

Introduction

At **21YunBox** ("we", "us", or "our"), we value and respect your privacy. This **Privacy Policy** applies to visitors of **21CloudBox.com**, related websites under the **21CloudBox.com** or **21YunBox** domains (the "Site"), and users of our software, tools, and related services (collectively, our "Services"). This policy outlines how we collect, use, and protect personal information, and demonstrates our commitment to transparency.

By using our Services, you acknowledge that you have read and understood this **Privacy Policy** and agree to its terms, as well as our **Terms of Service**.

Defining Key Terms

In this **Privacy Policy**, the following terms are defined:

- **Users:** Individuals who visit our Site and customers who use our Services.
- **End Users:** Visitors, users, or customers of sites created by our Users.
- **Personal Information:** Any information that can be used to identify an individual, either alone or combined with other data.

Other terms used in this **Privacy Policy** follow the definitions provided in our **Terms of Service**.

Information Collected

21YunBox offers various services collectively referred to as the "Services." We collect information from individuals who visit our website ("Visitors") and individuals who register to use our Services ("Customers"). The information we collect includes:

1. **Required Contact Information:** Information like your name, company name, address, phone number, and email address provided when you express interest in our Services or register to use them.
2. **Billing Information:** Financial qualification and billing details like billing name, address, credit card number, and details about employees using the Services.
3. **Optional Information:** Additional data, such as company revenue, number of employees, or industry, which helps us understand your needs better.
4. **Website Navigational Information:** Information collected through cookies and web beacons, such as your browser type, IP address, and actions taken on our website (e.g., pages viewed, links clicked). This helps us improve our website experience.

5. **Employee Data:** Personal data related to our employees, such as name, address, job title, location, compensation, and employment history, used for internal purposes.

By providing any of the above information, you give 21YunBox permission to use and store it in line with this Privacy Policy.

Use of Information Collected:

21YunBox uses the information it collects for various purposes, including:

1. **Service Delivery:** We use the information provided by our customers to perform and deliver the services requested.
2. **Marketing Purposes:** We may use customer information to contact you regarding your interest in our Services and to provide you with details about 21YunBox and our partners. This could include sending marketing materials and promotional offers, subject to your preferences.
3. **Payment and Financial Verification:** Credit card information is used solely to verify the financial qualifications of prospective customers and to collect payments for the Services.
4. **Website Improvement:** We use Website Navigational Information (such as cookies and browsing data) to enhance and operate our website, providing a better experience for visitors. This data may also be combined with customer data to deliver personalized content or services.
5. **Employee Data:** Employee data is used internally to manage administrative tasks, employee performance, and to handle reporting and compliance matters as needed.

Public Forums, Refer a Friend, and Customer Testimonials

21YunBox may provide interactive features such as bulletin boards, blogs, or chat rooms on our Website. Please be aware that any personal information you voluntarily share in these forums may be viewed, collected, or used by others, potentially leading to unsolicited messages.

21YunBox is not responsible for the personal information you choose to disclose in these public forums.

Referral Program: Customers and visitors may use our referral program to share the 21YunBox Website with friends. When using the referral feature, we will ask for your friend's name and email address to send a one-time invitation to visit our Website. We do not store this information after the email is sent.

Customer Testimonials: 21YunBox may display customer testimonials, which may include names, job titles, and other relevant details, on our Website. We will always obtain the customer's explicit consent before posting any testimonials or customer information.

Sharing of Information Collected

21YunBox may share customer data with our service providers, who assist us in delivering Services and communicating with users. These service providers may contact Customers or Visitors who have provided their information to 21YunBox on our behalf. We may also share customer data with service providers to enhance the quality of the Services and ensure accurate communication.

Unless stated in this Privacy Policy, 21YunBox does not sell, rent, or trade user data with third parties for promotional purposes. Occasionally, 21YunBox may partner with other companies to offer joint products or services. If you purchase or express interest in a jointly offered product or service, 21YunBox may share your data with our joint promotion partners after receiving your explicit consent.

