

# Privacy Policy – January 2024

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## Introduction

This Policy covers the processing activities of the WeTransfer services, software, websites (including browser extensions), applications, and advertisements (together: “Services”). The Services allow you to create, share, collect, capture and/or visualize your ideas, texts, graphics, videos, audio, data, information, files, decks or other content (together: “User Content”). The Services may be provided to you online, in the form of a mobile and/or desktop application(s) and/or may be integrated in a third party service. By using any of the Services you agree to have read and understood our Privacy Policy as below.

WeTransfer B.V. (a company vested in The Netherlands) is the data controller of your personal information.

If you have any questions, or complaints, or if you want to exercise your privacy rights: please contact [legal@wetransfer.com](mailto:legal@wetransfer.com).

## What information do we collect?

We collect information in three ways:

- 1. Information you provide
- 2. Information we collect automatically
- 3. Information we receive from other sources

Different types of personal information may be collected depending on the way you use our Services as well as on which Services you use.

### Information you provide

This section describes the information that you typically provide when you sign-up for our Services (with or without account), when you create or update your account or subscription. This information may also be collected when you reach out to us with questions, complaints, or reports of possible violations of our Terms.

Category	Description
User information	We collect this information when you use our Services, or when you sign-up for or update your account. We may also collect this information when you participate in surveys, research, promotional

	<p>activities, or events.</p> <p>Examples include your name, email address, home or billing address, company name, phone number, password, profile photo, branding, and your profession.</p> <p>This may also include your billing and payment information in case you decide to purchase a subscription or to make a purchase on our Services.</p>
User Content	<p>We collect the content you create, upload, or share through the use of our Services. This includes files, photos, videos, audio, metadata, messages, comments, reviews, and descriptions.</p>
User Contacts	<p>We collect the information of the people and organizations you connect and interact with when using our Services. For example, the email addresses of the recipients of your files.</p>
Information related to Communication, Surveys, Events	<p>If you participate in our surveys, research, or promotions, such as lotteries or events we organize, we collect information such as the answers you provide or your contact information.</p>

	<p>When you reach out to us for customer support, or when you report possible violations of our Terms, we collect information about your message or report as well as your contact information.</p>
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### Information we collect automatically when you use our Services

Category	Description
Technical Information	<p><u>Technical information, including approximate location</u></p> <p>We collect certain device and network connection information when you access the Services. This information includes your device model, OS, IP address, system language, device ID, and other technical data. We automatically assign you a user ID. Furthermore, we collect service-related, diagnostic, and performance information, such as crash reports.</p> <p>Based on your Technical Information, such as your IP-address or device settings, we determine your approximate (geo)location, such as the city or country you reside in at that moment.</p> <p><u>Cookie information</u></p> <p>We make use of cookies and other technologies to operate and secure</p>

	<p>our Services, for preference management, and for marketing and advertising purposes. Read the section “Why and how we use cookies” to learn more.</p>
Usage Information	<p>We collect information about how you engage with our Services, including information about the Transfers you download, the time, duration, and frequency of your use, your engagement with other users, and your settings.</p>
Inferred information	<p>We infer information such as attributes (e.g. age-range) and interests based on your data.</p>
Payment & Purchase Information	<p>When you make purchases or payments on our Services, we collect information such as purchased items, transaction information, transaction ID, product details, and price.</p>

## Information we receive from Other Sources

In certain cases we may receive the Information described above from Other sources, such as partners or other users. The table below offers you more insight into what information we receive and from whom.

Other Sources	Description	Information categories
Information from Advertising, marketing, and measurement partners	We receive inferences from certain advertising or marketing partners. These inferences are the partners' understanding of your interests and preferences. We may also receive information such as your device or mobile identifiers and other cookie information.	<ul style="list-style-type: none"><li>• Technical Information</li><li>• Usage Information</li><li>• Inferred Information</li><li>• Purchase &amp; Payment Information</li></ul>
Information from Payment and Transaction Fulfillment Providers	We receive information about you from payment and transaction fulfillment providers, such as payment confirmation details, and information about the delivery of products you have purchased through shopping features, such as Paid Transfers.	<ul style="list-style-type: none"><li>• Technical Information</li><li>• Payment &amp; Purchase Information</li></ul>

