

METEOR PRIVACY POLICY

Last Updated: May 25, 2018

Meteor Development Group Inc. (“Meteor”, “we”, or the “Company”) is committed to protecting the privacy of individuals who visit the Company’s Web sites, individuals who register to use the Services as defined below (“Customers”), and individuals who may register to attend the Company’s corporate events (“Attendees”). This Privacy Policy sets out how we collect and process personal data when you visit our websites (e.g. meteor.com, apollographql.com, graphql.com, atmosphere.js), when you use our products and services (our “Services”), or when you otherwise do business or make contact with us.

Please read this policy carefully to understand how we handle and treat your personal data.

What information do we collect?

We may collect and process the following personal data from you for our legitimate interests or the legitimate interests of third parties, as described in this Privacy Policy:

- **Information you provide to us:** We collect personal data when you voluntarily provide us with such information in the course of using our website or Services. For example, when you register to use our Services, we will collect your name, email address, password, organization information, and billing details. We also collect personal data from you when you subscribe to our newsletter, register for an event, or respond to a survey. If you make an inquiry through our website, or contact us in any other way, we will keep a copy of your communications with us.
- **Information we collect when you do business with us:** We may process your personal data when you do business with us – for example, as a customer or prospective customer, or as a vendor, supplier, consultant, or other third party. For example, we may hold your business contact information and financial account information (if any) and other communications you have with us for the purposes of maintaining our business relations with you.
- **Information we automatically collect:** We may also collect certain technical information, which in some cases is personal data, by automatic means when you visit our website, such as IP address, browser type and operating system, referring URLs, your use of our website, and other clickstream data. We collect this information automatically through the use of various technologies, such as cookies.
- **Personal information where we act as a data processor:** In certain rare cases, we also process personal data on behalf of our customers in the context of supporting our products and services. Where a customer subscribes to our Services for their website, game, or app, they will be the ones who control what event data is collected and stored on our systems. For example, they may ask us to log basic user data (e.g., email address or username), device identifiers, IP addresses, event type, and related source code. In such cases, we are data processors acting in accordance with the instructions of our customers, who are the data controllers. You will need to refer to the privacy policies of our customers to find out more about how such information is handled by them. If you are unable to contact the relevant customer, please contact us at the addresses provided below.

What are the legitimate interests for which we use your information?

The personal data we collect from you may be used in one of the following ways:

- To deal with your inquiries and requests
- To create and administer records about any online account that you register with us
- To provide you with information and access to resources that you have requested from us
- To provide you with technical support (your information helps us to better respond to your individual needs)

- To improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you), including to improve the navigation and content of our sites
- For website and system administration and security
- For general business purposes, including to improve customer service (your information helps us to more effectively respond to your customer service requests and support needs), to help us improve the content and functionality of our Services, to better understand our users, to protect against wrongdoing, to enforce our Terms of Service, and to generally manage our business
- To process transactions and to provide Services to our customers and end-users
- For recruitment purposes, where you apply for a job with us
- To administer a contest, promotion, survey, or other site features
- To improve advertising campaigns, primarily in an effort to prevent targeting of impressions via third-party channels when they are not relevant
- To send periodic emails. The email address you provide for order processing, will only be used to send you information and updates pertaining to your order. Where it is in accordance with your marketing preferences, we will send occasional marketing emails about our products and services, which you can unsubscribe from at any time using the link provided in the message.

How do we protect your personal data?

We implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information. We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our payment gateway providers database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential. After a transaction, your private information (e.g., credit cards, social security numbers, financials) will not be stored on our servers.

Do we use cookies?

Yes. Cookies are small files that a site or its service provider transfers to your computers hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information.

We use cookies to understand and save your preferences for future visits, to advertise to you on other sites (including but not limited to services such as Google AdWords and Facebook), and to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

You may refuse to accept cookies by activating the setting on your browser that allows you to refuse the setting of cookies. You can find information on popular browsers and how to adjust your cookie preferences at the following websites:

- [Microsoft Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)

However, if you choose to disable cookies, you may be unable to access certain parts of our site. A banner asking you to accept our cookies policy will be displayed upon the first visit to our website (or the first visit after you delete your cookies). Unless you have adjusted your browser setting so that it will refuse cookies and/or you have not accepted our cookies policy, our system will issue cookies when you log on to our site.

Do we disclose any information to outside parties?

