Privacy Policy

What does this policy cover

Welcome to Bluepic, the online and mobile service of FellowBlue GmbH (Bluepic," "we," or "us"). Our Privacy Policy explains how Bluepic and its affiliates collect, use, disclose, and protect information that applies to our visual communication platform (the "Service"), and your choices about the collection and use of your information. Capitalized terms that are not defined in this Privacy Policy have the meaning given to them in our Terms of Use. If you do not want your information processed in accordance with this Privacy Policy in general or any part of it, you should not use our Service. This policy applies to all users of the Service, including, but not limited to users of our Developer Portal.
This privacy policy explains how and which personal data we collect and pass on to third parties when you use the software products offered on our website "bluepic.io" (Bluepic Studio, Bluepic Social, Bluepic Social Shared, Bluepic Embedded, We Build Your Templates). We are aware of the importance of handling personal data and assure you that we comply with legal regulations in this regard. The protection of your privacy is of essential importance.

Contact If you have any questions, comments or concerns regarding data protection within our software products, please contact us by post or e-mail:

Fellow Blue GmbH
Grüner Brunnenweg 162
50827 Köln

Maurice Conrad
privacy@bluepic.io

Definition of personal data

Personal data is all information about the personal or factual circumstances of an identified or identifiable person. This can be information such as: your name, your date of birth, your e-mail address, your postal address, your telephone number, your cell phone number, information about your device (e.g. IP address, a numerical code used to identify your device, which may provide information about the country, region or city in which you are located); - information about your personal circumstances and how you use our websites and services.

Legal basis

Your data will be treated in accordance with the following legal provisions:

- With regard to data transmitted with your consent for contacting you, newsletters, etc., Art. 6(1) lit. (a) GDPR

- With regard to services that you use to fulfill a contract or when initiating a contract, Art. 6(1) lit. (b) GDPR

- Otherwise, in particular with regard to statistical data and online identifiers based on legitimate interests, Art. 6(1) lit. (f) GDPR (see below).

Our specific legal basis for the collection, use and disclosure of your data depends on the information concerned and the context in which it is processed. As a rule, however, we will only process your data if we need it to fulfill a contract with you, if it is in our legitimate interest or if we have your consent to do so. In some cases, we may also be legally obliged to process your data. The following is a general list of purposes for data collection and processing:

- Processing in connection with contacting us:
  If you contact us (e.g. by email), your data will be processed in order to carry out pre-contractual measures, to fulfill our contract with you or because it is in our legitimate interest to do so.

- General processing in the context of our business relationship:
  Where your data is processed in order to carry out business transactions and process the sale of the Service, your data is processed in order to perform pre-contractual measures, to fulfill our contract with you or because it is in our legitimate interest to do so.

- Processing for direct marketing purposes:
  When we contact you to inform you about news from our company, offers and events and to promote our own range of services, your data will be processed either on the basis of your consent or because it is in our legitimate interests to do so.

- Processing to manage security and improve our services:
We process your data to ensure system security, technically manage the service, optimize service quality and improve the service when it is in our legitimate interest to do so. We do not rely on this lawful basis if our legitimate interests are overridden by your interests.

Processing to comply with our legal obligations:
We may process your data to comply with our legal obligations, for example, for tax, accounting and audit purposes.

Third-party provider registration

We may receive information about you from third parties. For example, if you log in to the Service using a third party account (such as Facebook), we may also collect certain information from the third party that is necessary to authenticate your account, such as your email address and other information that you allow the third party to share with us. You should always check and, if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our Service. You can also unlink your third-party account from our websites by adjusting your settings on the third-party service. If you

unlink your third-party account, we will no longer receive any information collected about you in connection with that service.

Information we collect through your use of the Service

Each time you visit a page, our servers automatically record certain information that your web browser sends. This includes information such as your IP address, browser type and language, browsing and uploading behavior, other user interactions with your uploaded media, pages viewed, date and time. This data is used to ensure the stability of the service and is automatically deleted after seven days.

For more information on how we use cookies and other technologies, please see the "Cookies" section below.

Processed data, data sources and purpose of use

We collect and process personal data for the purpose of providing our software product (Bluepic Studio and Bluepic Social). Depending on use, various personal data is collected and stored for this purpose. There is no use beyond the purpose of using the software. In the following, we will provide you with a detailed breakdown of the purpose for which data is collected, whether and how it is passed on to third parties, whether and for how long it is stored and what rights you are entitled to.

Name and e-mail address

- Need: required
- Purpose: To ensure the authenticity of your person as well as the communication, we collect an e-mail address as well as a freely selectable name. From this we create a so-called "User", to which a unique Id ("User Id") is assigned.
- Storage: Permanently, you can delete this data by deleting your Bluepic user account

Access time, IP address, device information (user agent) & performance

- Need: required
- Purpose: In order to ensure the error-free and correct functioning of our software, we collect information such as the type of terminal device you are using, the browser as well as the speed of the internet connection. This data is used by us for the provision of our services and to offer a smooth and functional software, and is stored in so-called "log files". These are files in which we store your IP address, the time of use, the speed of your Internet connection and device information.
- Storage: Temporarily, for 2 weeks

Projects, Resources & Files

- Need: optional

- Purpose: The purpose of our software is to create graphics. In doing so, you can use texts, shapes and effects. Accordingly, these graphics indirectly contain the personal data that you add. And these graphics along with the resources such as fonts or images are stored with us to ensure the smooth retrieval and performance of the graphics templates.
- Storage: Temporary, project-related. You can delete these files at any time via the software.

