

This Privacy Policy applies to the access and use of the Afilias plc's ("**Registry Operator**", "**we**" or "**our**") website currently located at Afilias.info and through the Afilias Registry Platform.

This Privacy Policy sets out how we collect, use, transfer, retain, secure and disclose your personal data and/or personal data about your customers or end users that you provide to us pursuant to your use of the Registry Operator', as well as other terms relating to data location. It also describes your choices regarding use, access and correction of your personal data.

Many of our Services offered through our website and the Registry Platform are intended for use by business organizations. If you use your organization's email address to register a domain name, the owner of the domain associated with your organization's email address, and/or your organization, may monitor or control your account and access, process, and/or control your personal data, as well as the contents of your communications and files. Your organization's use of our Services may be subject to your organization's own rules or policies, and you shall direct all privacy enquiries relating to such rules or policies to your organization's administrators. We are not responsible for the privacy or security practices of your organization.

Any information collected or handled by Registry Operator is processed on behalf of the Registrar who controls the collection and use of such information. We do not have a direct relationship with the end users of our customers. Where this is the case, end users should direct all privacy enquiries, such as any requests to access, correct, amend or delete personal information, to the sponsoring Registrar. We are not responsible for the privacy or security practices of Registrars.

A. COLLECTION OF PERSONAL DATA

1. If you are (i) an individual or (ii) a representative of a business organization at the time you register a domain name via the Registry Platform or access the Registry Operator website, you may be required to provide information such as your email address, phone number, country, preferred language, name, contact address, and facsimile number. You may also provide to us additional optional contact information.
2. We record details of your activities (including any purchase or use of our product offerings and services) when you use the Registry Platform and/or Registry Operator's website for legal and/or business purposes. If you make purchases or otherwise transact online with Registry Operator, we also collect information related to such transactions including, any trade dispute/complaint records.
3. When you contact our customer support, sales or other departments, we may record the communications for security and customer services purposes and collect additional information to verify your identity.
4. Please note that certain categories of data are necessary for us to provide domain name registration Services, such as user name, address, phone number, and email address. These categories will be specified at the time of collection. In the event that you do not provide any or sufficient data marked as mandatory, we may not be able to complete the registration process or provide you with our domain name Services.

5. We also record records of users' activities on the Registry Operator's website, including but not limited to Internet Protocol ("IP") addresses, browsing patterns and purchasing patterns. In addition, we automatically gather statistical information about visitors to our Registry Operator website including, but not limited to, IP addresses, browser software, operating system, software and hardware attributes, pages viewed, number of sessions and unique visitors.
6. We may from time to time collect additional information from you and obtain information about you from third parties in order to carry out risk control, fraud prevention and compliance procedures.

B. PURPOSES FOR THE COLLECTION, RETENTION, USE, DISCLOSURE AND TRANSFER OF PERSONAL DATA

We collect, retain, use and disclose personal data for the following purposes:

1. processing your domain name registration;
2. providing you with customer service and responding to your queries, feedback, claims or disputes;
3. personalizing our communication with you based on your order history, and performing research or statistical analysis in order to improve our product offerings and services;
4. publishing any information you voluntarily submit to the Registry Platform;
5. to comply with applicable law, legal process or lawful government request, or in respect of any claims or potential claims brought against us or our parent companies, shareholders, subsidiaries and affiliates;
6. performing risk control, legal compliance and sanctions screening;
7. performing screening and checks for unlawful, fraudulent, deceptive or malicious activities;
8. providing credit scores associated with individual domain name Registrants; and
9. The provision of Registration Data Directory Services (RDDS) by which third-parties can access personal data associated with your domain name registration. While Registry Operator will comply with all requirements related to the accuracy of Registrant Data under its registry agreements with ICANN, Registry Operator cannot guarantee that all Personal Data received is accurate or up-to-date and will not, therefore, be responsible for any inaccuracies.

Subject to obtaining your specific consent (or where otherwise permitted by applicable law in your jurisdiction), we may use your name, phone number, residential address, email address and fax number (which may incorporate personal data) to provide notices, surveys, product alerts,

related communications and other marketing and promotional materials to you relating to goods and services offered by us on our Registry Platform.

