# web.com<sup>®</sup>



## WEB.COM GROUP - ACQUISIO PLATFORM PRIVACY POLICY

This Privacy Policy describes our policies on the collection, use and disclosure of your information in connection with your use of our websites, emails, services, platforms, and mobile applications ("Site" or "Sites"). When used herein, the terms "we", "us" and "our" refer to Acquisio Web.com ULC and/or Web.com PPC, LLC, subsidiaries of Web.com Group, Inc. ("Acquisio" and/or "Web.com"). For the purposes of data protection legislation (and with exception to our Reseller partners, described further below), we are a data controller for the information we hold about you in providing our Site.

By visiting this or another Web.com website displaying this Privacy Policy or a link thereto (a "Website", or collectively the "Websites"), or by otherwise interacting with Web.com, you agree to accept the practices described in this Privacy Policy. This Privacy Policy is further subject to the Web.com Services Agreement related to the Web.com services you utilize and/or purchase.

When this Privacy Policy uses the term "personal data," we mean any data that relates to an identifiable individual, including their name, address, online identifiers, payment details or email address. The specific data we collect is described in this policy. Please note that we do not sell your personal data, and only use it for the purposes outlined herein.

We encourage you to read the entire Privacy Policy, which consists of the sections listed below:

- Information We Collect
- How We Use Your Personal Data
- How Long We Keep Your Personal Data
- Who We Share Your Personal Data With
- Where We Transfer Your Personal Data
- How We Keep Your Personal Data Safe
- Your Rights In Relation To Your Personal Data
- Links To Or From Other Websites
- Partner Sites
- Children
- Changes To This Policy
- Resellers and Private Label Partners
- Contacting Us

## **Information We Collect.**

Contact information. We collect and retain personal contact information that you submit to us voluntarily in signing up to our products and services or any mailing lists. This includes your name, mailing address, web address, telephone number, fax number and e-mail address. Additionally, we collect contact information provided to us during any correspondence relating to customer support, as well as in connection with products and services offered on our Sites.

Financial Information. We collect and retain financial information you provide when you order our products and services. For example, when you apply to register a domain name or sign up for any other product or service through Web.com, we require you to provide a credit card number and billing address before we process that application.

Information on your use of the Site. We collect information about the device with which your use of the Sites and information on your use of the Site itself, such as the domain name, Internet Service Provider, browser type and version, pages viewed, information accessed, and the Internet Protocol (IP) address you use to connect to the Internet. We also collect information in relation to Cookies – for more information, please review our policy on cookies.

Demographic Information. We collect and store demographic information (your postcode, gender and age). We may also collect and store demographic information (such as your zip code, gender and age), and use this data to tailor your experience on our Websites, ensure you are at least 18 years of age to make purchases, provide content that we think you might be interested in, perform general improvements to the Websites, and display the content according to your preferences. Such demographic information may be shared with partners, market researchers and other third parties on an aggregate, non-personally identifiable basis. No personally identifiable information will be linked to such aggregated demographic information that is shared with third parties

Telephone Recording and Monitoring. To ensure Web.com customers receive quality service, Web.com selects phone calls for recording and/or monitoring. These calls, between Web.com customers (or potential customers) and employees, are evaluated by supervisors and/or other Web.com representatives. This is to guarantee that prompt, consistent assistance and accurate information is delivered in a professional manner.

## **How We Use Your Personal Data.**

To perform our contract with you. We use this information to perform our contract with you and fulfil your requests, such as:

- Sending you requested service information;
- Fulfilling your order;

- · Billing for services;
- Creating directories (only when you explicitly ask to be included);
- Responding to customer service requests, questions and concerns; and
- Administering your account.

Note that, generally, you may not opt-out of these communications, which are transactional and not promotional in nature. If you do not wish to receive them, you have the option to cancel your services with us.

We also engage other companies, individuals, and affiliates of Web.com to perform certain functions and services for you. These third parties:

- process credit card payments;
- provide marketing assistance; and
- remove duplicate information from customer lists.

