



Share.surf – Privacy Policy

Effective Date: 25 October 2025

1. Introduction

This Privacy Policy explains how Share.surf ("we", "our", or "us") collects, uses, stores, and protects your personal data in accordance with the **General Data Protection Regulation (EU) 2016/679 (GDPR)** and applicable data protection laws.

By using Share.surf, you acknowledge that you have read and understood this Privacy Policy.

2. Data Controller

Share.surf

Email: contact@harveycoombs.com

We are the data controller responsible for processing your personal data under the GDPR.

3. Personal Data We Collect

We collect different types of data depending on how you use the service:

a. Uploads Without an Account

When you upload a file without creating an account, we collect:

- The **IP address** associated with the upload
- **Upload metadata**, including the file name, file size, upload time, and expiry time
- (Optional) **Upload password**, if you choose to protect your file with one

Upload Password Handling:

Upload passwords are **never stored in plaintext**. They are securely hashed using the **Argon2** algorithm — a state-of-the-art password hashing function designed to

resist brute-force and GPU attacks. We do not retain the plaintext password at any time.

Retention:

All uploaded files, associated metadata, and linked IP addresses are automatically **deleted 48 hours after upload**.

b. Account Information (Optional)

If you choose to create an account, we collect:

- **Email address** (for login and account communication)
- **Name** (any chosen display name)
- **Account creation date**
- **Password** (stored as a **Argon2-hashed** value)

Purpose:

To allow you to view, manage, and delete your uploads and configure password-protected files.

Legal Basis:

- **Article 6(1)(b)** GDPR – Processing is necessary for the performance of a contract (provision of account functionality).
 - **Article 6(1)(f)** GDPR – Our legitimate interest in maintaining service security and preventing abuse.
-

c. Technical and Security Data

When you visit the website, we may automatically collect:

- IP address
- Browser type and version
- Operating system and device type
- Access date and time

Purpose:

To maintain security, prevent fraud or abuse, and monitor service stability.

Legal Basis:

Article 6(1)(f) GDPR – Legitimate interest in ensuring the safe operation and integrity of our service.

4. How We Use Your Data

We use the personal data described above for the following purposes:

- To provide and operate the Share.surf file-sharing service.
- To allow registered users to manage their uploads.
- To enable password protection for uploaded files.
- To maintain platform security and prevent abuse.
- To comply with legal obligations, where applicable.

We **do not** use your personal data for marketing or sell it to any third party.

5. Data Retention

Type of Data	Retention Period	Deletion Policy
Uploaded files and associated metadata	48 hours	Automatically deleted after expiry
IP addresses (linked to uploads)	48 hours	Automatically deleted with uploads
Upload passwords (hashed)	48 hours	Deleted with upload record
Account data	Until user deletes account or requests erasure	Permanently deleted upon request
Server logs	Up to 30 days	Automatically purged

6. Data Security

We implement strict technical and organisational measures to protect your personal data, including:

- **Argon2** password hashing for both user accounts and file protection passwords.
- **End-to-end HTTPS encryption** for all network communication.
- Access control, regular audits, and minimal data retention.

Despite these safeguards, no internet transmission is completely secure. You use the service at your own risk.

7. Data Sharing and Processing by Third Parties

We do **not** share your personal data with advertisers or analytics providers. Your data may be processed by third-party infrastructure providers (e.g., cloud hosting) **under GDPR-compliant data processing agreements** and only as necessary to operate the service.

We do **not** transfer your personal data outside the **European Economic Area (EEA)**.

If transfers become necessary, we will ensure adequate safeguards under **GDPR Chapter V**.

8. Cookies and Session Data

We use only **strictly necessary cookies** to:

- Keep you signed in to your account.
- Protect against CSRF and session hijacking.

We do **not** use tracking or advertising cookies.

9. Your Rights (Under GDPR)

You have the following rights regarding your personal data:

- **Right of Access (Art. 15):** Obtain a copy of your personal data.
- **Right to Rectification (Art. 16):** Correct inaccurate or incomplete data.
- **Right to Erasure (Art. 17):** Request deletion of your personal data (“right to be forgotten”).
- **Right to Restrict Processing (Art. 18):** Limit how your data is used.
- **Right to Data Portability (Art. 20):** Receive your data in a structured, machine-readable format.
- **Right to Object (Art. 21):** Object to processing based on legitimate interests.
- **Right to Lodge a Complaint (Art. 77):** With your local supervisory authority.

To exercise these rights, please contact us at **contact@harveycoombs.com**.

10. Automated Decision-Making

We do not perform automated decision-making or profiling that produces legal or significant effects on users.

11. Changes to This Policy

We may update this Privacy Policy periodically. Updates will be posted on this page with a revised effective date. Continued use of the service after updates constitutes acceptance of the new policy.

12. Contact Us

For questions or requests concerning this Privacy Policy or your personal data:

Email: **contact@harveycoombs.com**

Website: **<https://share.surf>**