We will only share your personal data with third parties in certain circumstances:

- We engage certain trusted third parties to perform functions and provide services to us, including cloud hosting services, off-site backups, email service providers, and customer support providers. We will only share your personal information with third parties to the extent necessary to perform these functions, in accordance with the purposes set out in this Privacy Policy and applicable laws.
- In the event of a corporate sale, merger, reorganization, dissolution, or similar event, your personal information may be sold, disposed of, transferred, or otherwise disclosed as part of that transaction.
- We may also disclose information about you to third parties where we believe it necessary or appropriate under law, for example: (1) to protect or defend rights, legitimate interests, or property belonging to us or third parties (for example, to enforce our Terms of Service); (2) to respond to valid legal process or lawful requests from public or government authorities, including for national security and law enforcement purposes; or (4) to prevent or investigate possible wrongdoing in connection with the Services or to maintain the security of our Services.
- We may use and share aggregated non-personal information with third parties for marketing, advertising, and analytics purposes.

We do not sell or trade your personal data to third parties.

Third Party Links

Occasionally, at our discretion, we may include or offer third party products or services on our website. If you access other websites using the links provided, the operators of these websites may collect information from you that will be used by them in accordance with their privacy policies. These third party sites have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

Do Not Track

We do not respond to the Do Not Track setting in your browser. While we do not use cookies to collect personally identifiable information or track users' online activities over time or across different web sites, certain of the third party tracking providers we use (e.g., Google, Facebook) may be able to do so, though we do not have access to that information. For information regarding Do Not Track mechanisms, see <http://allaboutdnt.com>.

International Transfers

If you are visiting our website or using our Services from outside the United States (U.S.), please be aware that you are sending personal information to the U.S. where our servers are located. The U.S. may not have data protection laws that are as comprehensive or protective as those in your country of residence. However, our collection, storage, and processing of your personal information will at all times be in accordance with this Privacy Policy.

EU-U.S. Privacy Shield

Meteor Development Group, Inc. is in the process of self-certification and complies with the principles specified in the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Meteor Development Group, Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity & Purpose Limitation and Recourse, Enforcement & Liability. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

As further set forth in the Privacy Shield Principles, we remain potentially liable if a third party processing personal data received from the EU on our behalf processes that Personal Data in a manner that is inconsistent with the Privacy Shield Principles (unless we can prove that we are not responsible for the event giving rise to the damage). Meteor Development Group, Inc. will be subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) with regards to our pending compliance with the Privacy Shield Principles.

In compliance with the Privacy Shield Principles, Meteor Development Group, Inc. commits to resolve complaints about our collection or use of your personal data. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Meteor Development Group, Inc. at:

Email Address: security@meteor.com

Mailing Address: 140 10th St, San Francisco, CA 94103

(2) Meteor Development Group, Inc. has further committed to cooperate and comply with the panel of the European data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU. If you are unsatisfied with the response you have received from us, or your complaint remains unresolved, you can contact your local DPA (contact details available [here](#)), and they will investigate your complaint free of charge.

(3) If your complaint is not resolved through the above methods, a binding arbitration process may be available under the Privacy Shield in certain circumstances. To find out more about the Privacy Shield's binding arbitration scheme, please see [this article](#).

Your Rights

EU individuals have the right to the right to access to, rectification or erasure of, and/or restriction of processing or objection to processing of your personal data. Some of these rights can be exercised through the account settings user interface of our online services. To the extent such rights cannot be exercised through the user interface, or you prefer that we assist you to exercise such rights, please contact us at the contact details above.

We will use reasonable efforts to respond within a reasonable time frame, and in any case, we will respond within any period of time mandated by applicable law (including the Privacy Shield Principles). Before we process any request, we may request personal information to verify your identity where allowed by law. Where permitted by local law, we may reject requests that are unreasonable or impractical.

Furthermore, we commit to giving you an opportunity to opt-out if your personal data is to be disclosed to any other independent third parties (other than for the purposes of those third parties to provide services to us as described herein), or to be used for a purpose materially different from or incompatible with those that are set out in this Privacy Policy. If you otherwise wish to limit the use or disclosure of your personal data, please write to us at the contact details above.

You can also unsubscribe from our marketing communications at any time by following the instructions or unsubscribe mechanism in the email message itself.

Data Retention

We may retain your personal data as long as you continue to use the Services, have an account with us, or for as long as is necessary to fulfil the purposes outlined in this Privacy Policy. You can ask to close your account by contacting us at the details above, and we will delete your personal data on request.

We may, however, retain personal data for an additional period as is required under applicable laws, for legal, tax, or regulatory reasons.

Changes to our Privacy Policy

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make material changes to this Privacy Policy, you will be notified via email (if you have an account where we have your contact information) or otherwise in some manner through the Service that we deem reasonably likely to reach you (which may include posting a new privacy policy on our website—or a specific announcement on this page or on our blog). Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting) or on the Effective Date set forth in the modified Privacy Policy. In all cases, your continued use of the Service or Website after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.