Figma Privacy & Data Protection FAQs

Intro

At Figma, our mission is to make design accessible to everyone. We are committed to achieving that goal in a way that safeguards the privacy of our users. This document describes the measures Figma has taken to comply with applicable global privacy and data protection laws and provides key information to help our customers complete their own privacy assessments as required. Figma currently provides 3 core products to its customers: the Figma Design platform, the FigJam Whiteboarding tool and most recently, the DevMode developer handoff solution. More detail as to what each product line does is set out below and collectively these products are referred to as the "**Figma Services**".

What is Figma Design?

Figma Design is a Software-as-a-Service ("SaaS") product, which is provided over the internet, in a multi-tenant hosted environment, through a browser, mobile, or desktop application. Typically Figma Design is used for an organization's internal business operations - enabling users to design, collaborate, and provide feedback, in real time, on applications, websites, and other projects created within the Figma Services. The Figma Services are most commonly used as a collaborative tool to explore design options, build digital solutions and improve design or user experience workflows. Figma Design provides the tools for the design phase of a project, which includes prototyping, a feature that enables users to simulate how a potential end-user might use or interface with the product being designed.

What is FigJam?

FigJam is an online whiteboard and collaboration tool that enables users to express ideas visually, gather feedback, and align on projects in real time or asynchronously throughout the product development process. It is designed to facilitate creative collaboration, brainstorming, ideation and diagramming. It can be used for a wide range of purposes such as collaborative planning, team building and visualization of abstract ideas or processes.

What is Dev Mode?

Dev Mode is a developer-focused interface for inspecting design specifications and relevant component information needed to understand a design and transform it into code. It is designed to streamline the handoff process between designers and developers by offering a closer integration between visual design and code, enabling teams to annotate and mark designs ready for review. It also includes Figma for VS Code, an optional plugin that lets you navigate and inspect design files, collaborate with designers, track design changes, get code suggestions, and speed up design implementation.

What personal data is required for users to access the Figma Services?

Figma only requires minimal personal data to use the Figma Services. The only personal data needed to use the Figma Services is an email and IP address, which we use to enable the account login function for our user, and a username, which can be any name you choose and doesn't have to be your actual name. Figma users can also add to their Figma account profile by providing their work title and by uploading a profile photo, but this information is completely optional and not required to use the Figma Services. Figma also offers several (optional) forms of multifactor authentication, one version of which, if chosen, requires the user to input their phone number for SMS identity verification.

Does Figma require any special category personal data from its users?

No. Users do not need to submit any data that is subject to specific governmental regulation, such as special category personal data e.g. medical information, financial information, or government identifiers - in order to use the Figma Services. Figma explicitly prohibits users from uploading such information to the Figma Services under its Acceptable Use Policy available at www.figma.com/aup.

Does Figma have a Data Processing Addendum (DPA)?

Yes. Figma's Data Processing Addendum (DPA) is available at http://www.figma.com/dpa. Our customers are welcome to countersign the DPA by completing the form here. Alternatively, if you are on a Figma Organization or Enterprise plan, we can also incorporate the DPA into your Order Form.

Who's who? Customer is the data controller, Figma the data processor

In connection with the data it processes for customers, Figma is the "data processor" and the customer the "data controller" for GDPR purposes. This is because the customer is responsible for collecting the relevant personal data required to use the Figma Services and Figma follows the customer's instructions as to how to process that personal data on behalf of the data controller. In the context of the Figma Services, the customer's processing "instructions" come from their interaction with, or use of, the Figma Services i.e. the Figma platform will act in accordance with the inputs given by the customer's users.

Where does Figma process its users' personal data?

To the limited extent Figma processes its users' personal data, this processing is carried out by employees and on servers based in the USA (EU customers can opt for EU data hosting, more information in the next section). Please note that Figma also uses sub-processors located in the USA and other parts of the world. You can find out more information about our sub-processors below and at www.figma.com/sub-processors.

Does Figma offer EU data hosting?

To help European customers meet their internal local data protection standards, customers on the Figma's Enterprise plan can host key parts of their Figma and FigJam files within the EU. We are offering EU hosting for those data fields most likely to contain the most amount of personal data first e.g. text boxes, sticky notes, images, videos, etc. More information about the types of Figma data that can be hosted within the EU can be found here.

