# JetBrains Privacy Policy

**Version 2.2, last updated: July 26, 2019**

In this Privacy Policy, we describe the types of data, including personal data (collectively, "data"), that we and our associated companies collect from you when you use JetBrains Websites and certain JetBrains products and services as described in this Privacy Policy (collectively, our "services"), how we and our associated companies use and disclose that data, and your options to access or update your data.

This Privacy Policy may be amended from time to time. The respective latest version of the Privacy Policy at the point of time of the purchase or registration of a JetBrains Software Product (whichever occurs later) shall apply. The data controllers are JetBrains s.r.o., Praha 4, Na Hřebenech II 1718/10, PSČ 140 00, Czech Republic, and the associated companies of JetBrains.

JetBrains and its associated companies act as joint data controllers, who are jointly responsible for compliance with data protection legislation. JetBrains s.r.o. is primarily responsible for exercising of rights of data subjects and providing information about data processing.

## Definitions

The following definitions are used throughout this Privacy Policy:

**JetBrains Software Product**. Any software product owned or created by JetBrains and provided under JetBrains' Subscription Agreement or other JetBrains' Agreement EXCLUDING software that can be used by JetBrains software products but is not created by JetBrains. This may include, but not be limited to, code that extends the functionality of a JetBrains software product (e.g., a "plugin"). Any such code is governed by its own terms and conditions and privacy policy.

**JetBrains Downloadable Software Product**. Any JetBrains Software Product that can be downloaded and installed on a device.

**JetBrains Software as a Service**. Any JetBrains Software Product that is offered as a hosted solution, where the software is installed and maintained by JetBrains and provided to you as a service.

**JetBrains Website**. Any website that is the property of JetBrains s.r.o. ("JetBrains", "we"), including but not limited to everything hosted under the domains listed at https://www.jetbrains.com/legal/websites/.

**JetBrains Account**. An account you create and which JetBrains may use in communicating with you or providing JetBrains Products to you, which contains your first name, last name, email address, and username. It is accessed via a username and password and can be used to manage your Personal Data.

**JetBrains Terms of Use** means JetBrains Subscription Agreement, JetBrains Terms of Use for a product or a service, JetBrains License Agreement, or other agreements you have in place with JetBrains covering JetBrains Products or services.

JetBrains Software Products, JetBrains Downloadable Software Products, JetBrains Website, and JetBrains Software as a Service may be collectively referred to as "**JetBrains Products**".

**Personal Data** means any data relating to an identified or identifiable natural person.

## Why We Collect Data and What We Collect

We collect data for various reasons, such as:

a) **To provide you with software, services, or information**. We may collect data which are required to provide you with the software, support, and services, including checking for license validation and updates, provision of support, reporting of issues and bugs, and other processing connected with use of JetBrains software, services, or information. We may use collected data in our development and testing of products and services. You explicitly fill in the data required for you to receive the software, support, or services, whether you purchase or use JetBrains Products, use

our support forums, sign up for a JetBrains Account, register for a webinar, participate in a survey, and/or subscribe to receive marketing and/or technical information and content, or these data are collected in the course of use of JetBrains Products. We may use third-party service providers, acting as data processors, to assist us in providing JetBrains Products to you or in our operations. For example, we may use third-party service providers to provide data storage and backup services. With your consent, your Personal data may also be transferred to third-party service providers, acting as separate data controllers, who provide products and services complementary to JetBrains Products (further data processing performed by these service providers is governed by their privacy policies). The legal basis for this data processing is performance of contract between you and us.

b) **To protect us from piracy and unlawful use of our software or services**. We may collect data which are required to protect us from any piracy, unlawful, or unauthorized use of our software or services, or which are necessary to ensure security of our software or services, including both data provided by you (see above) and data collected in the course of use of JetBrains Products. The legal basis for this data processing is JetBrains' legitimate interest in protection from piracy and unlawful use of JetBrains software and services.

c) **To improve our offerings based on usage**. We may collect data based on your use of JetBrains Products and services, and we do not associate these data with your name. We use these data to better understand the usage patterns of our products and the behaviors of our collective audience. At times we may share this information in aggregated anonymous form with third parties. Collection of data based on your use of JetBrains Downloadable Software Products is done only if you permit it. The legal basis for this data processing is our legitimate interest in improving our software and services.

