

PRIVACY POLICY

Last Updated: April 30, 2017

Version 2.0

THIS PRIVACY POLICY, AS AMENDED FROM TIME TO TIME ("POLICY"), GOVERNS THE INFORMATION RIGHTSIDE GROUP, LTD. ("WE," "US," OR "OUR") COLLECTS ABOUT YOU WHEN YOU ACCESS THIS WEBSITE (the "SITE"). THIS POLICY ALSO PROVIDES NOTICE OF CERTAIN INFORMATION THAT RIGHTSIDE MAY COLLECT OR RECEIVE FROM ITS AFFILIATES IN THE COURSE OF ITS BUSINESS OPERATIONS. IF YOU DO NOT AGREE TO THIS POLICY, DO NOT USE THE SITE.

THIS POLICY IS PART OF AND INCORPORATED INTO THE SITE [TERMS OF USE](#) (the "TERMS"). BY PROVIDING PERSONAL INFORMATION OR OTHER INFORMATION TO US OR BY USING OUR SITE, YOU AGREE TO THIS POLICY AND THE PRACTICES DESCRIBED IN THE POLICY.

1. INFORMATION YOU GIVE US

We collect any information you enter on the Site or give us in any other way (such as through an email, survey, or letter). Such information may include your name, postal and email address, and phone and facsimile numbers, but can vary depending upon how you use our Site.

2. INFORMATION COLLECTION

A. Cookies. Like many websites, we use "cookies". Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your Web browser to enable our systems to recognize your browser. We use persistent, identifying cookies to remember your information and to link your activities to you. While you can take steps to warn off, block or disable cookies, if you do,

the Site may not function and appear as we have designed it. Nonetheless, if you want to take these steps, you can do so by following the instructions associated with your browser. Our cookies collect information such as:

- i. the domain name and host from which you access the Internet and the Internet address of the site from which you direct-linked to ours;
- ii. the date and time you access the Site and pages you visit;
- iii. your computer's IP address and information about its operating system, platform and the Web browser type and version you use;
- iv. demographic and other non-personally identifiable profile information about you; and
- v. information to combat fraud or misuse.

B. Pixel Tags. If we email you, our emails may use "pixel tags" to determine if your email software or site can display html-formatted email (this helps us optimize the size of our email messages and conserve bandwidth).

C. Collection of Information by Third Parties. We use a number of third-party widgets / applications as part of our website. These have various functions from monitoring user activity data to linking to a map of our Dublin office location. Each of the suppliers of these widgets may set cookies to track the use of their widgets and provide the best user experience associated with the widgets' functionality. The information collected by third party cookies is subject to the privacy policy of the third party, not this Policy.

D. Affiliates. We are the parent company of the Rightside Group, Ltd. family of companies (the "Family of Companies"). The Family of Companies includes the following U.S. based companies: Acquire This Name, Inc.; DomainSite, Inc.; Hot Media, Inc.; Mobile Name Services Incorporated; Name.com, Inc.; Name.net, Inc.; Name104, Inc.; Name105, Inc.; Name106, Inc.; Name107, Inc.; Name108, Inc.; Name109, Inc.; Name110, Inc.; Name111, Inc.; Name112, Inc.; Name113, Inc.; Name114, Inc.; Name115, Inc.; Name116, Inc.; Name117, Inc.; Name118, Inc.; Name119, Inc.; Name120, Inc.; Rightside Group, Ltd.; Rightside Operating Co.; Secure

Business Services, Inc.; Sipence, Incorporated; Vedacore.com, Inc.; and Whois Privacy Protection Services, Inc. The Family of Companies also includes the following non-U.S. based companies: Beijing United TLD Tech Co., Ltd.; DMIH Limited; Rightside Australia Pty Ltd; Rightside Canada, Inc.; Rightside Domains Europe Limited; and United TLD Holdco Ltd. We may receive certain personal information from members of the Family of Companies collected by such members, including pursuant to their privacy policies. Without limiting the generality of the foregoing, we may receive the following personal information:

i. In order to carry out registrant requests for registration and/or reservation of a domain name with our affiliate, United TLD Holdco Ltd t/a Rightside Registry ("Rightside Registry"), or sign up to receive any services offered by Rightside Registry, individual approved registrars (acting as data controllers) shall provide Rightside Registry with certain information which may constitute personal information. Such information may be shared with us. Any personal information so received and/or collected by us, shall be limited, in both type and use, to only that data which is required in the fulfilment of Rightside Registry's agreements with the Internet Corporation of Names and Numbers ("ICANN"), the organization that assumes responsibility for the domain name allocation. Without commenting as to whether or not such information is considered personal information, such collected information includes full name, mailing address, phone number, email address, technical and administrative contacts (if different), expiration date, and DNS server name and IP address.

It should be noted in particular that all such information shall, as is required by ICANN, be made available to the public via an interactive webpage and a "port 43" WHOIS service. For the purposes of this Policy we will refer to this information as "WHOIS Information." Please note that we are not able to control how members of the public may use the WHOIS Information. Such information may include: full name, mailing address, phone number, email address, and, where provided, your facsimile number, as well as the creation and expiration dates of your

domain name registration and the name server information associated with your domain name.

In addition, if a company is applying to become a Rightside Registry-accredited registrar, Rightside Registry collects additional data via the [Registrar Sign-Up Portal](#). Such information may be shared with us. Rightside Registry may supplement the personal information provided with demographic data from third parties.

ii. Personal information collected by (i) Name.com, Inc. and its affiliated registrars in accordance with the privacy policy located at <https://www.name.com/privacy-policy>; (ii) Acquire This Name, Inc. in accordance with the privacy policy located at <http://acquirethisname.com/>; and (iii) Hot Media, Inc. in accordance with the privacy policy located at <https://www.hotkeys.com/m/legal/privacy-policy.aspx>;

3. OUR USE AND RETENTION OF YOUR INFORMATION

A. Use of Personal Information. We use personal information that you submit to us for such purposes as responding to your requests; monitoring and providing the Site; enforcing our rights and the rights of third parties; and investigating and ensuring compliance with the [Terms](#).

