RSL-IL4Privacy

Word Template

Policy Name: Dropbox

Author(s): Dropbox, Inc.

Organization(s): Dropbox

Date: 12-2-2016

Version: 2.0.0

Table of Contents

[1. Introduction 3](#_Toc442216363)

[2. Private Data 4](#_Toc442216364)

[3. Services 5](#_Toc442216365)

[4. Recipients 6](#_Toc442216366)

[5. Enforcements 7](#_Toc442216367)

[6. Statements 8](#_Toc442216368)

# Introduction

Dropbox Privacy Policy

# Private Data

* 1. **Account Information (PD1)**

Type: PersonalInformation

Description: Account Information

Attributes:

* Name, email, phone number, payment info, physical address – Name, email, phone number, payment info, physical address
  1. **Device Information (PD2)**

Type: UsageInformation

Description: Device Information

Attributes:

* IP addresses, the type of browser and device you use, the web page you visited before coming to our sites, identifiers associated with your devices. – IP addresses, the type of browser and device you use, the web page you visited before coming to our sites, identifiers associated with your devices.
  1. **Location Information (PD3)**

Type: UsageInformation

Description: Location Information

Attributes:

* Location information – Location information
  1. **Files (PD4)**

Type: PersonalInformation

Description: Files

Attributes:

* Photos, structured data, emails – Photos, structured data, emails
  1. **File-related Information (PD5)**

Type: PersonalInformation

Description: File-related Information

Attributes:

* Location tags in photos – Location tags in photos
  1. **Basic Public Information (PD6)**

Type: PersonalInformation

Description: Basic Public Information

Attributes:

* Name, email address – Name, email address
  1. **Complete Public Information (PD7)**

Type: PersonalInformation

Description: Complete Public Information

Attributes:

* Name, email address, IP address – Name, email address, IP address
  1. **Contacts (PD8)**

Type: PersonalInformation

Description: Contacts

Attributes:

* User contacts – User contacts

# Services

* 1. **Security (S9)**

Description:

Sub-Services:

* + 1. **Handle Prohibited Activities (S10)**

Description: prevent fraud or abuse of Dropbox or our users

* + 1. **Protection (S11)**

Description: protect any person from death or serious bodily injury

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)
  1. **Legal (S5)**

Description:

Sub-Services:

* + 1. **Compliance (S6)**

Description: comply with the law, legal obligation, enforce our agreements

* + 1. **Rights (S7)**

Description: protect Dropbox's property rights

* + 1. **Disputes (S8)**

Description: resolve disputes

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)
  1. **Account (S1)**

Description:

Sub-Services:

* + 1. **Managing Account (S2)**

Description: perform tasks on our behalf and in compliance with this Privacy Policy

* + 1. **Interaction With Services (S3)**

Description: use our Services

* + 1. **Provide Services (S4)**

Description: provide you with the Services

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

# Recipients

* 1. **Service providers (R1)**

Description: Service providers

Scope: Internal/External

Type: Organization

* 1. **Dropbox's trusted third parties (R2)**

Description: Dropbox's trusted third parties

Scope: External

Type: Organization

* 1. **Members (R3)**

Description: Members

Scope: Internal

Type: Individual/Organization

* 1. **Dropbox for Business users (R4)**

Description: Dropbox for Business users

Scope: Internal/External

Type: Individual

* 1. **Third parties (R5)**

Description: Third parties

Scope: External

Type: Organization

* 1. **Owner (R6)**

Description: Owner

Scope: Internal

Type: Organization

* 1. **Anyone (R7)**

Description: Anyone

Scope: Internal/External

Type: Individual/Organization

# Enforcements

* 1. **Cookies and Other Technologies (En1)**

Description: We use technologies like cookies and pixel tags to provide, improve, protect and promote our Services.

Type: Tool

* 1. **Selling Information (En2)**

Description: We won't sell information to advertisers or other third-parties.

Type: Action

* 1. **Team for Managing Information (En3)**

Description: We have a team dedicated to keeping your information secure and testing for vulnerabilities.

Type: Action

* 1. **Feature Improvement (En4)**

Description: We also continue to work on features to keep your information safe in addition to things like two-factor authentication, encryption of files at rest, and alerts when new devices and apps are linked to your account.

Type: Algorithm

# Statements

* 1. **St1**

Description: We collect, and associate with your account, information like your name, email address, phone number, payment info, and physical address.