<p>Information from Technical and Security Partners</p>	<p>We collaborate with Technical and Security partners to operate and secure our platforms.</p> <p>For example, We may look-up your non-precise geolocation through IP-address lookup tooling.</p>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information we collect automatically</li> </ul>
<p>Information from Third Party Platforms and (Integration) Partners</p>	<p>Third party platforms provide us with information (such as your email address, user ID, and public profile, User Content) when you decide to sign up for or login to our Services by using their login services. We could also receive this information when you decide to connect or integrate a third-party service or app with our Services.</p> <p>This could allow you to import your data or files from a third-party service to our Services.</p> <p>Furthermore, we may receive such information when you decide to sign-up via a promotion we offer in collaboration with the third party. For instance, when you participate in a student promotion campaign.</p>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> </ul>

Information from Others, including Law Enforcement.	We may receive information about you from others, for example, where you are included or mentioned in User Content, in a complaint, appeal, request or feedback submitted by a user or third party, including law enforcement agency, or if your contact information is provided to us by another user.	<p>Any of the data mentioned under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> </ul>
Acquired Companies	In case of mergers or acquisitions, we may receive any of the aforementioned information.	<p>Any of the data mentioned under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> </ul>



# How we use your Information, and our legal bases for using it

This section describes why and how we collect, process, and share your personal information. We provide a description of each reason or “purpose”. We also describe on which legal bases we rely to justify the processing of your information. Each reason or purpose is linked to a legal basis as well as to one or more of the information categories described in the previous section.

Here’s a brief overview of the different legal bases the GDPR provides:

- **Performance of our Contract with You:** When you use our Services, you’re entering into an agreement with us (our Terms of Services). We use your information to deliver our services, support you, and make our platform function effectively for you.
- **Legitimate Interests:** We sometimes use your information in ways that are beneficial for both of us. This could include things like improving our software, preventing fraud, and marketing activities. We always balance our interests with your rights and won’t use your information if it overly infringes on your privacy.
- **Consent:** in certain situations we might ask you for consent (opt-in) to process your information. When we do, we’ll make it very clear what it is we’re asking consent for. You’ll always have the right to withdraw your consent at any moment.
- **To fulfill our Legal Obligations:** Just like any other company, we’re bound by laws and regulations. Sometimes, we have to use your personal information to comply with these legal requirements.
- **To protect the Vital Interests of Others:** On rare occasions, we might use or share your information to protect someone’s life or to handle emergency situations.

Purpose for processing your information	Legal Basis	Information categories
<p><b>Provide and administer our Services to you</b>, such as allowing you to:</p> <ul style="list-style-type: none"> <li>• upload, create or distribute User Content;</li> <li>• sign-up for an account and login;</li> <li>• subscribe to and pay for our Services.</li> </ul> <p>We also send you Service emails and messages. For example, when your Transfer has been downloaded, or that your client has commented on your Review.</p>	Performance of a contract	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul> <p>As it relates to offering you our Services under our Terms.</p>
<p><b>Provide our distribution and payment collection features as well as to facilitate &amp; process orders.</b> This includes sharing Purchase</p>	Performance of a contract insofar you are bound by our Terms.	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> </ul>

<p>Information with Uploaders, Payment and Transaction Fulfillment Providers, and Service Providers.</p>	<p>Legitimate interests, such as:</p> <ul style="list-style-type: none"> <li>• Facilitating the sale and purchase of User Content. This includes payment collection.</li> </ul>	<ul style="list-style-type: none"> <li>• Information we collect automatically, <u>in particular Payment &amp; Purchase Information.</u></li> <li>• Information we receive from Other sources</li> </ul>
<p><b>Offer additional core elements of our Services</b>, such as sending recipients an email with a link to download or review User Content; or when you integrate our Services with third-party services.</p>	<p>Legitimate interests, such as:</p> <ul style="list-style-type: none"> <li>• Keeping our Services running; and</li> <li>• Allowing people to access and use our Services.</li> <li>• Facilitating the connection and integration with third-party services on your request and with your permission.</li> </ul>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul>

**Serve and measure the effectiveness of both non-personalised and personalised advertisements on both our Services and third-party services.** This includes serving you ads from our advertising clients as well as WeTransfer on our Services and measuring them to understand the effectiveness. It also includes WeTransfer’s own marketing and advertising activities on third-party services, such as social media platforms.

