

# **WebMVMT PRIVACY POLICY**

**Last Revised: February 9, 2017**

## **WebMVMT RESPECTS YOUR PRIVACY**

This Privacy Policy describes how we collect and use the personally identifiable information you provide on our Sites that link to this Privacy Policy and in our mobile applications. 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.



## **EU-U.S. Privacy Shield**

Our parent company, WebMVMT Operating Company, LLC (and our related entities, including WebMVMT.com, LLC, Wild West Domains, LLC, Blue Razor Domains, LLC, Starfield Technologies, LLC, Domains by Proxy, LLC, Outright, Inc., Locu, Inc. and Mad Mimi, Inc.) participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. WebMVMT Operating Company, LLC is committed to subjecting all personal data received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of [Commerce's Privacy Shield List](#)

WebMVMT Operating Company, LLC is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. WebMVMT Operating Company, LLC complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, WebMVMT Operating Company, LLC is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, WebMVMT Operating Company, LLC may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the [Privacy Shield website](#), you may invoke binding arbitration when other dispute resolution procedures have been exhausted

**Other than as described in this Policy, we will not give any information about you to others without your express permission.**

### **Information Collection and Use**

Our Site and mobile applications use forms to collect contact information (including your name, address, telephone number, and email address) so you can place orders, request information and

support, and make product suggestions. For certain services, we may also request a credit card number, government identification number, or other financial information. We will then create an account number for you.

We receive and store any information you enter on our Site or mobile applications, or give us in any other way, including through email, telephone, or other communications with our customer service department. If you contact us for support, we will keep an internal record of what support was given.

We use your information to contact you regarding functionality changes to our products, our Site and mobile applications, new WebMVMT services, and special offers we think you'll find valuable. If you would rather not receive this information, please see the "Updating Your Information" section below on how to change your preferences.

We may also use your information to present a co-branded offer with our partners or affiliates. If we collect information from you in connection with a co-branded offer, it will be clear at the point of collection who is collecting the information and whose privacy statement applies. In addition, it will also describe any choice options the individual has in regards to the use and/or sharing of PII by the participant and its co-branded partner, as well as how to exercise those options.

Certain services offered may allow you to import contacts by uploading a file or copying and pasting from a spreadsheet to add to your account (e.g., using Mad Mimi to send emails on your behalf). We will only use this information for your legitimate business purpose of importing the contacts as directed by you. When you provide us with personal information about your contacts we will only use this information for the specific reason for which it is provided. If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please contact us at [info@WebMVMT.com](mailto:info@WebMVMT.com).

Our Site and mobile applications use cookies and/or other tracking technologies to identify you so you don't need to log in each time you visit our Site or mobile applications. The cookies are linked to your customer number, which is associated with the information in your account. You can control the use of cookies, at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

Within our Site and mobile applications we and our partners, affiliates, and/or analytics or service providers use technologies such as cookies, beacons, tags and scripts to analyze trends, administer the Site and mobile applications, track users' movements around the Site and mobile applications, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual or aggregated basis.

As is true of most websites, we gather certain information automatically and store it in log files. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp and/or clickstream data. We use this information gathered about you from our Site or mobile application to help personalize search results, diagnose problems with our server, and to administer our Site and mobile applications. We also gather broad demographic information from this data to help us improve our Site and mobile applications 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.

We also use tracking technologies such as: CI codes (click tracking), ISC (source tracking), and ITC (item tracking codes, attached to purchases at an item level, used to determine where within the application a product was added). Our mobile applications automatically collect the device's operating system, phone model, app version, and device ID, and customer number. We report this data back to

our WebMVMT web services. These results are not shared with any third parties and are used solely for deciding when to retire SDKs/OS versions and to identify characteristics of major users so that we may optimize our applications and services for those user types.

With your express consent, we may access and track location data from your mobile device in order to personalize results such as user favorite domain name selections. We do not tie any personally identifiable information about you to any of the location tracking technologies that we use, and we do not track location data when our mobile applications are not in use. You may withdraw your consent for us to use location data at any time by turning off the location services setting on your device. To manage Flash cookies, please click [here](#).

We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile applications. This Site and our mobile applications contain links to third party websites. Unfortunately, WebMVMT is not responsible for the privacy practices or the content of such sites. We encourage you to carefully read the privacy statement of any website you visit.

For domain name registrations, please review the privacy portion (where available) of the [Registry Policies](#) for the top-level domain in which you wish to or have registered a domain name to better understand how your WHOIS data is utilized by the individual registry.

***For additional information, and to manage how we use cookies, web beacons and similar technologies on your devices, please click [here](#).***

### **Security**

We use security measures to protect against the loss, misuse or alteration of the information under our control. When you enter sensitive information (such as a credit card number) on our order forms, we encrypt the transmission of that information using secure socket layer technology (SSL).

We follow generally accepted standards to protect the personal information transferred to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about the security of your personal information, you can contact us at [info@WebMVMT.com](mailto:info@WebMVMT.com). We may retain your information for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements.

### **Contacting You**

From time to time, WebMVMT or someone acting on behalf of WebMVMT may contact you, to confirm your orders, to send information to you, and to provide you with offers for services. The contacts may occur by e-mail, telephone, or text message. By providing your telephone or mobile number, you consent to receive marketing telephone calls from or on behalf of WebMVMT that may be initiated by an automatic telephone dialing system and/or use an artificial or prerecorded voice. You understand that providing consent is not a condition of purchasing any good or service from WebMVMT. By providing your mobile number, you consent to receive marketing text messages from or on behalf of WebMVMT that may be sent by an automatic telephone dialing system. You understand that providing

consent is not a condition of purchasing any good or service from WebMVMT. Message and data rates may apply.

