

Privacy by Default	Your privacy is very important to us.
Your Data. Your Asset.	Your data belong to you, not to Sharekey or to anyone else.
Zero-Knowledge Encryption	Your data is encrypted on your device, we do not hold the decryption keys.
No Access	Only you can access your data. Sharekey has no access to them.
No Backdoor	Our software contains no backdoor.
No Metadata	Your metadata is also encrypted on your device with your encryption keys.
No Social Graph	We cannot build any social relationship between Users, so-called Social Network or Social Graph.
No Ads	Your personal data or the content of your communications and storage is never sold or rented to anyone, it will never be used for any third-party advertising.
No Cookies	No tracking and no cookies on our website.
Limited Technical Data	So-called "log files" are kept for a maximum of 7 days, and only to facilitate troubleshooting, improve the service and prevent misuse.
Transparency	We are transparent about the data we collect and what we do and don't do with it.
No CLOUD Act	We follow Swiss and European privacy laws.

This was a brief summary of our Privacy Policy.

Please read the complete version below.

If you have any questions about it, please contact us at

privacy@sharekey.com.

July 29th, 2020

Table of Contents

Our Privacy Commitment
Content
Profile Information that you provide
Processing of data in response to requests
No Address Book
No Usage Statistics
Logs files
Additional technical data
Support cases
Newsletters
Third-parties / data transfer to third countries
Your rights as a data subject
Notification of changes
Terms of Service

Our Privacy Commitment

SHAREKEY Swiss AG ("Sharekey " "we" "us"), as the responsible party within the meaning of data protection law, is committed to protecting your data. Sharekey does not rent or sell your data to third-parties. Your data is also not used for targeted ads, or any other kind of profiling. Our website does not have any tracker or cookies. This Privacy Policy informs you about how we process your data when you use the app offered by us and/or additional Sharekey products (together "Sharekey Services") and what rights you have as a data subject towards us. Unless the context indicates otherwise, any reference to "you", "your" or "yourself" in this Privacy Policy includes the respective user of a team management functionality, the respective team admin and the respective team member of the Sharekey Services (as defined in our Terms of Service).

Our contact details are:

SHAREKEY Swiss AG
Gotthardstrasse 26
CH-6300 Zug
e-mail: privacy@sharekey.com

You can contact our Data Protection Officer (DPO) at dpo@sharekey.com. You can address inquiries to them regarding your data, its protection and its treatment by Sharekey.

Content

All content is encrypted with **strong encryption on the sender's device** and is only decrypted on the recipient's device (also known as end-to-end encryption). Sharekey doesn't hold the decryption keys, and our software contains **no backdoor. Your data is yours. Sharekey has no access to them.**

You may delete the content of the communications and storage on your device specifically and generally at any time.

In addition, Sharekey also uses strong encryption to encrypt metadata.

Sharekey stores encrypted data on its servers. Users can access all their data from any authorised device as soon as they are online. The legal basis for the transmission and storage of communications is Art. 6 Para. 1 lit. b) GDPR (fulfilment of contract).

Profile Information that you provide

When you create an account with Sharekey, we ask you to provide your name and your email address ("**Profile Information**"). We do not ask you your mobile number.

The Profile Information you provide will be used for the purpose of providing Sharekey Services. By default, this information will remain private and it will NOT be displayed to other Sharekey users. Depending on your preferences, you can make your Profile Information visible to other users when using Sharekey.

We store your profile information only for the duration of your account usage. If you want to delete your account, we will delete your profile information immediately upon request. You can change or delete your profile data at any time. The legal basis for the processing of your profile data is Art. 6 § 1 b) GDPR (fulfilment of contract).

Processing of data in response to requests

If you send us an inquiry about our products as an interested party, we collect the information you provide, such as your name, e-mail address or other contact information you provide us with. We process this information for the purpose of answering your inquiry. The legal basis for the processing of your above-mentioned personal data is Art. 6 § 1 b) GDPR (contract initiation).

When you provide us your e-mail address, Sharekey may send you e-mails to inform you of important changes (e.g. to confirm your e-mail address or to inform you that a new device logged into your account). This is to help us provide you with a more secure experience with your account. The legal basis for the processing of this personal data is Art. 6 § 1 b) GDPR (fulfilment of contract).

No Address Book

Sharekey Services do NOT need your address book or your phone number.

For the purpose of connecting with other users of Sharekey Services, you only need to share your KEY, visible in your Profile Information once created. Your KEY can be public, you are free to share it with other Users, it is NOT used to encrypt or decrypt locally your data.