In case of non-personalised advertisements, we use very limited information to serve you the ads, such as your non-precise geolocation (typically country) and your browser language.

When offering non-personalised ads:  
Legitimate Interests, such as:

- Being able to offer a Free version of our Services

When offering personalised ads, and where required by law: Consent.

Non-personal ads

- Geolocation (based on IP-address)
- Browser language

Personalised ads

Any of the data described under:

- Information you provide **(but not User Content)**
- Information we collect automatically
- Information we receive from Other sources

<p><b>Review our Services and user base to inform the planning, improvement, and development of our Services (including advertising), our business activities (including marketing), and our technology.</b></p> <p>For instance, we monitor and analyse how users are using and interacting with the Services, each other, and across their devices. This helps us with gaining an understanding of:</p> <ul style="list-style-type: none"> <li>• how our Services, including new features, are being used,</li> <li>• how we might further develop our Services,</li> <li>• what type of people or entities our user base exists of, and</li> <li>• which type of potential users to focus on in our marketing &amp; advertising activities - both on our Services and on third-party</li> </ul>	<p>Legitimate interests, such as:</p> <ul style="list-style-type: none"> <li>• Developing &amp; improving our Services</li> <li>• Enhancing user experience</li> <li>• Making informed strategic and business decisions</li> </ul>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul>

<p>services, such as social media platforms. This purpose relates to broad user segments, and not individual targeting.</p> <p>In certain cases, and where allowed by law, we could receive Information from third-parties to help improve the understanding of our user base.</p> <p>Moreover, we train and improve our software and technology, such as our machine learning models and algorithms.</p>		
<p><b>Conduct surveys and research.</b> We might ask you for feedback about our Services or about features that are in development. In some cases, we might ask you to participate in lengthier research, including as part of a panel or an Early Access Program (EAP). We might also conduct independent research to gain further user insights.</p>	<p>Legitimate interests, such as:</p> <ul style="list-style-type: none"><li>• Understanding how our users and others think of our Services</li><li>• Making informed strategic and business decisions</li></ul>	<ul style="list-style-type: none"><li>• Information you provide</li><li>• Information we collect automatically</li></ul>

	Where required, we sometimes also ask for your Consent.	
<b>Enforce our Terms, guidelines, and policies.</b> We use your information to enforce our Terms and policies. If we determine that you've violated our Terms, we could remove your content or suspend your account.	Performance of a contract	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide, in particular <u>User Content</u></li> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul>
<b>Maintain and enhance the safety, integrity, security, and stability of our Services as well as to protect (the rights of) and serve the safety and wellbeing of our users, our community, and third parties.</b>	<p>Legitimate interests, such as:</p> <ul style="list-style-type: none"> <li>• Ensure ongoing security, stability, and availability of our Services</li> </ul>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide, including <u>User Content</u></li> </ul>

<p>For instance, we implement security measures, perform diagnostics, troubleshoot and fix issues with the Services.</p> <p>We also use automated means as well as human moderation to investigate, detect, and act against (suspicions of) illegal or unwanted activity or User Content. Examples include of illegal activity or content, but are not limited to, Child Sexual Abuse Material (CSAM), malware, fraud, and copyright infringement.</p> <p>Next to automated means, we rely on reports of users and third parties to become aware of suspicious or illegal content and activity.</p>	<ul style="list-style-type: none"> <li>• Ensure the safety of our Users and community</li> <li>• Protect the rights &amp; reputation of WeTransfer and others.</li> </ul>	<ul style="list-style-type: none"> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul>
<p><b>Communicate and Promote WeTransfer, our Services, our events &amp; promotions both on- and off-WeTransfer.</b></p> <p>We may send you direct marketing messages, including email, about WeTransfer, features of the Services, and third party services. We may</p>	<p>Legitimate interests, such as:</p> <ul style="list-style-type: none"> <li>• Direct marketing</li> </ul>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> </ul>



