

Passage Privacy Policy

Much more than just a policy – 1Password is Private by Design

Last updated: May 17, 2023

This Passage Privacy Policy applies to the Passage branded websites owned and operated (“Passage Website”) by AgileBits Inc., doing business as 1Password (1Password, We, Us, or Our). This Privacy Policy describes how 1Password collects and uses the personal data collected through the Website (including, but not limited to, <https://passage.id/>) and Passage Services located behind the logins of Passage Applications. It also describes individual rights regarding the use of, access to, and how to update, correct, or remove personal information. The use of information collected through Passage Services shall be limited to the purpose of providing the Passage Service for which 1Password is engaged.

If you have questions or complaints regarding this Privacy Policy or Our practices, please contact Us via email at dpo@1password.com.

Your privacy is important to us and we respect each individual’s right to privacy. This privacy policy explains the personal data related to Passage Services and Websites that 1Password collects and processes, how it processes data and for what purposes it is collected and processed. This Privacy Policy further describes our commitment to preserving the privacy and security of your personal data. We will collect and use information through the Passage Website only in the ways disclosed in this Privacy Policy. We have created this Privacy Policy to let you know what information we collect when you visit the Passage Website, why we collect it, and how it is used. By using this website, you consent to the data practices prescribed in this Privacy Policy.

Who We Are and Our Commitment to Privacy

1Password is a Canadian company located at 4711 Yonge St, 10th Floor, Toronto, Ontario, M2N 6K8, Canada. At 1Password, we believe that the less information we know about you, the better. After all, it is impossible to lose, misuse, or abuse information we don’t have. To the extent that we have control over your data or data about you, we see ourselves as custodians of that data on your behalf.

We use your data solely to provide you with Passage Services in which you enroll and to provide you an enhanced user experience when you visit our Passage Website. Our business is providing Passage Services to you, the customer.

Who are You

Unless otherwise noted, we refer you, the Customer, as an owner or organizer of an individual or business account.

If you represent an organization, such as a business or educational institution, that utilizes Passage Services through a business account or if you are an end user of a Passage account provided by your organization, please see the [Passage Enterprise Accounts](#) section of this privacy statement to learn how we process your data.

Non-Owners

If you are a non-owner member of a business account, your use of Passage may be subject to your organization's privacy policy or practices, if any. Non-owner members of an account transfer some of the rights described here to the account owners.

Information Collected Through the Passage Services

We collect some data from you, in order to provide you with our Passage Service, in addition to your use of our Passage Website. You provide some data directly, such as when you create a Passage account, when you register for a Passage event or a webinar, or contact us for support. Such data is limited to your email address only. We get some limited data from your use of the Passage products and services. Such data may include your IP address, and the make and model of your device through which you access or use 1Password products or services.

We use your personal data to provide you with services associated with the use of a Passage account and to provide you with a rich customer experience through our customer support. In particular, we use your data to provide 1Password services, which includes updating, securing and troubleshooting, and providing support.

The following is a more detailed description of the types of 1Password account user data: We process Service Data. Both are treated securely with respect for customer privacy and data confidentiality, but there are important technical and usage differences.

(i) Service Data

We inevitably acquire Service Data about your usage of 1Password, your account, and your payments through operating our services. We retain only enough Service Data to operate and maintain the services.

Service Data are kept confidential. It is visible to our staff and may include, but is not limited to, server logs, billing information, client IP addresses, company or family name, and email addresses. Service data includes the name you provide us for your profile and any image that you may upload, at your option and discretion, as part of your profile.

As long as you are using our services, we retain the right to hold and use Service Data to provide our services, troubleshoot problems, analyze the performance and demands on our services, and to provide our payment processors with the information they need to process payments.

(ii) Diagnostic Data (Optional)

Diagnostic Data are a category of Service Data which are not automatically collected or required for operation of our services.

In some cases we seek diagnostic reports and other troubleshooting, bug, and crash reports from customers to help identify and solve problems with our products and services. This information is sent to us only on a case by case basis, or by users who explicitly opt into our beta software programs or who otherwise explicitly choose to provide diagnostic data to us. Diagnostic Data may contain sensitive information about your devices and operating environment as well as personally identifying information. Although there may be occasions when we ask for Diagnostic Data to assist you with a problem, you are never obligated to provide it.

Keeping Your Information Safe

We understand and accept our responsibility to protect Service Data. We use strict access control mechanisms, network isolation, and encryption to ensure that Service Data is only available to authorized personnel.

