Privacy Policy

Pusher Limited ("We" or "we") are committed to protecting and respecting your privacy.

This policy (together with our terms of use https://pusher.com/legal-archived/aup and any other documents referred to in it) (the “Terms of Service”) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting pusher.com ("our site") you acknowledge and agree to the practices described in this policy in respect of the use of your personal data. Unless otherwise defined, defined terms in this Privacy Policy have the definitions given to them in the Terms of Service.

1. Who We Are

We are Pusher Limited, an English company.

Our registered address is Eighth Floor 6 New Street Square, New Fetter Lane, London, England, EC4A 3AQ.

2. How Do You Use My Data?

2.1. When you use the Pusher Service or our site (pusher.com)

2.1.1. We need to process your personal data in order facilitate access and use of the Service you have contracted with us to provide, this will include:

- When you sign up for an account to use our Service you will need to provide your email address and company name for us to create your account. You may also need to provide your name, address and credit card information for billing purposes.

- We may send you service-related communications for the Services.

2.2. Marketing

2.2.1 If you have opted-in to marketing emails or if you’re an existing customer and have not opted-out of marketing, we may send you marketing communications. For more information on how we use your personal data to communicate with you and opting out, please see the section on ‘Communications’ below

2.3. If our business is sold

2.3.1. We will transfer your personal data to a third party:

if we sell or buy any business or assets, we will provide your personal data to the seller or buyer (but only to the extent we need to, and always in accordance with data protection legislation); or

if Pusher Limited or the majority of its assets are acquired by somebody else, in which case the personal data held by Pusher Limited will be transferred to the buyer.
2.3.2. We process your personal data for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your personal data in this way, the relevant seller or buyer of our business may not be able to provide services to you.

2.4. In certain circumstances we may need to disclose your personal data to third parties:

2.4.1. In some circumstances we may also need to share your personal data if we are under a duty to disclose or share it to comply with a legal obligation such as:

· to enforce or apply our Terms of Service; or

· to protect the rights, property, or safety of Pusher Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

2.4.2. We may also need to share your personal data with selected third parties including business partners, suppliers and sub-contractors (including our payment processors, data storage and hosting service providers) for the performance of any contract we enter into with them or you and analytics and search engine providers that assist us in the improvement and optimisation of our site and Service. We may on occasion share certain IP addresses with the owners of the corresponding applications where they are relevant to ongoing support investigations.

2.4.3. We may need to do this to allow us to provide the Service to you or to improve our site.

3. What About Technical Information and Analytics?

3.1. Information we collect about you:

3.1.1. When you visit our site or use our Service we will automatically collect the following information:

· technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, screen resolution, operating system and platform;

· information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page; and

· we may also collect and store any phone number used to call our customer service number.

3.2. Information we receive from other sources:

3.2.1. We are also working closely with analytics providers, hosting providers and search information providers from whom we may also receive information about you.

3.2.2. We will combine the information you provide to us with information we collect about you.
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3.2.3. We use this information:

- to provide our Service to you;
- for error logging and monitoring issues in providing the Service and our site;
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them;
- for the purposes of keeping our site safe and secure;
- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information; products and services that you request from us;
- to notify you about changes to our Service; and
- we may publish feedback or support requests you send us in order to clarify or respond to your request, or to help support other users.

3.2.4. We process your data for these reasons because we have a legitimate interest to provide you with the best experience we can, to ensure that our site is kept secure and to provide the Service.

4. Cookies

4.1. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

5. Communications

5.1. This section explains how we will ensure you only receive communications that you want to receive.

5.2. Email marketing:

5.2.1. We use your personal data to send you marketing communications when:

- you have opted-in; or
- you are an existing customer and have not opted-out of marketing and we have a legitimate business interest in letting you know about new products or services that we think might interest you.
5.2.2. You can change your preferences and unsubscribe at any time by unsubscribing from the relevant communication channel or by contacting us at dataprotection@pusher.com. If you choose not to receive this information, we will be unable to keep you informed of new products, events, content, services and promotions that may interest you.

5.3. Service communications:

5.3.1. We may send you communications such as those which relate to any service updates (e.g. in relation to billing). We consider that we can lawfully send these communications to you as we have a legitimate interest to do so, namely, to effectively provide you with the best service we can and to grow our business.

5.3.2. We use Customer.io to manage our marketing campaigns. Customer.io is a marketing automation software provider based in the US.

6. Where Is My Data Stored?

6.1. Personal data may be processed in the European Economic Area (EEA) or in the US by our third party data storage and hosting provider, depending on the location of the server cluster that has been selected by you or Pusher as part of the Service, so their processing of your personal information may involve a transfer of data outside of the EEA.

6.2. Whenever we transfer your personal information outside of the EEA, we ensure an adequacy status has been awarded to that third country or international organisation, or in absence of an adequacy decision, appropriate safeguards are provided.

