

# Neo4j Privacy Policy

Thank you for visiting this Internet web site at neo4j.com, neo4j.org, neo4j.io, [arrows.app](#), [graphconnect.com](#), [graphdatabases.com](#), and [opencypher.org](#) (and subdomains thereof) (each a “Site”) offered by Neo4j, Inc., Neo4j Sweden AB, Neo4j Germany GmbH and Neo4j UK Limited (collectively “Neo4j”). Neo4j Sweden AB, Neo4j Germany GmbH and Neo4j UK Limited are personal data controllers for the processing of your personal data, under UK and European data protection legislation. Our Data Protection Officer can be reached at: [dponeo4j@neo4j.com](mailto:dponeo4j@neo4j.com). In this privacy policy, the term “personal data” has the meaning as defined in applicable law, including, European Data Protection legislation and the California Consumer Privacy Act (CCPA/CPRA). California Consumers should visit our [California Privacy Rights](#) page for relevant information.

Neo4j, Inc. complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Neo4j, Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Neo4j, Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>. The Federal Trade Commission has jurisdiction over Neo4j’s compliance with the Data Privacy Framework. This Privacy Policy describes our policies for Neo4j’s collection, use and disclosure of personal data about users of our Site(s) (including use of services made available via our Site(s)) and users of Neo4j software and services. We offer self-managed software (such as Neo4j Desktop) as well as hosted services (such as Neo4j Aura). We refer to our hosted services as “Neo4j Cloud Products.” We refer to self-managed software, our support and consulting services and our Neo4j Cloud Products, collectively, as “Products.”

## Information Collection and Use

We collect personal data from you when you visit our Site(s). However, to use some of the services and functionality of the Site and Products, you may be required to register for an account or fill out a form to provide us with certain personal data such as an email address that can be used to contact or identify you. For

example, when you fill out a contact me or registration form to use the Neo4j software, Neo4j Desktop, Neo4j Browser, Neo4j Operations Manager or Neo4j Aura or when you register for a webinar or an event or download white papers. We collect the following personal data and use your personal data to:

- *Communicate with You and Tell You About Neo4j Products and related events.* When you register for an account or otherwise contact us with questions or comments or submit a proposed talk, we will collect personal data such as your name, e-mail address, company name, job title and/or function and any other contact or personal data that you voluntarily transmit with your communications to us. We also may collect personal data about you that you elect to upload to the Site when you use our Site and services.
- *Provide, Improve and Facilitate the Delivery of Neo4j Products.* When you download or use Products we may collect information about your usage of our Products, such as, product edition, version downloaded, system type and IP address, UI feature use, success/fail of a query, RAM utilization, CPU usage and database instance identifier/usage. Some of this information may be personal data. You may opt-out of our collection of certain personal data as set forth in the Choice section below. If you use the community edition of our Products, we collect this information in aggregated form only.
- *Respond to your Comments or Questions or Provide information Requested by You.* We offer online communities and messaging through our website services and other platforms where users can share their experiences. When you choose to participate in these communications, we collect personal data and business information. If you elect to post a comment otherwise make personal data publicly available on our Site, such as in a comment to one of our blogs, other users of the Site will be able to view such comment and/or your personal data.
- *Use our Support Services.* For customer support, you will be required to register for an account with your name, email address, company name, username and password. In addition, in connection with troubleshooting an issue, we may need to access personal data that you have used in connection with queries to our Products. If you use our Products, we will collect the information that you voluntarily include in your queries, including, personal data and business information that you may specify in your query; provided that we will not store such personal data in queries to the Neo4j Cloud Product if you parameterize your queries. Although your data will be hosted by our hosting providers when you use the Neo4j Cloud Product, your data is encrypted and we will not be able to readily access the personal data that you elect to upload to the Neo4j Cloud Product, unless you provide us with the password to your Neo4j Cloud database so we can provide you with support.
- *Better understand how the Site is used.* We collect information about how you use our Site(s) . This information includes your IP address, your Site history and other information, such as your browser type. We use this information to analyze Site traffic and administer and improve the Site, track users' movement, and gather broad demographic information for aggregate us.

Neo4j processes the personal data for the following purposes, based on the following legal grounds:

Purpose of the Processing	Legal Basis for the Processing
Communicate with you and tell you about Neo4j Products and related events	Pursue legitimate interests
Provide, improve and facilitate the delivery of Neo4j Products that you request	Fulfill contractual obligations, or if you represent a legal entity, to pursue our legitimate interests
Respond to your comments or questions or provide information requested by you	Fulfill contractual obligations
Improve the content and general administration of the Site and our services	Pursue legitimate interests
Provide our support services	Fulfill contractual obligations
Better understand how the Site is used	Pursue legitimate interests

Neo4j’s legitimate interests are: (a) providing Products and other services to business customers; (b) sending marketing communications; and (c) maintaining, improving and administering our Products and our Site(s).

