrivo is the Data Controller for this Personal Data. Our view is that the lawful basis for the processing of this data is Contractual : we need to process the data to service our contracts or to service pre-contractual requests. Contract performance could not reasonably be undertaken without this processing of Personal Data.
Information collected by Clients	Escrivo is the Data Processor for any Personal Data contained within Client Data. As described in our Data Processing Agreement, our Clients are responsible for establishing the lawful basis for processing any such Personal Data.
Information collected automatically	Escrivo is the Data Controller for this Personal Data. Our view is that the lawful basis for the processing of this data is Consent : we need the consent of the data subject to process the data in order to measure, typically in aggregate, the performance of our services.
Information from other sources	Escrivo is the Data Controller for this Personal Data. Our view is that the lawful basis for the processing of this data is Contractual : we need to process the data to service our contracts or to service pre-contractual requests. Contract performance could not reasonably be undertaken without this processing of Personal Data.

5. To whom we disclose information

Except as described in this Policy, we will not intentionally disclose the Personal Data or Client Data that we collect or store on the Service to third parties without the consent of the applicable Visitor, User or Client.

We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

Scenario	Description
Unrestricted information	Any information that you voluntarily choose to include in a Public Area of the Service, such as a public profile page, will be available to any Visitor or User who has access to that content.

Scenario	Description
Domains & SSL services	<p>We work with third party domain registries and registrars who provide domain registration services and SSL certificate issuing services which are integral to the provision of our Service. These third parties may require Personal Data in order to properly record and verify domain registrants and technical, administrative and billing contact information.</p> <p>We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.</p> <p><i>You should be aware that, particularly for domain registrations, the contact details we use may be included in the public WHOIS directory service. Although many domain registries have already taken steps to ensure that personal data is redacted from the WHOIS service, many have not yet announced their plans for GDPR compliance.</i></p>
Our other service Providers	<p>We work with third party service providers who provide development, hosting, maintenance, and other professional services for us which are integral to the provision of our Service. These third parties may have access to, or process Personal Data or Client Data as part of providing those services for us.</p> <p>We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions. For example, our accountants would reasonably be expected to have access to a Client's billing-related Personal Data, but not to the Client's Client Data.</p> <p>Our contracts with our service providers require them to maintain the confidentiality of such information.</p>
Law Enforcement, Legal Process and Compliance	<p>We may disclose Personal Data or other information if required to do so by law, or in the good-faith belief that such action is necessary to comply with applicable laws, or in response to a valid court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.</p> <p>We also reserve the right to disclose Personal Data or other information that we believe, in good faith, is appropriate or necessary to</p> <ul style="list-style-type: none">• take precautions against liability• protect ourselves or others from fraudulent, abusive, or unlawful uses or activity• investigate and defend ourselves against any third-party claims or allegations• protect the security or integrity of the Service and any facilities or equipment used to make the Service available• protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others.

Scenario	Description
Change of ownership	<p>Information about Users and Visitors, including Personal Data, may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of the User or Visitor Data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.</p> <p>Client Data may be physically or electronically transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets, for the sole purpose of continuing the operation of the Service, and only if the recipient of the Client Data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.</p>

6. Your Choices

6.1 Access, Correction, Deletion

We respect your privacy rights and will provide you with reasonable access to the Personal Data that you may have provided through your use of the Services.

If you wish to access or amend any Personal Data we hold about you, or to request that we delete or transfer any information about you, you may contact us as set forth in the “How to Contact Us” section. At your request, we will have any reference to you deleted or blocked in our database.

Please note that while any changes you make will be reflected in active databases instantly or within a reasonable period of time, we may retain your information for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

You may decline to share certain Personal Data with us, in which case we may not be able to provide to you some of the features and functionality of the Service.

At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact Escrivo’s Managing Director at cameron@escrivo.com. You also have a right to lodge a complaint with data protection authorities.

This provision does not apply to Personal Data that is part of Client Data. In this case, the management of the Client Data is subject to the Client’s own Privacy Policy, and any request for access, correction or deletion should be made directly to the Client responsible for the uploading and storage of such data into the Service.

6.2 Analytics

You may opt out from the collection of navigation information about your visit to the Site by Google Analytics by using the Google Analytics Opt-out feature <https://tools.google.com/dlpage/gaoptout>.

6.3 Opting out from Commercial Communications

If you receive marketing communications from us, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to the address provided in the “How to Contact Us” section.

Please be aware that if you opt-out of receiving marketing email from us, you will continue to receive administrative and contractual messages from us regarding the Service.

Escrivo has no direct relationship with the Client’s customers or third parties whose Personal Data it may process on behalf of a Client. An individual who seeks access, or who seeks to correct, amend, delete inaccurate data or withdraw consent for further contact should direct his or her query to the Client or User they deal with directly.

7. Third-Party Services

The Service may contain features or links to web sites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators’ policies, if any, governing privacy and security, even if accessed through the Service.

Escrivo is not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties’ privacy and security policies before providing them with information.