What data transfer mechanism does Figma use for processing personal data of EU or UK citizens in the USA (or other third party countries)?

For our **EU based** customers, Figma uses the new form of European Commission approved Standard Contractual Clauses (the "**SCCs**" or "**Model Clauses**") to safeguard the transfer of any personal data to the USA (or any other third party country that does not benefit from a GDPR adequacy decision) for processing. The EC SCCs are incorporated into Figma's DPA by reference in Section 6(e)(a) - see www.figma.com/dpa.

For our **UK based** customers we use the UK Data Transfer Addendum as the relevant data transfer mechanism, which is also attached to the DPA as Exhibit D.

Is Figma certified to any Data Protection Frameworks?

Figma has certified to the U.S. Department of Commerce that we adhere to: (i) the EU-U.S. Data Privacy Framework Principles with regards to the processing of personal information received from the European Union in reliance on the EU-U.S. Data Privacy Framework ("**EU-U.S. DPF**") and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF, and (ii) the Swiss-U.S. Data Privacy Framework ("**Swiss-U.S. DPF**") with regards to the processing of personal information received from Switzerland in reliance on the Swiss-U.S. DPF (collectively, the "**DPF Principles**"). You can see our entry here: https://www.dataprivacyframework.gov/list.

Does Figma use sub-processors?

Yes, like almost all cloud-based services providers Figma uses sub-processors to provide certain functionality of the Figma Services to our customers. A full list of our sub-processors, including their location and a description of their function can be found at: https://www.figma.com/sub-processors.

What happens if Figma changes its sub-processors?

Figma notifies customers of new sub-processors by updating its list of sub-processors on the Figma website at www.figma.com/sub-processors. Customers can use the self-serve form on our website (at bottom of sub-processors page) to sign up to receive email notifications of new sub-processors.

What if a Figma customer doesn't agree to the appointment of a new sub-processor?

As per the terms of Figma's DPA, customers have a right to object to the appointment of a new sub-processor and if a mutually acceptable solution cannot be reached within the relevant time frame then the customer may terminate the remaining portion of their Figma subscription. The appointment and objection process for new sub-processors is set out in more detail in the Figma DPA.

What are Figma's security standards?

The Figma Services operate to a very high standard of security. An overview of Figma's security framework can be found in the "Security Standards" exhibit attached to your Software Services Agreement ("**SSA**") with Figma or, if you are on linked through SSA terms (check your Figma Order Form), you will find the security standards on Exhibit C on the following link https://www.figma.com/ssa. We also include the "Security Standards" under Exhibit B to the Figma DPA on the following link: https://www.figma.com/dpa.

If you require further technical information to conduct a full security review we can provide you with a copy of Figma's SOC 2 Type II Report, which provides a detailed overview of Figma's security framework. Figma is also ISO 27001: 2013 and ISO 27018: 2019 certified (the "**ISO Certifications**"). All of these standards and certifications are validated by security experts on an annual basis following a comprehensive audit of Figma's operations.

Does Figma comply with the EU Cloud Code of Conduct?

The EU Cloud Code of Conduct is an approved standard that aims at harmonizing GDPR compliance across the entire cloud industry. It's an industry body made up of cloud service providers ("**CSPs**") that hopes to create a code of common standards for CSPs operating throughout the European Union. These standards (the "**Code**") relate to an organization's technical, security measures and data privacy measures. Figma has received the EU Cloud Code of Conduct (Level 2) compliance mark - giving Figma users peace of mind that their design work is being handled securely, in accordance with the General Data Protection Regulation (GDPR). You can find Figma's entry on the Code's public registry at https://eucoc.cloud/en/public-register/list-of-adherent-services, where you can also download a full report of Figma's Declaration of Adherence to the Code.

Does Figma encrypt its users' personal data?

Yes, Figma encrypts customer personal data as appropriate in transit and at rest, with the TLS 1.2+ standard used for encrypting personal data being submitted from the internet to Figma's servers. For a more detailed technical overview of Figma's encryption protocols please see the relevant section of our SOC 2 Type 2 Report.

What is Figma's position in respect to US surveillance laws?

To date, no US court has found Figma to be eligible under any US surveillance laws, including specifically FISA Section 702 and US Executive Order 12333 (and no such court action is pending).

