

**Privacy Policy** 

### Last Updated: Friday, September 22nd, 2017

Your privacy is vital to us at We Cobble. The primary principle which guides us is that we will only ask for your information if we need it. We will never share your personal information with anyone except to comply with the law, protect our rights, or develop our products. Put simply, we deeply value your privacy. Below you will find the privacy policy for all of We Cobble's digital products and websites, including those represented by We Cobble and its DBAs, Philip Arthur Moore, Professional Themes, Press Build, and KA Style.

### Security

We Cobble takes extensive measures to protect information both offline and online. All information, including any transmitted during a We Cobble payment transaction, is encrypted and protected using an SSL certificate. Information that is stored about our customers in external platforms (for example Basecamp, Slack, or Crisp) is SSL-protected as well. Email, group communication channels, and client-facing project management tools are all protected via multi factor authentication. In short, we are very serious about security and take all necessary measures to ensure the safety of both our data and your data. If there are ever any concerns with regard to potential security practices or We Cobble data retention, email security@wecobble.com. Finally, we encourage responsible disclosure around any and all We Cobble security.



#### Website Visitors

Like most website operators, We Cobble collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. We Cobble's purpose in collecting nonpersonally identifying information is to better understand how visitors use our website. From time to time, We Cobble may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of our website.

We Cobble also collects potentially personally-identifying information like Internet Protocol (IP) addresses. We do not use such information to directly identify our visitors, however, and do not disclose such information, other than under the same circumstances that it uses and discloses personally-identifying information, as described in this policy.

## Gathering of Personally-Identifying Information

Some visitors to We Cobble (and its DBAs) websites choose to interact with them in ways that require us to gather personally-identifying information. The amount and type of information that We Cobble gathers depends on the nature of the interaction. For example, we ask visitors who use our products or purchase our support and upgrade licenses to provide a username and email address. In each case, We Cobble collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with us. We do not disclose personally-identifying information other than as described in this policy. And visitors can always refuse to supply personallyidentifying information, with the caveat that it may prevent them from engaging in certain website-related activities or acquiring certain products.



## **Aggregated Statistics**

We Cobble may collect statistics about the behavior of visitors to its websites. For instance, we may reveal how many downloads a particular software version got, or say which products are most popular based on checks from sales figures, ratings, or visits. However, we do not disclose personally-identifying information other than as described in this privacy policy.

# Protection of Certain Personally-Identifying Information

We Cobble discloses potentially personally-identifying and personallyidentifying information only to those of its employees, contractors, and affiliated organizations that (i) need to know the information in order to process it on our behalf or to provide services available on We Cobble websites, and (ii) that have agreed not to disclose it to others. Some of those employees, contractors and affiliated organizations may be located outside of your home country; by using our websites, you consent to the transfer of such information to them. We will not rent or sell potentially personally-identifying and personally-identifying information to anyone. Other than to its employees, contractors, and affiliated organizations, as described above, We Cobble discloses potentially personally-identifying and personally-identifying information only when required to do so by law, or when We Cobble believes in good faith that disclosure is reasonably necessary to protect the property or rights of We Cobble, third parties, or the public at large. If you are a registered user of our websites or digital products and have supplied your email address, we may occasionally send you an email to tell you about new features, solicit your feedback, or keep you up to date with what's going on at We Cobble and with our products. We primarily use our blog to communicate this information, so we expect to keep these emails to a minimum. We hate spam as much as you do and will do our best to abide by lead and customer email standards.



# Protection of Certain Personally-Identifying Information (Cont.)

If you send us a request, we reserve the right to publish it to help us clarify or respond to your request or to help us support other users. We Cobble takes all measures reasonably necessary to protect against the unauthorized access, use, alteration, or destruction of potentially personally-identifying and personally-identifying information.

### Cookies

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns.

We Cobble uses cookies to help us identify and track visitors, their usage of We Cobble websites, and their website access preferences. We Cobble visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using our websites, with the drawback that certain features of We Cobble's websites may not function properly without the aid of cookies.