Legal basis for Processing for Users from European Economic Area (“EEA”)

Our legal basis to process personal data for EEA Users includes processing that is: necessary for the performance of the contract between you and your Sponsoring Registrar; necessary to comply with legal requirements (for example, to comply with applicable accounting rules and to make mandatory disclosures to law enforcement); necessary for our legitimate interests (for example, to manage our relationship with you and to improve our Services); **and based on your consent (for example, to communicate with you about our products and services and provide you with marketing information), which may subsequently be withdrawn at any time without affecting the lawfulness of processing based on consent before its withdrawal.**

C. DISCLOSURE OF PERSONAL DATA

1. We may disclose your personal data to third party service providers engaged by us to assist with providing you with our services (including partners providing customer services to you, contacting you regarding promotions products and services, performing risk control, fraud prevention and legal compliance procedures, and conducting payment processing services) (the “Third Party Service Providers”). These Third Party Service Providers may be located in United States and/or Canada or outside of United States and/or Canada, and are under a duty of confidentiality to us and are only permitted to use your personal data in connection with the purposes specified in Section B above, and not for their own purposes.
2. We may share your personal data with affiliated companies within Afiliac plc and/or their designated Service Providers, for the purposes specified at Section B above.
3. We may provide aggregated or anonymized data to third parties, but when we do so, the information we share is in a de-identified format that does not personally identify you.

D. TRANSFER OF PERSONAL DATA

As part of providing you with Services, we may need to transfer your personal data from your jurisdiction to an overseas jurisdiction. Recipients of the data in these jurisdictions may be subject to data privacy laws less protective or not equivalent to those in your own jurisdiction. Such overseas transfer or processing of your personal data may be necessary to process and provide domain name Services (including providing customer services to you, contacting you regarding promotions, products and services, performing risk control, fraud prevention and legal compliance procedures, and conducting payment processing services). You appoint us to perform any such transfer of personal data to any such country and to store and process such personal data in order to provide our Services to you. You are solely responsible for ensuring compliance with any laws or regulatory obligations relating to personal data and/or privacy and your use of the same on or in connection with the Services, and you warrant that you have obtained all requisite consents from all relevant data subjects to permit the use of the same.

E. SECURITY MEASURES

1. We use commercially reasonable endeavors to protect the personal data that you provide to us. We also employ several security techniques, including but not limited to the use of industry-standard Secure Socket Layer (SSL) encryption for transmission of personal data in registration information and payment information and the adoption of identity, credential and access management measures for transmission of such personal data to prevent security breaches and unauthorized access of personal data. We limit access to your personal data and other data to people who need to access to such data for their work.
2. Nevertheless, no data transmission over the internet or any wireless network can be guaranteed to be perfectly secure. As a result, while we try to protect your personal data, we cannot guarantee the security of any personal data you transmit to us and you do so at your own risk. We cannot and do not guarantee security in connection with your use of the Registry Operator website or Registry Platform.
3. We retain your personal data as long as you have an account with us, as needed to provide services or products to you, to resolve disputes, or as required or permitted by applicable laws, such as tax and accounting laws.

F. RIGHT TO ACCESS/CORRECT PERSONAL DATA; CONTACTING US

You have the right to request access to your personal data held by us (or on our behalf) and to request correction or deletion of such personal data. Additionally, upon request, we will provide you with information about whether we hold your personal information. You may contact us at privacy@afilias.info to request access, correction or deletion of your personal data. We will respond to your request within a reasonable timeframe. You may also have supplemental rights under applicable law in relation to your personal data. For example, if you are an EEA user, you have the right to object to or request the restriction of processing of your personal data, and to request portability of your data.

In case where we act as a processor, we have no direct relationship with the individuals whose personal data we process. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct their query to the appropriate data controller.

You may receive e-newsletters from us. If you would like to discontinue receiving this information, you may update your email preferences by using the “Unsubscribe” link found in emails we send to you or at your member profile.

We do not knowingly collect personal data of minors (persons under the age of 18). If a minor has provided us with personal data without parental or guardian consent, the parent or guardian may contact us on the minor’s behalf to request that we cease any further collection, use and/or disclosure of the personal data relating to the relevant minor.

