# **Privacy Policy**

### 1. The TL;DR version

- We use your email address as your username, to send emails about your use of Report-URI and our services, and to provide access to our webinars.
- We use your payment card data to allow us to process your monthly subscription
- Report-URI runs on established cloud service providers including Stripe, Cloudflare, Microsoft Azure, and Digital Ocean, and some data is processed outside of the UK and EEA.
- We're pretty serious about security
- We only use essential cookies to provide our service (that's why there isn't a cookie pop-up)
- If you are a data Controller as defined by GDPR and you believe that the data received by Report-URI in your telemetry and violation reports will contain the personal data of your users or customers, you must let us know if you want to designate Report-URI as your data Processor.

## 2. Data related to logging in

When you sign up for an account at Report-URI you need to provide your **email address** and a **password**.

As part of the sign-up process, we use Google's reCAPTCHA service which is essential to prevent automated bot registrations. Google's use of the data processed by reCAPTCHA is described at <a href="https://policies.google.com/technologies/partner-sites">https://policies.google.com/technologies/partner-sites</a>.

The email address you provide is stored and is used as a unique identifier for you to login. It is also used to send you emails in relation to your use of the service, ask for your feedback, and inform you of changes and enhancements to our services.

The password you choose is salted, hashed and stored. This hash is used every time you login to authenticate that the person logging in and claiming to be you, really is you.

We also create a unique **UserID** (think GUID) for your account. This is used to reference your account and for internal administration.

Data related to logging in is retained until your account is deleted.

By signing up for an account at Report-URI, you agree that we can use this information relating to you for these purposes. No other information is required for you to use the service.

### 3. Data related to payments

When you enter your payment card information we require the following data.

- A company or person name that the payment card is registered to
- The **country** of residence
- The billing address, city, and postcode that the payment card is registered to
- An optional EU VAT ID
- The **Primary Account Number** (PAN), **expiration date** and **verification code** of the payment card.

To enter your payment card information your browser will be redirected to Stripe Payment Europe. All payment data is entered directly into Stripe's servers. Report-URI never sees this data, instead Stripe send us a **reference**.

This information, along with your payment history, is necessary for us to process payments in accordance with our terms of service. It is retained as long as you continue to use Report-URI.

In addition to Stripe Payments Europe acting as our payment processer, Stripe also uses the data provided for their own purposes which include the prevention and detection of fraud and their own regulatory obligations. You can find out more about how Stripe uses your data in their privacy policy at https://stripe.com/gb/privacy.

## 4. Data related to your engagement with us

If you email us to ask about our services or require to be invoiced before paying, then we will process the data you provide to us in emails which may include your **name**, **telephone number(s)**, **job title**, **company** and **physical address**. We use this information to communicate with you and to send invoices to you.

This information may be retained as long as you use our service and as required by law (e.g. accounting records).

If you sign up for a webinar, we'll use your email address to provide access to the webinar and to follow-up. You can unsubscribe from our emails at any time.

### 5. Third-party service providers

As a cloud-based service, we rely on the use of third-party service providers.

Name	Services provided	Personal Data Processed
Cloudflare	Edge computing, CDN, WAF.	Email address
Digital Ocean	Core application processing on Report-URI administered systems hosted on Digital Ocean hypervisor plane	Email address
Fastmail	Email services	Email address and contact information – if you correspond with us
Microsoft Azure	Core application storage Database services	Email address
Sendgrid	Core application Email sending and receipt (SMTP servers)	Email address – automated emails sent by the system
Sage	Accounting SaaS	Invoicing and accounting information for enterprise customers. May include contact information.
Stripe Payments Europe	Payment Services	Payment card data Payment card billing address Billing history

Other than Stripe Payments Europe and Sage, all these third-parties operate outside the UK or EEA. For EU-based customers, we have executed agreements that incorporate the European Commission's revised Standard Contractual Clauses (SCCs) with all third-parties to provide the

necessary protection for personal data relating to you. For UK-based customers, the previous Commission SCCs approved by the ICO are still effective.

We have undertaken a Transfer Impact Assessment in respect of the transfer of personal data to the US and assessed that the risk of US authorities' lawful access to this data is negligible. However, it is important to remember that the only personal data processed by all these third parties is your email address and the other data related to logging in.

## 6. Security of data

As you'd expect from a company run by Scott, we're pretty serious about security.

Although the systems we run process minimal personal data – just your email address, password hash and a payment token – our systems are designed, built, and operated securely.