We may also share information with third-party service providers, such as payment processors, who manage financial transactions. These providers will not store, retain, or use your billing information beyond the processing of your payments.

In some cases, 21YunBox may disclose your information if required by law, or if we reasonably believe such disclosure is necessary to protect our legal rights or comply with a court order, legal process, or law enforcement request. Employee Data will only be disclosed for Employee Data Purposes, and employees will be notified with an opportunity to opt-out or object to such use.

Communications Preferences; Opt-In Policy

21YunBox provides Customers and Visitors the ability to manage how their contact information is used. You can manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link included at the bottom of our marketing emails. Additionally, you may specify your communication preferences by sending a request to hello@21yunbox.com. If, at any time after registering, you decide to change your preferences regarding receiving information from us or the use of information you have provided, you can update your preferences by contacting us as specified.

How Does This Privacy Policy Apply?

This Privacy Policy explains how we handle personal information that we collect and use for our own purposes (i.e., when we act as a controller), such as your account information and data

about how you use and interact with our Services. This includes information submitted to our customer support channels and any data related to your End Users.

When you use our Services, we store, process, and transmit your User Content. User Content includes any content you post or upload to our Services, such as your images. We store and process these files and information to provide our Services. This Privacy Policy does not cover what we do with User Content on behalf of our Users (where we act as a processor). If you are an End User of one of our User's sites, please refer to their privacy policy to understand how they handle your information.

What Information Do We Collect?

While using our Services, we may request that you provide certain personally identifiable information that can be used to contact or identify you. The types of personal information we may collect include, but are not limited to, your email address, name, and portions of your payment information (e.g., the last four digits, country of issuance, and the expiration date of your payment card).

Personal Information We Collect Regarding You or Your Device Includes:

- **Information you provide to create an Account.** This may include your email address, name, and portions of your payment information provided by our payment processor (e.g., the last four digits, country of issuance, and the expiration date of the payment card).
- **Emails and other communications.** This includes customer support inquiries or other communications that you send or contribute. Please note that any content you voluntarily disclose in public areas of our Service (such as blogs or community forums) is available to others. Even if you remove content you posted, copies may still be accessible in cached or archived pages, or if others have copied or saved the information.
- **Marketing materials.** We may send you marketing materials, subject to your opt-out preferences.
- **Promotions, quizzes, surveys, or contests.** Information you share with us during participation in these activities.
- **Information from your use of our Services or Users' sites.** This includes details such as IP addresses, browser type and version, operating system, device preferences, network or internet service provider, timestamps, referral pages, browsing behaviors, and interactions with our Services and Users' sites.
- **Partner-provided information.** To improve our Services and support marketing initiatives, we may receive information from our partners, such as when you are shown one of our ads via an advertising platform.

- **Social media and website information.** If you choose, you may provide additional information such as your social media profiles, personal website name, or other discretionary information.

How We Collect Personal Information

We collect personal information from various sources:

1. **Direct information.** You provide some of this information directly, such as when you register for an Account.
2. **Automatically collected information.** We collect some information automatically when you interact with our Services or Users' sites, through technologies like cookies and similar tools (including the 21YunBox speed test, 21YunBox code test, and Site Audit).
3. **Third-party sources.** We may receive information from third-party services, such as payment processors or services like Google, if you use them to register for an Account.

I. Personal Information You Provide

We collect personal information directly from you to provide or improve our Services. This includes details like your name and email address for registration, identity confirmation, and account management. We may also use this information to communicate with you about the Service or send you marketing materials (in line with your preferences).

We also collect any communications you send us (e.g., customer support inquiries or forum posts). You might also provide us with information in other ways, such as responding to surveys or submitting a form.

In some cases, for contractual or legal reasons, we require specific personal information. If you do not provide requested information, you may be unable to use certain features of our Services.

II. Personal Information Obtained from Your Use of Our Services

When you interact with our Services, we automatically collect information about your activities, such as your IP address, the pages you visit on our Site, browser details, and previous websites visited before coming to our or our Users' sites.