## Opting-Out of Communication from Neo4j

You have the ability to “opt-out” or unsubscribe from continuing to receive any Neo4j marketing communications via email at any time. Neo4j also provides opt-out information in all marketing communications via an “unsubscribe” link in communication emails, which directly unsubscribes you from any further communication from Neo4j.

## Children’s Privacy

Neo4j recognizes the privacy interests of children and we encourage parents and guardians to take an active role in their children’s online activities and interests. Our Site(s) and Products are not intended for children under the age of 16. Neo4j does not target its Site(s) or Products to children under 16. Neo4j does not knowingly collect personal data from children under the age of 16.

## Cookies and Tracking Data

We may use small text files called cookies and other tracking mechanisms to improve your experience with our Site(s) and our Products. We use both session ID cookies and persistent cookies on our Site. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. To learn more about the cookies and other tracking mechanisms that we use, please see our <https://neo4j.com/privacy-policy/cookies/>.

## Disclosure

We may provide your personal data to our third party service providers for their use in providing services to us. For example, your personal data may be shared with Google Cloud Platform in connection with Google Cloud Platform's hosting and support of our Neo4j Cloud Products. Additionally, we may use a third party payment processor to process your payments. In connection with the processing of such payments, we do not retain any personal data or any financial information such as credit card numbers. Rather, all such information is provided directly to our third party processors. Unless we give you the choice to opt-out and you do not exercise your opt-out right, Neo4j's service providers do not have any right to use personal data we share with them beyond what is necessary to assist us or for a purpose incompatible with the purpose for which it was originally collected or subsequently authorized by you. We will not otherwise disclose your personal data to a third party unless set forth below or unless you have provided us with affirmative or explicit (opt in) consent. We generally do not share any personal data gathered on our Site(s) or from our Products with third parties for their own direct marketing purposes. Please note, however, that your registration information for a particular event may be provided to co-presenters or co-sponsors for that event. Unless you opt-out at the time of registering for the event, those sponsors may use your personal data for their own marketing purposes. Their privacy policies may differ from this one. For example, we use Eventbrite to register you for certain events and Eventbrite's privacy policy will govern their use of your personal data. In addition, we may share your information with our partners, such as distributors and resellers, and to other business partners, to fulfil product and information requests, to effectively deliver unified support, to you with information about our Products, and for event purposes. We use Auth0 for certain authentication services in the Products. Any information that you save in our Auth0 enabled services will be hosted by our service provider Firebase. Firebase's use of your information is subject to Firebase's policies at <https://www.firebase.com/terms/privacy-policy.html>. We will also disclose your personal data (a) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, if we are required to do so by law, regulation or other government authority or otherwise in cooperation with an ongoing investigation of a governmental authority, (b) to enforce the terms of service or subscription agreement(s) for our Site(s) or Products or to otherwise protect our rights or (c) to protect the safety of users of our Site(s) or Products. We may transfer your personal data to a successor entity upon a merger, consolidation or other corporate reorganization in which Neo4j participates or to a purchaser or acquirer of all or substantially all of Neo4j's assets to which this Site relates.

## Links to Third Party Sites

The Site may provide links to other Web sites or resources over which Neo4j does not have control (“**External Web Sites**”). For example, our pages at Slack, Google Groups, and Stackoverflow are External Web Sites. Such links do not constitute an endorsement by Neo4j of those External Web Sites. You acknowledge that Neo4j is providing these links to you only as a convenience, and further agree that Neo4j is not responsible for the content of such External Web Sites. Your use of External Web Sites is subject to the terms of use and privacy policies located on the linked to External Web Sites.

## Social Plugins on Our Site

We may use social plugins on our Site and may include icons that allow you to interact with third party social networks such as LinkedIn, Twitter and Facebook. For example, you may “like” us or a book on Facebook or follow us or Tweet about us on Twitter. If you use our Neo4j Browser Sync, Neo4j Cloud and Neo4j Sandbox services, you will be required to login using your GitHub, LinkedIn, Twitter and/or Google credentials. The third party social plugin may set a cookie when your browser creates a connection to the servers of such social networks and the plugin may transmit your data to the social networks. Additionally, there may be places where we offer the ability for Neo4j applications to connect with third party social networks, such as Twitter or Facebook. We will collect certain data that the third party social networks provide to us and we will only use that data to provide the application for your use. Your use of these social plugins is subject to the privacy policies of the third party social networks.

## Retaining your Personal Data

We keep your personal data for as long as we need it for the purposes for which it was collected. Where we keep your data for purposes beyond those of our contractual fulfillment, we keep the data only as long as necessary and/or mandated by law for the respective purpose. When we decide how long we will keep your information we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, why we need it, and any relevant legal requirements. We may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may retain and use this information indefinitely.