Our security is regularly tested by independent parties and you can read about our latest penetration test <u>here.</u>

#### 7. Cookies

When you access the Report-URI website, six first party cookies (from us) are stored on your computer, all are essential for the safe and secure operation of the site. The Cookies used are:

Party	Cookie	Purpose
1 <sup>st</sup>	_nss	Set to prevent CSRF, expires at the end
		of the session.
1 <sup>st</sup>	Host-report_uri_csrf	Set to prevent CSRF, expires in two
		hours.
1 <sup>st</sup>	Host-report_uri_sess	Session cookie, expires in 24 hours.
1 <sup>st</sup>	cf_bm	Cloudflare Bot Management
		The _cf_bm cookie supports Cloudflare
		Bot Management by managing incoming
		traffic that matches criteria associated
		with bots. The cookie does not collect
		any personal data, and any information
		collected is subject to one-way
		encryption. This encrypted file contains
		Cloudflare's proprietary bot score and
		helps manage incoming traffic that
		matches specific criteria.
		This cookie is a session cookie that lasts
		for up to 30 minutes from the time you
		connect with our site.
1 <sup>st</sup>	Secure-hideSeries- <report< td=""><td>where <report type=""> is the type of</report></td></report<>	where <report type=""> is the type of</report>
	type>	report. Currently for csp only, but the
		code is generic enough to support all
		report types. Used to remember which
		data series the user has hidden from the
		graph.

		Expires after one year.
1 <sup>st</sup>	sidebar_closed	Set when, you guessed it, the user closes the sidebar! Expires at the end of the session.
		expires at the end of the session.

## 8. Your rights

### Getting a copy of your data

You can see the data we process about you related to logging in, in your account.

If you have registered a payment card and want a copy of the data you provided, please email info@report-uri.com.

If you are an enterprise customer and require a copy of any personal data, please email info@report-uri.com.

### Correcting your data

If you believe any data we hold relating to you is incorrect, please email info@report-uri.com

#### Deleting your data

The processing of your personal data is necessary for your use of the service. If you delete your account this will also delete all the data related to you. This is a one-way process; it is not reversible.

### 9. Complaints?

We provide this service and process the minimum amount of personal data that we can. If you have questions or complaints, please address them to info@report-uri.com.

If you are not happy with how we have dealt with your questions or complaints in relation to how we process personal data, you can contact the UK Information Commissioner. The best place to start is <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a>

### 10. Changes to this Privacy Policy

Although changes are likely to be minor, we may change our Privacy Policy from time to time, at our sole discretion. We'd encourage you to frequently check this page for any changes to this Privacy Policy.

### 11. Personal data received by Report-URI in telemetry and violation reports

The data that we receive from your customers' browsers and email gateways in telemetry and violation reports *may* constitute the personal data of your users or customers. **Only you are able to make this determination and you should seek professional advice, we are not able to advise you.** 

There are two questions you need to consider:

- 1. Does the UK or EU GDPR apply to you?
- 2. Is the data received by Report-URI personal data that relates to identified or identifiable people who visit your website?

Typically, there are five types of data that are received by Report-URI which, for you, may be the personal data of visitors to your website. These are:

**IP address**: although we receive this it is discarded and not stored.

**HTTP Referrer**: The referring site may be received as part of a report and may contain the data relating to an identified or identifiable person. By default the HTTP Referrer is discarded and not stored, however a Report-URI user can change this setting and allow it to be stored.

**Document URI:** The structure of your URI may relate to an identified or identifiable person, for example www.yoursite.com/profile/john/doe/12345/. URIs are received and stored.

Query String: A query string may relate to an identified or identifiable person, for example www.yoursite.com/editprofile?userID=12345&name=JohnDoe. Query String is received in the telemetry or violation reports, and by default it is discarded and not stored. However a Report-URI user can change this default and allow Query String to be stored.

**URI Fragments:** A URI Fragment may relate to an identified or identifiable person, for example www.customer.com/editprofile#JohnDoe-12345. The default behaviour is that all fragments are discarded by Report-URI before the telemetry report is stored. However, this can be overridden by the Customer.

From a security and privacy perspective we would discourage anyone from including Personal Data in a URI, Fragment or Query String.

If you determine that Report-URI processes the personal data of your customers, and that therefore in GDPR terms, you are the Controller for this data, and Report-URI will act as your Processor, you must agree to amending our Terms of Service by incorporating our Data Processing Agreement after you upgrade from a free account.

You should determine that the reporting and data management functionality provided by Report-URI allows you to fulfil your obligations as a Controller.

Further information about the privacy implications of telemetry and violation reporting is available in the following detailed technical standards and RFC documents.

General W3C Reporting API	https://www.w3.org/TR/reporting/#privacy
Content Security Policy (CSP)	https://www.w3.org/TR/CSP3/#security-
	considerations
Network Error Logging (NEL)	https://www.w3.org/TR/network-error-
	logging/#privacy-considerations
Domain-based Message Authentication,	https://tools.ietf.org/html/rfc7489#section-9
Reporting, and Conformance (DMARC)*	
Transport Layer Security for Simple Mail	https://tools.ietf.org/html/rfc8460#section-8
Transport Protocol (SMTP over TLS)	
Certificate Transparency (CT)	https://tools.ietf.org/html/rfc6962

<sup>\*</sup> The forensic reporting option in DMARC (ruf) will expose the private information contained in an email. Report-URI does not support this option.

We have detailed further observations about a Controller's use of Report-URI as a Processor which is available in this document Report URI and Data Protection.

This policy was last updated on 30 October 2023 (1v10).

• Remove reference to Cyber Essentials scheme