d) **For internal evidence of JetBrains and to protect the rights and interests of JetBrains and other users**. We may collect data which are required to keep evidence of provision of software and services to you, of any communication between you and us, of your contact details, of your use of our software and services, of any payments or refunds, and of any issues or disputes between you and us. We may use and disclose these data where we believe, in our sole judgment, that it is legitimate and appropriate to do so to protect our rights and interests and the rights and interests of other users of JetBrains Products or services, or where we believe there has been a violation of this Privacy Policy that could affect the interests of JetBrains or its customers. The legal basis for this data processing is our legitimate interest in keeping internal evidence and protecting the rights and interests of us and other users.

e) **To promote and market our products and services**. We may use feedback that you provide voluntarily on our products or services. As permitted by applicable law, we may use this in the form of quotes or in other ways in accordance with the JetBrains Terms of Use. We also may use data that we collect and aggregate to assist us in determining appropriate marketing and advertising for our products and services. In doing so, we may share anonymous aggregated data with third parties to assist us with these efforts. With your consent or if permitted by applicable law, we may also use your contact details to send you commercial communications about our products and services. We also may use third-party service providers to assist us with our email marketing; in that case, the third-party service provider will have access to your email address, your name, and other information necessary to engage in the marketing. Such third-party service provider will act as a data processor and will not use your data for any other purpose. The legal basis for this data processing is our legitimate interest in promoting and marketing our products and services.

f) **To fulfil legal duties stipulated by accounting, taxation, and other laws**. We may use and disclose your personal data where required by law, such as in keeping and disclosing our accounts, in keeping and disclosing our tax records, and in response to a court order, valid subpoena, or other legal process. The legal basis for this data processing is our compliance with our legal obligations.

You may object to the processing of your personal data for the purposes b) to e) at any time.

Categories of data involved in data processing include:

- names,
- email address,
- phone number,
- username,
- password,
- cookies,
- IP address,

- SSH public key,
- physical address,
- information about subscription and payments,
- tax ID,
- data about usage of JetBrains products and services,
- comments, voluntarily provided feedback, and any data provided in survey responses,
- data in issue reports pertaining to JetBrains products and services.

Where appropriate, we will prompt you to give us your consent to the collection and processing of your data as described above. This may happen within JetBrains Products, on JetBrains Website, or in another environment set up by JetBrains, always in a clear and conspicuous manner. You can manage your data and opt-outs as described in the Transparency section below.

## Children

Our products and services are not designed for and are not offered to children under the age of 13. If we discover that a person under the age of 13 has submitted information directly to us, we will endeavor to delete the information from our systems.

## Transparency

To respect your privacy, before using your personal data, we will inform you about the categories of data we collect and the purposes we use them for. We will also inform you about the data management options that you may have. For this purpose, we use agreements, terms of use, and consent notices embedded in JetBrains Products and services, which are available here. Should you wish to access and manage your data, you can do so here, you can update and manage your data and also provide us with an opt-out of certain personal data collection.

## Sharing

Collected personal data are shared based on Subscription Agreement, License Agreement, Terms of Use of a product or service in use, and this Privacy Policy. Additionally, we share collected personal data within the JetBrains group of companies described above, which act as joint data controllers and process personal data for the purposes described above.

According to JetBrains Terms of Use covering a particular product or service, as part of the product or service functionality, collected personal data may be shared with other representatives of your company.

We may share your data with certain third parties which help us provide you with JetBrains Products or services, or to run our business, for example to providers of data storage and backup services. We may also share your data with individual representatives of your company.

Your personal data may also be shared with other organizations or individuals if we have obtained your consent to do so.

We may also share your data with certain third parties if we are obliged to do so under applicable legislation (especially with tax authorities or with other government bodies exercising their statutory powers) or if such sharing is necessary to achieve the purposes defined above (especially with government bodies or with parties harmed by your illegal acts, if applicable).

## Security

To secure your personal data, our products and services are designed with security and privacy in mind.

We encrypt your data in transfer and at rest where it is technically feasible. External web resources are protected by SSL encryption.

We review the processes of personal data usage before implementing them. This is done to minimize data usage and to make sure that you as the data owner is informed about the processing. When the reason for data storage expires, we remove your personal data from our servers or anonymize it for further usage. By the nature of the activity within which your data is collected, it may appear in datasets used for research. Before using the datasets for research or other purposes you are not informed of, we remove or anonymize your personal data in the datasets.

We use partners to host our services and websites and to process your data in accordance with this Privacy Policy. While choosing the partners, we ascertain their compliance with legal regulations and security standards to make sure your data are stored in a secure location with appropriate security measures in place.