Type: Collection

Modality: Permitted

References to Private Data:

* Account Information (PD1)
  1. **St2**

Description: We collect information from and about the devices you use to access the Services, including things like IP addresses, the type of browser and device you use, the web page you visited before coming to our sites, and identifiers associated with your devices.

Type: Collection

Modality: Permitted

References to Private Data:

* Device Information (PD2)
  1. **St3**

Description: Your devices (depending on their settings) may also transmit location information to the Services.

Type: Collection

Modality: Permitted

References to Private Data:

* Location Information (PD3)
  1. **St4**

Description: Some of our services let you access your accounts and your information with other service providers.

Type: Disclosure

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Recipients:

* Service providers (R1)
  1. **St5**

Description: When you use our Services, we transmit your files (including stuff like your photos, structured data and emails) and information related to them (for example, location tags in photos).

Type: Disclosure

Modality: Permitted

References to Private Data:

* Files (PD4)
* File-related Information (PD5)

References to Recipients:

* Anyone (R7)

References to Services:

* Account (S1)
* Interaction With Services (S3)
  1. **St6**

Description: Dropbox's trusted third parties will access your information only to perform tasks on our behalf and in compliance with this Privacy Policy.

Type: Disclosure

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Recipients:

* Dropbox's trusted third parties (R2)

References to Services:

* Account (S1)
* Managing Account (S2)
  1. **St7**

Description: Our Services display information like your name and email address to other users in places like your user profile and sharing notifications.

Type: Disclosure

Modality: Permitted

References to Private Data:

* Basic Public Information (PD6)

References to Recipients:

* Members (R3)
  1. **St8**

Description: You can also give third parties access to your information and account - for example, via Dropbox APIs.

Type: Disclosure

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Recipients:

* Dropbox's trusted third parties (R2)
  1. **St9**

Description: If you are not a Dropbox for Business user but interact with a Dropbox for Business user (by, for example, joining a shared folder or accessing stuff shared by that user), members of that organization may be able to view the name, email address and IP address that were associated with your account at the time of that interaction.

Type: Disclosure

Modality: Permitted

References to Private Data:

* Complete Public Information (PD7)

References to Recipients:

* Dropbox for Business users (R4)
  1. **St10**

Description: We may disclose your information to third parties if we determine that such disclosure is reasonably necessary to comply with the law.

Type: Disclosure

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Recipients:

* Third parties (R5)

References to Services:

* Legal (S5)
* Compliance (S6)
  1. **St11**

Description: We may disclose your information to third parties if we determine that such disclosure is reasonably necessary to protect any person from death or serious bodily injury.

Type: Disclosure

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Recipients:

* Third parties (R5)

References to Services:

* Security (S9)
* Protection (S11)
  1. **St12**

Description: We may disclose your information to third parties if we determine that such disclosure is reasonably necessary to prevent fraud or abuse of Dropbox or our users.

Type: Disclosure

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Recipients:

* Third parties (R5)

References to Services:

* Security (S9)
* Handle Prohibited Activities (S10)
  1. **St13**

Description: We may disclose your information to third parties if we determine that such disclosure is reasonably necessary to protect Dropbox's property rights.

Type: Disclosure

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Recipients:

* Third parties (R5)

References to Services:

* Legal (S5)
* Rights (S7)
  1. **St14**

Description: To provide you with the Services, we may transmit information in locations around the world - including those outside your country.

Type: Disclosure

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Recipients:

* Anyone (R7)

References to Services:

* Account (S1)
* Provide Services (S4)
  1. **St15**

Description: If we are involved in a reorganization, merger, acquisition or sale of our assets, your information may be transferred as part of that deal.

Type: Disclosure

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Recipients:

* Owner (R6)
  1. **St16**

Description: When you use our Services, we store your files (including stuff like your photos, structured data and emails) and information related to them (for example, location tags in photos).

Type: Retention

Modality: Permitted

References to Private Data:

* Files (PD4)
* File-related Information (PD5)

References to Services:

* Account (S1)
* Interaction With Services (S3)

Period: As long as it is necessary

* 1. **St17**

Description: If you give us access to your contacts, we'll store those contacts on our servers for you to use.

Type: Retention

Modality: Permitted

References to Private Data:

* Contacts (PD8)

Period: As long as it is necessary

* 1. **St18**

Description: We'll retain information you store on our Services for as long as we need it to provide you the Services.

Type: Retention

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Services:

* Account (S1)
* Provide Services (S4)

Period: As long as it is necessary

* 1. **St19**

Description: If you delete your account, we'll also delete the information you store on our Services.