<p>also send or offer you promotions, contests, or marketing campaigns or event information.</p>	<p>Consent, where required by law. For instance, when we send you email marketing.</p>	<ul style="list-style-type: none"> <li>• Information we receive from Other sources</li> </ul>
<p><b>To establish, exercise, or defend legal claims.</b></p> <p>In case of negotiations, disputes, or (potential) litigation we may need to process your information or possibly share it with our lawyers.</p>	<p>Legitimate interests, such as:</p> <ul style="list-style-type: none"> <li>• Defending ourselves, our users, or others in specific legal matters</li> <li>• Seeking legal advice</li> </ul>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul>

<p><b>Comply with legal obligations</b></p> <p>As a business we are sometimes obliged to process your information in relation to laws, such as:</p> <ul style="list-style-type: none"> <li>• Dutch law (as our headquarters are based in The Netherlands), including civil law, tax laws, law enforcement laws</li> <li>• EU law, including laws regarding consumer protection, law enforcement, illegal content, hosting services.</li> </ul>	<p>Complying with Legal Obligations</p>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul>
<p><b>Share your information with others</b></p> <p>There are limited instances in which we will share your information with others. These are described in more detail in section “How &amp; when we share your information with others”, but here’s a brief overview:</p> <p>You might request us to share the information, for instance, when you integrate our Services with another third-party service of your choice.</p>	<p>Complying with Legal obligations, such as:</p> <ul style="list-style-type: none"> <li>• EU laws, such as the EU Digital Services Act</li> <li>• Dutch law (as our headquarters are based in The Netherlands)</li> </ul>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul>

In certain cases we might need to share your information with law enforcement, public authorities, or other third-parties. For example, when we have a legal obligation to do so, when there are valid legal grounds for further investigation, or when there's an emergency or life-threatening situation.

Legitimate Interests, such as:

- Complying with regulatory requests, court orders, search warrants, or subpoenas when not specifically dictated by applicable law
- Complying with laws from countries where our local entities reside, such as France, The UK, and the USA.
- Laws from the country you reside in
- Following case law related to the disclosure of user information. For instance, in relation to illegal content

	Vital interests of an individual (emergency or life-threatening situation)	

## How & when we share your information with others

There are limited instances in which we will share your information with others. This section describes with whom we might share your personal information, why, and which categories of information.

Categories of recipients	Reason(s) for sharing	Information categories
<p><b>Service Providers</b></p> <p>These could be parties that provide services, such as cloud hosting, content delivery, security, survey &amp; research, and customer support.</p>	<p>We have to rely on service providers to offer our Services to you, and to ensure that our Services remain secure. Our employees also use a wide variety of tools of Service providers to conduct planning, research, and execution of projects.</p>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul> <p>As it relates to offering you our Services under our Terms.</p>

<p><b>Advertising Partners, including our Advertising Clients</b></p>	<p>We share your information to deliver our advertisements to you. We also share aggregated information with our advertising partners to measure the effectiveness of our advertising services.</p> <p>In case we have your permission, we might also share certain personal information to deliver more relevant advertising.</p>	<ul style="list-style-type: none"> <li>• Your hashed email address</li> <li>• Technical information</li> <li>• Usage information</li> </ul>
<p><b>Marketing Partners</b></p> <p>Examples are partners that promote WeTransfer, or platforms, apps, websites that allow WeTransfer to advertise its Services to you.</p>	<p>We do this to promote through communication and advertisements WeTransfer, our Services, and other activities, events or campaigns we host. These partners also enable us to allow you to sign-up for events and campaigns. Moreover, we measure the effectiveness of our marketing activities and campaigns.</p>	<ul style="list-style-type: none"> <li>• User Information</li> <li>• Information related to Communication, Surveys, Events</li> <li>• Technical Information</li> </ul>