We may also collect information about your interaction with our Users' sites, which is used in an aggregated, pseudonymized, or anonymized format, without focusing on individual users. This data helps us provide, protect, and improve our Services.

We also use cookies and similar technologies to collect some of this information. Cookies are small files that may include a unique identifier and help personalize your experience. If you decline cookies, some features of the Services may not be available.

We honor Global Privacy Control ("GPC") signals: when your browser sends one, we do not create an anonymous identifier or record your browsing on our Site. We do not act on legacy "Do Not Track" signals, for which no consistent industry standard exists.

III. Personal Information Obtained from Other Sources

If you register for an Account using a third-party service, such as Google, that service may provide us with your account information, including your name and email address. Your privacy settings with the third-party service control what information they share with us.

When you provide or update your payment information, we transmit it via an encrypted connection to our payment processor, Stripe. Payment Information may include your shipping and billing address, name, and email. Stripe processes this information in accordance with its own Privacy Policy.

Data Processing Agreement (DPA)

21YunBox is committed to ensuring compliance with data protection regulations, including but not limited to the **General Data Protection Regulation (GDPR)** and other applicable laws. When 21YunBox processes personal data on behalf of clients, a **Data Processing Agreement (DPA)** is automatically incorporated by reference into this Privacy Policy and the **Terms of Service (TOS)**.

Applicability of DPA

The **DPA** applies to all clients on the **Small Business (SMB) Plan** or higher who use 21YunBox services to process personal data on behalf of their end users. This ensures compliance with applicable data protection laws, including **GDPR**, **PIPL**, and others. The **DPA** outlines the roles and responsibilities of **21YunBox as a data processor** and the client as a **data controller**.

By using the Services, you authorize us to process personal data as necessary to provide the Services, in accordance with our **Privacy Policy** and **TOS Section 7.4**. This includes the processing of personal data related to your account, your users, and any personal data collected through your use of the Services.

General DPA for SMB Plans

For clients under the **SMB Plan**, a **general DPA** is provided as part of our standard offering. This general DPA covers all standard data processing activities and ensures compliance with data protection laws such as **GDPR** and **PIPL**, as described in the **TOS** and this **Privacy Policy**. No separate DPA is required under the SMB Plan.

Key data protection services provided under the SMB DPA include:

- Processing of personal data strictly in accordance with your instructions.

- Implementation of appropriate security measures to safeguard personal data.
- Assisting in responding to data subject requests in compliance with GDPR and other applicable laws.
- Notification in the event of a personal data breach.
- Ensuring that any sub-processors meet the same data protection standards.

Custom and Detailed DPAs for Enterprise Customers

If your business requires a **custom or detailed DPA**, such as including **Standard Contractual Clauses (SCCs)** for international data transfers outside the **European Economic Area (EEA)** or has specific compliance needs, you will need to upgrade to our **Enterprise Plan**.

For inquiries about upgrading to the **Enterprise Plan** or obtaining a custom DPA, please contact us at sales@21yunbox.com.

Why Do We Collect Such Information?

We use the personal information we collect from you to:

- **Provide and operate our Services.** This includes ensuring that the functionality of the Services meets your needs and delivering any relevant features.
- **Communicate with you.** We may send emails related to Service announcements, transactions, and other relevant information.
- **Improve, customize, and develop our Services.** Based on your interactions, we enhance and personalize the Services to better suit your preferences and needs.
- **Support and customer assistance.** We use your information to provide ongoing support, including troubleshooting and technical assistance.
- **Send service-related notices and marketing material.** We may send general or personalized service updates, as well as marketing materials, subject to your preferences.
- **Manage promotions.** We use your information to manage and administer surveys, quizzes, contests, and other promotional events.
- **Deliver customized services.** We utilize your location and interaction data to tailor your experience, such as determining language preferences or recalling recent interactions with our Services.
- **Ensure security and integrity.** Your information helps maintain the safety and integrity of the Services and prevent unauthorized access or fraud.
- **Improve and further develop our Services.** We continuously evolve the platform by analyzing user interactions and preferences.
- **Enforce legal agreements.** We use your information to enforce our Terms of Service and comply with other legal requirements.
- **Manage vendor and partner relationships.** Your information aids in handling relationships with our vendors and partners.

