



LetPub Privacy Policy

Last Updated on April 1, 2020. This Privacy Policy is effective immediately for users that sign up for LetPub accounts on or after **April 1, 2020** and will become effective on **April 1, 2020** for users that already have LetPub accounts.

This Privacy Policy describes our policies on the collection, use, and disclosure of information about you in connection with your use of our services, including those offered through our websites, emails, and mobile applications (collectively, the "**Service**"). The terms "**we**", "**us**", and "**LetPub**" refer to Accdon LLC, a Massachusetts corporation with its headquarters in Waltham, MA. When you use the Service, you consent to our collection, use, and disclosure of information about you as described in this Privacy Policy.

I. Information We Collect and How We Use It

We may collect and store information about you in connection with your use of the Service, including any information you transmit to or through the Service. We use that information to provide the Service's functionality, fulfill your requests, improve the Service's quality, engage in research and analysis relating to the Service, personalize your experience, track usage of the Service, provide feedback to third party businesses that are listed on the Service, display relevant advertising, market the Service, provide customer support, message you, back up our systems, allow for disaster recovery, enhance the security of the Service, and comply with legal obligations. Even when we do not retain such information, it still must be transmitted to our servers initially and stored long enough to process.

Please also note:

▮ **Account Information:** If you create a LetPub account, we may store and use the information you provide during that process, such as your full name, email address, zip code, physical address, and other information you may provide with your account.

▮ **Transactions:** If you initiate a transaction through the Service, such as a purchase, we may collect and store information about you, such as your name, phone number, address, email, and payment information (such as a credit card number and expiration date), as well as any other information you provide to us, in order to process your transaction, send communications about them to you, and populate forms for future transactions. When you submit credit card numbers, we encrypt that information using industry standard technology.

|| **Activity:** We may store information about your use of the Service, such as your search activity, the pages you view, the date and time of your visit. We also may store information that your computer or mobile device may provide to us in connection with your use of the Service, such as your browser type, type of computer or mobile device, browser language, IP address, WiFi information such as SSID, mobile carrier, phone number, unique device identifier, advertising identifier, location (including geolocation, beacon based location, and GPS location), and requested and referring URLs. We may also receive and store your location whenever our mobile applications are running, including when running in the background, if you enable our mobile apps to access such information in the course of using the Service. You may be able to limit or disallow our use of certain location data through your device or browser settings, for example by adjusting the "Location Services" settings for our applications in iOS privacy settings.

For the use of our paid services (English Editing, Translation, and other services) you have to set up an account. Your customer account retains your personal data in order to communicate with you during a submission, re-edits, and follow-ups. This processing is based on Article 6 sec. 1 sent. 1 lit. b.] By statutory law we are required to retain the provided financial data in relation to transactions (including address, payment and order information) for 10 years. Regarding this, the retention of your personal data is based on Article 6 sec. 1 sent. 1 lit. c GDPR.

|| **Different Devices:** You may access the Service through different devices (e.g., your mobile phone or desktop computer) and different platforms (e.g., the LetPub website or LetPub mobile app). The information that we collect and store through those different uses may be cross-referenced and combined.

|| **Newsletter and Marketing E-mail Communications:** With your email address you can subscribe to our newsletter and marketing e-mail communications that provide you with the latest news about our products and services if you consent to receiving such newsletters. This also includes special offers and exclusive discounts. Your email address will be retained as long as you subscribe to marketing emails. Regardless of your country, you can unsubscribe from newsletters and marketing emails by opting out via the link provided in each newsletter or marketing email.

|| **Data retention:** We strive to keep our processing activities with respect to your personal data as limited as possible. In the absence of specific retention periods set out in this policy, your personal data will be retained only for as long as we need it to fulfill the purpose for which we have collected it and, if applicable, as long as required by statutory retention requirements.

We use such information only to assist us in providing an effective service (e.g. to adapt our website to the needs of your device or to allow you to log in to our website), and to collect broad

demographic information for anonymized, aggregated use. The personal data automatically collected is necessary for us to provide the website, Article 6 sec. 1 sent. 1 lit. b GDPR, and for our legitimate interest to guarantee the website's stability and security, Article 6 sec. 1 sent. 1 lit. f GDPR.