Information Collected from Your Use of Our Website

In a few areas on Our Website, We ask you to provide personal information that will enable Us to enhance your site visit, to assist you with technical support issues or to follow up with you after your visit. It is completely optional for you to participate. For example, We request information from you when you:

- Subscribe to a newsletter
- Participate in promotional offers
- 1Password uses your information for specific purposes. Your information may be used to:
 - Send you requested information about 1Password
 - Provide support
 - Market Passage Services to you
 - Provide you with access to Passage Services

Personal information you provide will be kept confidential and used to support your customer relationship with Our company.

All email communication with you will be on an Opt-In basis. This is solely at your discretion. Occasionally, We will send you e-mail communications with information, which may be useful to you, including information about Our products and Services or about offerings from affiliates or business partners. When you first provide Us with your e-mail address, you will be given the option of not receiving any such e-mail communications. We will include instructions in Our e-mail messages on how to unsubscribe if you later decide you do not want to receive any

future e-mail communications. At any time, you can easily opt-out of receiving further marketing from 1Password by contacting Us at the address below and requesting to have your name removed from Our lists.

Information Sharing and Disclosure to Third Parties

Agents or contractors of 1Password may have access to your personal information for the purpose of performing services on behalf of 1Password. All such agents or contractors who have access to your personal information have Data Processing and Confidentiality obligations to keep the information confidential and not use it for any other purpose than to carry out the services they are performing for 1Password.

Unless We tell you otherwise, or unless otherwise stated in this Privacy Policy or required by law, We do NOT sell or rent your personal information to any third parties. However, We might share your personal information with Our service providers, such as Our hosting services providers. If you choose to participate in a survey, a focus group etc., we may also share de-identified data with Our customers.

Information collected from you is only used to complete and support your purchases from 1Password and use of the Site and to comply with any requirements of law. 1Password may disclose personal information if required to do so by law or in the good faith belief that such action is necessary to: (1) conform to the edicts of the law or comply with legal process served on 1Password or this Site; (2) protect and defend the rights or property of 1Password; or (3) act in urgent circumstances to protect the personal safety of users of 1Password, its web sites or the public. We may collect and possibly share your information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Our terms and conditions posted on Our Websites, or as otherwise required by law.

If 1Password is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on Our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information. We may also disclose your personal information to any other third-party with your prior consent.

Compliance with the laws

AgileBits fully complies with the Canadian privacy laws and the GDPR. AgileBits is a Canadian company, we are not U.S.- E.U. Privacy Shield certified. If you are affiliated to an organization who provides you with 1Password account through its Enterprise level account then there may be additional requirements for us to meet, based on the contracts with the organization. For further information, please read below the section [1Password Product or Account provided by your Organization](#).

Customer support system

Our customer support and email services are hosted primarily in the United States. Any information you choose to send us through email or our customer support system may pass through and be stored on a variety of intermediate services.

Third-Party Data Processors

Your Service data is held by third-party data processors, who provide us with hosting and other infrastructure services. The locations of these are described above. In many cases (but we cannot promise that this will always be the case) even Service data held by these entities is encrypted with keys held only by us.

Data needed to process payments is collected by our payment processor, Stripe, Inc., which conforms to the U.S.-E.U. Privacy Shield Framework. See <https://stripe.com/in/legal/privacy-shield-policy>

Contacting You

We may use your contact information, that is, the contact email address provided by you, to communicate with you about Service activity, provide support, and send you other information such as product updates and announcements. You may choose to stop receiving communications from us, except certain important notifications such as billing and account security alerts.

Your Responsibilities for Protecting Your Data

Due to the nature of our design and the sensitivity of the information you entrust to us (even in encrypted form), it may not be possible for us to help you with certain customer service requests unless you are listed as an account owner and are communicating from your verified email address. In the event that you change your email address, it is very important that you update your email on your Passage account(s) or you may eventually lose access.

Data Protection Principles that We Practice

(i) Data Portability

We want happy customers, not trapped ones. We will not lock you out of your own data.

You may export your Passage data at any time you wish during the life of your Passage account.

(ii) Your right to access and control your personal data

You can also make choices about collection and use of your data by AgileBits. You can control your personal data and exercise your data protection rights by contacting AgileBits at the address and information provided below. You can add, remove, edit, change any data that are in

your Passage account. If you are an affiliate of an organization which provides you with the access to 1Password account and services, there may be certain restrictions to the above, based on your affiliate organization's privacy or other similar policies. For further details, please review below the section under [1Password Product or Account provided by your Organization](#).

Cookies and Tracking

We set and use cookies (small text files placed on your device) on our own domains and subdomains to store settings that assist with identifying your account for sign-in. We also use third-party packages and trackers for our public pages that may set cookies on your computer. These cookies are used to understand broad and anonymous user behavior when you visit 1password.com, 1passage.id and affiliated subdomains. Such user behavior includes time spent by a visitor on the website, most visited webpage, aggregated clicks on signups etc. We also use these third-party cookies to serve more relevant advertisements to visitors once they have left the 1Password website on our partner sites across the web.