To contact you. If you have given your consent to send you email, phone or SMS marketing, or if you have provided us with your postal address, we will use the personal data you give to us to contact you from time to time. If you register on the Site, you can choose to provide your consent to receive marketing communications by e-mail, phone and/or cell number (including use of automated dialling equipment and/or pre-recorded calls), text (SMS) message, social networks or any other means of communication that your device may be capable of receiving (i.e. video, etc.). If you do not want to receive postal or electronic communications, you may withdraw your consent at any time, by clicking the link in a communication, or emailing us using the address provided below.

Directory Listings. If you provide your information in order to be included in our free directories you are consenting to (1) individuals contacting you to solicit your products and services and (2) businesses contacting you to market services you may find useful. Due to the nature of a directory, your information will be published publicly and you may be contacted by phone or email depending on the information you provide. You will never be added to our directories unless you request to be included and you may remove your listing at any time by accessing your Scoot dashboard, calling + 44 0800 170 100 or emailing us at <a href="mailto:customersupportuk@web.com">customersupportuk@web.com</a>.

Promotional Offers and Sweepstakes. If you provide your name for a promotional offer or to enter a sweepstakes or contest and you win a prize, we will post a winner's list online where your name and city will be listed for our promotional purposes and to demonstrate the transparency of a competition, and we will file your name with state agencies if required by law.

To protect our Site and our business. We monitor use of the Sites and we use the information we collect, including personal data, to pursue our legitimate interest in protecting you, others and the Site itself by:

- identifying fraudulent activities and transactions;
- preventing abuse of the Sites and investigating and/or seeking prosecution for any potential threats to or misuse of the Sites;
- ensuring compliance with the applicable terms of service and this Privacy Policy;
- investigating violations of or enforcing these agreements; and
- otherwise protecting the rights and property of Web.com, its partners, and customers.

To improve our services. In order to pursue our legitimate interest in improving our Sites, we also use personal data to conduct research and analysis and to identify what services you and other customers like you need:

- to better understand how people interact with our websites to provide communications about products which we think will be of interest to you; and
- to determine the effectiveness of promotional campaigns and advertising.

Whenever we process data for these purposes we will ensure that we always keep your personal data rights in high regard and take account of these rights. You have the right to object to this processing if you wish and if you wish to do so, please click <a href="here">here</a> to update your communication preferences. Please bear in mind that if you object this may affect our ability to carry out tasks above for your benefit.

To provide required information to ICANN. For any domain name registrars owned and/or operated by Web.com, ICANN requires us to make certain information, collected in connection with the registration of a domain name, available to the public via an interactive web page and a "port 43" WHOIS service. Information made public is your full name, mailing address, phone number, email address, and, where provided, your fax number, as well as the creation and expiration dates of your domain name registration and the nameserver information associated with your domain name. This does not involve the demographic, financial or Internet usage information listed above. For the purposes of this Privacy Policy we will refer to this information collectively as your "WHOIS Information." Please note that we do not control how members of the public may use the WHOIS Information. For the avoidance of doubt, and in order to comply with certain applicable laws or other privacy requirements, we reserve the right to mask your personally identifiable information as needed, including but not limited to, masking data published to Port 43 or the WHOIS database.

\*For services in the United States, by registering on a Website and providing your telephone

number, you agree that this action constitutes a purchase, inquiry and/or application for purposes of telemarketing laws. Regardless of the fact that your telephone and/or cell number may be listed with the Federal Do-Not-Call Registry or your local State Do-Not-Call list, you are providing your express written consent to receive future information (including telemarketing) about products and services from us and/or our affiliates, and you hereby agree and consent to our contacting you using the information you have provided and will provide to us. This means we may contact you by e-mail, phone and/or cell number (including use of automated dialling equipment and/or pre-recorded calls), text (SMS) message, social networks or any other means of communication that your wireless or other telecommunications device may be capable of receiving (i.e. video, etc.). We may also send you information or offers from time to time to the postal address or email address we have on file (as further outlined in this Privacy Policy).

# How Long We Keep Your Personal Data.

We keep information only for as long as we need it to provide you services, manage our business or as required by law or contract. Where you have a contract with us, we will retain your data for the length of the contract, and will further retain that information for a time period consistent with our legal or regulatory responsibilities, after you terminate all your services with us to resolve disputes, enforce our relevant Service Agreement, and to adhere to the technical and legal requirements and constraints related to the security, integrity and operation of the Sites. If you have any questions about how long we will keep your specific data, please contact privacy@web.com.