If you have any questions regarding this Privacy Policy or if you wish to exercise any of these or other rights you may have under applicable law in relation to your personal data, you may send your request in writing to the following contact and address:

- **European Economic Area (EEA)**

For individuals in the EEA, and/or in relation to processing conducted by or on behalf of Registry Operator, please contact:

Attention: Chief Privacy Officer

4th Floor, International House
3 Harbourmaster Place
IFSC
Dublin 1, Ireland

E-mail address: privacy@afilias.info

If Registry Operator is not the relevant “data controller” for the purposes of EEA data protection law, you will be directed to the relevant entity.

- **Outside the EEA**

In all other cases, please contact:

Attention: Chief Privacy Officer

300 Welsh Road
Building 3, Suite 105
Horsham, PA 19473
USA

E-mail address: privacy@afilias.info

This Privacy Policy also contains links to third party websites. If you experience difficulties using these links, please contact us at support@afilias.info

G. COOKIES

1. We and our partners use “cookies” and/or similar technologies to store specific information about you and track your visits to our Registry Operator website. We may also use “cookies” to store specific information about your use of certain Services as part of its features and to facilitate or enhance your user experience of the relevant service. A “cookie” is a small amount of data that is sent to your browser and stored on your device. A cookie can be sent to your device only if you access our Registry Operator website using a device. If you do not de-activate or erase the cookie, each time you use the same device to access our Registry Operator website, our web servers will be notified of your visit to our Registry Operator website and in turn we may have knowledge of your visit and the pattern of your usage.

2. Generally, we use cookies to identify you and enable us to i) access your registration information so you do not have to re-enter it; ii) gather statistical information about usage by users; iii) research visiting patterns and help target advertisements based on user interests; iv) assist our partners to track user visits to the Afilias Platform and process orders; v) track progress and participation in promotions; and iv) facilitate your use of any relevant Registry Services which may involve the use of cookies. We partner with third parties to manage our advertising on other sites. Our third party partners may use cookies and/or similar technologies in order to provide you advertising based upon your browsing activities and interests.
3. You can determine if and how a cookie will be accepted by configuring the browser which is installed in the computer you are using to access the Afilias Platform. If you choose, you can change those configurations. You may be able to change your browser preferences or settings to reject all cookies or when notified and can choose to consent each time a cookie is sent. If you reject all cookies by choosing the cookie-disabling function in your browser, you may be required to re-enter information on our Afilias Platform more often and certain features of our Afilias Platform may be unavailable.
4. To manage Flash cookies, please click [here](#).
5. By accessing and using our Afilias Platform, and by accepting the cookies, you consent to the storage of cookies on your devices. You also consent to the access of such cookies by us and by our partners mentioned above.

H. CHANGES TO THIS PRIVACY POLICY

Any changes to this Privacy Policy will be communicated by us posting an amended Privacy Policy on our Registry Operator website. Once posted on our Registry Operator website the new Privacy Policy will become immediately effective. We may also in our discretion provide notice to you of any changes to the Privacy Policy. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this website prior to the change becoming effective. Any information and/or personal data we hold about you (as described in this Privacy Policy and whether or not collected prior to or after the amended and restated Policy comes into effect) will be governed by the latest version of our Privacy Policy. We strongly encourage you to visit the Registry Operator website from time to time to review the Privacy Policy. Your continued use of the Registry Operator website and/or the Registry Platform signifies your acceptance of the changes to the Privacy Policy.

AUSTRALIA ADDENDUM

If you are located in Australia, you acknowledge that Afilias Australia Pty Ltd is bound by the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act). If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our General Counsel at the address for “Outside the EEA” set forth in Part F above, who will review your complaint and respond within a reasonable period. If you are dissatisfied with the handling of your complaint or concern, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

EEA ADDENDUM

This section of the Privacy Policy applies only if you are located in the EEA and supplements the information in this Privacy Policy.

Registry Operator is the controller of personal data only when it collects personal data and determines the purposes and means of processing that personal data. For example, when you register a domain name through a Registrar, we are the controller of that data. When we transfer data to ICANN for purposes of contractual compliance, we act as a data processor with respect to that data.

Our business may require us to transfer your personal data to countries outside of the EEA, including to countries that may not provide the same level of data protection as your home country, such as the United States. We take appropriate steps to ensure that recipients of your personal data are bound to duties of confidentiality and we implement measures such as standard contractual clauses. A copy of those clauses can be obtained by contacting us at privacy@afilias.info

You may lodge a complaint with a supervisory authority if you consider that our processing of your personal data infringes applicable law.