<b>Payment &amp; Transaction Fulfillment Platforms</b>	<p>We share the information related to the transaction with payment and transaction fulfillment providers, and other service providers, when you make a purchase or collect a payment on our Services. This could be when you pay for a subscription or when you pay for User Content from another user; or when you request a payment before enabling a download. We share this information so they can fulfill the order, and in some cases for security reasons.</p>	<ul style="list-style-type: none"> <li>• User Information</li> <li>• Technical Information</li> <li>• Payment &amp; Purchase Information</li> </ul>
<b>Law enforcement and other authorities, or other parties to legal review or litigation</b>	<p>We may access, preserve, and share your information, including User Content, with law enforcement agencies, public authorities, IP rights holders, or other third parties if we have good faith belief that it is necessary to:</p> <ul style="list-style-type: none"> <li>• comply with applicable law, legal process, search warrant, subpoena or government requests,</li> <li>• protect the rights, property, and safety of our users, copyright holders, and others, including to protect life or prevent imminent bodily harm</li> </ul>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul>

	<ul style="list-style-type: none"> <li>• detect, investigate, prevent, or address unwanted activity, copyright infringement, or other illegal activity.</li> <li>• investigate (suspicions of) violations of our Terms, Guidelines, or Policies - as well as to enforce them; or</li> </ul>	
<b>Other users</b>	<p>You may choose to interact with other users by sharing files or reviews with them; or by downloading or purchasing their User Content. In these instances, we could (have to) share or display some of your personal information with them to ensure that our Services work properly.</p>	<ul style="list-style-type: none"> <li>• User Information</li> <li>• User Content</li> <li>• Payment &amp; Purchase information</li> </ul>
<b>Other WeTransfer companies, or companies we acquire</b>	<p>As a global company we have entities and colleagues in several countries around the world. These entities -and the colleagues who work there- may process your information for us. For instance, to review, develop &amp;</p>	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> </ul>



	improve features, for security and content moderation, for analytics, technical & customer support.	<ul style="list-style-type: none"> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul>
<b>Parties in relation to Corporate Transactions</b>	Your information may be disclosed to third parties in connection with a corporate transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control, or acquisition of all or a portion of our business.	<p>Any of the data described under:</p> <ul style="list-style-type: none"> <li>• Information you provide</li> <li>• Information we collect automatically</li> <li>• Information we receive from Other sources</li> </ul>

## How & why we use cookies

We place cookies with the intention of making WeTransfer even better. We work hard to make our Services safe, beautiful and unobtrusive. Feel free to block cookies, but this may affect how well our Services work.

We place several cookies (or similar technologies, like pixels or web beacons) on your device for the purpose of facilitating your use of the Service and to find out how the Service may be improved. We or our advertising partners also place cookies on our website(s). Being a global service, these partners can vary per country. When our advertising partners place cookies, these cookies can process personal information to measure the effectiveness of the campaign.

Cookies are small text files that are stored on your computer by your browser when you visit a website. Examples of cookie purposes are: your language preferences, logging into an account, remembering login details, serving you personalised advertisements and acceptance of the Terms of Service and Privacy & Cookie Policy. Our website can place these cookies for the following purposes:

1. **Functional cookies** are used to provide functionalities when using our Service, such as the possibility to set preferences or to remember your previous settings.
2. **Analytical cookies** are used to optimise our Service. For example to optimise the usability of our website by AB-testing a new feature, to make the website more user-friendly and to analyse how you use our Service. We also use analytical cookies to stop bots and malicious behaviour like spam. When we use analytical cookies, this could include third party cookies, as found in the cookie list. These third party analytical cookies process personal information, which is detailed in the cookie list too.

3. **Advertisement cookies** are used for commercial, editorial and promotional purposes. With these cookies your internet- and surf behaviour can be followed over various domains and websites. WeTransfer only checks the (one) website you visited prior to your visit to one of our websites. We do not track the website you visit after you leave our website. Advertisement cookies are often also placed by third parties to measure the effectiveness of their advertising campaigns and to follow your internet- and surf behaviour over other domains and websites where they have placed a cookie. WeTransfer does not have access to or control over personal information collected via these cookies or other features that advertisers and third parties may use. Our Privacy & Cookie Policy is therefore not applicable to these third party cookies and we refer you to third parties' Privacy Policies to read how they handle personal information. You can find a list of the limited amount of third party cookies and a link to their privacy policies [here](#).
4. **Pixel tags or web beacons** are a piece of code embedded on the website that collects personal information about users' engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. The pixel also allows us to see from which previous website or channel a user arrived at our website.