- **Protect rights and property.** We collect information to safeguard our rights, as well as those of others, including addressing any breaches or violations.
- **Tailor advertisements.** We use your information to show relevant advertisements, which may be customized based on your subscription plan or other factors.
- **Send tailored marketing materials.** We provide marketing content about 21YunBox and its partners, and track the effectiveness of these campaigns.

Use of Personal Information

We will only use your personal information for the purposes outlined in this Privacy Policy when:

- **Contractual Necessity:** We need to process your personal information to perform a contract or take steps to enter into a contract with you. For example, we require your email address to create your 21YunBox account and allow you to sign in.
- **Legal Obligation:** We have a legal obligation to use your personal information to comply with tax and other government regulations or to respond to binding law enforcement requests.
- **Legitimate Business Interests:** We have a legitimate interest in using your personal information to:
 - **Provide, maintain, and improve our Services.**
 - **Anonymize and use data.** We may anonymize your data and use it for purposes that do not identify you personally.
 - **Monitor and improve security.** We analyze usage patterns and activity to improve the security and integrity of our Services.
 - **Share within 21YunBox group companies.** Sharing your information helps us enhance our services across different areas of our business.
 - **Administer our Services.** This includes providing you with tailored communications, promotions, and advertising to better serve you.
- **Vital Interests:** We may use your personal information to protect your vital interests or those of others.
- **Third-Party Interests:** When necessary, we may process your information for the legitimate interests of third parties, such as our partners. These third parties may use your information to deliver tailored advertising, monitor its effectiveness, or support Users in improving the functionality and security of their websites.

Data Processing and GDPR Compliance

21YunBox is committed to ensuring compliance with data protection regulations, including but not limited to the General Data Protection Regulation (GDPR) and other applicable laws.

Data Processing Agreement (DPA)

A Data Processing Agreement (DPA) is automatically incorporated by reference into this Privacy Policy and the Terms of Service (TOS) for all users, including those on the Small Business (SMB) Plan.

Applicability of DPA

The DPA applies to all clients who use 21YunBox services to process personal data on behalf of their end users. This ensures compliance with applicable data protection laws, including GDPR. The DPA outlines the roles and responsibilities of 21YunBox as a data processor and the client as a data controller.

Key Provisions of the DPA

1. **Processing of Personal Data:** We will only process personal data in accordance with your documented instructions and for the purpose of providing our Services.
2. **Data Security:** We implement and maintain appropriate technical and organizational measures to protect personal data against unauthorized or unlawful processing and accidental loss, destruction, or damage.
3. **Sub-processors:** We may engage sub-processors to assist in providing the Services. We will inform you of any intended changes concerning the addition or replacement of sub-processors and give you the opportunity to object to such changes.
4. **Data Subject Rights:** We will assist you in responding to requests from data subjects to exercise their rights under the GDPR, to the extent possible given the nature of the processing.
5. **Data Breach Notification:** We will notify you without undue delay upon becoming aware of a personal data breach affecting your personal data.
6. **Data Transfer Mechanisms:** For transfers of personal data from the European Economic Area (EEA) to countries not deemed to provide an adequate level of data protection, we rely on appropriate safeguards such as Standard Contractual Clauses (SCCs) approved by the European Commission.

GDPR Compliance Measures

To ensure GDPR compliance, 21YunBox has implemented the following measures:

1. **Data Minimization:** We collect and process only the personal data necessary for the specified purposes.
2. **Data Subject Rights:** We have procedures in place to handle data subject requests for access, rectification, erasure, data portability, and objection to processing.
3. **Privacy by Design and Default:** We incorporate data protection principles into our services and business processes from the outset.
4. **Records of Processing Activities:** We maintain records of our processing activities as required by Article 30 of the GDPR.

