



Privacy Policy

Your privacy is critically important to us. At WSS Media, 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.

Information We Collect

We only collect information about you if we have a reason to do so — for example, to provide our Services, to communicate with you, or to make our Services better.

We collect this information from three sources: 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 directly. Here are some examples:

- **Basic account information:** We ask for basic information from you in order to set up your account. For example, we require individuals who sign up for a WSS Media account to provide an email address and password, along with a username or name — and that's it. You may provide us with more information — like your address and other information you want to share — but we don't require that information to create a WSS Media account.
- **Public profile information:** If you have an account with us, we collect the information that you provide for your public profile. For example, if you have a WSS Media account, your username is part of that public profile, along with any other information you put into your public profile, like a photo or an "About Me" description. Your public profile information is just that — public — so please keep that in mind when deciding what information you would like to include.



- **Payment and contact information:** If you buy something from us or earn revenue through your site, we'll collect information to process those payments and contact you. If you buy something from us — a subscription to a WSS Media plan, a premium theme, a custom domain, you'll provide additional personal and payment information like your name, credit card information, and contact information. We also keep a record of the purchases you've made. If you use our Ecommerce Services you'll have to create an account. You may also provide us with financial details to set up a payment integration, like the email address for your Stripe or PayPal account or your bank account information.
- **Content information:** You might provide us with information about you in draft and published content (a blog post or comment that includes biographic information about you, or any media or files you upload).
- **Credentials:** Depending on the Services you use, you may provide us with credentials for your self-hosted website (like SSH, FTP, and SFTP username and password). Jetpack and VaultPress users may provide us with these credentials in order to use our one-click restore feature if there is a problem with their site, or to allow us to troubleshoot problems more quickly.
- **Communications with us (hi there!):** You may also provide us with information when you respond to surveys, communicate with our Engineers about a support question, post a question in our public forums, or sign up for a newsletter. When you communicate with us via form, email, phone, or otherwise, we store a copy of our communications (including any call recordings as permitted by applicable law).
- **Job applicant information:** If you apply for a job with us — awesome! You may provide us with information like your name, contact information, resume or CV, and work authorisation verification as part of the application process.

Information We Collect Automatically

We also collect some information automatically:

- **Log information:** Like most online service providers, we collect information that web browsers, mobile devices, and servers typically make available, including the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information. We collect log information when you use our Services — for example, when you create or make changes to your website.
- **Usage information:** We collect information about your usage of our Services. For example, we collect information about the actions that site administrators and users perform on a site — in other words, who did what and when (e.g., [Website.com username] deleted "[title of post]" at [time/date]). The WooCommerce Usage Tracker also tracks information like your email address, WooCommerce settings, and PHP settings, along with information about your online store, like the aggregate number of orders and customers. We also collect information about what happens when you use our Services (e.g., page views, support document searches, features enabled for your website, along with information about your device (e.g., screen size, name of



cellular network, and mobile device manufacturer). We use this information to, for example, provide our Services to you, get insights on how people use our Services so we can make our Services better, and understand and make predictions about user retention.

- **Location information:** We may determine the approximate location of your device from your IP address. We collect and use this information to, for example, calculate how many people visit our Services from certain geographic regions. We may also collect information about your precise location via our mobile apps (like when you post a photograph with location information) if you allow us to do so through your mobile device operating system's permissions.
- **Information from cookies & other technologies:** A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. WSS Media uses cookies and other technologies to help us identify and track visitors, usage, and access preferences for our Services, as well as track and understand email campaign effectiveness and to deliver targeted ads.

How and Why We Use Information

Purposes for Using Information

We use information about you for the purposes listed below:

- **To provide our Services.** For example, to set up and maintain your account, host your website, backup and restore your website, provide customer service, process payments and orders, and verify user information.
- **To ensure quality, maintain safety, and improve our Services.** For example, by providing automatic upgrades and new versions of our Services. Or, for example, by monitoring and analysing how users interact with our Services so we can create new features that we think our users will enjoy and that will help them create and manage websites more efficiently or make our Services easier to use.
- **To place and manage ads in our advertising program.** For example, to place ads on our users' sites and some of our own sites as part of our advertising program, and understand ad performance.
- **To market our Services and measure, gauge, and improve the effectiveness of our marketing.** For example, by targeting our marketing messages to groups of our users (like those who have a particular plan with us or have been users for a certain length of time), advertising our Services, analysing the results of our marketing campaigns (like how many people purchased a paid plan after receiving a marketing message), and understanding and forecasting user retention.
- **To protect our Services, our users, and the public.** For example, by detecting security incidents; detecting and protecting against malicious, deceptive, fraudulent, or illegal activity; fighting



spam; complying with our legal obligations; and protecting the rights and property of WSS Media and others, which may result in us, for example, declining a transaction or terminating Services.