Client applications, including web browsers, will store information about your account to assist with future sign-ins and keep some information available to you when you are not signed in. Users may remove all such information from their devices, but doing so will require that they provide complete information (account details) on subsequent sign-ins. For more information on our use of cookies, please visit our Cookie Policy page [here](#).

Disclosure

We will comply with applicable laws and the contracts with our customers to provide Service Data to law enforcement agencies. If permitted, we will notify you of such a request and whether or not we have complied. Some Service Data is made available to family account organizers and team owners. In some limited circumstances we may provide some information to non-owner members of these accounts. Account owners will be informed in these circumstances.

Breach Notification

In an event of a breach, we recognize our responsibility to our customers and to the public to disclose the nature of the risk and provide a transparent account of the events without undue delay. We follow applicable requirements under the laws, that is, the Canadian data privacy breach notification requirements and the requirements related to data breach notification under the GDPR.

1Password Product or Account provided by your Organization

When we offer Passage Services to you through your organization, we continue to adhere to the Canadian privacy laws and the data protection requirements under the GDPR. We follow the Canadian data privacy laws and the GDPR, in addition to any requirements under the contracts with your organization, to ensure that your data are located, and if applicable, appropriately transferred.

If you use a Passage Service or Passage account to access our products and services, and such Passage Service or Passage account was provided by the organization that you are affiliated with, that organization is the controller or the administrator of your 1Password product or 1Password account. Your organization can access and process your data associated with your 1Password product or account. If your organization provides you with access to 1Password product or 1Password account, your use of the product or account is subject to your organisation's policies, if any. You should direct your privacy inquiries, including any requests to exercise your data protection rights, to your organization's administrator. We are not responsible for the privacy or security practices of your organization, which may differ from those set out in this privacy policy.

If you lose access to the organization that you are affiliated with (for example, if you change your employment), you may lose access to 1Password product or 1Password account and the content or data associated with such product or account.

Updates to our Privacy Policy

At our discretion, we may make changes to this Policy and note the date of the last revision. You should check here frequently if you need to know of updates to our Privacy Policy. We maintain the right to send you an email informing you of substantive changes.

Contact Us

If you have any questions about this Policy, you can [contact our support team](#) or write us by mail at:

4711 Yonge St, 10th Floor,
Toronto, Ontario,
M2N 6K8
Canada

Supervisory Authority

If you have concerns or complaints about this policy or practices with regard to that you do not feel you can resolve through contacting us, you should bring those concerns to your local regulatory authority.

For residents of the European Union, our primary Supervisory Authority is the [Berlin Commissioner for Data Protection and Information Freedom](#).

Berliner Beauftragte für Datenschutz und Informationsfreiheit

Friedrichstr. 219

10969 Berlin, Germany

Tel.: +49 30 13889-0

Fax: +49 30 2155050

E-Mail: mailbox@datenschutz-berlin.de

<https://www.datenschutz-berlin.de/>

👏 Thanks for reading! ❤️

Glossary

AgileBits, we, our, Service Provider

AgileBits Inc., a Canadian company located at 4711 Yonge St, 10th Floor, Toronto, Ontario, M2N 6K8, Canada. Owners and operators of 1Password. As Data Processors, we include AgileBits' employees and subcontractors appointed by AgileBits.

Data Processor

Data Processor as defined by the GDPR. We and the subprocessors (hosting services, payment processors) we appoint are the Data Processors.

Account Password

A user secret that is necessary to access an account.

AgileBits staff, staff

Our Directors, employees, and subcontractors

GDPR

European Union's [General Data Protection Regulation](#)

Decrypt

Decryption transforms encrypted data back to its original form. It cannot be performed without the appropriate cryptographic key.

Encrypt, Encryption

Encryption transforms usable data into a form that conceals all information contained in the original data.

Owner, Organizer

Business and Family accounts, which allow for multiple members, will have Owners or Organizers. Owners and Organizers have some rights over the data belonging to members of the Business or Family.

Personal Data

As defined under the Canadian privacy laws and the GDPR.

Subprocessor

Anyone other than us who we have appointed to process customer data. Subprocessors can see no more data than we can see. Examples include our data hosting providers and payment processors.

Supervisory Authority

A local regulator under the GDPR which has the job of seeing that we protect your data properly.

Service Data

Data about a user account, which is available to AgileBits.

You, Data Subject

You are the Data Subject as defined in the GDPR. In general, we are addressing “you” as the Owner or Organizer of an Individual, Family, Team, or Business account.