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## Preamble

Netnorth Limited knows that you care how information about you is used and shared, and we appreciate your expectation that we will do so carefully and sensibly. This notice describes our privacy policy. By visiting the Netnorth Limited Web site (the "Site") or by otherwise interacting with Netnorth Limited, you agree to accept the practices described in this Privacy Notice. This Privacy Notice is subject to any relevant Netnorth Limited Services Agreement.

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## 1. What information does Netnorth collect?

We receive and store any information you enter on our Site or give us in any other way, such as via telephone, electronic mail or online form. For example, information may be collected when you register a domain name or when you contact us for customer support. Here are the types of information we gather from visitors to Netnorth Limited:

### 1.1 Contact Information.

We are required by the Internet Corporation for Assigned Names and Numbers ("ICANN"), the organization which assumes responsibility for domain name allocation, to collect certain information about you during the domain name registration process. This information includes your full name, mailing address, phone number, email address, and, where provided, your facsimile number. Such contact information may be used, for example, to communicate with you when necessary with respect to transactions conducted through the Site. Additionally, we may collect contact information provided to us during any correspondence relating to customer support we supply to you, as well as in connection with products and services offered on the Site.

### 1.2 Financial Information.

We also collect and retain certain financial information from you during the domain name registration process, as well as in connection with other products and services which we offer on the Site. For example, when you apply to register a domain name or sign up for any other product or service through Netnorth Limited, we may require you to provide a credit card number and billing address before we will process that application. We will not sell, share or rent any financial information collected from you except as disclosed in this policy or as necessary to fulfil your order.

### 1.3 Demographic Information.

We may collect and store anonymous demographic information (such as your postcode, gender and age), and use this data to tailor your experience at our Site, provide content that we think you might be interested in, 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.

### 1.4 Internet Protocol Address.

We collect and retain an IP address from all visitors to the Netnorth Limited Site. We use your IP address to help diagnose problems with our server, to administer our Site and for purposes of traffic analysis within the Site, and to help prevent fraud. No personally identifiable information will be linked to such information.

### 1.5 Other Information.

We collect and store certain types of information whenever you interact with us. For example, our servers track the type of Web browser you are using, and the page to which you link from Netnorth Limited. We collect this information to better develop a sense of what services our customers need, but not to track your individual usage patterns, except within the Site. We may use such information for marketing purposes, and to send information to you which we believe might be of interest. In addition, such 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 information shared with third parties.

#### **1.6 Cookies.**

From time to time, the Netnorth Limited Site may use "cookie" technology for such purposes as enhancing your online experience by making it easier for you to navigate through the Site and making certain features work better. Cookies are text files which are commonly deposited by Web sites on a user's hard drive when the user visits a Web site. The file identifies a user's computer and can record the user's preferences and other data about the user's site visit. We do not extract information about individual users during this process. Your Web browser may enable you to disable cookies, but please note that certain services may not function correctly without it.

#### **1.7 Third Party Cookies.**

From time to time, the Netnorth Limited Site may use third-party advertising companies to serve ads when you visit our Site. Our third-party advertising companies may also separately place or recognize a cookie file on your browser in the course of delivering advertisements to this Site. These companies may use information about your visits to this and other Web sites in order to provide advertisements about goods and services of interest to you. However, no personally identifiable information (such as your name, address, email address or telephone number) will be connected with such information.

#### **1.8 Web Beacons.**

Web pages may contain electronic images (called a "single-pixel GIF" or "web beacon") that allow a Web site to count users who have visited that page or to access certain cookies. From time to time, the Netnorth Limited may use web beacons to access our cookies within and outside our network of Web sites and in connection with Netnorth Limited products and services.

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## **2. Does Netnorth Limited Share the Information It Receives?**

Except as set out in this Privacy Notice, you will receive notice whenever personal information (excluding WHOIS Information) about you might go to third parties, and you will have an opportunity to choose not to have us share that information. We share personal information as described below:

#### **2.1 WHOIS Information.**

ICANN requires Netnorth Limited 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. This public information includes your 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, but does not include demographic, financial or Internet usage information. For the purposes of this Privacy Notice we will refer to this information collectively as your "WHOIS Information." Please note that we may not be able to control how members of the public may use the WHOIS Information.

#### **2.2 Third Parties.**

If you have opted-in to receiving information about products and services provided by Netnorth Limited's partners and affiliates, we will share your name, address, phone number and email address, in addition to information provided by you in response to our opt-in survey, so that the appropriate partners and affiliates may contact you regarding the products and services in which you have expressed interest. Netnorth Limited cannot guarantee that these third parties will offer the same level of protection as Netnorth Limited, or that their protections will be adequate.