Images and videos

- Need: optional
- Purpose: Within our software we offer, as already mentioned in the previous point, the use of resources like fonts or images. We store these temporarily for the duration of use of the respective project or graphic.
- Storage: Temporary. If you create a graphic in Bluepic Social, images you upload there will be stored as long as the graphic is in a creation process as "Draft" (draft). Within Bluepic Studio, graphics and fonts are stored until the project they belong to is deleted or the graphics are manually deleted by you before.

External fonts

- Need: optional
- Purpose: Within our software we offer not only the upload of fonts, but also the direct integration via a public link. In principle, it is possible to integrate any font that can be accessed via a public URL as a CSS file. This results in:
  1. while accessing a template/ project in Bluepic Sopcial as well as in Bluepic Studio, a connection is established with the server behind the URL. Accordingly, information such as IP address, device type and time are transmitted. You are responsible for the privacy-compliant integration of fonts to the users of your graphic templates insofar as we offer here only an interface to external resources in generic form.
  2. even if in principle the input of each URL is possible, we offer a simplified form of the integration of "Google Fonts" by displaying all Google Fonts and thus directly enable the integration via the associated URL. If you use this function in Bluepic Studio, you agree to the transfer of information such as IP address, device type and time to Google's servers in the USA, as the use of this function is optional. In such a case, the Google fonts will be displayed as examples within our software, which means that the information such as IP address, device type and time will be passed on to Google Fonts specifically during the session in Bluepic Studio. If you include such a font in your project, it will also be included each time you access the specific template/ project. Since this is a function that you have programmed yourself, for which Bluepic Studio merely provides an interface, you are also responsible for data protection-compliant use vis-à-vis third parties (e.g. through embedding) and for obtaining the necessary permissions.
- Storage: Temporary.

Payment information

- Need: optional, necessary as soon as paid subscriptions are booked.

- Purpose: We process our payments entirely through the service provider Stripe (stripe.com). This means that Bluepic Studio and Bluepic Social only link the personal and unique User-Id with a "Customer Id" within Stripe, but the payment, input of sensitive data such as address, bank details or credit card data happens through websites provided by Stripe. The software products we operate therefore have no access to this sensitive data. In order to enable the administration of the payment data and address, we link to a page specially created by Stripe for this purpose. There the data can be viewed, changed or deleted.
- Storage: Temporary. The data is collected by Stripe and is fully administrable through the interface provided by Stripe.

Analytics

- Need: necessary
- Purpose: To ensure the security of our software, we collect anonymized statistics about the use of computationally intensive processes such as rendering on our servers. In addition, as part of fulfilling our contractual obligations for the software services we provide, we collect statistics on the type and frequency of use of products such as "Spaces" or any others where the service does not include a "flat rate" on usage but rather identifies a specific quota of retrievals or entities at a given time.
- Storage: Temporary. Data is stored for as long as it is necessary to provide our software service.

Cookies

- Need: necessary
- Purpose: In order to ensure the authentication of the "users" (users) against our servers, we store data objects in the so-called "local storage" on your device. These contain so-called "tokens" with which you authenticate yourself to our servers after you have logged in. Likewise, our servers store so-called "session cookies" on your device, which ensure that the network connections you establish pass at best with the same replicas of our servers. This is necessary for the correct functioning of our software. These cookies have an automatic expiration date of 60 minutes and do not contain any personal information but only a unique ID that assigns your CLient to a specific replica of our servers.
- Storage: Temporary over 60 minutes.

Third Party Services

In order to collect the data listed above, store it or process it, we use the services of third parties. We list these below.

Stripe

- Type of data processing: Dissemination by linking
- Type of data: Address, payment information
- Direct link: Yes, but through Stripe's own software product.
- Purpose of data processing: Provision of a payment system
- Further information: Stripe Privacy Policy (https://stripe.com/de/privacy)

Cloudlfare Images

- Type of data processing: Storage
- Type of data: Images and videos uploaded and used in our software.
- Direct connection: No.
- Purpose of data processing: Provision of functions
- Further information: Cloudflare Privacy Policy (https://www.cloudflare.com/de-de/trust-hub/privacy-and-data-protection/)

Cloudlfare Workers

- Type of data processing: Network connection
- Type of data: Connection and device information.
- Direct connection: Yes.
- Purpose of data processing: Provision of functions
- Further information: Cloudflare Privacy Policy (https://www.cloudflare.com/de-de/trust-hub/privacy-and-data-protection/)

Cloudlfare S3 Storage

- Type of data processing: Storage
- Type of data: User data, files created through our software.
- Direct connection: No.
- Purpose of data processing: Provision of functions
- Further information: Cloudflare Privacy Policy (https://www.cloudflare.com/de-de/trust-hub/privacy-and-data-protection/)

Digital Ocean S3 Storage

- Type of data processing: Storage
- Type of data: User data, files created through our software.
- Direct connection: No.
- Purpose of data processing: Provision of functions
- Further information: Digital Ocean Privacy Policy (https://www.digitalocean.com/legal/privacy-policy)

Google Cloud Functions

- Type of data processing: Network connection

- Type of data: Connection and device information.
- Direct connection: Yes.
- Purpose of data processing: Provision of functions.
- Further information: Google Cloud Privacy Policy (https://cloud.google.com/terms/cloud-privacy-notice?hl=de)