Figma maintains a transparency report in respect to government requests for personal data and has not received any such surveillance request from any government body (in the USA or elsewhere). Specifically, Figma has not received any national security orders of the type described in Paragraphs 150-202 of the judgment in the CJEU Case C-311/18, *Data Protection Commissioner v Facebook Ireland Limited and Maximillian Schrems,* nor is Figma aware of any such orders in progress.The latest Figma transparency report is available here attached at Part 2 to Exhibit C of the Figma DPA on the following link: https://www.figma.com/dpa.

What would Figma do if it received a government access request in respect to customer personal data?

If Figma did receive a government request to access or disclose our customer's personal data it would adhere to the Figma Privacy Principles in providing a response. These principles are as follows:

1. Figma will retain and, as appropriate, consult with expert legal counsel regarding all third-party requests for customer data.

2. Figma will seek to refer each government request promptly to the relevant customer or user so that the customer or user can respond directly.

3. If the government declines to redirect its request to the relevant customer, Figma will provide the customer with prompt notice of the request unless it is legally prohibited from doing so.

4. If Figma is prohibited from providing prompt notice of a request to a customer, Figma will provide such notice as soon as the prohibition expires or is no longer in effect.

5. Figma publishes and annually updates a Transparency Report that provides customers with information regarding the number and types of government requests for customer data it receives and how it responds to them.

6. Figma will assess the legality of all such requests and comply with requests only if and to the extent it assesses that they are valid, lawful and compulsory.

7. Figma will decline to comply with and undertake reasonable efforts to contest any request it determines is not absolutely required by applicable law, including any non-valid request under FISA 702 or U.S. Executive Order 12333.

Does Figma grant audit rights to customers?

Figma only provides for customer audits as required by applicable data privacy laws. We are also happy to provide you with a copy of the third party audit reports relating to our SOC 2 Type II Report and our ISO certifications. Figma formally provides these rights to our customers under the Figma DPA**.** We do not otherwise offer our customers any audit rights.

How would Figma respond to a data breach?

Figma maintains an information security incident management program that addresses the management of security incidents or data breaches, you will find more information on this process in Figma's SOC 2 Type II Report and ISO certifications. In accordance with its obligations under GDPR, Figma will notify customers without due delay after becoming aware of such an incident.

What is Figma's position on data retention and deletion?

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Figma will delete your personal data within 30 days of your request. This does not apply to archival or back-up copies of such data, which will be deleted in accordance with Figma's then current data retention schedule. If Figma is required to retain personal data, in archives or otherwise, to comply with applicable laws it will separate and protect that data from any further data processing.

Where are Figma's customer support operations located?

Figma has a globally distributed support function that uses a "follow the sun" model, with support operatives based across the globe. This means our customers receive more comprehensive support coverage with longer support hours but also means we cannot limit the provision of services to the US or any specific location. Support services personnel may occasionally access its Figma users' personal data upon the user's request to resolve support issues.

Does Figma collect customer usage data?

Like most SaaS companies, Figma collects and analyzes certain limited personal data, namely users' Figma ID (a Figma generated identifier) and IP addresses, so far as this is related to the provision, use, development and performance of the Figma Services. Figma will be free (during and after each customer's order term) to use such data and information in a de-identified and aggregated form to maintain, improve, and enhance Figma's products and services.

Where to go for help or further information

If you have any further queries in respect to Figma's positions on data privacy or data protection matters, please contact us at privacy@figma.com.

Figma DPA: Reviewer's Guide

Topic:	Reference:
Sub-Processors	Section 3(e) to the DPA
Figma Security Standards	Section 4 and Exhibit B to the DPA
Data Breaches / Security Incidents	Section 5 to the DPA
Cross-border transfers	Section 6 to the DPA
EU Standard Contractual Clauses (SCCs)	Section 6(e)(a) to the DPA
Data Protection Frameworks	Section 6(d) to the DPA
Audit Rights (Right to Audit & Access to Audit Reports)	Section 7 to the DPA
Data Retention & Deletion	Section 8 to the DPA
Processing Details	Exhibit A to the DPA
Figma Supplemental Measures	Exhibit B to the DPA
UK Data Transfer Addendum	Exhibit D to the DPA

Link: www.figma.com/dpa