## Who We Share Your Personal Data With.

We provide your personal data to companies that help us with our business activities (e.g. assisting us in Site operations, providing customer service, etc.) or that assist us in improving our products, content, services or advertising. These companies are authorised to use your personal data only as necessary to provide these services. When you ask to be part of our directories, the information you provide will be displayed publicly.

We will also share your personal data:

- As required by law, court order or other government or law enforcement authority or regulatory agency (including ICANN) in order to enforce or apply our Services Agreement or other agreements;
- When we believe in good faith that disclosure is necessary to protect our rights, protect
  your safety or the safety of others, investigate fraud or respond to a government request.
  This includes exchanging information with law enforcement, other companies and
  organisations for fraud protection, credit risk reduction or other similar purposes;
- In connection with a corporate change including a merger, acquisition, transfer or sale of assets or in connection to insolvency, bankruptcy or receivership. Information about our

users, including customer information, will also need to be disclosed to our legal and financial advisors, investors or potential buyer in some commercial transactions seeking financing, investment or support or funding;

- To any other third party where we have your prior informed consent to do so; and
- To other entities belonging to Web.com (i.e. any companies directly or indirectly controlled by Web.com). A list of our companies is included <a href="here">here</a> including their vendors, suppliers, contractors and agents, which may be involved in the provision of the Website or the content, so that we can better serve you or, simply, to give response to your requests (e.g. when you use contact us forms).

## Where We Transfer Your Personal Data.

Our Sites are operated in the United States. If you are located in the European Union please be aware that information we collect will be transferred to and processed in the United States. As it relates to Web.com UK (which includes but is not limited to Enable Media and TouchLocal), our sites are operated in the European Union but some data may still be hosted in the US.

EU-U.S. and Swiss-U.S. Privacy Shield. Web.com and certain of its subsidiaries (namely, Franchise Website Solutions, LP, Monster Commerce, LLC, NameSecure, LLC, Network Solutions, LLC, Register.com, Inc., RPI, Inc., SnapNames Web.com, LLC, Web.com Holding Company, Inc., and Yodle Web.com, Inc.) participate in and comply with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce with respect to the collection, use and retention of personal information that is transferred from European Union (EU) member countries and Switzerland to the United States (collectively, the "Framework"). To learn more about the Privacy Shield program and to view our certification, please visit https://www.privacyshield.gov/. To provide adequate protection for certain EU Personal Data and Swiss Personal Data about corporate customers, clients, suppliers, and business partners received in the U.S., Web.com has elected to self-certify to the Framework administered by the U.S. Department of Commerce ("Privacy Shield"). Web.com adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability. Web.com is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and for any subsequent transfers to a third party acting as an agent on its behalf. Web.com complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions. For purposes of enforcing compliance with the Privacy Shield, Web.com is subject to the investigatory and enforcement powers of the United States Federal Trade Commission with regard to our compliance with the Privacy Shield. Web.com may be required to disclose personal information to law enforcement, regulatory or other government agencies, or to other third parties, in each case to comply with legal, regulatory, or national security obligations

or requests. Web.com commits 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 privacy policy should first contact Web.com by email at privacyshield@web.com. We will investigate and attempt to resolve any complaints or disputes within 45 days of receiving your complaint. Web.com's independent recourse mechanism for Privacy Shield complaints for use by EU and Swiss individuals is JAMS. If you are unsatisfied with the resolution of complaint, **JAMS** your you may contact https://www.jamsadr.com/eu-us-privacy-shield for further information and assistance. You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (1) raised your complaint directly with Web.com and provided us the opportunity to resolve the issue; (2) made use of the independent dispute resolution mechanism identified above; and (3) raised the issue through the relevant data protection authority and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you.

With regard to Human Resources data, Web.com commits to cooperate with the panel established by the EU data protection authorities (DPAs) with respect to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship.

If you have any questions about this Web.com participation in the Privacy Shield Framework please contact us as follows: privacyshield@web.com or by mail at Web.com Group, Inc., Attn: Privacy Officer, 5335 Gate Parkway, Jacksonville, FL 32256.