Mapbox

- Type of data processing: Network connection
- Type of data: Connection and device information.
- Direct connection: Yes.
- Purpose of data processing: Provision of functions.
- Further information: Mapbox Privacy Policy (https://www.mapbox.com/legal/privacy)

Pixabay

- Type of data processing: Network connection
- Type of data: Connection and device information.
- Direct connection: Yes.
- Purpose of data processing: Provision of functions.
- Further information: Pixabay Privacy Policy (https://pixabay.com/de/service/privacy/)

Hetzner

- Type of data processing: Storage, processing and hosting of our application
- Type of data: User data, files created through our software and the entire application source.
- Direct connection: Yes.
- Purpose of data processing: Provision of general infrastructure.
- Further information: Hetzner Privacy Policy (https://www.hetzner.com/legal/privacy-policy)

Neontech

- Type of data processing: Storage Postgres Database
- Type of data: User data, files created through our software.
- Direct connection: No.
- Purpose of data processing: Provision of general infrastructure.
- Further information: Neontech Privacy Policy (https://www.neontech.io/privacy-policy/)

Mezmo

- Type of data processing: Storing log data
- Type of data: Logs
- Direct connection: No.
- Purpose of data processing: Security and performance
- Further information: Mezmo Privacy Policy (https://www.mezmo.com/privacy-policy)

Amplitude

- Type of data processing: Analytics and log data
- Type of data: Analytics
- Direct connection: No.
- Purpose of data processing: Analytics, performance and security
- Further information: Amplitude Privacy Policy (https://amplitude.com/privacy)

Posthog

- Type of data processing: Analytics and log data
- Type of data: Analytics
- Direct connection: No.
- Purpose of data processing: Analytics, performance and security
- Further information: Posthog Privacy Policy (https://posthog.com/privacy)

Twilio

- Type of data processing: Sending emails
- Type of data: Email address, notification data
- Direct connection: No.
- Purpose of data processing: Sending emails
- Further information: Twilio Privacy Policy (https://www.twilio.com/legal/privacy)

On which way we collect information:

We collect the following types of information about you:

(a) Information you directly provide to us

We may request specific details when you register for a Bluepic account or communicate with us, such as a username, your first and last names, birthdate, phone number, profession, physical address and email address. Additionally, any messages you send us via our Service (including user feedback, search queries, and prompts) and information within User Content you upload to the Service (such as text and photos used in your designs) may be collected. This information enables us to operate, maintain, and provide the Service's features to you, communicate with you, and address any concerns you raise regarding the Service.

We additionally gather any messages you transmit to us via the Service (including user feedback, search inquiries, and prompts), and we might gather details that you uploaded in User Content that you publish on the Service (such as text and photos that you upload for use in your designs). This data is utilized to manage, sustain, and deliver the features and capabilities of the Service to you, to communicate with you, and to resolve any concerns you bring up regarding the Service.

If you choose not to provide us with your personal information, you might encounter limitations in accessing or utilizing our Service, potentially resulting in a less enjoyable user experience.

Summary: We gather information from you that you willingly provide, such as when you create an account, utilize the Service, or engage with us in any other manner.

(b) Data originating from third-party applications that we receive

We might obtain information about you from external sources. For instance, if you access the Service using a third-party connection or login, such as Facebook Connect, through actions like "following," "liking," adding the Bluepic application, or linking your account to the Bluepic Service, the third party may transmit specific details regarding your usage of their service to Bluepic. This information may encompass, but is not confined to, your user ID associated with your account (e.g. your Facebook UID), an access token required for Service access, any information you've granted the third party permission to share with us, and any publicly available information related to that service. Prior to connecting or linking these third-party websites and services to our Service, it is advisable to regularly review and, if necessary, adjust your privacy settings. You can also disconnect your third-party account from the Service by modifying your settings on the third-party service. By doing so, we will no longer receive data collected about you in connection with that service. Additionally, if you opt to include elements into your designs, enhance media, streamline your workflow, or share content on social media using third-party applications, we may acquire information from these applications (as well as share information with them). In the case that you interact with us via social media platforms such as Instagram, Facebook or TikTok, and choose to share your user-generated content with us, we may receive various details, including videos you've created, your photos, your account name, and your comments related to Bluepic.

Summary: When utilizing our Service, such as when logging in via a third-party application, we may collect information about you from that specific third-party application.

(c) Data that comes to us from additional third-party sources

We may gather information about you from third-party sources, which encompass publicly available data, social media platforms like Facebook, Instagram, LinkedIn, Twitter, and others, as well as third-party data providers and information services. Examples of the data we may acquire from these third-party sources include details about your company, its size, your job title and seniority, industry, and various other profile information. To enhance our understanding of your profile and interests, we may share your email address or other relevant information, combining it with the data you provide to us or the information we collect while you use our Service. This process helps us offer personalized services and tailored offers, enabling us to serve you with relevant promotions through email, chatbots, or phone.

Certain providers have the capability to merge the data they collect from our Service using cookies, pixels, tags, and similar technologies with email or mailing addresses they have access to. This collaborative effort helps us in delivering offers to you.

If you're not already a Bluepic customer, we might acquire your contact information from a social media platform like LinkedIn or a third-party data provider. This enables us to introduce our product offerings and subscription services to you if we believe they could be beneficial in your professional capacity.

We may have also received your information from another Bluepic user, particularly when they have shared a design with you.

Additionally, we may receive data about you and your interaction with our advertisements from our ad servers, ad networks, and social media platforms. This information may encompass the websites you visited prior to accessing Bluepic, which helps us assess the effectiveness of our advertising efforts and compensate our referral partners accordingly.