### Location of Your Information

Any servers or services that contain personal data are located within the EU. For Software as a Service products, we provide the option for our customers to choose between hosting their instance in the EU or in other regions. At times, JetBrains may process or transfer some of your personal data (such as name and email address) to our affiliate companies outside of the EU. Any such transfer will be made in accordance with the applicable laws on data protection and this Privacy Policy and will be based on a relevant adequacy decision of the European Commission, especially on standard data protection clauses or Privacy Shield decision.

### Third-Party Links

JetBrains Websites may contain links to other websites provided by third parties not under JetBrains control. When following a link and providing information to a third-party website, please be aware that JetBrains is not responsible for the data provided to that third party. This Privacy Policy only applies to JetBrains Websites, so when you visit other websites, even when you click on a link posted on JetBrains Websites, you should read their own privacy policies.

### Data retention, withdrawal of approval, access to data and your rights

If at any time you choose to cease using JetBrains Products, you may ask for your data to be removed from our servers by sending a request to privacy@jetbrains.com or via your JetBrains Account. After the data removal, we may keep pseudonyms of your personal data solely for a record about the data removal. Generally, we retain your data as long as we need to in order to achieve the purpose for which it was collected. We may retain your information if it is required to comply with legal obligations and/or defense in case of violation of JetBrains Terms of Use and/or Privacy Policies. We may also have copies of your information in application logs, weblogs, and/or backups made for security and support purposes if this is mentioned in a JetBrains Terms of Use or consent text accepted before the personal data collection. These backups will not be accessible as separately delineated information. We may store data pertaining to a customer or user for as long as they are entitled to a license or usage of JetBrains Products. Further, we may keep the data to protect ourselves from damage in case of litigation in accordance with the current legislation. Please note, however, that you must retain a copy of all data that you have placed on our servers in the case of any loss; further, if you cease using our software and/or services, we will not be responsible for retention of any of your data.

You may manage your Personal Data in your JetBrains Account, including opting out of certain kinds of data collection. You are responsible for the correctness of the Personal Data you provide to us. We expect you to check the Personal Data you provide to us and if any inconsistency takes place, update your Personal Data or report the inconsistency to JetBrains.

As permitted by applicable law, EU residents may request a copy of the information that we hold about them. To do so, please go to your JetBrains Account and ask for a copy through the means available there, or contact privacy@jetbrains.com. We may charge a fee in accordance with applicable law for this service.

Moreover, as set out in locally applicable personal data protection law, you may have the right to: (i) request access to your personal data; (ii) request rectification of your personal data; (iii) request erasure of your personal data; (iv)

request a restriction on the processing of your personal data; (v) request personal data portability; or (vi) object to the processing of your personal data.

- **Right of access**. You may have the right to obtain from us a confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, to request access to your personal data. The information about personal data processing includes the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipient to whom your personal data have been or will be disclosed, etc. However, this is not an absolute right and the interests of other individuals may restrict your right of access. Further, you may have the right to obtain a copy of your personal data undergoing processing. For additional copies requested, we may charge a reasonable fee based on administrative costs.
- **Right to rectification**. You may have the right to obtain from us the rectification of inaccurate personal data. Depending on the purposes of the processing, you may have the right to have incomplete personal data made complete, in particular by providing a supplementary statement.
- **Right to erasure (right to be forgotten)**. Under certain circumstances, you may have the right to require us to delete your personal data.
- **Right to a restriction on processing**. Under certain circumstances, you may have the right to require us to restrict the processing of your personal data. In this case, the respective personal data will be marked and may only be processed by us for certain purposes.
- **Right to personal data portability**. Under certain circumstances, you may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format, and to transmit these personal data to another entity.
- **Right to object**. Under certain circumstances, you may have the right to object, on grounds relating to their particular situation, at any time to the processing of your personal data by us and we can be required to no longer process your personal data.

These rights can be exercised via the email address privacy@jetbrains.com.

You may also contact JetBrains to get up-to-date information about your personal data processing and any personal data recipients.

You may lodge a complaint related to the processing of your personal data with the competent data protection supervisory authority, i.e. in the Czech Republic the Office for Personal Data Protection, with its registered office at Pplk. Sochora 727/27, 170 00 Praha 7- Holešovice, phone number: +420 234 665 111. For more information, please visit https://www.uoou.cz.

## Changes to this Policy

This Privacy Policy is current as of the Effective Date set forth above. We may change this Privacy Policy from time to time, so please be sure to check back periodically. We will post any changes to this Privacy Policy on JetBrains Website. If we make any changes to this Privacy Policy that materially affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with an advance notice of such change by highlighting the change on JetBrains Website.

## Reaching out

If you have any questions or concerns, or you feel that this Privacy Policy has been violated in any way, please let us know immediately by contacting privacy@jetbrains.com.