#### **2.3 Agents and Service Providers.**

We engage other companies, individuals and subsidiaries of Netnorth Limited to perform certain functions and/or services to our customers. Examples may include processing credit card

payments, providing marketing assistance and removing repetitive information from customer lists, as well as offering electronic mail services and making available digital certificates. Additionally, if you register a domain name through Netnorth Limited, we may forward certain information you provide to the appropriate registry handling the administration of your chosen top level domain. Your contact and financial information may either be collected by or shared with such third parties as necessary, and in some cases, your information may be retained or used by such third parties.

#### **2.4 Partner Web Sites and Pages.**

Netnorth Limited may sometimes enters into agreements in which we jointly develop or operate Web sites with third parties ("Partner Site"). Any information collected via a Partner Site may be jointly owned by Netnorth Limited and the applicable third party partner, or alternatively, owned solely by us or the third party partner. It is your responsibility to check the privacy policy of such third parties before submitting any personal information to a Partner Site.

#### **2.5 Business Transfers.**

As we continue to develop our business, we might sell or buy businesses or their assets. In such transactions, customer information generally is one of the transferred business assets. Also, if Netnorth Limited or all or substantially all of its assets were ever to be acquired, customer information will of course be one of the transferred assets.

#### **2.6 Protection of Netnorth Limited and Others.**

We may release account and other personal information when we are required to do so by law, court order or other government or law enforcement authority or regulatory agency, including ICANN; to enforce or apply our Services Agreement or other agreements; or when we believe in good faith that disclosing this information is necessary or advisable, including, for example, to protect the rights, property, or safety of Netnorth Limited, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

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### **3. Electronic Mail**

From time to time, Netnorth Limited may use your personal information to contact you by electronic mail concerning our services. These communications are intended to inform you of important information regarding your account, or about general services provided by Netnorth Limited. If you do not want to receive email from us regarding new services, please click the "unsubscribe" link which is included at the bottom of any email you receive from Netnorth Limited. However, in order to fulfil our service obligations to you, we will continue to send you emails regarding your account administration, as well as any necessary information, such as renewal instructions.

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### **4. Access to Information**

#### **4.1 How Secure Is Information About Me?**

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. 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 Netnorth Limited username and password and to your computer. Be sure to sign off when finished using a shared computer. We will take reasonable care to protect your personal information once it is transferred to us, but it is ultimately your responsibility to prevent the disclosure of your personal information outside of Netnorth Limited, as well as any disclosure on the Netnorth Limited Site which is due to your error.

## 4.2 What Information Can I Access?

Netnorth Limited gives you the ability to access your contact information for the limited purpose of viewing and, in certain cases, updating that information. To view or change this information, Netnorth Limited customers may login to The Customer Portal. Past customers may view this information by emailing their request to Customer Service or by calling 01204 900700. Please note, however, that no financial information or usernames and passwords will be provided over the phone, and in no event will such information be provided without verification.

When you update your information, we may keep a copy of the prior version for our records.

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## 5. Sites Other Than Netnorth Limited

Netnorth Limited has no control over and is not responsible for the privacy policies or information gathering practices of other Web sites, including those to which we may link and those which may link to us. In addition, Netnorth Limited owns and operates other Web sites separately from the Site, and this Privacy Notice applies only to the information collected by the Site. We strongly recommend that you review the privacy policies of every online service you use before submitting any personal information and direct any concerns to the site administrator of that site.

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## 6. Children.

Netnorth Limited does not knowingly collect information from children under the age of 13. If you are under 18, you may use Netnorth Limited only with involvement of a parent or guardian.

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## 7. Conditions of Use, Notices, and Revisions

- 7.1 By choosing to visit Netnorth Limited, you agree that your visit and any dispute you may have regarding the protection of your privacy during such visit is subject to this Privacy Notice and our Disclaimer, including, but not limited to, the provisions regarding limitations on damages and the application of the law in the United Kingdom. Please note that if you enter into other agreements with Netnorth Limited, such other agreements may supercede this policy. If you have any concern about your privacy at Netnorth Limited, please contact Customer Support, and we will attempt to resolve it.
- 7.2 Due to the constantly changing nature of our business, we reserve the right to change, update or modify this policy at any time at our sole discretion, and will post any new privacy policy here. Any such change, update or modification will be effective immediately upon posting on the Netnorth Limited Site. Use of information that we gather now will be subject to the Privacy Notice in effect at the time of use. By using or navigating around the Site or utilizing any of the services we provide here, you acknowledge that you have read and understand and agree to be bound by this Privacy Notice. If you do not agree to be so bound, do not remain on the Site. You are responsible for checking our Site frequently to keep apprised of recent changes.