If you wish to refrain from having your information utilized for this purpose, you have the option to opt out at any time by sending an email to us at privacy@bluepic.io.

 (d) Data that is collected from you automatically

We will collect or generate specific information regarding your utilization of the Service, such as user activity data, analytics event data, and clickstream data, directly for the purposes of data analytics and machine learning. This data aids us in measuring traffic patterns and usage trends for the Service. Additionally, we may employ third-party analytics tools that automatically gather information transmitted by your browser or mobile device. This includes the pages you access and other relevant data that contributes to the enhancement of the Service. For more detailed information, please refer to the sections below on cookies information, log file data, clear gifs, device identifiers, and location data.

Summary: We automatically collect and generate specific information about your usage of our Service. This assists us in delivering and enhancing the Service for your benefit.

 (e) Data derived from cookies and other comparable technologies

When you access the Service, both we and our third-party partners utilize cookies, which are small text files containing a unique string of alphanumeric characters. These cookies serve various purposes, including speeding up your login process, enhancing your navigation on the website, remembering your preferences, and overall improving your user experience.

Additionally, cookies provide us with insights into how you use the Service, such as the pages you visit, the links you click, and other actions you perform while using the Service. They also enable us and our business partners to monitor your usage of the Service over time, measure traffic and usage patterns, deliver personalized advertisements that align with your interests, assess the effectiveness of these ads, and identify potential new users for the Service.

You have the ability to manage or reset your cookies and similar technologies using your web browser. This allows you to tailor your cookie preferences, including the option to reject all cookies or receive notifications when a cookie is being sent. It's important to note that disabling the acceptance of cookies may impact the proper functioning of certain features within the Service.

For a comprehensive understanding of how we utilize cookies and other technologies, as well as detailed information on how to control them, please consult our Cookies Policy (#action:cookie-info).

(f) Log file information

Log file information is reported automatically by your browser or mobile device each time you visit the Service. When you utilize our Service, our servers automatically document specific details in these server logs. This information may consist of anonymous data such as your web request, browser type, referring/exit pages and URLs, the number of clicks, your interactions with links on the Service, domain names, landing pages, pages you viewed, and other related information.

Summary: Every time you load a page on Bluepic, your browser transmits information about itself and your interactions with our Service. This information is then stored on our servers.

(g) Information related to clear gifs or web beacons

When you utilize the Service, we may utilize clear GIFs, also known as web beacons, for the purpose of anonymously monitoring the online usage patterns of our users. Furthermore, clear GIFs may be employed in HTML-based emails that we send to our users to track the opening of emails and the clicking of links by recipients. This data enables us to provide more precise reporting and enhance the Service accordingly.

Summary: We may utilize small images to monitor the number of individuals who open our emails and visit our website.

(h) Device identifiers

When you use the Service on a device, which can include smartphones or tablets, we may access, gather, and monitor one or more "device identifiers," such as a universally unique identifier (UUID). These device identifiers are small data files designed to uniquely identify your mobile device. They may provide us with information regarding your usage of the Service. A device identifier can persistently remain on your device, assisting you in logging in and navigating the Service more effectively. It's important to note that if the use of device identifiers is restricted, certain features of the Service may not function correctly. Among the device identifiers employed by Bluepic are the Android Advertising ID and iOS Advertising Identifier.

Summary: Your phone or device transmits information to us regarding your usage.

(i) Location data

Bluepic gathers location information from its users for several purposes. This data is utilized to customize and localize content, adhere to local regulations, perform aggregated analytics, ascertain whether users employ Bluepic for personal, business, or educational purposes, enhance advertising effectiveness, and estimate Bluepic's tax obligations.

We may gather your specific or approximate location:

- directly from you, when you provide, update, or verify your location (e.g., during product purchases);
- by deducing your location based on your IP address; and
- through our partners or your payment service provider.

#(j) The content stored within your account

We collect the content that you generate within your Bluepic account, including media you upload for use within the platform, such as designs, images, documents, videos, and associated metadata.

Summary: Bluepic gathers the content you upload to your account.

Our utilization of your information

We use the information we gather about you for the following purposes:

- Supplying the Service to you: We utilize the information you provide us directly to provide the Service, including functions such as enabling your login to Bluepic, managing and upkeeping the Service, granting access to your designs, and processing transactions you initiate through the Service. Furthermore, we rely on automatically collected information to remember your details, eliminating the need for you to repeatedly input them during your current visit or on future visits to the site.
- For the purpose of data analytics: We utilize your information to assist us in enhancing the Bluepic Service and the overall experience of our users. This includes activities such as monitoring aggregate metrics like the total number of visitors, traffic patterns, and demographic trends.
- For analytics and machine learning purposes: We may analyze your activities, content, media uploads, and associated account data to deliver and personalize the Service. Additionally, we employ machine learning to train our algorithms, models, and AI products and services, with the aim of enhancing and expanding our Service. You have the option to control the utilization of your data for AI training through the privacy settings available in your account settings (https://id.bluepic.io). These activities include, but are not restricted to:
- Labeling and identifying elements in images to enhance our tools.
- Detecting content for moderation issues and security purposes, such as identifying pornographic or copyright-protected material.

