

Your privacy is critically important to us. At 10up, 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 to make it as simple as possible for you to control what information on your website is shared publicly (or kept private), indexed by search engines, and permanently deleted.
- We help protect you from overreaching government demands for your personal information.
- We aim for full transparency on how we gather, use, and share your personal information.

Below is our Privacy Policy, which incorporates and clarifies these principles.

Who We Are and What This Policy Covers

Howdy! We are a team of folks around the world who make the web better by finely crafting websites & tools for content creators. We believe in powering the open Internet with code that is open source and are proud to say that the vast majority of our work is available under the GPL. Unlike most other services, because our GPL code is public, you can actually download and take a look at that code to see how it works. This Privacy Policy applies to information that we collect about you when you use:

- Our websites (including 10up.com and DistributorPlugin.com);
- Our other products and services that are available on or through our websites (including registration for Distributor at DistributorPlugin.com); and

- Other users' websites that use our Services, while you are logged in to your account with us.

Throughout this Privacy Policy we'll refer to our website, mobile applications and other products and services collectively as "Services." Please note that this Privacy Policy does not apply to any of our products or services that have a separate privacy policy. Below we explain how we collect, use, and share information about you, along with the choices that you have with respect to that information.

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Portions of this Privacy Policy are based on documents provided by Automattic available under a [Creative Commons Sharealike](#) license. You're more than welcome to copy it, adapt it, and repurpose it for your own use. Just make sure to revise the language so that your policy reflects your actual practices. Also, if you do use the policy we'd appreciate a credit and link to 10up and Automattic somewhere on your site.

Information We Collect

We only collect information about you if we have a reason to do so—for example, to provide our Services and Solutions, to communicate with you, or to make our Services and Solutions better. We collect information in three ways: if and when you provide information to us, automatically through operating our Services, and from outside sources. Let's go over the information that we collect.

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:

- **Distributor Registration:** We ask for basic information from you in order to set up your free registration key, which enables free updates inside of WordPress. Specifically, we require individuals who register Distributor to provide a name, email address, company name, and use case. You may provide us with more information about your use case, but we don't require that information. You may also opt in to receive other news and information directly from 10up, but we do not require that.
- **Communications With Us (Hi There!):** You may also provide us information when you respond to surveys, communicate with our engineering team on GitHub, or email us.

Information We Collect Automatically

We also collect some information automatically:

- **Log / Analytics Information:** Like most online service providers, we collect information that web browsers, mobile devices, and servers typically make available, such as the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information.

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 keep our users apprised of important updates and changes to Distributor that may impact or alter their websites or use case.

- To further develop and improve our Services and Solutions—for example by adding new features that we think our users will enjoy or will help them to share and distribute content between websites more efficiently;
- To monitor and analyze trends and better understand how users adopt our Services and Solutions, which helps us improve Solutions like Distributor and make them easier to use; and
- To communicate with you, for example through an email, about offerings by 10up we think will be of interest to you, solicit your feedback, or keep you up to date on 10up and our products.

Legal Basis for Collecting and Using Information

A note here for those in the European Union about our legal grounds for processing information about you under EU data protection laws, which is that our use of your information is based on the grounds that: (1) The use is necessary for compliance with a legal obligation; or (2) The use is necessary in order to protect your vital interests or those of another person; or (3) We have a legitimate interest in using your information—for example, to provide and update our Solutions, to improve our Solutions so that we can offer you an even better user experience, to safeguard our Solutions, and to communicate with you, to better understand user retention and attrition, and to monitor and prevent any problems with our Solutions; or (5) You have given us your consent—for example before we request permission before sending you news and information not directly related to Distributor.

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 Solutions 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. This group includes vendors that help us provide our Solutions to you (like postal and email delivery services that help us stay in touch with you, customer chat and email support services that help us communicate with you), and those that help us understand and enhance our Solutions (like analytics providers), who may need information about you in order to, for example, provide technical or other support services to you. We require vendors to agree to privacy commitments in order to share information with them.
- **Legal Requests:** We may disclose information about you in response to a subpoena, court order, or other governmental request.
- **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 10up, 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 10up 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.
- **Aggregated or De-Identified 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 Solutions.
- **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 users.

Information Shared Publicly

Information that you choose to make public is—you guessed it—disclosed publicly. That means, of course, that information like your distributed posts, other content that you make public using Distributor, and your “Likes” and comments on other websites, are all available to others.

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. For example, we keep the web server logs that record information about a visitor to one of 10up’s websites, such as the visitor’s IP address, browser type, and operating system, for approximately 30 days. We retain the logs for this period of time in order to, among other things, analyze traffic to 10up’s websites and investigate issues if something goes wrong on one of our websites. After the thirty days are up, the deleted content may remain on our backups and caches until purged.

Security

While no online service is 100% secure, we work very hard to protect information about you against unauthorized 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 register with us, you can choose not to provide the optional extended use case information.
- **Opt-Out of Electronic Communications:** You may opt out of receiving promotional messages from us. Just follow the instructions in those messages. If you opt out of promotional messages, we may still send you other messages, like important Distributor update changes or legal notices.
- **Set Your Browser to Reject Cookies:** You can usually choose to set your browser to remove or reject browser cookies before using 10up’s websites, with the drawback that certain features of 10up’s websites may not function properly without the aid of cookies.

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.

If you would like to contact us about one of the other rights, scroll down to How to Reach Us to, well, find out how to reach us. EU individuals also have the right to make a complaint to a government supervisory authority.

Controllers and Responsible Companies

10up’s Services are worldwide. 10up Inc., our US-based company, is the controller for the processing activities across all of our Services worldwide.

10up, LLC

A Delaware limited company

234 5th Avenue, 2nd Floor, New York, NY 10001

How to Reach Us

If you have a question about this Privacy Policy, or you would like to contact us about any of the rights mentioned in the Your Rights section above, please contact us at distributor@10up.com, and include Privacy Policy in the subject line.

Other Things You Should Know (Keep Reading!)

Transferring Information

Because 10up's Services are offered worldwide, the information about you that we process when you use the Services in the EU may be used, stored, and/or accessed by individuals operating outside the European Economic Area (EEA) who work for us, other members of our group of companies, or third party data processors. This is required for the purposes listed in the How and Why We Use Information section above. When providing information about you to entities outside the EEA, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this Privacy Policy as required by applicable law. These measures include:

- In the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the [EU-US Privacy Shield](#); or
- In the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them.

You can ask us for more information about the steps we take to protect your personal information when transferring it from the EU.

Ads and Analytics Services Provided by Others

Ads appearing on any of our Services may be delivered by advertising networks. Other parties may also provide analytics services via our Services. These ad networks and analytics providers may set tracking technologies (like cookies) to collect information about your use of our Services and across other websites and online services. These technologies allow these third parties to recognize your device to compile information

about you or others who use your device. This information allows us and other companies to, among other things, analyze and track usage, determine the popularity of certain content, and deliver advertisements that may be more targeted to your interests. Please note this Privacy Policy only covers the collection of information by 10up and does not cover the collection of information by any third party advertisers or analytics providers.

Privacy Policy Changes

Although most changes are likely to be minor, 10up may change its Privacy Policy from time to time. 10up encourages visitors to frequently check this page for any changes to its Privacy Policy. If we make changes, we will notify you by revising the change log below, and, in some cases, we may provide additional notice (such as sending you a notification through email). Your further use of the Solutions after a change to our Privacy Policy will be subject to the updated policy. That's it! Thanks for reading.

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