- **To fix problems with our Services.** For example, by monitoring, debugging, repairing, and preventing issues.
- **To customise the user experience.** For example, to personalise your experience by serving you relevant notifications and advertisements for our Services, recommending content through our Reader post suggestions, and providing new essays and stories through WSS Media for your reading pleasure.
- **To communicate with you.** For example, by emailing you to ask for your feedback, share tips for getting the most out of our products, or keep you up to date on WSS Media; texting you to verify your payment; or calling you to share offers and promotions that we think will be of interest to you. If you don't want to hear from us, you can opt out of marketing communications at any time. (If you opt out, we'll still send you important updates relating to your account.)
- **To recruit and hire new WSS Media staff.** For example, by evaluating job applicants and communicating with them.

Legal Bases 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 in order to fulfill our commitments to you under the applicable terms of service or other agreements with you or is necessary to administer your account — for example, in order to enable access to our website on your device or charge you for a paid plan; or

(2) The use is necessary for compliance with a legal obligation; or

(3) The use is necessary in order to protect your vital interests or those of another person; or

(4) We have a legitimate interest in using your information — for example, to provide and update our Services; to improve our Services so that we can offer you an even better user experience; to safeguard our Services; to communicate with you; to measure, gauge, and improve the effectiveness of our advertising; and to understand our user retention and attrition; to monitor and prevent any problems with our Services; and to personalise your experience; or

(5) You have given us your consent — for example before we place certain cookies on your device and access and analyse them later on.

Sharing Information



How We Share Information

We share information about you in limited circumstances, and with appropriate safeguards on your privacy. These are spelled out below.

- **Subsidiaries and independent contractors:** We may disclose information about you to our subsidiaries and independent contractors who need the information to help us provide our Services or process the information on our behalf. We require our subsidiaries and independent contractors to follow this Privacy Policy for any personal information that we share with them.
- **Third-party vendors:** We may share information about you with third-party vendors who need the information in order to provide their services to us, or to provide their services to you or your site. This includes vendors that help us provide our Services to you (like Stripe, which powers WooCommerce Payments, payment providers that process your credit and debit card information, payment providers you use for your own ecommerce operations, fraud prevention services that allow us to analyse fraudulent payment transactions, cloud storage services, 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, registrars, registries, data escrow services that allow us to provide domain registration services, and your hosting provider if your site is not hosted by WSS Media); those that assist us with our marketing efforts (e.g., by providing tools for identifying a specific marketing target group or improving our marketing campaigns, and by placing ads to market our services); those that help us understand and enhance our Services (like analytics providers); those that make tools to help us run our operations (like programs that help us with task management, scheduling, word processing, email and other communications, and collaboration among our teams); other third-party tools that help us manage operations; and companies that make products available on our websites (like the extensions on WooCommerce.com), 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 and regulatory requirements:** We may disclose information about you in response to a subpoena, court order, or other governmental request. If you have a domain registered with WSS Media, we may share your information to comply with the Internet Corporation for Assigned Names and Numbers' (ICANN) regulations, rules, or policies. For example, your information relating to your domain registration may be available in the WHOIS database, or we may be required to share your information with ICANN-approved Dispute Resolution Service Providers.
- **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 WSS Media, 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 WSS Media 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. For example, we may share your information with third parties when you authorise us to do so, like when you connected your site to a social media service through our Publicise feature.
- **Aggregated or de-identified information:** We may share information that has been aggregated or de-identified, so that it can no longer reasonably be used to identify you. For instance, we may publish aggregate statistics about the use of our Services, or share a hashed version of your email address to facilitate customised ad campaigns on other platforms.
- **Published support requests:** If you send us a request for assistance (for example, via a support email or one of our other feedback mechanisms), we reserve the right to publish that request in order to clarify or respond to your request, or to help us support other users.

We have a long-standing policy that we do not sell our users' data. We aren't a data broker, we don't sell your personal information to data brokers, and we don't sell your information to other companies that want to spam you with marketing emails.

Information Shared Publicly

Information that you choose to make public is — you guessed it — disclosed publicly.

That means information like your public profile, posts, other content that you make public on your website, and your "Likes" and comments on other websites are all available to others — and we hope they get a lot of views!

For example, the photo that you upload to your public profile, or a default image if you haven't uploaded one, is your Globally Recognised Avatar, or Gravatar — get it? :) Your Gravatar, along with other public profile information, displays alongside the comments and "Likes" that you make on other users' websites while logged in to your WSS Media account. Your Gravatar and public profile information may also display with your comments, "Likes," and other interactions on websites that use our Gravatar service, if the email address associated with your account is the same email address you use on the other website.

