#### PRIVACY AND COOKIE POLICY

We, URL Solutions Inc. a company incorporated under the laws of Panama ("the Company", "we", "us", "our") are data controllers, as this term is defined under the General Data Protection Regulation 2016/679 and applicable data protection laws) which means we determine the purpose, conditions and means of processing of your personal data. The terms "you", "your", "user", or "customer" shall refer to any individual or entity who obtains our services and by purchasing our Services (as this term is defined below) confirms that it accepts this Agreement.

In this privacy policy, your data is sometimes called "personal data" or "personal information". We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data or any such action as "processing" such personal data. For the purposes of this statement, personal data shall mean any information relating to you which identifies or may identify you and which includes, for example, your name, address, identification number.

Process, Processed, Processing shall mean any operation or set of operations performed on Personal Data or on sets of Personal Data, whether or not by automated means. Operations performed may include collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

This privacy policy describes how we collect and use the personally identifiable information you provide on our Site (as this term is defined below) when using the Company's domain name registration services ("Services"). It also describes the choices available to you regarding our use of your personally identifiable information and how you can access and update that information. This privacy notice applies solely to information collected by this web site: <a href="https://www.pananames.com">www.pananames.com</a> (hereinafter the "Site"). The Company demonstrates its commitment to customers' privacy by providing this statement. We will do everything in our power to ensure your right to privacy to the extent permitted by laws and other regulations that bind us as a company and also as a domain name registrar. We are committed to developing long lasting relationships that are built on trust.

This Site contains links to other websites. The Company is not responsible for the privacy practices or the content of such sites. Please refer to such websites' privacy policies for the ways that such websites collect and process personal data.

We may collect the following personal information from you:

- Contact Information: such as name, email address, mailing address, and phone number.
- Billing Information: such as the last four digits of the credit card used to make the payment, and billing address
- Driver's License or ID
- Business/Tax ID/Certificate of registration, if you are a legal entity
- Unique Identifiers: such as password, IP address

We may also collect the following information from you:

Information about your business such as company name

- Demographic information: such as zip code
- Utility bills if we need to confirm your address

## What Specific Personal Data Do We Collect in relation to Domain Registrations?

When you place an order for the registration of a domain name, you are required to provide information such as your name, postal address, fax number (where available), email address and telephone number. All such information is mandatory to provide the service requested unless otherwise stated at the time. You shall also be required to provide the name, postal address, fax number (where available), email address and telephone number of the technical, administrative and billing contacts associated with the domain name. You will need to ensure that you are duly authorized and permitted to provide the personal data of such other contact persons.

In compliance with our obligations as a domain name registrar and as required by ICANN and domain name registries, we collect further mandatory data in relation to domain names including (1) the domain name (2) original creation date (3) expiration date and (4) the names of the primary and secondary name servers for the domain together with IP addresses (5) contact of registrant, admin, technical and billing contacts.

The information collected by the Company will be published in the applicable domain name WHOIS or RDAP, as applicable (a service offered by each domain name registry that allows users to check domain name registration details) and is capable of being accessed globally but no personally identifiable information shall be published unless you consent to this when registering for our Services.

We also log other identifying details necessary for the provision of our Services, to ensure we only act on your instructions and comply with applicable laws and regulations and other rules that bind us as a domain name registrar, such as written communications, confirmations, modifications and any other related correspondence, payment source information, log files, billing records and any other communications information such as source IP address, HTTP headers and other records concerning registration such as dates, times, zones and sessions.

In providing related services to you, such as the provision of SSL Certificates, we may request additional information at the time of order.

#### How Do We Use Your Personal Data gathered Through a Domain Registration?

The information you provide when registering a domain name are mandatory and required to allow us to properly handle your domain name registration, perform our contract with you, comply with applicable laws and regulations, to conduct KYC/AML and fraud checks, to administer your account, including notifying you about matters related to the domain name, such as renewal or updates and to provide other services that you have ordered from us, for the purposes of complying with the rules and regulations of ICANN and for our own legitimate interests or those of third parties in accordance with applicable data protection laws. We might also use your personal information for marketing (where you have consented to such marketing) and internal analytical purposes for our own benefit which is entirely anonymous.

