

MarginNote Privacy Policy

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Last Updated: May 2024

Protecting your privacy at MarginNote

Your privacy is of paramount importance to us at MarginNote. We are deeply committed to handling your personal information with the utmost care and ensuring its safety.

Our core privacy commitments:

- We pledge never to sell or lease your data or content within your notebooks to any outside parties.
- Your notebooks and documents remain private and untouched by us unless you grant us explicit permission.
- We employ minimal, anonymized data for the purpose of refining our services and fulfilling our legal duties.

Data sharing principles:

Your information is shared only under these circumstances:

- With your outright consent and exclusively with parties clearly outlined in this policy
- To safeguard the rights, assets, or safety of MarginNote, our users, or others as necessary.

Data we collect:

- We accumulate anonymized statistics (such as crash reports and feature engagement) to improve the app's performance.

Before sharing any information with third parties, we ensure they adhere strictly to data protection agreements or confidentiality commitments. Please consult our detailed Privacy Policy for further information. We keep this document regularly updated to align with the most recent legal standards and best practice recommendations.

MarginNote Limited and its affiliates ("MarginNote" , "we" , "us") are devoted to upholding your privacy rights. Registered at Room 1056, 1 Kaituo Road, Shangdi Information Industry Base, Haidian District, Beijing, China, our company's Privacy Policy elaborates on how data collected from you is processed by us through your interactions with the MarginNote services. This

encompasses the MarginNote application (across iOS, iPadOS, macOS platforms), alongside any other software, functionalities, or content we provide. This Policy governs your engagement with all aspects of our services and is consistently updated to reflect legal and best practice evolutions.

1. What types of data are being gathered?

MarginNote collects a variety of data to enhance user experience and provide personalized services. This information is known as “Personal Data,” referring to any data that can identify you. The collection and processing of Personal Data depend on how you interact with our services. We adhere strictly to data protection laws such as the European Union’s General Data Protection Regulation 2016/679 (EU GDPR) and its UK counterpart to ensure lawful handling of your data.

1.1 What we do not collect:

We refrain from gathering special categories of Personal Data as outlined in the GDPR. This includes data revealing racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, health, sex life, or sexual orientation. We do not solicit this type of information from our users.

1.2 Types of collected data:

- **Diagnostic Data:** For support purposes, we may request diagnostic data from your app, including titles of documents, folders, and imported files necessary for troubleshooting.
- **Voluntary Information:** We collect any personal information you willingly share within the service, such as details in uploaded documents.

1.3 Automated Collection:

Our services automatically capture data about you and your device, including:

- Interaction data with the service
- Contact history for enquiry purposes to ensure service satisfaction
- Usage data, including device location and IP address
- Marketing and communication preferences
- Activity data showcasing your service usage patterns like device type, unique identification, storage, and data usage.

1.4 Information Acquired from External Sources:

Occasionally, MarginNote gathers Personal Data that third parties, various service providers, agencies, or sources available to the public share with us. The array of such information spans, but is not limited to:

Social Media Interaction Data Collection:Our services might incorporate social media functionalities that can capture your IP address and the specific page you are viewing on our sites or subdomains. These features may also enable third-party social media services to share with us details about you, which could include your name, email address, and other forms of contact information. The scope of information we receive hinges on your privacy preferences with these third-party social media services. These functionalities might be hosted by third parties or directly within the MarginNote Services themselves. How you interact with these features falls under the privacy policies of the respective third-party entities providing them. We advise always examining and tweaking your privacy settings on third-party platforms and services before linking or integrating them with our Services.

2. Data Utilization Purposes:

2.1 We may store and process your Personal Data for a series of purposes, including but not limited to:

- Facilitating your interaction with and access to the Services' features and functionalities;
- Communicating updates regarding terms, policies, product alterations, and other significant notices;
- Analyzing feedback on the Services to enhance the provision of information and support;
- Engaging with you for service provision or to inform about our services and updates;
- Analyzing feedback on the Services to enhance the provision of information and support;
- Engaging with you for service provision or to inform about our services and updates;
- Personalizing visible content to align with your interests and preferences;
- Enhancing and personalizing your experience and optimizing the Services through continuous review and user-friendly improvements;
- Implementing safeguards against disruptions and potential cybersecurity threats;
- Gauging your needs and interests for targeted marketing communications (with your consent);Delivering technical and other forms of assistance;
- Ensuring adherence to legal, regulatory, and internal policy requirements;
- Managing our Personal Data storage databases;
- Addressing fraud, security, or technical concerns.

2.2 Our commitment to lawful Personal Data usage encompasses compliance with data protection laws, under circumstances such as:

- Fulfilling contractual obligations to our customers and partners;
- Operating under your consent;
- Meeting legal and regulatory duties;
- Protecting, exercising, or defending our legal rights;
- Pursuing legitimate business interests, such as efficient business administration, enforcing agreements, maintaining compliance with policies, copyright protection, facilitating quick access to information, and safeguarding the rights, property, or safety of MarginNote, our user community, customers, and the public.

3. Data Disclosure Practices

3.1 Internal Group Companies: Your Personal Data may be shared within our corporate group for reasons outlined in the “Data Utilization Purposes” section, alongside cooperating with law enforcement or regulatory bodies as mandated by law.

3.2 Collaboration Features: Utilizing certain features, like collaboration tools within our Services, allows the content you choose to share, including any Personal Data within, to be accessed by chosen individuals. Further dissemination of this content by those individuals is permissible. Such sharing is contingent upon your direction through the service functionalities provided.