Any information you send to us may be stored and used to improve this Site, our mobile application, and our products, or it may be reviewed and discarded.

### **Third Party Service Providers**

We may at times provide information about you to third parties to provide various services on our behalf, such as processing credit card payments, serving advertisements, conducting contests or surveys, performing analyses of our products or customer demographics, shipping of goods or services, and customer relationship management. We will only share information about you that is necessary for the third party to provide the requested service. These companies are prohibited from retaining, sharing, storing or using your personally identifiable information for any secondary purposes.

### **Google Analytics**

We use a tool 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 on servers in the United States.

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.

### **For Website Builder Users Only**

Website Builder incorporates the Google Places API. Google's ability to use and share information collected by the Google Places API is governed by the [Google Privacy Policy](#).

### **Supplementation of Information**

We may receive information about you from other sources, including publicly available databases or third parties from whom we have purchased data, and combine this data with information we already have about you. This helps us to update, expand and analyze our records, identify new customers, and provide products and services that may be of interest to you. If you provide us personal information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.

Examples of the types of personal information that may be obtained from public sources or purchased from third parties and combined with information we already have about you, may include information from our strategic partners, service providers, or the United States Postal Service. We do this to enhance our ability to serve you, to tailor our products and services to you, and to offer you opportunities to purchase products or services that we believe may be of interest to you.

### **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). 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. When we do, 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.

### **“Do Not Track” Signals**

Note that your browser settings may allow you to automatically transmit a “Do Not Track” signal to websites and online services you visit. There is no consensus among industry participants as to what “Do Not Track” means in this context. Like many websites and online services, we currently do not alter our practices when we receive a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” you may wish to visit ([www.allaboutdnt.com](http://www.allaboutdnt.com)).

### **Targeted Advertisements**

WebMVMT may display targeted, or interest-based, 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.

We also partner with third parties to manage our advertising on other websites. Our third party partners may use technologies such as cookies to gather information about your activities on this Site and other websites in order to provide you with advertising based upon your browsing activities and interests, and to measure advertising effectiveness. If you wish to opt out of interest-based advertising click [here](#) [or if located in the European Union click [here](#)]. Please note you will continue to receive generic ads.

We also use a tool called Sizmek to place a cookie on our behalf. This cookie collects anonymous data that helps us conduct targeted advertising and improve the performance of our advertising on other websites. To opt-out of our use of Sizmek, click [here](#) (or if located in the European Union, click [here](#)). Please note that opting out of targeted advertisements does not completely opt you out of being served with ads. You will continue to receive generic ads.

### **Tell-A-Friend**

If a user elects to use our referral service to inform a friend about our Site or mobile application, we ask the user for the friend's name and email address. WebMVMT will automatically send the friend a one-time email inviting them to visit our Site. WebMVMT stores this information for the sole purpose of sending this one-time email. The friend may contact WebMVMT at [info@WebMVMT.com](mailto:info@WebMVMT.com) to request the removal of this information from our database. If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please contact us at [info@WebMVMT.com](mailto:info@WebMVMT.com).

### **What Happens to my Personally Identifiable Information if I Terminate my WebMVMT Account?**

When your WebMVMT account is cancelled (either voluntarily or involuntarily) all of your personally identifiable information is placed in "deactivated" status on our relevant WebMVMT 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.

### **Updating Your Information**

You may alter or update your account information or opt out of receiving communications from us and our partners at any time by accessing your Account online (Accounts Settings > Contact Preferences). Please note, where your personal information is reasonably necessary for the provisioning of the products or services you have purchased, or for the operation of our network, the collection, use and disclosure of personal information is required and you cannot opt-out or delete the information without terminating your products/services. If your personal information is not reasonably necessary for the provisioning of the services you have requested or the operation of our network, you will have the choice to withdraw your consent by opting out. For example, where you have provided express consent for the use of specific product or services for marketing purposes, you can opt-out later on as you like. Similarly, you can opt-out of your personal information being used for a variety of marketing communications by us, including telemarketing or addressed marketing mail, or commercial electronic messages like emails and SMS messages, at any time by revisiting Contact Preferences in your Account Settings.

### **Access**

Upon request we will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. You may access, correct, or request deletion of your personal information by contacting us at any of the addresses below:

- i. Access your [Account](#) online (Accounts Settings > Contact Preferences) [\*Note that this is not an option for deactivation]
- ii. You may send mail to WebMVMT at the following postal address:
- iii. 4535 South Lakeshore Dr. Tempe, AZ 85282
- iv. You may call us at: (480) 644-1953 
- v. You may send an email to [info@WebMVMT.com](mailto:info@WebMVMT.com)

To deactivate your account, please contact our Support team for the fastest service at (480) 505-8877. If you are an international customer, you may find a list of our support phone numbers listed [here](#). We have the following options for changing, terminating, and modifying your account information or contact preferences.

We will respond to your request for access or to modify or deactivate your information within thirty (30) days.

### **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. By visiting this Site and communicating electronically with us, you consent to such transfers.

### **Compliance with Laws and Law Enforcement**

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including without limitation subpoenas), to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent

or stop activity we consider to be illegal or unethical. We will also share your information to the extent necessary to comply with ICANN's rules, regulations and policies.

To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process.

#### **Changes in Our Practices**

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

If we make material changes to this Policy, we will notify you here, by email, or by means of a notice on our home page, at least thirty (30) days prior to the implementation of the changes.