6.3. To keep this Privacy Policy as short and easy to understand as possible, we have not set out the specific circumstances when each of these protection measures are used. You can contact us at dataprotection@pusher.com for the details as to how we protect specific transfer of your data.

6.4. All information you provide to us is stored on our secure servers or those of our third party data storage providers.

6.5. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

6.6. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
7. How Long Do We Retain Your Data For?

7.1. We may collect and store for up to 14 calendar days the IP address of your browser or device of those of an End User that connects to the Service if you or the End User receives an application error. This IP address may be made available to you through your customer dashboard in the application error logs. We will only store the 100 most recent errors and related user IP addresses. We may collect, use and store your IP addresses to track usage of our customer dashboard to monitor potential issues and abuse of the Service. To the extent that any Content includes Personal Data, this may also be processed during the Term, solely for the purpose of us providing the Service to you.

7.2. We may store personal data processed when you sign up for the Service or for any other reason (such as where you have contacted us with a question in connection with the Service) for as long as you have an account with Pusher. If you terminate your account, or your account becomes inactive (we deem accounts that have seen no activity for a period of longer than 12 consecutive months as inactive), we will store personal data processed when you sign up for the Service or for any other reason for a period of 1 year from the date your account was either terminated, or became inactive.

7.3. Your right to object under data protection laws

- we are handling your personal data based on our legitimate interests (as described in the “How do you use my data?” section above). If you ask us to stop handling your personal data in this way, we will stop unless we can show you that we have compelling grounds as to why our use of your personal data should continue; or
- for marketing purposes. If you ask us to stop handling your personal data on this basis, we will stop.

7.4. What are my rights under data protection laws?

- Right of access
  - You are entitled to receive confirmation as to whether your personal data is being processed by us, as well as various other information relating to our use of your personal data. You also have the right to access your personal data which we are handling. You can exercise this right by contacting us at dataprotection@pusher.com. If you exercise this right before 25 May 2018, your request will be subject to a £10 fee.

- Right to rectification
  - You have the right to require us to rectify any inaccurate personal data we hold about you. You also have the right to have incomplete personal data we hold about you completed, by providing a supplementary statement to us.
· Right to restriction

· You can restrict our processing of your personal data where:
  · you think we hold inaccurate personal data about you
  · our handling of your personal data breaks the law, but you do not want us to delete it
  · we no longer need to process your personal data, but you want us to keep it for legal reasons
  · we are handling your personal data because we have a legitimate interest (as described in the “How We Use Your Data” section above), and you are in the process of objecting to this use of your personal data

6.6. Where you exercise your right to restrict us from using your personal data, we will then only process your personal data when you agree, except for storage purposes and to handle legal claims.

· Right to data portability

· You have the right to receive the personal data we hold about you in a structured, standard machine-readable format and to send this to another organisation controlling your personal data. This right only applies to your personal data that we are handling because you consented to us using it or because there is a contract in place between us.

· Right to erasure

· You have the right to require us to erase your personal data which we are handling in the following circumstances:
  · we no longer need to use your personal data for the reasons we told you we collected it for
  · where we needed your consent to use your personal data and you have withdrawn your consent and there is no other lawful way we can continue to use your personal data
  · you object to our use of your personal data and we have no compelling reason to carry on handling your personal data
  · our handling of your personal data has broken the law
  · we must erase your personal data to comply with a law we are subject to

· Right to complain

· You have the right to lodge a complaint with the Information Commissioner’s Office, the supervisory authority for data protection issues in England and Wales.

· You can also exercise these rights by contacting us at Pusher Limited at Eighth Floor 6 New Street Square, New Fetter Lane, London, England, EC4A 3AQ or by emailing us at dataprotection@pusher.com.
8. What About Websites We Link To?

8.1. Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Our site connects you to different websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

IMPORTANT NOTICE - INFORMATION UPLOADED OR TRANSMITTED AS PART OF THE SERVICE

8.2. You or End Users of your Application may upload and transmit Content as part of the Service that contains personal data relating to you or other individuals. In respect of Pusher’s Channels and Beams products, we do not view, store or control such Content and simply transmit the Content on behalf of you or the owner of the Application in accordance with our Terms of Service. You expressly acknowledge that you or the person uploading the Content (as applicable) retain sole responsibility for the Content and for obtaining all relevant consents, from the individual to which any personal data contained within the Content relates, to the processing of that personal data as part of the Service, and that such personal data is not covered by this Privacy Policy. Content may be processed in the EEA or in the US, depending on the location of the server cluster the operator of the Application has elected as part of the Service. It is the responsibility of the operator of each Application to ensure that it has a suitable Privacy Policy in place to cover the transmission and processing of the Content and any personal data that it contains.

9. When Will You Change Your Privacy Policy?

9.1. Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

10. How Do I Contact You With Feedback?

10.1. Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to Pusher Limited at Eighth Floor 6 New Street Square, New Fetter Lane, London, England, EC4A 3AQ or dataprotection@pusher.com.

This Privacy Policy was last updated on 13 August 2021.