## How We Keep Your Personal Data Safe.

We work to protect the security of your financial information during transmission by using Secure Sockets Layer ("SSL") software, which encrypts the information you input on the Site. However, no method of transmission over the Internet or method of electronic storage is completely secure and we cannot guarantee its absolute security. You can further help to ensure your security by taking a few simple precautions. For instance, it is important to protect against unauthorized access to your computer and to any Web.com username and password, and to be sure to sign off when you are finished using a shared computer.

# Your Rights In Relation To Your Personal Data.

You are entitled to ask us:

- For access to a copy of your personal data;
- To identify what personal data of yours has been shared;
- To correct, erase or restrict our processing of your personal data;
- To transfer the information you have provided under contract or consent to another

- organisation; or
- To stop processing your information, by withdrawing your consent or objecting to our legitimate interests.

Your rights in relation to your personal data are limited in some situations. For example, if we have a legal requirement or a compelling legitimate ground we may continue to process your information. We will provide you with information on whether there are limits or exemptions that apply to any request that you make. But know that we will not discriminate against you for exercising your privacy rights, meaning except as otherwise permitted by law we will not deny you goods or services or otherwise impose financial penalties on you for exercising those rights.

You can view or change the information you have provided us by submitting a request through <a href="https://dsar.web.com/">https://dsar.web.com/</a> or logging into your online account manager, if applicable. You are also welcome to send your questions, concerns and requests to: <a href="mailto:privacy@web.com">privacy@web.com</a> or by calling our Customer Service department. Due to the nature of your request you may be asked for additional forms of identification so that we can properly verify your identity. Please note, in no event will financial information be provided over the phone, nor will such information be provided without verification.

And as always, all of our customers that simply wish to unsubscribe from our communications may do so by following the unsubscribe link found either at the bottom of any of our marketing emails or within the footer of many of our Sites.

You also have the right to make a complaint if you feel your personal data has been mishandled by contacting <a href="mishandled">privacy@web.com</a>. We encourage you to come to us in the first instance but, to the extent that this right applies to you, you are entitled to complain directly to the relevant supervisory authority. This can be the supervisory authority where you reside or work, or where you believe a breach has taken place.

# **Links To Or From Other Websites.**

Web.com has no control over and is not responsible for the privacy policies or information gathering practices of other websites, including those to which we may link and those which may link to us. We recommend that you review privacy policies of every online service you use before submitting any personal data and direct any concerns to the site administrator of that website.

#### Partner Sites.

Web.com sometimes enters into agreements in which we jointly develop or operate websites with third parties (each a "Partner Site"). Any information collected via a Partner Site may be jointly owned by Web.com and the applicable third-party partner, or, alternatively, owned solely

by us or the third party partner. In such event we will make sure you know who is collecting your data when it is collected as well as which privacy policy applies.

# Client Campaigns.

For certain Acquisio digital marketing platforms, such as ClientCampaigns.com, we allow our customers to provide us with their Google Analytics account information, and then we download their Google tracking data and store it locally for that customer to access for reporting purposes.

## Children.

You must be at least eighteen years old to register online or purchase our goods or services. Web.com does not knowingly collect information from children under the age of eighteen.

## Changes To This Policy.

We may amend this Privacy Policy at any time, and will communicate changes to this Policy via email to users who have provided an email address and post a notice on our Site prior to the change becoming effective.

## **Resellers and Private Label Partners.**

As it relates to Web.com's trusted resellers and private label partners (collectively, "Resellers"), Web.com may process customer Personal Data on behalf of Reseller. In such cases, Reseller is the data controller and Web.com is the data processor and each party's obligations will be outlined in the Reseller Agreement between the parties. In the event of a data subject access request sent by a third party to a Reseller, Reseller will make a similar request to Web.com by visiting <a href="https://dsar.web.com/reseller">https://dsar.web.com/reseller</a>, and submitting the appropriate form. All data collected through this relationship will be treated in accordance with this policy.

# Contacting Us.

If you have questions or concerns regarding this Privacy Policy, you can contact us by writing to us at <a href="mailto:privacy@web.com">privacy@web.com</a> or by mail at 5335 Gate Parkway, Jacksonville, Florida 32256, Attention: Privacy Team.