### **Business Transfers**

If We Cobble, or substantially all of its assets, were acquired, or in the unlikely event that We Cobble goes out of business or enters bankruptcy, user information would be one of the assets that are transferred or acquired by a third party or in the interest of user protection destroyed entirely.

You acknowledge that such transfers may occur and that any acquirer of We Cobble may continue to use your personal information as outlined in this privacy policy.



## Third-Party Advertising

Ads appearing on any of our websites may be delivered to users by advertising partners, who may set cookies. These cookies allow the advertising partners' servers to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by We Cobble and does not cover the use of cookies by any advertisers.

## Apple iOS Related Products

We Cobble does not collect any user data outside of that already provided to us via Apple Analytics. Apple themselves have strong Privacy provisions which include encryption and a statement of your privacy rights. We may ask for your email address, or we may ask you to sign up for a We Cobble newsletter, but that is all. We will use your email address if we need to communicate with you, and we will never provide it to any other person or entity for any reason whatsoever that does not involve the express purpose of communicating directly to you from us. We never collect data without your consent, and we only ever use such data for the specific purpose that you have supplied it.

### **Privacy Policy Changes**

Although most changes are likely to be minor, We Cobble may change its Privacy Policy from time to time, and in We Cobbles's sole discretion. We encourage visitors to frequently check this document or any We Cobble website for any changes to its Privacy Policy. Your continued use of our services or products after any change in this Privacy Policy will constitute your acceptance of such change.



## Commitment To Comply With Privacy Shield Framework(s)

We Cobble complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. We Cobble has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms of this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit https://www.privacyshield.gov/

# Independent Recourse Mechanism For Privacy Shield Complaints

In compliance with the Privacy Shield Principles, We Cobble commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact We Cobble at:

We Cobble, LLC 4023 Kennett Pike #50098, Wilmington, Delaware 19807 Web: https://wecobble.com/ Email: mail@wecobble.com Phone: +1-888-410-3280 Fax: +1-844-774-0503

We Cobble has further committed to refer unresolved Privacy Shield complaints to the American Arbitration Association<sup>®</sup>, an alternative dispute resolution provider located in the United States.



## Independent Recourse Mechanism For Privacy Shield Complaints (cont.)

If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit http://go.adr.org/privacyshield.html for more information or to file a complaint. The services are provided at no cost to you.

## Data Protection Authorities Cooperation

We Cobble commits to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland in the context of the employment relationship.

# Additional Consumer Rights And Information Disclosure

1. The types of third parties which We Cobble discloses Certain Personally-Identifying Information are those related to payment processing (e.g. Stripe, PayPal, Amazon Payments, et al.), email newsletter software (MailChimp, Campaign Monitor, et al.), and CRM/customer support software (Crisp.im, et al.). We never collect your information with the express intention of using it for profit-seeking, data selling to third parties motives, and we do not believe in this behavior. Your data, or that which may be potentially-identifying, is kept with We Cobble and never stockpiled for nefarious means.

2. All individuals who interact with We Cobble are free to contact us at any time to request all personal data that we may have on file.

3. Whether or not website visitors decide to share their personal data with We Cobble is completely up to them. We Cobble employs double opt-in methods for newsletters, gives visitors the option to give us their information, if asked, for support, and make all earnest efforts to be as transparent as possible.



# Additional Consumer Rights And Information Disclosure (cont.)

4. We Cobble is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). Visitors and customers have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms: https://www.privacyshield.gov/article?id=ANNEX-I-introduction. We Cobble is required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. In the case of We Cobble business transfer to a third party, We Cobble will strictly adhere to the policies set forth by Privacy Shield: https://www.privacyshield.gov/article?id=3-ACCOUNTABILITY-FOR-ONWARD-TRANSFER

## Email Usage

The email address you provide for order processing may be used to send you information and updates pertaining to your order, in addition to periodic company news, updates, and/or related product or service information, etc. If you decide to opt-in to our mailing list, you will receive emails that may include company news, updates, related product or service information, promotions, etc. However, you may opt-out at any time by clicking the unsubscribe button at the bottom of your emails, or sending an email to unsubscribe@wecobble.com, etc.).

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