

PRIVACY POLICY

We are company DX HEROES LTD, id. no. 11892468, with its registered office at WC2H9JQ Covent Garden, London, 71-75 Shelton Street, and we as a controller want to inform you (data subjects) about processing of personal data. In this privacy policy we will describe how we process your personal data, for what period they are processed, who has access to the data etc.

We are providing a service called DX Scanner which can scan your code and related services to detect and recommend best practices in software development. Part of our services is displaying some info about your code. With this, we may also display and process some personal data.

We have tried to describe everything as clearly and simply as possible; nevertheless, should you still not understand certain notions, such as personal data, processor, controller etc., please contact us on e-mail address: info@dxheroes.io.

1. WHAT INFORMATION WE COLLECT AND HOW WE COLLECT THEM

We collect the following information:

- **Information gathered by scanning your code.** After you download the API key and insert it to your code, we scan your code and gather information about the owner of the code, e-mail (if accessible) of the person who made part of the code, URL of a repository, information from pull requests and other information as information about cooperation.
- **Your e-mail address and your information from Google profile.**
- **Information you provide us when you contact us.**
- **Information on your activity on our website.** When you visit our website, your activity on the site is recorded. We use the cookies technology to analyse the traffic on our website. When you visit our website, we collect information on your behaviour on the website, such as the number of pages visited, the duration of the visit, the visited pages, repeated visits, etc. We never combine this information with your personal data, such as data that you fill in within the forms on our website or your IP address. Further information on the use of cookies is given in **Schedule A to this Policy**.

2. HOW WE USE THE COLLECTED INFORMATION AND ON WHAT LEGAL BASIS

We use information gathered by scanning your code to process and analyse issues in your code and to provide you relevant information, so you may contact the person who wrote the code and may help you to fix issues. You may be using various services for software development, such as GitHub, or GitLab (hereinafter as **Services**). We are trying to be as transparent as possible, so when your e-mail address in used Services is publicly available, we will use and display this data in DX Scanner. We are processing data from services stated below and we are also providing link where you may manage publicity of your e-mail address:

Name of Service	Link to manage your e-mail address
GitHub	https://docs.github.com/en/github/setting-up-and-managing-your-github-user-account/setting-your-commit-email-address

Bitbucket	https://confluence.atlassian.com/doc/user-email-visibility-138596.html
GitLab	https://docs.gitlab.com/ee/user/profile/#private-com-mit-email

The legal basis for this processing is necessary for the performance of a contract to which the data subject is party according to the Article 6.1.b) GDPR. The data gathered from GitHub are also processed on the base of our legitimate interest according to the Article 6.1.f) GDPR which is based on our availability of provided services.

You may also create a user profile on our website <https://dxscanner.io>. If you are a Google user, you may create your user profile by logging in via Google account. For this reason, we may process your data inserted to your Google account in scope of your e-mail address and your profile info to create a user account. The legal basis for this processing is your consent via OAuth consent screen and necessity for the performance of a contract to which the data subject is party according to the Article 6.1.b) GDPR. Your personal data will not be utilized for a secondary purpose.

When you contact our support department, we may keep a recording of the communication so that we are able to help you resolve your problems. This contact data will be processed on the basis of performance of a contract if the communication will lead us to mutual relationship according to the Article 6.1.b) GDPR or under our legitimate interest according to the Article 6.1.f) GDPR. The legitimate interest is based on our improvement of provided services.

3. FOR WHAT PERIOD OF TIME WE PROCESS THE COLLECTED INFORMATION

Your personal data are always used only for a period necessary to achieve the purpose for which they were collected – for example, for the duration of the usage of our DX Scanner or as long as we are dealing with your requests for support. You may contact us at any time and we will let you know which data and for how long we are collecting.

4. WHO HAS ACCESS TO THE INFORMATION

We take care of the protection of personal data and we never sell our personal data files. We only pass the personal data to third parties for the above purposes only to the extent necessary.

Your personal data will be processed by our following **processors** in order to improve the quality of our services and ensure certain activities:

- server provider, which is company DigitalOcean, LLC. We concluded standard contract clauses with this company;
- our workers which cooperate with us under cooperation agreement or service agreement.

We process your personal data only on the territory of the European Union or the European Economic Area. However, some of our partners that we pass on your personal data may be from third countries. However, we always ensure that your data is passed on to our partners in these countries in accordance with legal regulations in the field of personal data protection, so we only cooperate with partners from countries providing an adequate level of protection, based on decisions of the European Commission or partners who provide other appropriate guarantees for transfer.

If you want to determine where your specific information is located, you can contact us at any time at the following e-mail address: info@dxheroes.io and we will resolve your request together.

5. HOW WE SECURE PERSONAL DATA

We are aware that ensuring security of personal data to prevent their misuse is our important duty towards you. That is why we strive to efficiently use the best possible security measures to prevent misuse or other unauthorised interference with your personal data. We have adopted the following measures to secure your personal data:

- **Risk-based principle.** We carry out regular reviews of information security risks related to your personal data. For this reason, we have also hired specialised employees performing supervision and participating in the company management.
- **Organisational security.** We place emphasis on securing your personal data against risks associated with the human factor, in particular:
 - We have adopted and maintain internal security policies and documents;
 - We regularly provide for training of employees and other workers on the rules of handling personal data and information security risks;
 - We stipulate in a contract the liability of employees, external contractors, suppliers and other third parties who have access to your personal data;
 - We have adopted and maintain standardised processes related to the handling of your personal data.
- **Technical measures.** We have put in place important technical measures to ensure the security of your personal data, in particular:
 - Solutions for network safety, combining firewalls, network element configuration and other technologies;
 - Encryption of hard disks and external media;
 - Backup of important infrastructure and data.
- **Physical security.** To protect personal data in written form and for the physical protection of IT equipment:
 - We control access to your personal data;
 - We have physically secured the premises and personal data storage facilities.