B. Use of Other Information. We use other information about our users for purposes such as measuring the number of visitors to sections of our Site, making the Site more useful to visitors and delivering targeted advertising and non-advertising content. We use IP addresses to analyze trends, administer the Site, track a user's movement, and gather broad demographic information for aggregate, non-personally identifiable use.

C. Retention of Information. We retain information for as long as required, allowed or we believe it useful, but do not undertake retention obligations. We may dispose of information in our discretion without notice, subject to applicable law that specifically requires the handling or retention of information.

4. OUR SHARING OF INFORMATION

We share information with third parties, but only as described in this Section 4. We may be subject to liability in cases of onward transfer to third parties that do not conform with this Policy.

A. Advertisers and Others. We share non-personally identifiable information with advertisers, site providers, and other persons with whom we conduct business. Conversely, these advertisers, site providers, and other persons may share with us information about you that they have independently developed or acquired.

B. Site Third Parties. We contract with affiliated and non-affiliated third parties to provide sites to us or to you on our behalf. Examples include providing marketing assistance and analyzing data. These third parties have access to personal information needed to perform their functions.

C. Business Transfer. As we develop our business, we might sell or buy businesses or their assets, or engage in acquisitions, mergers, restructurings, changes of control, or similar transactions. In such transactions, customer information generally is one of the transferred business assets. Also, in the unlikely event of a bankruptcy, customer information may be transferred to a bankruptcy trustee or debtor in possession and then to a subsequent purchaser.

D. Affiliates. We may share information we have about you with members of the Family of Companies. Each U.S. based member of the Family of Companies adheres to the Privacy Shield Principles (as discussed below).

E. Compliance and Safety. We may release user information when we believe release is appropriate to:

- i. comply with applicable law to respond to subpoenas, search warrants, court orders, or legal process by public authorities, including disclosures required by national security or law enforcement agencies, and to respond to or otherwise address

written complaints of copyright infringement;

- ii. make disclosures under programs intended to prevent potential crimes or investigate persons;
- iii. enforce or apply agreements, including the [Terms](#); or
- iv. protect the rights, property, or safety of the Site, our users, or others, including exchanging information with other companies for fraud protection and credit risk reduction.

5. INFORMATION SECURITY

A. Your Obligations. You must protect against unauthorized access to your personal information and to your computer. YOU MUST DO WHAT YOU REASONABLY CAN TO ENSURE THE SECURITY OF YOUR PERSONAL INFORMATION.

B. Our Security Measures. We have physical, electronic, and managerial procedures to help safeguard, prevent unauthorized access, maintain data security, and correctly use your information. HOWEVER, WE DO NOT GUARANTEE SECURITY. Neither people nor security systems are foolproof, including encryption systems.

6. LINKS

The Site may contain links to other sites. We are not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our Site and to read the privacy statements of every web site that collects your personally identifiable information. This Policy applies only to information collected by the Site.

7. CHOICE

By sending us your email or other contact information, you consent to us sending you customary business communications. You may

opt out of receiving such customary business communications by sending such a request to legalnotice@rightside.co.

8. CONDITIONS OF USE, NOTICES, AND REVISIONS

A. Privacy Concerns. Your use of the Site and any dispute over privacy is subject to the Terms. If you have any concern about privacy at Rightside Group, Ltd., please send us a thorough description to legalnotice@rightside.co, and we will try to resolve it. If you think we are in default of the Terms, you may contact us at Our Legal Notices Address in Section 9 below.

B. Notice Required by Law. In those jurisdictions that permit email notice, if we are required to disclose or provide notice of invasion of certain security systems, we will do so by email to the most current email address provided by you to us.

C. Identity Theft. If you believe that you are a victim of identity theft entitled by law to request information from us, write us at our Legal Notice address (see Section 9) and we will let you know what additional information you must provide to us. After we have received that information, we will supply without charge the information legally required to be disclosed that we then have, subject to applicable law and reserving all of our rights and defenses.

9. CONTACT INFORMATION AND INFORMATION ABOUT ENFORCEMENT OF OUR POLICY.

For customer site matters (including questions relating to this Policy), you may email us at legalnotice@rightside.co. To send us a legal notice, mail it by certified mail (return receipt requested) to: Rightside Group, Ltd., 5808 Lake Washington Blvd. Suite 300, Kirkland, WA 98033, Attn: Legal Department.

10. FOR EUROPEAN UNION & SWISS CITIZENS

Privacy Shield Frameworks

- We comply with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. We have certified that we adhere to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>
- Note that you have the right to access, correct, or delete your personal data processed by us. For assistance with accessing, correcting, or deleting your personal data, please contact us at legalnotice@rightside.co. Please be aware that deleting your personal data may result in termination of the services you receive through us.
- In compliance with the Privacy Shield Principles, We commit to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this Policy should first contact our Legal Department at legalnotice@rightside.co, or by certified mail (return receipt requested) at: Rightside Group, Ltd., Attn: Legal Department, 5808 Lake Washington Blvd NE, Suite 300, Kirkland, WA 98033 USA
- We have further committed to refer unresolved privacy complaints under the Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed,

please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint. In addition, it is possible, under certain limited conditions, for individuals to invoke binding arbitration before the Privacy Shield Panel to be created by the US Department of Commerce and the European Commission. Note that the US Federal Trade Commission (FTC) has enforcement authority over our compliance with this Policy.