We will not process your Personal Data in a way that is incompatible with the purposes mentioned in this Privacy Policy.

We do not sell your personal information in compliance with the California Consumer Privacy Act (CCPA). As a "Service Provider" as defined in the CCPA, Company will not sell, retain,

use or disclose Personal Information for any purpose other than as set out in an agreement with our customer or as otherwise permitted or required by the CCPA.

#### **How Do We Protect Personal Data?**

Security is a high priority for our Company. We take reasonable precautions to protect personal information from loss, misuse, unauthorised access or disclosure, alteration or destruction. When you submit sensitive information via this site, your information is protected both online and offline. Wherever we collect sensitive information that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the top or bottom of your web browser, or looking for "https" at the beginning of the address of the web page. While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about security on this site, you can contact us at privacy@pananames.com.

# To Whom Do We Disclose Personal Data Gathered Through the Process of Domain Registration?

In accordance with the requirements as a domain name registrar and as mentioned above, we are required to disclose your information as follows:

(i) We make non personally identifiable data available to the public for free query-based access on WHOIS or RDAP, as applicable, unless you have agreed to enable the dislcosure personally identifiable information: such (ii) We make domain related data, including communications with you, available to ICANN and domain name registries pursuant to their rules regulations; We may transfer domain related data as often as is required to reputable third parties appointed by ICANN or domain registries who act as data escrow agents; and

We allow third parties access to WHOIS or RDAP data in bulk provided they agree, amongst other things, not to use them improperly such as for the transmission of unsolicited commercial email.

The disclosure of your personal information to ICANN and other third parties involves the transfer of your personal information to entities located outside Panama in order to perform the services and comply with the applicable laws and regulations that bind us.

## **Information You Provide About Others**

In providing personal information about other individuals (such as someone in whose name you are registering or the domain name's technical or billing contacts) you, the Registered Name Holder represent that you have notified them of (i) the purposes for which information will be used (ii) the recipients of their personal information and (iii) how they can access and correct the information and you are duly authorized to disclose their personal data on their behalf.

#### **Service Providers**

We may provide your personal information to companies that provide services to help us with our business activities such as fulfilling your order or offering customer service. These companies are authorized to use your personal information only as necessary to provide these services to us and are prohibited from retaining, sharing, storing or using your personally identifiable information for any secondary purposes.

## **Legal Disclaimer**

We may also disclose your personal information:

- As required by law, such as to comply with a subpoena, or similar legal process;
- 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 in accordance with applicable data protection laws:
- If Company is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information;
- To any other third party with your prior consent to do so.

When your account is cancelled (either voluntarily or involuntarily) all of your personally identifiable information is placed in "deactivated" status on our relevant Company databases. However, deactivation of your account does not mean your personally identifiable information has been deleted from our database entirely. We will retain and use your personally identifiable information as necessary in order to comply with our legal obligations, resolve disputes, or enforce our agreements. We will retain your information for as long as your account is active. Additionally, we will retain and use your information after the service has been terminated/deactivated as necessary to comply with registry and ICANN regulatory requirements, our legal obligations, to resolve disputes, and to enforce our agreements.

## **Opt-out Preferences**

If you wish to subscribe to our newsletter(s), we will use your name and email address to send the newsletter to you. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, accessing the email preferences in your account settings page or you can contact us at privacy@pananames.com.

#### **Transfer of Data Abroad**

If you are visiting this Site from a country other than the country in which our servers are located, your communications with us may result in the transfer of information across international boundaries.

# **Cookie policy**

This Cookie Policy explains what cookies are, how and why we use cookies. Our Privacy Policy sets out full details of the other information we may collect and how we may use your personal information.