- Translating audio.
- Predicting the most suitable subscription or product offerings for a user to personalize communications and advertising.
- Analyzing search terms and corresponding search result interactions to develop algorithms that deliver the most pertinent design results.
- Customizing the Service for you: We use and combine the information you provide us and information about you that we collect automatically and receive from other sources (including information we receive on and off our Service) and combine it with information about the behavior of other users to make sure that your use of the Service is customized to your needs. For example, to recommend templates, ingredients, and fonts that are likely to be useful to you in a design, we may use information derived from your prior behavior on our Service, the use of these elements by other people working on similar designs, and other inferred information.
- To communicate with you about the Service: We use your contact information to get in touch with you and to send information about critical elements of the Service. For example, we may send you emails about technical issues, security alerts, or administrative matters.
- To promote and drive engagement with the Bluepic Service: We use your contact information to get in touch with you about taking part in our surveys or about features and offers relating to the Service that we think you would be interested in. We also use information we collect about you to make sure that you get the most relevant offers and promotions based on your use of the Service and your preferences. You can opt-out of these communications as described below.
- To improve the Service: We analyze information about your use of the Service and your content to better understand how users are engaging with our Service and measure the effectiveness of the Service so we can make improvements and develop our services for users.
- Customer happiness: We use information about you, information that we collect from within your account, information that you provide to our customer happiness team, and information about your interactions with the Service to resolve technical issues you experience with the Service and to ensure that we can repair and improve the Service for all Bluepic users.
- For security measures: We use information about you and from within your account to monitor activity that we think is suspicious or potentially fraudulent, and to identify violations of this Privacy Policy or our Terms of Use (https://id.bluepic.io/AGB-BLUEPIC-2023.pdf).
- For matters that you have specifically consented to: From time to time, Bluepic may seek your consent to use your information for a particular purpose. Where you consent to our doing so, we will use it for that purpose. Where you no longer want us to use your information for that purpose, you may withdraw your consent to this use.
- For troubleshooting, error resolution, and service improvement: We may need to review your designs to support your request for help, correct general errors with the Bluepic Service, or improve our services.
- For matters that we are required to use your information by law: Bluepic will use or disclose your information where we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use and our Acceptable Use Policy or to protect the security or integrity of our

Service; and/or (c) to exercise or protect the rights, property, or personal safety of Bluepic, our users, or others.

Summary: Bluepic utilizes your information for various purposes, including the provision, customization, and enhancement of the Service.

Sharing your information

(a) Here's how we disclose your information:

We disclose your information to third-party service providers for the following reasons: to deliver the Service to you, to support Bluepic's legitimate interests, or when you give your consent. We carefully assess and select these service providers, and they will only be granted access to your information as required for the specific purpose for which Bluepic has engaged them. We insist that these third parties adhere to relevant laws and maintain security, privacy, and data retention practices that align with our policies.

Some of the third parties with whom Bluepic may share your personal information are service providers who assist Bluepic with functions such as:

- Billing;
- Customer support and customer management;
- Email services;
- Hosting and storage;
- Data analytics and predictive analytics;
- Data labelling and machine learning;
- Security;
- Advertising and marketing services;
- Domain name registration;
- Delivery of physical products; and
- Other service providers.

Summary: To provide you with the Service and serve Bluepic's legitimate business interests, we may share specific information about you with our business partners and third-party service providers.

(b) Ways to share your User Content

(i) Spaces

Any resources related to a project in Bluepic Studio and the project itself get accessible by all members of a space you have attached to the project. This includes images, fonts and anything else that is part of your project. You should ensure that any personal information, confidential information, or User Content that you'd like to keep private is not shared via a space.

If you accept an invitation to join a space, you will be able to see all projects and resources that are shared with that space. This will also make your personal information provided to your user account such as
- your name
- your profile picture
- your email address
be visible by all other members of the space.

(ii) Shared files

Aside of the ability to share projects via spaces, you can directly give a user access to a project or a folder of projects via Bluepic Studio. Giving a user access to a folder will lead to read and write access to all related files Giving access to a single project file will lead to full-access to this file. Also, if you provide access to a file that is part of a folder, the user has no dedicated access to, this will give the user read acces over the folder name and its unique ID. So do not provide personal information, confidential information, or User Content that you'd like to keep private via a shared file, a shared folder or the folder name of a shared file.

If you accept an invitation to join a shared file or folder, you will be able to see all projects and resources that are shared with that file or folder. This will also make your personal information provided to your user account such as
- your name
- your profile picture
- your email address
be visible by all other members of the shared file or folder.

(iii) Bluepic Embed

We provide you the ability to make a template/project public by subscribing to the "Bluepic Embed" product. This will give anyone with the unique the embed template URL access to the template file and all related resources. Please be aware not to expose any personal information, confidential information, or User Content that you'd like to keep private via a public embed template. You can read more about Bluepic Embed in the section under the headline "Bluepic Embed".

(c) Sharing related to a merger, acquisition, or restructuring

Bluepic may also disclose, sell, or transfer your information to third parties in connection with, or in anticipation of, any merger, acquisition, reorganization, financing, asset sale, bankruptcy, or insolvency event involving Bluepic or any part of our assets, services, or businesses. This may include the sharing of information such as customer names, email addresses, User Content, and other user-related data associated with the Service. If such a transaction occurs, you will be notified via email and/or a notice on the Service, and you will be informed of any significant changes to how we manage your data under this policy.

Summary: In the event that we sell our business, any information we have gathered about you may be included as part of the sale.

(d) Sharing with additional third parties

Bluepic may also disclose your information to third parties in specific situations, such as when you provide consent for us to share it with a third party for a particular purpose.