5. **Data Protection Impact Assessments (DPIAs):** We conduct DPIAs for high-risk processing activities.
6. **International Data Transfers:** When transferring personal data outside the EEA, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses.
7. **Data Retention:** We retain personal data only for as long as necessary for the purposes for which it was collected, or to comply with legal obligations.

Data Controller Responsibilities

As a data controller using our Services, you are responsible for:

1. Ensuring you have a legal basis for processing personal data.
2. Providing clear and transparent information to your end users about how their data is processed.
3. Obtaining necessary consents for data processing, including for the use of cookies and similar technologies.
4. Responding to data subject requests and informing us promptly if our assistance is required.
5. Notifying relevant authorities and data subjects in the event of a data breach, where required.

Additional Information for EU Users

If you are located in the EU or EEA, you have the following rights under the GDPR:

1. Right to access your personal data
2. Right to rectification of inaccurate personal data
3. Right to erasure of your personal data
4. Right to restrict processing of your personal data
5. Right to data portability
6. Right to object to processing of your personal data
7. Right not to be subject to automated decision-making, including profiling

To exercise these rights, please contact us at legal@21yunbox.com. We will respond to your request within 30 days.

By using our Services, you acknowledge and agree to the data processing practices described in this section and throughout our Privacy Policy.

Enterprise Plan Options

While our standard DPA and GDPR compliance measures are sufficient for most SMB clients, we recognize that some businesses may require more comprehensive solutions. For these clients, we offer additional options under our Enterprise Plan:

1. **Custom Standard Contractual Clauses (SCCs):** For clients who transfer personal data from the EEA or other jurisdictions with similar requirements to countries outside these areas (such as China), we offer customizable SCCs as a legal mechanism for ensuring appropriate safeguards.
2. **Enhanced GDPR Compliance Measures:** This includes more detailed reporting, advanced data subject request handling, and customized data protection terms.
3. **Dedicated Data Protection Support:** Enterprise clients receive prioritized support for data protection-related inquiries and issues.

If your business requires these advanced features, please contact us at sales@21yunbox.com to discuss upgrading to our Enterprise Plan.

How We Share Your Personal Information

- **Service Providers:** We integrate with various third-party services and applications (collectively, "Third Party Services") to provide our Services. These service providers may assist us in delivering content, analyzing usage, or performing related tasks. For example, we may use website analytics providers to improve our Service's functionality. These third parties have access to your personal information only to the extent necessary to perform their tasks on our behalf and are prohibited from using or disclosing it for any other purposes. Please note that your interactions with any third-party services or websites are subject to their respective privacy policies and terms.
- **Third-Party Account Information:** If you choose to use Third Party Services, such as social media platforms, you may provide us with your account information. We may store and transmit this information as needed to provide our Services, in accordance with the third party's policies.
- **Compliance with Laws:** We may disclose your personal information to comply with legal obligations, such as responding to subpoenas, court orders, or other legal requests. We may also disclose personal information when we believe it is necessary to protect the integrity or security of our Services, even without notice to you.
- **Advertising and Promotions:** We share personal information with third parties to provide tailored advertising and measure its effectiveness. For instance, we may share pseudonymized email addresses with third-party social media platforms to avoid showing ads to users who already use 21YunBox.
- **Business Transactions:** In the event of a merger, acquisition, or sale of assets involving 21YunBox, your personal information may be transferred to the new entity. We will notify you before such a transfer occurs and if the privacy policy changes as a result.
- **Payment Processing:** We transmit your personal information securely via encrypted connections to our Payment Processor, ensuring that sensitive data like payment details remain protected.