Cookies are small pieces of texts files containing small amounts of information that a website saves and which are downloaded and may be stored on your user device e.g. your computer (or other internet enabled devices, such as a smartphone or tablet).

We use information gathered about you from our Site to help diagnose problems with our server, for analytical purposes in an anonymized manner, to detect or investigate fraud and to administer our Site. We also gather broad anonymous demographic information from this data to help us improve our Site and make your browsing and purchasing experience more enjoyable. This is not linked to any personally identifiable information, except as necessary to prevent fraud or abuse on our system.

Our Site uses functional cookies, which are essential cookies assisting you to navigate the Site and to keep track of your shopping cart and receipts ensuring that your choices are remembered when you navigate through the Site. We use such cookies to also identify you so you do not need to log in each time you visit our Site. The cookies are linked to your customer number, which is associated with the information in your account.

#### **Google Analytics**

We also use analytics cookies which are called "Google Analytics" to collect information about use of this Site, such as how often users visit the Site, what pages they visit when they do so, and what other sites they used prior to coming to this Site. Google Analytics collects only the IP address assigned to you on the date you visit this Site, rather than your name or other identifying information.

Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this Site. This cookie cannot be used by anyone but Google, Inc. The information generated by the cookie will be transmitted to and stored by Google servers. We use the information received from Google Analytics only to improve services on this Site. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to this Site by disabling the Google Analytics cookie on your browser.

#### Contests/Surveys

From time-to-time, we may provide you with the opportunity to participate in contests or surveys. If you choose to participate, we may request certain personally identifiable information from you. Participation in these contests or surveys is completely voluntary and you therefore have a choice whether or not to disclose the requested information. The requested information typically includes contact information (such as name and address), and demographic information (such as zip code and age level - note that you must be 18 or above to enter). We use this information to notify contest winners and award prizes, to monitor site traffic, and to personalize our Site.

We may use a third party service provider to conduct these surveys or contests, which service providers may be outside of the EEA. When we do, we require third parties to respect the security of your data and to treat it in accordance with the law that company will be prohibited from using our users' personally identifiable information for any other purpose. We will not share the personally identifiable information you provide through a contest or survey with other third parties unless we give you prior notice and choice.

# **Targeted Advertisements**

We may display targeted offers to our customers based on the products currently owned by the customer. These offers will display as varying product banners. There is no personal or geolocation information collected within these product banners to build a profile about your activities or that is shared with third party advertising companies.

#### **Additional Information**

# **Links to 3rd Party Sites**

Our Site may include links to other web sites whose privacy practices may differ from those of the Company. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Web site you visit.

#### Chat

We may use a chat feature to assist you with customer support. If our chat feature is offline we will collect your name and email address so that we may contact you and reply to your request.

## **Anti-Spam**

We have a zero tolerance spam policy. We monitor the use of our system and services to ensure they are not used for the purpose of sending out unsolicited email. Please contact us at abuse@pananames.com to enter any issues regarding spam and the use of our services. Your message will be evaluated for merit and acted on where appropriate, and therefore, we reserve the right to use your notice to substantiate the abuse to our customer. Please note that due to the volume of complaints received, unless we need additional information, you will not receive a reply or update from us. Please be assured that we take abuse very seriously and investigate every incident that is reported.

#### **Changes To This Policy**

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we may notify you by email (sent to the e-mail address specified in your account) or by uploading the revised version on Company's website. We encourage you to periodically review this page for the latest information on our privacy practices.

# RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- Request erasure of your personal information. This enables you to ask us to delete or remove
  personal information where there is no good reason for us continuing to process it. You also
  have the right to ask us to delete or remove your personal information where you have
  exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask
  us to suspend the processing of personal information about you, for example if you want us
  to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please <a href="mailto:privacy@pananames.com">privacy@pananames.com</a> in writing.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact privacy@pananames.com

#### **Contact Us**

URL Solutions Inc privacy@pananames.com

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