6. WHAT RIGHTS YOU HAVE IN RELATION TO THE COLLECTED INFORMATION AND HOW YOU SHOULD EXERCISE THEM

You have the following rights in relation to our processing of your personal data:

- a) right of access to personal data;
- b) right to rectification;
- c) right to erasure ('right to be forgotten');
- d) right to restriction of data processing;

- e) right to data portability;
- f) right to object to processing; and
- g) right to file a complaint with respect to personal data processing.

Your rights are explained below so that you can get a better idea of their contents. **You can exercise all your rights by contacting us at the following e-mail address: info@dxheroes.io. You can file a complaint with the supervisory authority (<https://ico.org.uk/>).**

The right of access means that you can ask us at any time to confirm whether or not personal data concerning you are being processed and, if they are, you have the right to access the data and to information for what purposes, to what extent and to whom they are disclosed, for how long we will process them, whether you have the right to rectification, erasure, restriction of processing or to object; from which source we obtained the personal data, and whether automated decision-making, including any profiling, occurs on the basis of processing of your personal data.

The right to rectification means that you may request us at any time to rectify or supplement your personal data if they are inaccurate or incomplete.

The right to erasure means that we must erase your personal data if (i) they are no longer necessary for the purposes for which they were collected or otherwise processed; (ii) the processing is unlawful; (iii) you object to the processing and there exist no overriding legitimate grounds for processing; or (iv) this is required of us based on a legal duty.

The right to restriction of processing means that until any disputable issues concerning the processing of your personal data are resolved, we must restrict the processing of your personal data.

The right to data portability means that you have the right to obtain personal data that concern you and which you have provided to us and which are processed in an automated manner and on the basis of consent or contract, in a structured, commonly used and machine-readable format, and the right to have these personal data transferred directly to another controller.

The right to object means that you may object to the processing of your personal data that we process for the purposes of our legitimate interests, especially for the purposes of direct marketing. If you object to processing for the purposes of direct marketing, we will no longer process your personal data for those purposes.

This Privacy Policy is effective from 1. 10. 2020

SCHEDULE A

USE OF COOKIES ON OUR WEBSITE

1. What are cookies?

Cookies are small text files saved by a website on your computer or mobile device when you start using the website. For a certain period of time, the website will thus remember your preferences and steps you have taken (e.g. login details, language, font size and other display preferences), so that you need not enter the data again and go from one page to another.

2. Why do we use cookies?

Our website, just like almost all websites, uses cookies to provide you with the best possible user experience. Specifically, our cookies help us:

- Operate our website as you would expect;
- Constantly improve our website;
- Make our website more efficient.

We **do not use** cookies for:

- Collecting any sensitive data;
- Transferring personal data to third parties; or
- Obtaining any commission on sales.

You can learn more about all the cookies we use below.

3. More information on cookies

3.1. Cookies used for correct functioning of the website

We use some cookies to ensure that our website functions correctly, such as helping us to save your account login.

Unfortunately, there is no way to prevent the use of these cookies other than by stopping the use of our website.

3.2. Third-party functions

Our website, just like most websites, also includes third-party functionalities. For example, Facebook Pixel which is included in the website to connect your social network. If these cookies are disabled, this will likely block the functionalities provided by these third parties.

Our website includes the following third-party cookies:

3.2.1. Social network cookies

They allow us to connect your social network profile with your preferences.

We use:

Facebook Pixel ([More information](#)).

3.2.2. Visitors' statistics cookies

We also use cookies to draw up visitor statistics, e.g. to determine how many people have visited our website, which type of technology they used (e.g. iOS or Windows – this helps us determine in which cases our website does not work as it should for specific technologies), what time they spent on our website, which page they viewed the most, etc. This helps us continuously improve our website. These programmes, so called “analytics”, also indicate how people reached the website (e.g. from Google search engines) and whether they had already visited it previously – this helps us spend more money to develop the services for you instead of making marketing expenses.

We use:

Google Analytics ([More information](#))

HubSpot ([More information](#))

Hotjar ([More information](#)).

4. Administration of cookies settings

In order to ensure your protection in conformity with the EU law, we are not allowed to use all cookies without having your prior consent. To this end, we divide the cookies we use into two categories. Those necessary for correct functioning of the website or performance of a service you require from us, on the one hand, and other cookies, on the other hand. The former category is described above in this information message and we can use these cookies even without your consent.

We may use other cookies only if you give your consent to this by clicking on “I agree” in the information banner displayed during the visit of our website or by clicking on “I agree with cookies” below in this information message.

5. Disabling or limiting cookies

In most cases, you can disable cookies by modifying the browser settings in that you disable cookies in the browser. If you do so, you will probably limit the functioning of our website, as well as a great many websites worldwide, because cookies form a standard part of a majority of modern websites. In respect of cookies, you might be concerned about “spyware”. Please note that rather than by disabling cookies in your browser, you can attain the same objective by installing an anti-spyware software that automatically removes cookies considered invasive.

Below, you can find a link to the cookies settings in individual browsers:

- [Google Chrome](#);
- [Mozilla Firefox](#);
- [Safari](#);

- [Microsoft Edge](#).