If you would want to remove certain cookies, or block them from being stored in your browser, it is possible to arrange this through your browser settings for cookies. You can find these settings under the Privacy tab in the Preferences section of most browsers. Here you can specify your cookie preferences or remove cookies. Please note that if you remove or refuse WeTransfer cookies, the Service might not function in optimal form.

# How we operate as a global business

All Personal Information, including User Content, that is uploaded within Europe (including the United Kingdom) is in principle hosted on servers in Dublin, Ireland.

We are a business with a global footprint. Therefore we work together with WeTransfer entities and partners outside the European Economic Area (“EEA”). This means that we might share or store certain personal information with them.

Those entities and partners may reside in countries which have different data protection laws in place – and, in some cases these offer less protection to your information. To ensure that you and your personal information enjoy a similar level of protection as under the EU GDPR, we will make sure that appropriate safeguards are in place, such as technical, legal, and organizational measures. Examples are pseudonymisation, encryption, and policies to challenge disproportionate legal access by governments.

When sharing personal information with other WeTransfer entities, or with third parties, such as service providers and marketing partners, who are located outside the EEA, we ensure that either:

- The European Commission has issued a so-called “[Adequacy Decision](#)” regarding the country where the WeTransfer entity or third-party is located. This is the case for:
  - our subsidiary as well as third-parties based in the UK,
  - third parties based in Canada, Israel, and Switzerland, and
  - certain third parties based in the USA who have certified themselves under the [EU-US Data Privacy Framework](#). When this is the case, we conduct a review to ascertain whether their certification is still active.

- We have signed special contracts, called “[Standard Contractual Clauses](#)”, with the WeTransfer entity or third-party. These clauses require the other party to protect your information and to provide you with EU-level rights and protections. You can exercise your rights under the Standard Contractual Clauses by [contacting us](#) or the third party who processes your personal information

Our WeTransfer entities commit to processing information in compliance with WeTransfer’s privacy policy and applicable privacy laws.

## How we protect your personal information

WeTransfer takes technical and organisational measures to protect your personal information against loss or other forms of unlawful processing. We take these measures against industry standards and certifications, such as ISO 27001.

We have policies and measures in place to pseudonymise, encrypt, and anonymise personal information. Moreover, we have safeguards in place to make personal information only accessible by those who need access to do their job and that they are properly authorised. We monitor activity on our servers and on company devices, such as laptops, to ensure the security and safety of personal information.

WeTransfer staff is required to conduct themselves in a manner consistent with the company’s guidelines regarding confidentiality, ethics, and appropriate usage of personal information. Staff is required to sign a confidentiality agreement and undergoes periodic security training.

# How long we keep your personal information

The retention period for your personal information depends on which Service you use and it depends on which category of personal information we're talking about. Always check out the website(s) or app(s) of the Service(s) for the specific information on retention periods.

## Personal Information

WeTransfer retains your personal information as long as its necessary to provide our Services to you (e.g. upholding your user account), to conduct our business activities and fulfill our legitimate interests, such as providing safe and secure services, to fix bugs and to reach out to you, to comply with applicable laws (e.g. retaining financial information for 7 years for tax purposes; or retaining personal information after receiving government data preservation orders), to review, challenge, or comply with legal requests, and to resolve (legal) disputes.

Where your User Content and/or Personal Information has been reported, detected, blocked, or removed due to suspicious, infringing, or illegal activity, we may keep limited information in relation to you and that activity for a limited period of time. This is to:

- to help maintain and enhance the safety and security of our users, and our platform;
- to act on reports of harmful or illegal content or activity;
- to comply with our obligations under applicable law, such as the EU Digital Services Act.

## User Content on File Transfer

When using WeTransfer File Sharing your Content will be deleted after 3 days, unless you have a Paid subscription in which case you can set and adjust the expiry date manually. After this period, a file is automatically and permanently deleted from our servers.

