



Privacy notice

Last updated: 23 July 2020

Introduction

This notice applies across all websites that we own and operate and all services we provide, including our online and mobile accounting and financial services products, and any other apps or services we may offer (for example, events or training). For the purpose of this notice, we'll just call them our 'services'. If you are a WorkflowMax user, this notice applies to you too!

When we say 'personal data' we mean identifiable information about you, like your name, email, address, telephone number, bank account details, payment information, support queries, community comments and so on. If you can't be identified (for example, when personal data has been aggregated and anonymised) then this notice doesn't apply. Check out our [terms of use](#) for more information on how we treat your other data.

We may need to update this notice from time to time. Where a change is significant, we'll make sure we let you know – usually by sending you an email.

You can read the whole notice below, or if you haven't got much time, you can jump to the section you need using the navigation menu.

Here is a summary of the key changes we made on 23 July 2020:

- **International data transfers:** We removed references to Privacy Shield certification.



Who are 'we'?

When we refer to 'we' (or 'our' or 'us'), that means Xero Limited and all its wholly owned subsidiaries. Our headquarters are in New Zealand but we operate and have offices all over the world. Address details for all Xero offices are available on our [Contact us](#) page.

We provide an easy-to-use global online platform for small businesses and their advisors. At the core of our platform is our beautiful cloud accounting software. If you want to find out more about what we do, see the [About Xero](#) page.

For European Union data protection purposes, when we act as a controller in relation to your personal data, Xero (UK) Limited (company number 06071722) is our representative in the European Union.



Our principles of data protection

Our approach to data protection is built around four key principles. They're at the heart of everything we do relating to personal data.

Transparency: We take a human approach to how we process personal data by being open, honest and transparent.

Enablement: We enable connections and efficient use of personal data to empower productivity and growth.

Security: We champion industry leading approaches to securing the personal data entrusted to us.

Stewardship: We accept the responsibility that comes with processing personal data.



How we collect your data

When you visit our websites or use our services, we collect personal data. The ways we collect it can be broadly categorised into the following:

Information you provide to us directly: When you visit or use some parts of our websites and/or services we might ask you to provide personal data to us. For example, we ask for your contact information when you sign up for a free trial, respond to a job application or an email offer, participate in community forums, join us on social media, take part in training and events, contact us with questions or request support. If you don't want to provide us with personal data, you don't have to, but it might mean you can't use some parts of our websites or services.

Information we collect automatically: We collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you're using our websites and services so that we can continue to provide the best experience possible (e.g., by personalising the content you see).

Some of this information is collected using cookies and similar tracking technologies. If you want to find out more about the types of cookies we use, why, and how you can control them, take a look at our cookie notice.

Information we get from third parties: The majority of information we collect, we collect directly from you. Sometimes we might collect personal data about you from other sources, such as publicly available materials or trusted third parties like our marketing and research partners. We use this information to supplement the personal data we already hold about you, in order to better inform, personalise and improve our services, and to validate the personal data you provide.

Where we collect personal data, we'll only process it:

- to perform a contract with you, or
- where we have legitimate interests to process the personal data and they're not overridden by your rights, or
- in accordance with a legal obligation, or
- where we have your consent.

If we don't collect your personal data, we may be unable to provide you with all our services, and some functions

and features on our websites may not be available to you.

If you're someone who doesn't have a relationship with us, but believe that a Xero subscriber has entered your personal data into our websites or services, you'll need to contact that Xero subscriber for any questions you have about your personal data (including where you want to access, correct, amend, or request that the user delete, your personal data).



How we use your data

First and foremost, we use your personal data to operate our websites and provide you with any services you've requested, and to manage our relationship with you. We also use your personal data for other purposes, which may include the following:

To communicate with you: This may include:

- providing you with information you've requested from us (like training or education materials) or information we are required to send to you
- operational communications, like changes to our websites and services, security updates, or assistance with using our websites and services
- marketing communications (about Xero or another product or service we think you might be interested in) in accordance with your marketing preferences
- asking you for feedback or to take part in any research we are conducting (which we may engage a third party to assist with).

To support you: This may include assisting with the resolution of technical support issues or other issues relating to the websites or services, whether by email, in-app support or otherwise.

To enhance our websites and services and develop new ones: For example, by tracking and monitoring your use of websites and services so we can keep improving, or by carrying out technical analysis of our websites and services so that we can optimise your user experience and provide you with more efficient tools.

To protect: So that we can detect and prevent any fraudulent or malicious activity, and make sure that everyone is using our websites and services fairly and in accordance with our [terms of use](#).

To market to you: In addition to sending you marketing communications, we may also use your personal data to display targeted advertising to you online – through our own websites and services or through third party websites and their platforms.

To analyse, aggregate and report: We may use the personal data we collect about you and other users of our websites and services (whether obtained directly or from third parties) to produce aggregated and anonymised analytics and reports, which we may share publicly or with third parties.



How we can share your data

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

- other companies in the Xero group of companies
- third party service providers and partners who assist and enable us to use the personal data to, for example, support delivery of or provide functionality on the website or services, or to market or promote our goods and services to you
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure
- an actual or potential buyer (and its agents and advisors) in connection with an actual or proposed purchase, merger or acquisition of any part of our business
- other people where we have your consent.



International Data Transfers

When we share data, it may be transferred to, and processed in, countries other than the country you live in – such as to the United States, where our data hosting provider's servers are located. These countries may have laws different to what you're used to. Rest assured, where we disclose personal data to a third party in another country, we put safeguards in place to ensure your personal data remains protected.

For individuals in the European Economic Area (**EEA**), this means that your data may be transferred outside of the EEA. Where your personal data is transferred outside the EEA, it will only be transferred to countries that have been identified as providing adequate protection for EEA data (like New Zealand), or to a third party where we have approved transfer mechanisms in place to protect your personal data – i.e., by entering into the European Commission's [Standard Contractual Clauses](#). For further information, please contact us using the details set out in the Contact us section below.



Security

Security is a priority for us when it comes to your personal data. We're committed to protecting your personal data and have appropriate technical and organisational measures in place to make sure that happens. For more information about security, check out Xero's security pages.

If you want more detailed information, we've produced a Service Organisation Control (SOC 2) report, which is available on request. The SOC 2 report was produced after an independent auditor's examination of our service controls.

To keep up to date on known phishing and other scams targeting our community, and for information on how to protect yourself from them, sign up to our [security noticeboard](#).



Retention

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you've requested or to comply with applicable legal, tax or accounting requirements).

We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised.



Your rights

It's your personal data and you have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication, or make your request from the [Privacy at Xero](#) page.

You also have rights to:

- know what personal data we hold about you, and to make sure it's correct and up to date
- request a copy of your personal data, or ask us to restrict processing your personal data or delete it
- object to our continued processing of your personal data

You can exercise these rights at any time by making a request from the [Privacy at Xero](#) page.

If you're not happy with how we are processing your personal data, please let us know by getting in touch from the [Privacy at Xero](#) page. We will review and investigate your complaint, and try to get back to you within a reasonable time frame. You can also complain to your local data protection authority. They will be able to advise you how to submit a complaint.



How to contact us

We're always keen to hear from you. If you're curious about what personal data we hold about you or you have a question or feedback for us on this notice, our websites or services, please get in touch.

As a technology company, we prefer to communicate with you by email – this ensures that you're put in contact with the right person, in the right location, and in accordance with any regulatory time frames.

Contact us from the [Privacy at Xero page](#).