## Security

We employ technical and organizational measures, consistent with industry practice, which are reasonably

designed to help protect your personal data from loss, unauthorized access, disclosure, alteration or destruction. These measures may include encryption, secure socket layer and other security measures to help prevent unauthorized access to your personal data. The security of the Neo4j Browser Sync service is provided by our cloud hosting provider, Firebase and you can read more about Firebase's security policies at <https://www.firebase.com/terms/privacy-policy.html>.

## Your Rights Regarding Personal Data Concerning You

You have the following rights with regard to our processing of your personal data: (i) to receive confirmation whether your personal data is being processed by us, to receive information about the processing and to access your personal data, and to obtain a copy of your personal data; (ii) to object to our processing of your personal data; (iii) to have personal data concerning you deleted, and to have incorrect data about you corrected, and to restrict the processing of data concerning you; (iv) to data portability, meaning that you in certain cases have a right to receive personal data concerning you in a commonly used format, or to have it transmitted to another personal data controller in accordance with your specification; and (v) to not be subject to a decision based only on automatic processing. Please note that the exercise of these rights is not absolute, and that for some rights certain criteria must be at hand for the right to be exercised, or that certain exceptions might be applicable. In compliance with the Data Privacy Framework Principles, Neo4j commits to resolve complaints about our collection or use of your personal information. European Union, United Kingdom or Swiss individuals with inquiries or complaints regarding our Data Privacy Framework policy should first contact Neo4j at: <https://preferences.neo4j.com/privacy>. If your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Data Privacy Framework Panel. Neo4j has further committed to cooperate with the panel established by the EU data protection authorities (DPAs), the UK Information Commissioners Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Data Privacy Framework complaints concerning human resources data transferred from the EU and Switzerland in the context of the employment relationship. In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Neo4j commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship. In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Data Privacy Framework, UK Extension to the EU-U.S. and the Swiss-U.S. Data Privacy Framework, Neo4j is potentially liable. Neo4j provides you with the ability to review and update the registration information that you provide to us by contacting us at <https://preferences.neo4j.com/privacy>.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Neo4j commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the

EU-U.S. DPF and the Swiss-U.S. DPF to International Centre for Dispute Resolution (ICDR-AAA <https://www.icdr.org/dpf>), an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit [https://go.adr.org/dpf\\_irm.html](https://go.adr.org/dpf_irm.html) for more information or to file a complaint. The services of ICDR-AAA are provided at no cost to you.

## Exercise Your Rights; Questions

If you wish to exercise your rights described above or if you have any questions regarding this Privacy Policy please visit <https://preferences.neo4j.com/privacy>.

## Notice to Users Outside of the United States of America (Transfers)

Any information you enter on this Site or that we collect through our Products may be transferred outside of the country in which you are located and to another country, such as the United States of America, which does not offer an equivalent level of protection to that required in other countries, such as the European Union. In particular, you are advised that the United States of America uses a sectoral model of privacy protection that relies on a mix of legislation, governmental regulation, and self-regulation. The European Union's General Data Protection Regulation ("GDPR") allows for transfer of personal data from the European Union to a third country in certain situations. By agreeing to the Terms of Use and this Privacy Policy, you agree and consent to the transfer of all such information to the United States of America which may not offer an equivalent level of protection to that required in other countries, particularly the European Union, and to the processing of that information by Neo4j on servers located in the United States of America as described in this Privacy Policy. Additionally, transfers of personal data from the European Union to the United States of America are made using the EU Commission's Standard Contractual Clauses (Decision 2004/915/EC) in accordance with applicable law. Please contact us for more information about this, or if you want to obtain a copy of the Data Processing Agreement between our European entities and our United States entity and/or a copy of the Standard Contractual Clauses used.

## Complaint

If you have any complaints regarding our processing of your personal data, you may file a complaint to the competent data protection authority. You can find out more about the local data protection authorities under the following link [https://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

## Privacy Policy Updates

Neo4j may update this Privacy Policy from time to time. If so, Neo4j will post our updated Privacy Policy on our Site(s) or on an administrative or notice page of our Product(s), as applicable, along with notice that the Privacy Policy has been changed. Neo4j may also send registered users of the Site(s) or Products e-mail notifications notifying such users of any material changes to the Privacy Policy. Neo4j encourages you to review this Privacy Policy regularly for any changes. Your continued use of this Site and/or continued provision of personal data to us will be subject to the terms of the then-current Privacy Policy. This Privacy Policy was last updated: September 15, 2023.

## Contact Information for European Companies

Neo4j Sweden AB: Nordenskiöldsgatan 24, 211 19 Malmö, Sweden

Neo4j UK Limited: Second Floor, Union House, 182 – 194 Union St, London SE1 0LH, United Kingdom

Neo4j Germany GmbH: Westendstraße 28, 60325 Frankfurt am Main, Germany