### User Content on Services other than File Transfer

The Content you create, use, store or share on our Services, other than our File Sharing Service, is, in principle, retained until you stop interacting with our Service(s), when you delete your Content from the Service(s), when you delete the Service(s) from your device(s) or when you delete your account. Always check out the website(s) or app(s) of the Service(s) you use for specific information.

## Your rights and choices

You have certain rights under GDPR, and similar privacy laws. This section explains the different types of rights, how to exercise them, and whether they may be subject to certain limitations. After receiving your request, WeTransfer will respond within the time period limits provided by the relevant law. In the EEA and UK, the time period is one month.

### **Access your information**

You have the right to receive access to your personal information, including a copy thereof. You can request this by reaching out to us.

### **Rectify your information**

If your Personal Information has changed, or if you believe it's incorrect, you have the right to correct the Personal Information. If you have an account, you can adjust most of your Personal Information via your [account settings](#). Otherwise, you can request us to rectify it for you.

**Delete your information**

You can request deletion of your Personal Information by reaching out to us. In some of our products or apps it's also possible to delete your account via your account settings.

There are scenarios where we can't erase your personal information, such as when:

- The data is still needed for the reason we gathered it.
- WeTransfer's interest in using the information outweighs your wish for its deletion. This might be the case when we require the data to protect our services from fraudulent or illegal activities.
- WeTransfer has a legal obligation to retain the data, or
- WeTransfer requires the data to establish, exercise, or defend against legal action. For example, when there's an unresolved matter linked to your account.

**Port your information**

In certain scenarios, you have the right to request a copy of your personal data in electronic ("machine-readable") format. You can request us to transmit your data when we are processing your personal data on the legal bases of consent or performance of contract. We will honor this request to the extent possible.

**Object to the processing of your information**

When we process your personal information for the legitimate interests of WeTransfer or a third party, you may object to the processing of your personal information. You can either do this via "Your Privacy Choices" or account settings, or by contacting us. When you contact us, we ask you to provide all relevant information. This includes the processing activity you are objecting to, why you want to object, how the processing activity affects you, as well as any additional information that you think will help us review your request. We will stop the particular processing if we don't have compelling legitimate grounds to continue that processing and if we don't need it for legal claims.



**Restrict the processing of your information**

You can request us to (temporarily) restrict the processing of your personal information. For instance, if (1) you believe your personal data is inaccurate, or (2) when the processing is unlawful but you oppose deletion of the data, or (3) you require the data to be retained in relation to a legal claim or defense, or (4) you have objected to the processing and are awaiting our response.

**Lodge a complaint**

If you're unhappy with how we've handled your request or your personal information, we encourage you to contact us. You also have the right to file a complaint with our lead supervisory authority, the Dutch "[Autoriteit Persoonsgegevens](#)" (based in The Netherlands) or with your [local supervisory authority](#).

**Withdrawal of consent**

When you've provided your consent for us to process your personal information, you can withdraw your consent at any time, without affecting the lawfulness of processing activities based on consent before its withdrawal. If you withdraw your consent, we will no longer process the personal information which we've received based on your consent. You can withdraw your consent via "Your Privacy Choices" or by contacting us.

**How to exercise your rights**

To exercise any of the above rights, please contact us via [legal@wetransfer.com](mailto:legal@wetransfer.com). Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details or provide additional information so that we can understand your request.

## Minors

WeTransfer's Services are not directed towards minors. You are only allowed to use our Services when aged 16 and over.

## How to contact us

You can contact us about this privacy policy or other related questions via [legal@wetransfer.com](mailto:legal@wetransfer.com). You can also reach us by mail on Keizersgracht 271-287, 1016 ED, Amsterdam, The Netherlands.

You can reach out to our Data Protection Officer via email [dpo@wetransfer.com](mailto:dpo@wetransfer.com) or by mail at the following address: Bird & Bird DPO Services SRL, Avenue Louise 235 b 1, 1050 Brussels, Belgium.

## Updates to this Privacy Policy

Note that WeTransfer may revise this Privacy & Cookie Policy from time to time. Each revised version shall be dated and posted on the website. If you do not agree with the Privacy & Cookie Policy, you should not or no longer access or use the website and/or service. By continuing to use the website and/or service you accept any changes made to the Privacy & Cookie Policy.