Type: Retention

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

Period: As long as it is necessary

* 1. **St20**

Description: We may retain the information you store on our Services if necessary to comply with our legal obligations, resolve disputes, or enforce our agreements.

Type: Retention

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Services:

* Legal (S5)
* Compliance (S6)
* Disputes (S8)

Period: As long as it is necessary

* 1. **St21**

Description: To provide you with the Services, we may store information in locations around the world - including those outside your country.

Type: Retention

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Services:

* Account (S1)
* Provide Services (S4)

Period: As long as it is necessary

* 1. **St22**

Description: Information may also be stored locally on the devices you use to access the Services.

Type: Retention

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

Period: As long as it is necessary

* 1. **St23**

Description: When you use our Services, we process your files (including stuff like your photos, structured data and emails) and information related to them (for example, location tags in photos).

Type: Usage

Modality: Permitted

References to Private Data:

* Files (PD4)
* File-related Information (PD5)

References to Services:

* Account (S1)
* Interaction With Services (S3)
  1. **St24**

Description: To provide you with the Services, we may process information in locations around the world - including those outside your country.

Type: Usage

Modality: Permitted

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Services:

* Account (S1)
* Provide Services (S4)
  1. **St25**

Description: This will make it easy for you to do things like share your stuff, send emails, and invite others to use the Services.

Type: Informative

Modality: Permitted

* 1. **St26**

Description: We use technologies like cookies and pixel tags to provide, improve, protect and promote our Services.

Type: Informative

Modality: Permitted

References to Enforcements:

* Cookies and Other Technologies (En1)
  1. **St27**

Description: You can set your browser to not accept cookies, but this may limit your ability to use the Services.

Type: Informative

Modality: Permitted

* 1. **St28**

Description: We won't sell information to advertisers or other third-parties.

Type: Informative

Modality: Forbidden

References to Private Data:

* Account Information (PD1)
* Device Information (PD2)
* Location Information (PD3)
* Files (PD4)
* File-related Information (PD5)
* Basic Public Information (PD6)
* Complete Public Information (PD7)
* Contacts (PD8)

References to Enforcements:

* Selling Information (En2)
  1. **St29**

Description: Dropbox uses certain trusted third parties to help us provide, improve, protect, and promote our Services.

Type: Informative

Modality: Permitted

* 1. **St30**

Description: Certain features let you make additional information available to other users.

Type: Informative

Modality: Permitted

* 1. **St31**

Description: The use of your information by third parties will be governed by their privacy policies and terms.

Type: Informative

Modality: Permitted

* 1. **St32**

Description: If you are a Dropbox for Business user, your administrator may have the ability to access and control your Dropbox for Business account. Please refer to your employer's internal policies if you have questions about this.

Type: Informative

Modality: Permitted

* 1. **St33**

Description: Stewardship of your data is critical to us and a responsibility that we embrace.

Type: Informative

Modality: Permitted

* 1. **St34**

Description: We believe that our users' data should receive the same legal protections regardless of whether it's stored on our services or on their home computer's hard drive.

Type: Informative

Modality: Permitted

* 1. **St35**

Description: When receiving, scrutinizing and responding to government requests for our users' data, we must be transparent, fight blanket requests, protect all users, and provide trusted services.

Type: Informative

Modality: Permitted

* 1. **St36**

Description: We have a team dedicated to keeping your information secure and testing for vulnerabilities.

Type: Informative

Modality: Permitted

References to Enforcements:

* Team for Managing Information (En3)
  1. **St37**

Description: We also continue to work on features to keep your information safe in addition to things like two-factor authentication, encryption of files at rest, and alerts when new devices and apps are linked to your account.

Type: Informative

Modality: Permitted

References to Enforcements:

* Feature Improvement (En4)
  1. **St38**

Description: There might be some latency in deleting the information you store on our Services from our servers and back-up storage

Type: Informative

Modality: Permitted

* 1. **St39**

Description: Dropbox complies with the EU-U.S. and Swiss-U.S. Safe Harbor ('Safe Harbor') frameworks and principles.

Type: Informative

Modality: Permitted

* 1. **St40**

Description: We will notify you (for example, via a message to the email address associated with your account) of any reorganization, merger, acquisition or sale of our assets and outline your choices in that event.

Type: Informative

Modality: Permitted

* 1. **St41**

Description: We may revise this Privacy Policy from time to time, and will post the most current version on our website.

Type: Informative

Modality: Permitted

* 1. **St42**

Description: If a revision meaningfully reduces your rights, we will notify you.

Type: Informative

Modality: Permitted