You or your account administrator have the option to collaborate with third-party products that are integrated into Bluepic (such as Figma, YouTube, Google Drive, Microsoft Outlook Drive, Pixabay, Mapbox, Cloudflare Images, or Dropbox) to enhance your media or streamline your workflow (such as with LinkedIn or Slack). For instance, you might install a third-party document sharing app to store, share, and edit content via our Service. Utilizing third-party products or integrating with third-party applications could involve importing data from that third party into Bluepic and/or exporting data from Bluepic to that third party. To do this, you may need to connect your Bluepic account with your account on the third-party application, and permission will be requested accordingly.

(i) Third-party applications that you or your account administrator opt to integrate with Bluepic

- Google Drive. Privacy Policy: https://policies.google.com/privacy?hl=en-US
- Microsoft Outlook Drive. Privacy Policy: https://privacy.microsoft.com/en-US/privacystatement
- Dropbox. Privacy Policy: https://www.dropbox.com/privacy
- Figma. Privacy Policy: https://www.figma.com/privacy
- YouTube. Privacy Policy: https://policies.google.com/privacy?hl=en-US
- Pixabay. Privacy Policy: https://pixabay.com/service/privacy/
- Mapbox. Privacy Policy: https://www.mapbox.com/legal/privacy/
- Cloudflare Images. Privacy Policy: https://www.cloudflare.com/de-de/trust-hub/privacy-and-data-protection/

(e) Sharing summarized data

We may also compile or anonymize data by removing all personally identifiable attributes and then share this anonymized data with third parties.

Summary: We may disclose anonymized data to third parties.

Sharing with law enforcement or authorities

We access, retain, and disclose your information in compliance with the legal obligations of the country in which we are operating. This may include sharing your information with regulatory bodies, law enforcement agencies, police, intelligence sharing organizations, and others as required by law.

Summary: We may disclose data to authorities in compliance with the legal obligations of the country.

The methods by which we transfer, store, and safeguard your data

Your information and the data we collect from you will be stored in the following geographic locations:
- European Union (EU)
- United States of America (USA)
- Australia (AU)
- Singapore (SG)

Bluepic may transfer the information we collect about you, including personal information, to affiliated entities and other third parties across borders and from your country or jurisdiction to other countries or jurisdictions worldwide. Consequently, your information, including personal information, may be transferred to a country and jurisdiction that may not have the same data protection laws as your own. Nevertheless, we always take measures to ensure that your information remains safeguarded, regardless of where it is stored and processed, in accordance with applicable laws. When necessary under applicable laws, you provide consent for the transfer of information to the EU or any other country in which Bluepic, its parent, subsidiaries, affiliates, or service providers have facilities, and for the utilization and disclosure of your information as outlined in this Privacy Policy.

Summary: We may transfer your data to other countries, but we will consistently implement measures to ensure that your information remains secure, adhering to applicable laws and regulations.

Ensuring the security of your information

Bluepic prioritizes the security of your information and employs appropriate measures to maintain the integrity and safety of all data gathered through the Service. To safeguard your privacy and security, we implement reasonable measures, such as requiring a unique password, to verify your identity before granting access to your account. It is your responsibility to keep your unique password and account details confidential and to manage access to your email communications from Bluepic. However, please be aware that Bluepic cannot guarantee the security of any information you transmit to Bluepic, and we cannot guarantee that data on the Service will not be accessed, disclosed, altered, or compromised. Additionally, changes to the functionality of third-party sites and services integrated with the Bluepic Service, such as social networks, may affect your privacy settings. Bluepic is not accountable for the functionality or security measures of any third-party services.

Summary: We prioritize the security of your data and have put in place industry-recognized measures to safeguard it. However, it's important to understand that we cannot provide an absolute guarantee that no security incidents will ever occur.

Bluepic Embed

We provide you the ability to make a template/project public by subscribing to the "Bluepic Embed" product. This will give anyone with the unique embed template URL access to the template file and all related resources. Please be aware not to expose any personal information, confidential information, or User Content that you'd like to keep private via a public embed template.

When visiting an embedded template, we store the following information about you anonymously:
- Your IP address
- Your browser type
- Your device type
- Your operating system
- Your country
- Time of visit
- Time of leaving

Rendering

On an embedded template page, you can type any input provided by the template's form. We store all provided information temporarily in order to render the template for you. Be aware of not exposing critical information such as passwords or credit card information. We will not store any of this information permanently but if you provide them, they will be stored temporarily on our servers. We will not use this information for any other purpose than rendering the template for you. We will not share this information with any third party. If you have questions about this, please contact us at privacy@bluepic.io

Frame-Communication

An embedded template can be embedded by a third-party who uses our "Bluepic Embed" product. This means that the template is loaded in an iframe on the third-party's website. In order to provide the best experience for you, we need to communicate with the third-party's website. This communication is limited to the following:
- We send a message to the third-party's website when the template is loaded.
- We send a message to the third-party's website when the template is closed.
- We send a message to the third-party's website when the template is rendered.
- We send the given data to the third-party's website to enable the application to communicate, modify or delete the information by its own means.

We are not responsible for the privacy practices of the third-party's website data usage.

Your choices about your data

(a) You have control over your account data and settings.

We offer options regarding the processing of your account data:

- You can correct, download, or delete the data in your account through the settings in Your Account.
- You can request access, correction, or deletion of the data Bluepic holds about you by contacting privacy@bluepic.io
- You can choose to stop receiving marketing messages in the "Message Preferences" section of Your Account settings here (https://id.bluepic.io/me) or by clicking the "unsubscribe link" provided in such communications. Please note that you may not opt out of Service-related communications, such as account verification, purchase and billing confirmations and reminders, and changes/updates to features of the Service, as well as technical and security notices. You also have the option to disable all kind of messaging in the settings, but be aware that this may result in not receiving important information.