Your Rights and Choices

- **Access, Update, Change, or Delete Personal Information:** You have the right to access, update, modify, or delete your personal information or that of your End Users directly through your Account. If you're unable to do so via your account settings, you can contact us at legal@21yunbox.com for assistance. Please note that deleting or restricting your personal information may limit the functionality of the Services.
- **Opting Out of Marketing Communications:** You can manage your marketing communication preferences by clicking on the "unsubscribe" link in our marketing emails or by contacting us directly at legal@21yunbox.com. You can also update your preferences if you no longer wish to receive marketing materials.
- **Data Deletion and Retention:** We may retain personal information for as long as necessary to fulfill legal obligations, resolve disputes, or enforce our policies. Deleting your personal information from our systems may take some time due to technical reasons. Additionally, we retain certain anonymized or pseudonymized information indefinitely for service improvement and analysis purposes.
- **Rights to Restrict or Object:** Where applicable, you may have the right to restrict or object to the processing of your personal information, as well as the right to data portability under relevant law. You also may lodge a complaint with a competent supervisory authority.
- **End Users' Rights:** If you are an End User of one of our User's sites, you should contact the site owner to exercise your rights regarding any information they hold about you

How We Protect Your Information

We prioritize the security of your personal information. Although we use commercially acceptable methods to protect your data, no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to protect your personal information, we cannot guarantee its absolute security.

How We Retain Your Personal Information

We retain personal information related to your use of our Services for as long as necessary to provide you with the Services or as required to fulfill legal obligations. You can request the deletion of your personal information by deleting your Account or contacting us at legal@21yunbox.com. Please note, there may be a delay in removing your personal information from our servers and backup systems.

We also retain personal information for as long as it is necessary for:

- Complying with legal obligations.
- Protecting ourselves in the event of disputes or to enforce our agreements.
- Achieving the purposes outlined in this Privacy Policy.

The retention period for specific data will vary depending on the type of information and the reason it was collected. Information that is anonymized, aggregated, or de-personalized may be retained indefinitely, as it no longer relates to a specific individual.

Data Transfers

Your personal information may be transferred to and stored in countries other than where you reside, which may have different data protection laws. By using the Services, you consent to the transfer of your information to such countries, where it will be processed under applicable laws.

In accordance with Article 46 of the GDPR, we may transfer personal information to recipients who have entered into the European Commission-approved contract for the transfer of personal data outside the European Economic Area (EEA).

Your consent to this Privacy Policy and submission of personal information constitutes your agreement to such transfers.

End Users' Personal Information

If you are a customer ("User") of 21YunBox who has created a site using our Services, you are responsible for the collection, handling, and use of the personal information of your site's visitors ("End Users"). This section is directed at such Users.

As a User, you may collect personal information about your End Users, and you may also use cookies and similar technologies to track site usage. It is your responsibility to ensure compliance with any relevant laws and regulations regarding the collection and use of your End Users' personal information, including the use of 21YunBox's functionality or any cookies or tracking technologies.

You are required to publish your own privacy and cookie policy and ensure compliance with it. We are not liable for your relationship with your End Users, the personal information you collect from them (even if it's collected through 21YunBox's functionality), or how you use that information. We also do not provide legal advice concerning these matters.

End Users' payment information may be processed by third-party eCommerce Payment Processors that you integrate into your account, in accordance with those payment processors' terms and policies. We transmit your End Users' payment information solely for processing purposes and do not collect or store that information.

Access to Your Personal Information

You retain the rights to your personal information and may access, amend, correct, delete, or limit the use of it at any time. Many personal information updates, including contact and payment details, can be done directly within your account settings. If you are unable to make these changes, please contact us at legal@21yunbox.com for assistance.

Please note that if you choose to delete or limit the use of your personal information, some features of the Service may not function properly.

If you have questions about your personal information or this Privacy Policy, or if you wish to file a complaint about how we process your personal data, you can contact us at legal@21yunbox.com.

Updates to This Privacy Policy

We reserve the right to update this Privacy Policy periodically. Any changes made will be posted on this page. You are encouraged to review this policy periodically to stay informed about how we are protecting your information.

Changes to this Privacy Policy become effective upon posting on this page. If the updates involve significant changes, we will provide additional notice, such as by sending an email notification or posting a prominent notice on our website.

Contact Us

If you have any questions about your personal information or this Privacy Policy, or if you would like to make a complaint regarding how your personal data is processed, please contact 21YunBox by email at legal@21yunbox.com.