II. Cookies

We, and third parties with whom we partner, may use cookies, web beacons, tags, scripts, local shared objects such as HTML5 and Flash (sometimes called "flash cookies"), advertising identifiers (including mobile identifiers such as Apple's IDFA or Google's Advertising ID) and similar technology ("**Cookies**") in connection with your use of the Service, third party websites, and mobile applications. Cookies may have unique identifiers, and reside, among other places, on your computer or mobile device, in emails we send to you, and on our web pages. Cookies may transmit information about you and your use of the Service, such as your browser type, search preferences, IP address, data relating to advertisements that have been displayed to you or that you have clicked on, and the date and time of your use. Cookies may be persistent or stored only during an individual session.

The purposes for which we use Cookies in the Service include:

| Purpose | Explanation |
|--|--|
| Processes | Intended to make the Service work in the way you expect. For example, we use a Cookie that tells us whether you have already signed up for an account. |
| Authentication, Security, and Compliance | Intended to prevent fraud, protect your data from unauthorized parties, and comply with legal requirements. For example, we use Cookies to determine if you are logged in. |
| Notifications | Intended to allow or prevent notices of information or options that we think could improve your use of the Service. For example, we use a Cookie that stops us from showing you the signup notification if you have already seen it. |
| Analytics | Intended to help us understand how visitors use the Service. For example, we use a Cookie that tells us how our search suggestions correlate to your interactions with the search page. |

You can set some Cookie preferences through your device or browser settings, but doing so may affect the functionality of the Service. The method for disabling Cookies may vary by device and browser, but can usually be found in your device or browser preferences or security settings. For example, iOS and Android devices each have settings which are designed to limit forms of ad tracking. For flash cookies, you can manage your privacy settings by clicking [here](#).

III. Automated decision making

We do not use your personal data for automated decision making which produces legal effects concerning you or similarly significantly affects you.

IV. Information sharing

Where personal data is disclosed to the following third parties for the purposes mentioned above the legal basis for the transfer of your personal data is Article 6 sec. 1 sent. 1 lit. b and f GDPR. Some of the recipients may reside outside the EEA.

1. Our agents and business partners: We employ other companies and individuals to administer, service. Examples of such activities include order fulfillment, order delivery, credit card payment processing, and customer service support. It may also be necessary for us to pass your information on to the editors that we work with to proofread your documents.

2. Credit card companies: Credit card transactions are handled by a third-party financial institution and their vendors, which receive the credit card number and other personal identifying information such as IP address to verify the credit card numbers and process transactions.

3. Compliance & protection: We may release your information when we believe, in our reasonable judgment, that release is appropriate to (i) protect the security and integrity of our website; (ii) protect our rights and property and the rights and property of others; (iii) take precautions against liability; (iv) comply with legal requirements or respond to judicial process; and (vii) provide information, to the extent legally permitted, to law enforcement agencies or for investigations on matters related to public safety.

4. Cross border data transfers: Within the scope of our information sharing activities set out above, your personal data may be transferred to other countries (including countries outside the EEA) which may have different data protection standards from your country of residence. Please note that data processed in a foreign country may be subject to foreign laws and accessible to foreign governments, courts, law enforcement, and regulatory agencies. However, we will endeavor to take reasonable measures to maintain an adequate level of data protection when sharing your personal data with such countries.

V. Children

The Service is intended for general audiences and is not directed to children under 13. We do not knowingly collect personal information from children under 13. If you become aware that a child has provided us with personal information without parental consent, please contact us. If we become aware that a child under 13 has provided us with personal information without parental consent, we take steps to remove such information and terminate the child's account.

VI. Security

We use various safeguards to protect the personal information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet or via mobile device, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, you should bear in mind that submission of information over the internet is never entirely secure. We cannot guarantee the security of information you submit via our website whilst it is in transit over the internet and any such submission is at your own risk.

VII. Contact

You may contact us online concerning our Privacy Policy, or write to us at the following address:

Accdon, Attn: Data Privacy Manager

400 Fifth Ave Suite 530

Waltham, MA 02451

VIII. Modifications to This Privacy Policy

We may revise this Privacy Policy from time to time. The most current version of the Privacy Policy will govern our collection, use, and disclosure of information about you and will be located on this page. If we make material changes to this Privacy Policy, we will notify you by email or by posting a notice on the Service prior to the effective date of the changes. By continuing to access or use the Service after those changes become effective, you acknowledge the revised Privacy Policy.