Please keep all of this in mind when deciding what you would like to share publicly.

How Long We Keep Information



We generally discard information about you when it's no longer needed for the purposes for which we collect and use it — described in the section above on How and Why We Use Information — and we're not legally required to keep it.

For example, we keep the web server logs that record information about a visitor to one of WSS Media's websites, like 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, analyse traffic to WSS Media's websites and investigate issues if something goes wrong on one of our websites.

As another example, when you delete a post, page, or comment from your site, it stays in your Trash folder for thirty days in case you change your mind and would like to restore that content, because starting from scratch is no fun. 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 unauthorised access, use, alteration, or destruction, and take reasonable measures to do so. We monitor our Services for potential vulnerabilities and attacks.

To enhance the security of your account, we encourage you to enable our advanced security settings, like [Two Step Authentication](#).

Choices

You have several choices available when it comes to information about you:

- **Limit the information that you provide:** If you have an account with us, you can choose not to provide the optional account information, profile information, and transaction and billing information. Please keep in mind that if you do not provide this information, certain features of our Services — for example, premium themes that carry an additional charge — may not be accessible.
- **Opt out of marketing communications:** You may opt out of receiving promotional communications from us. Just follow the instructions in those communications or let us know. If you opt out of promotional communications, we may still send you other communications, like those about your account and legal notices.
- **Set your browser to reject cookies:** You can usually choose to set your browser to remove or reject browser cookies before using WSS Media's websites, with the drawback that certain features of WSS Media's websites may not function properly without the aid of cookies.
- **Close your account:** While we'd be very sad to see you go, you can close your account if you no longer want to use our Services. Please keep in mind that we may continue to retain your



information after closing your account, as described in How Long We Keep Information above — for example, when that information is reasonably needed to comply with (or demonstrate our compliance with) legal obligations such as law enforcement requests, or reasonably needed for our legitimate business interests.

Your Rights

If you are located in certain parts of the world, including California and countries that fall under the scope of the European General Data Protection Regulation (aka the “GDPR”), you may have certain rights regarding your personal information, like the right to request access to or deletion of your data.

European General Data Protection Regulation (GDPR)

If you are located in a country that falls under the scope of the GDPR, data protection laws give you certain 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.

You also have the right to make a complaint to a government supervisory authority.

California Consumer Privacy Act (CCPA)

The California Consumer Privacy Act (“CCPA”) requires us to provide California residents with some additional information about the categories of personal information we collect and share, where we get that personal information, and how and why we use it.

The CCPA also requires us to provide a list of the “categories” of personal information we collect, as that term is defined in the law, so, here it is. In the last 12 months, we collected the following categories of personal information from California residents, depending on the Services used:

- Identifiers (like your name, contact information, and device and online identifiers);
- Commercial information (your billing information and purchase history, for example);
- Characteristics protected by law (for example, you might provide your gender as part of a research survey for us);



- Internet or other electronic network activity information (such as your usage of our Services, like the actions you take as an administrator of a WSS Media site);
- Geolocation data (such as your location based on your IP address);
- Audio, electronic, visual or similar information (such as your profile picture, if you uploaded one);
- Professional or employment-related information (for example, your company and team information if you are a Happy Tools user, or information you provide in a job application); and
- Inferences we make (such as likelihood of retention or attrition).

You can find more information about what we collect and sources of that information in the Information We Collect section above.

We collect personal information for the business and commercial purposes described in the How and Why We Use Information section. And we share this information with the categories of third parties described in the Sharing Information section.

If you are a California resident, you have additional rights under the CCPA, subject to any exemptions provided by the law, including the right to:

- Request to know the categories of personal information we collect, the categories of business or commercial purpose for collecting and using it, the categories of sources from which the information came, the categories of third parties we share it with, and the specific pieces of information we collect about you;
- Request deletion of personal information we collect or maintain;
- Opt out of any sale of personal information; and
- Not receive discriminatory treatment for exercising your rights under the CCPA.

Contacting Us About These Rights

You can usually access, correct, or delete your personal data using your account settings and tools that we offer, but if you aren't able to or you'd 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.

When you contact us about one of your rights under this section, we'll need to verify that you are the right person before we disclose or delete anything. For example, if you are a user, we will need you to contact us from the email address associated with your account. You can also designate an authorised agent to make a request on your behalf by giving us written authorisation. We may still require you to verify your identity with us.



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 through our web form or via email. These are the fastest ways to get a response to your inquiry, but you can also contact us by telephone at +61 (0)433 237 379.