No Usage Statistics

We do NOT process individual data about the use of Sharekey Services in order to create anonymous usage statistics and crash logs. There is no need to prevent the processing of your usage data, we don't.

Log Files

When you use Sharekey Services, we collect technical data, so-called "log files", with each access. The collection of log files serves the purpose of providing Sharekey Services. The legal basis for the collection is Art. 6 § 1 b) DS-GVO (fulfilment of contract). Log files are kept for a maximum of 7 days, and only to facilitate troubleshooting, improve the service and prevent misuse. The legal basis for storage is Art. 6 § 1 f) GDPR (legitimate interest). Our legitimate interest is the trouble-free provision of the Sharekey Services.

Additional Technical data

Sharekey stores additional technical data (such as the type of device through which you authorized the Sharekey application) to be able to route data between user devices. The Sharekey Service is designed to keep additional technical data to the minimum required to operate the service.

Support Cases

When you contact Sharekey Customer Support for a support request, we process the personal information you provide in the support request for the purpose of processing your support request. The legal basis for the processing of your data for the processing of the support request is Art. 6 § 1 f) GDPR (legitimate interest). Our legitimate interest is to provide a support service for our Customers.

Newsletter

If you have given us your consent for the purpose of receiving our newsletter with information about Sharekey's offers and products by e-mail, Sharekey will process your e-mail address and name to send you the newsletter. The legal basis for the processing of your data is your consent in accordance with Art. 6 § 1 a) GDPR. You can unsubscribe from the newsletter at any time. For this purpose, there is a link in every newsletter. We only store your data for this purpose for as long as the newsletter subscription is active.

Third parties / Data transfer to third countries

Sharekey undertakes to select only third-party providers for the provision of Sharekey Services in the EU and/or Switzerland.

To provide Sharekey Services, Sharekey uses the services of the following third-party providers:

Name	Function of the Third-Party	Jurisdiction
EXOSCALE	CLOUD Service (Infrastructure) Data Center ZH5 EQUINIX (Zurich) https://www.exoscale.com/privacy/	Switzerland
OVH	DNS Service https://www.ovh.com/fr/protection-donnees-personnelles/	France

For the processing of personal data of business prospects and users of business accounts, Sharekey makes use of services of the following third-party providers:

Name	Function of the Third-Party	Jurisdiction
SENDINBLUE	Sending of emails CRM https://www.sendinblue.com/legal/privacypolicy/	France

Sharekey will disclose personal data to third-parties only if and to the extent necessary to provide the third-party service (e.g., to send login verification e-mail), if required by law or legal process, or if necessary, to enforce the Terms of Service and/or protect Sharekey's rights.

Sharekey will not disclose your data to public authorities unless Sharekey is obliged to do so under Swiss law.

In addition, to the extent permitted by data protection law, Sharekey may disclose your personal data to third-parties if we (or our affiliates) are acquired by that third-party with any of our assets or voting securities (or those of our affiliates) or if we are otherwise involved in a transaction with similar financial effect. In such a situation, we will use reasonable efforts to require the third-party to process your data in accordance with this Privacy Policy in relation to your personal data. If your personal data is subsequently used in a manner different from that described in this Privacy Policy, we ask the third-party to notify you in advance.

Your rights as a data subject

As a data subject within the meaning of the GDPR, you have the following rights in relation to Sharekey:

You have the right to obtain information about the personal data that we store about you (Art. 15 GDPR), the right to correction (Art. 16 GDPR), deletion (Art. 17 GDPR) and restriction of the processing of your personal data (Art. 18 GDPR). You are also entitled to exercise your right to data transferability (Art. 20 GDPR).

You also have the right to object to the processing of personal data concerning you which is carried out in accordance with Art. 6 § 1 e) or f) GDPR. Unless we are still legally obliged or entitled to process your personal data, we will no longer process your personal data (Art. 21 § 1 GDPR). If you object to the use of your data for the purposes of direct marketing, we will no longer process the personal data concerned for these purposes (Art. 21 § 2 GDPR).

You may revoke any declarations of consent you have given at any time (Art. 7 § 3 GDPR). Revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until revocation. You have the right to complain to a supervisory authority.

No automated decision making, including profiling, pursuant to Article 22 § 1 and § 4 GDPR by Sharekey takes place.

Notification of changes

This Privacy Policy may change from time to time. We will make the revised Privacy Policy available through the Apps and post a revised version of this Privacy Policy on the website. Please check the Privacy Policy regularly to be informed of any changes.

Terms of Service

Please read the Terms of Service governing the use of the Site and the Service, as they also govern the terms of this Privacy Policy.