8. Use of Cookies

The following types of cookies are used in the Service:

Scenario	Description
Strictly necessary, or essential cookies	These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for cannot be provided. These cookies don’t collect information that identifies a visitor.
Performance cookies	These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don’t collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

Scenario	Description
Functionality cookies	These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

9. Minors and Children's Privacy

Protecting the privacy of young children is especially important. Our Service is not directed to children under the age of 18, and we do not knowingly collect Personal Data from children under the age of 18 without obtaining parental consent. If you are under 18 years of age, then please do not use or access the Service at any time or in any manner. If we learn that Personal Data has been collected on the Service from persons under 18 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information.

If you are a parent or guardian and discover that your child under 18 years of age has obtained an Account on the Service, then you may contact us by sending an email to the address provided in the "How to Contact Us" section, and request that we delete your child's Personal Data from our systems.

10. Data Security

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain administrative, technical and physical safeguards to appropriately protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession.

This includes, for example,

- the use of firewalls to restrict access to services
- password protection and other access and authentication controls
- SSL technology to encrypt data during transmission through public internet
- Use of file encryption and encrypted storage technologies

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Service, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

If you believe your Personal Data has been compromised, please contact us as set forth in the "How to Contact Us" section.

If we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law.

11. Data Retention

We only retain the Personal Data collected from a User for as long as that Client's account is active or otherwise, and thereafter for a limited period as long as we need it to fulfil the purposes for which we have initially collected it, unless otherwise required by law.

We will retain and use information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements as follows:

Scenario	Retention policy
Client data	The contents of closed accounts are deleted within 3 months of the date of closure. Backups may be kept for up to 3 months beyond deletion.
Analytics data	Where Google Analytics collects data associated with cookies, user identifiers, or advertising identifiers, this can be regarded as Personal Data and is deleted 26 months after the most recent interaction.
Other data	All records of our Service, including (but not limited to) emails, financial & contractual records, and other communication logs, are retained in accordance with the relevant business law (https://www.gov.uk/running-a-limited-company/company-and-accounting-records) and for a minimum of 7 years.

In very limited circumstances, a small proportion of records may be deemed to be of permanent legal or historical significance and will be stored on a permanent basis.

12. Settings

Although we may allow you to adjust your privacy settings to limit access to certain Personal Data, please be aware that no security measures are perfect or impenetrable. We are not responsible for circumvention of any privacy settings or security measures on the Service.

Additionally, we cannot control the actions of other users with whom you may choose to share your information. Further, even after information posted on the Service is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on the Service. We cannot and do not guarantee that information you post on or transmit to the Service will not be viewed by unauthorized persons.

13. Data Transfer

We may transfer, process and store Personal Data we collect through the Services in centralized databases and with service providers located in the EU and in other countries. Other countries may not have the same data protection framework as the country from which you may be using the Services.

If we transfer Personal Data to service providers in non-EU countries, we will ensure the Personal Data is protected by us as described in this Privacy Policy and we will ensure that

the service providers concerned are working with us under GDPR-compliant processing agreements.

14. Data Controller and Data Processor

Escrivo does not own, control or direct the use of any of the Client Data stored or processed by a Client or User via the Service. Only the Client or Users are entitled to access, retrieve and direct the use of such Client Data. This is described in the Data Processing Agreement we have with each of our Clients.

Escrivo is largely unaware of what Client Data is being stored or made available by a Client or User to the Service and does not directly access such Client Data except as authorised by the Client, or as necessary to provide Services to the Client and its Users.

Because Escrivo does not collect or determine the use of any Personal Data contained in the Client Data and because it does not determine the purposes for which such Personal Data is collected, the means of collecting such Personal Data, or the uses of such Personal Data, Escrivo is not acting in the capacity of data controller in terms of the European Union's General Data Protection Regulation (Regulation (EU) 2016/679, hereinafter "GDPR") and does not have the associated responsibilities under the GDPR. Escrivo should be considered only as a processor on behalf of its Clients and Users as to any Client Data containing Personal Data that is subject to the requirements of the GDPR.

Except as provided in this Privacy Policy, Escrivo does not independently cause Client Data containing Personal Data stored in connection with the Services to be transferred or otherwise made available to third parties, except to third party subcontractors who may process such data on behalf of Escrivo in connection with Escrivo's provision of Services to Clients. Such subcontractors are required to have a written data processing agreement with Escrivo, demonstrating their compliance with the requirements of GDPR.

The Client or the User is the data controller under the Regulation for any Client Data containing Personal Data, meaning that the Client or User controls the way such Personal Data is collected and used, as well as the determination of the purposes and means of the processing of such Personal Data.

Escrivo is not responsible for the content of the Personal Data contained in the Client Data or other information stored on its servers (or its subcontractors' servers) at the discretion of the Client or User, nor is Escrivo responsible the way the Client or User collects, handles disclosure, distributes or otherwise processes such information.

15. Changes and updates to this policy

This Policy document may be updated from time to time. If we modify the Policy, we will make it available through the Service, and indicate the date of the latest revision, and will comply with applicable law.

Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy.

16. How to contact us

Please contact us with any questions or comments about this Policy, your Personal Data, our use and disclosure practices, or your consent choices by emailing our Managing Director at cameron@escrivo.com.