3.3 Service Providers: We may entrust your Personal Data to external agents, contractors, or service entities (“Service Providers”), under stringent confidentiality obligations. These partners are contractually bound to use your data solely for delivering specified services to us and consequently to you, encompassing administrative, data processing, and similar utilities to optimize service provision.

3.4 Business Transitions: In events of mergers, sales, transfers, reorganizations, liquidations, or dissolutions within our group, or during the preparatory phases of these actions, we may transmit your Personal Data to involved parties. The focus is on anonymizing data wherever feasible and ensuring necessity-based access only.

3.5 Specific Third-Party Disclosures Include:

- Statistical Analysis: For aggregating statistical insights, we employ Google Analytics for Firebase.
- User Feedback: UserVoice serves our need for gathering feedback, requiring account creation for active participation.
- Cloud Services: Options for syncing app files with iCloud are provided for user convenience.
- User Interaction and App Improvement: Mixpanel and Amplitude are tools we use for understanding app usage patterns to enhance our app, services, and features.

4. Retention Practices

4.1 Retention Duration: The period for retaining your Personal Data is influenced by its intended use and statutory retention mandates, keeping data only as necessary per purpose or legal requirement.

5. International Data Transfers

5.1 Being a global entity means Personal Data is transferred internationally, potentially outside your home country's jurisdiction. We commit to securing and lawfully transferring your Personal Data consistent with legal stipulations, regardless of the destination. Means of protection include:

- Adequate Jurisdiction Approval: Transferring data to countries recognized by data protection authorities for possessing suitable Personal Data safeguards.
- Contractual Clauses: Engaging in agreements that encompass "model contractual clauses" authorized by data protection bodies, compelling data protection adherence from recipients.
- Binding Corporate Rules: In some cases, the receiving party is bound by internally enforced rules that ensure data protection.
- Other Legal Bases: There exist other legal grounds that permit us to transfer your Personal Data outside Europe under certain conditions.

6. Data Security Measures

6.1 We implement several technical and organizational measures to ensure the protection of your Personal Data, such as:

- Access Control: Membership access, for those registered with us, is protected by a unique email and password.
- Data Encryption: All Personal Data is encrypted to safeguard it from unauthorized access.
- Secure Servers: Any processing or storage of Personal Data is conducted on secure servers, enhancing data protection.

6.2 Our approach to processing your Personal Data adheres strictly to data protection principles, ensuring that:

- Data is processed lawfully, fairly, and transparently.
- Maintained data is accurate and, where necessary, updated; efforts are made to correct or erase inaccuracies.
- Data is processed in a way that guarantees its security.

6.3 To prevent unauthorized access, use, loss, or disclosure of your Personal Data, we employ robust security protocols. Access to your data is restricted to individuals who require it for professional reasons. We mandate that all who might process your Personal Data do so under confidentiality agreements, safeguarded within an authorized framework. Additionally, we have

established mechanisms to address and respond to data security violations, including legal obligations to notify you and relevant authorities about potential breaches.

7. Handling Information of Others

If you provide us with information for another individual, you confirm that you have the necessary consent from that person for:

- The processing and transfer of their Personal Data.
- Receiving data protection-related notices on their behalf.

8. Third-Party Websites

Our Services may feature links to external sites or contain social media buttons (Facebook, Twitter, YouTube and bilibili) . These third-party entities might collect personal information if you interact with them. Note that your interactions with these external features and third parties are governed by their respective privacy policies, not ours.

9. Your Rights under the GDPR

9.1 Under GDPR, you possess specific rights regarding your Personal Data, which include:

- Right to Access: You can request access to your Personal Data held by us.
- Right to Withdraw Consent: You may withdraw consent for data processing at any time, though we might still process your data if there are other legitimate grounds for doing so.
- Right to Rectification: You can ask us to correct inaccurate or incomplete Personal Data.
- Right to Erasure: You can request the deletion of your Personal Data under certain conditions, though legal obligations may allow us to retain it.
- Right to Data Portability: Under certain conditions, you can receive the Personal Data you' ve provided in a structured, commonly used format, or request we transmit it to another party.
- Right to Object: You have the right to object to processing for direct marketing and, under specific circumstances, other processing based on changing legitimate interests.

9.2 You can exercise these rights free of charge, providing a channel for you to manage your Personal Data effectively.

9.3 Should you believe that your rights have been breached by us in any way, you have the inherent right to lodge a complaint with the appropriate data protection regulatory authority. This gives you a recourse in case you are dissatisfied with how we have handled your Personal Data.

10. Children' s Privacy

In compliance with the Children’s Privacy Protection Act (“COPPA”), MarginNote consciously avoids collecting personal identifiable information from children under the age of 13. Our services are designed with a general audience in mind and do not target children under this age group.

11. More questions

11.1 For issues, inquiries, or complaints concerning the collection or use of your Personal Data, individuals are encouraged to initially contact MarginNote support at support@MarginNote.com. This step ensures direct communication with us to resolve any concerns efficiently.

11.2 Furthermore, you hold the right to contact and lodge a complaint with a supervisory authority competent in your habitual residence, place of work, or where an alleged infringement has occurred. This provides an additional layer of protection and recourse for your rights.

12. Policy Updates

MarginNote reserves the unilateral right to amend this privacy policy at any given time. Notice of such changes will be communicated to users through our website, the app, or directly via email, wherever feasible. Users are encouraged to frequently review this policy to stay informed about how we are protecting their Personal Data. This practice helps ensure that you are aware of any adjustments or updates to our privacy practices.