Summary: You have the authority to manage your account settings, including your account information and marketing e-mail preferences. However, please note that there are certain essential notifications that we will always send to you. If you have any inquiries regarding reviewing or amending your account information, you can reach out to us directly at privacy@bluepic.io

(b) Choosing not to have your information collected through tracking technologies

Please refer to the technical information provided by your mobile device or browser for guidance on how to delete and disable cookies and other tracking or recording tools. It's important to note that depending on your device type, it may not be possible to delete or disable tracking mechanisms on your mobile device. Disabling cookies and other tracking tools will prevent Bluepic and its business partners from tracking your browser's activities related to the Service, as well as from using this information for targeted advertising, including on third-party websites. However, please be aware that doing so may disable numerous features available through the Service. If you have any questions regarding opting out of the collection of cookies and other tracking or recording tools, you can consult our Cookies Policy (#action:cookie-info) or contact us directly at privacy@bluepic.io

Summary: If you wish to cease the collection of information about you, you may have the option to adjust settings in your browser or device. However, please note that without this information, Bluepic may not be able to provide a personalized experience for you, which could make it more challenging to find the content you are seeking.

(c) Opting out of enrichment using third-party data

As previously explained, we may merge information about you with data acquired from third-party sources to gain a deeper understanding of your profile and preferences, enabling us to provide customized offers and personalized services. If you prefer not to have Bluepic

collect additional data about you from third-party providers to customize your experience and the messages we send you, you can opt out by contacting us at privacy@bluepic.io or by using the opt-out options provided here (#action:cookies-manager).

Summary: You have the option to decline receiving promotions from Bluepic that are based on information we acquire from third parties, such as your job title and employer.

(d) Your rights concerning your information

In specific countries, including the European Union, United Kingdom, and Brazil, individuals have the following rights regarding their personal information:

- The right to request access to their information.
- The right to request the correction of inaccuracies in their information.
- The right to request the deletion of their information or the restriction of access to it.
- The right to request a structured electronic copy of their information.
- The right to object to the use of their information.

These rights are subject to applicable laws and may vary based on your location. If you wish to exercise any of these rights, please contact us at privacy@bluepic.io

If you wish to make a request regarding your personal information, please contact us at privacy@bluepic.io You also have the right to object to our processing of personal data for marketing purposes, and we will stop processing data for that purpose.

In certain circumstances, Bluepic may not be able to comply with your request concerning your personal data. If we are unable to remove any of your information, we will explain the reason for this. For example, we may not be able to provide a copy of your information if it infringes on the rights of another user. In some cases, if you have shared your information with third parties, such as by publishing a design on a third party's website, Bluepic will not be able to delete the information, and you will need to contact that third party directly.

If we are unable to resolve your request or if you are concerned about a potential violation, you also have the option to report the issue or make a complaint to the data protection authority in your jurisdiction. If you have provided your consent to certain processing and no longer want us to use your information for that purpose, you may withdraw your consent to this use. Please note that withdrawing consent will not affect the lawfulness of processing based on consent before its withdrawal. For more options on how to opt out of marketing communications, change the related settings in your user account settings)(https://id.bluepic.io/me).

Summary: You may have specific rights regarding your information depending on your location. Bluepic offers various controls through Your Account settings, and you can exercise your privacy rights by contacting us at privacy@bluepic.io.

#How long we keep your information

After your user account is terminated or deactivated, Bluepic will retain your profile information and User Content for a reasonable duration, as deemed commercially appropriate, and for as long as there remains a legitimate reason to do so. Specifically, Bluepic will keep this information to fulfill its legal and auditing responsibilities and for backup and archival purposes.

Summary: We keep your profile information and user content to ensure the provision of our Service to you and to fulfill our legal and regulatory obligations.

Links to other websites and services

We want to emphasize that we are not responsible for the practices of websites or services that are linked to or from the Service, including the information or content they contain. It's important to keep in mind that when you click on a link that takes you from our Service to another website, our Privacy Policy does not apply to those third-party websites or services. Your actions and interactions on any third-party website or service, even if they have a link or advertisement on our site, are governed by the rules and policies of that specific third party. Additionally, we want to make it clear that we do not have control over any third parties you authorize to access your User Content. If you decide to use a third-party website or service (like Facebook) and grant them access to your User Content, you do so at your own risk. It's important to note that this Privacy Policy only pertains to information we collect through the Service and does not cover information collected through other means, including offline interactions or from sources other than our Service.

Summary: When we provide a link to a third-party website on Bluepic, it's important to understand that we cannot control the activities or practices of that external website. The same principle applies if you choose to allow another website to access your data on Bluepic. In such cases, the usage and handling of your information will be subject to the Privacy Policy of the respective third party.

Additional information for users in the EU, Switzerland, and UK

This part of the policy pertains to Bluepic users situated within the European Economic Area (EEA), Switzerland, or the United Kingdom (UK). Bluepic handles your personal data in compliance with European legal standards and regulations, including the General Data Protection Regulation (GDPR) and the UK General Data Protection Regulation (UK GDPR).

(a) Details

In accordance with the GDPR and UK GDPR, FellowBlue GmbH acts as the data controller for your personal information. You can reach FellowBlue GmbH at Grüner Brunnenweg 162, 50827 Cologne, using the contact information provided in section 2 under the "Contact" heading.

Under certain circumstances, we may process personal data as a data processor on behalf of our customers. The specific situations in which Bluepic acts as a data processor are outlined

in our Terms of Use (https://id.bluepic.io/AGB-BLUEPIC-2023.pdf). If you have any questions or concerns about how your personal data is managed by one of our customers, please get in touch with the respective customer using our Service, and refer to their individual privacy policies for more information.

(b) Legal bases for processing your data

If you are located in the European Economic Area (EEA), Switzerland, or the United Kingdom (UK), we are required to have a lawful basis for collecting, using, and disclosing your personal data as a data controller. The specific lawful basis we rely on will depend on the nature of the information and the circumstances in which it is processed.

In general, Bluepic collects and uses your information based on the following lawful bases:

- Contractual necessity: We collect and use your information to provide you with the Service and fulfill our obligations to you under our Terms of Use (https://id.bluepic.io/AGB-BLUEPIC-2023.pdf). This includes tasks such as creating and maintaining your account, resolving any issues you may encounter with the Service, processing payments for our services, and granting you access to your designs.

- Legitimate interests: We process your information to serve our legitimate interests. This includes providing you with a useful and personalized Service, sending you relevant marketing messages, displaying advertisements and assessing their effectiveness, utilizing data we gather about you (such as your spending habits, platform usage, occupation, and employer) to make informed predictions, decisions, and offers for our users. We also use your information to help users connect with team members and their employer's subscription on Bluepic, as well as to enhance our Service through research and development, data analytics, data labeling, machine learning, and predictive analytics related to your usage data. However, we do not rely on this lawful basis if your rights and interests override our legitimate interests.

- Consent: We may use your information as you've consented, for example, to inform you about new features or offers and for machine learning and predictive analysis related to your User Content. You can withdraw your consent at any time. Depending on the situation, you can withdraw your consent by emailing privacy@bluepic.io(privacy@bluepic.io) or by adjusting your preferences in your account settings (https://id.bluepic.io/me).

- Legal obligations: We may process your information to comply with our legal obligations, such as disclosing your information in response to law enforcement requests and retaining your information for record-keeping purposes.

If we process your information based on legitimate interests, you have the right to object to such processing by contacting privacy@bluepic.io(privacy@bluepic.io). However, please be aware that objecting to such processing may impact the quality of the Service you receive or may prevent you from using certain features of the Service.

(c) Information transfers cross-border

When you sign up for Bluepic, you acknowledge and agree that FellowBlue GmbH, an entity in Germany, will receive and process your personal data. We may also transfer your personal data to other countries where our service providers are located. Please be aware that some of these countries may have data protection laws that differ from those in your own country, and in some cases, they may not offer the same level of protection.

For Bluepic users in the European Economic Area (EEA), Switzerland, or the United Kingdom (UK), if we transfer your information to a third-party service provider located outside of Europe and not in a country that has received an adequacy decision from the European Commission, UK authorities, or Swiss authorities, we will ensure that these third-party providers enter into agreements that include appropriate safeguards for the protection of your information. This may include using mechanisms such as the EU Model Clauses and the UK International Data Transfer Addendum to safeguard your data.

Information for users in the United States

The following section of this policy pertains to Bluepic users located in the United States. Depending on the specific state you reside in, you may have additional privacy rights under state privacy laws. These laws include the California Consumer Privacy Act as amended by the California Privacy Rights Act, the Virginia Consumer Data Protection Act, the Colorado Privacy Act, and the Connecticut Data Privacy Act.

(a) Categories of personal information collected by Bluepic

If you want to learn more about the specific personal information that Bluepic has collected in the past year, please refer to section 1, titled "Information we collect" in this policy. For comprehensive information about how we use this data, who we share it with, and our data retention practices, please consult section 2, titled "How we use your information," section 3, titled "Sharing your information," and section 8, titled "How long we keep your information."

(b) Rights in respect of your personal information

Under these state privacy laws, resident users have various rights concerning the personal information we collect, including the following rights (subject to applicable law and certain limitations):

1. Request access to the personal information that Bluepic has collected about you.
2. Request that Bluepic deletes your personal information.
3. Request that Bluepic corrects inaccurate personal information.
4. Opt out of the "sale" of your personal information.
5. Opt out of the "sharing" of your personal information for cross-context behavioral advertising.
6. Appeal decisions where we deny your rights request.

If you wish to exercise these rights, please contact us at privacy@bluepic.io We will verify your request using the email address associated with your Bluepic account, and in some cases, we may require proof of residency. Depending on applicable state law, you may also appeal a refusal to take action on a request by contacting us at privacy@bluepic.io

You can opt out of the "selling or sharing" of your personal information, which may include us sharing your information with third-party advertising partners, as described in section 4 titled "Advertising," or providing your employer with information confirming whether or not you use Bluepic using their email domain, as described in section 3(d) titled "Your employer." You can opt out by following the instructions on the "Do not sell or share my personal information" banner, or by emailing privacy@bluepic.io

Changes to this Policy

We may periodically update this policy to align with our current practices and ensure compliance with applicable laws. When we make changes to this policy, we will modify the "Last Updated" date at the top of the policy. In the event of significant alterations to the way we collect, use, store, and share your personal information, we will notify you through our website or by sending an email to the email address associated with your Bluepic account. We advise you to check this page periodically to stay informed about any policy changes.