web.com

WEB.COM GROUP INC. 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 (collectively, "Site" or "Sites"). When used herein, the terms "we", "us" and "our" refer to Web.com Group Inc. and our subsidiaries and brands as listed <u>here</u> (collectively, "Web.com"). This Privacy Policy does not apply to brands that historically belonged to The Endurance International Group, Inc. ("Legacy Endurance Brands"), renamed Newfold Digital, Inc., our corporate parent. To view the privacy notice applicable to Legacy Endurance Brands, please click <u>here</u>. For the purposes of the UK Data Protection Act 2018 and UK General Data Protection Regulation ("**UK GDPR**") (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 Sites and access thereto.

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/orpurchase.

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:

- What Data 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
- <u>Children</u>
- <u>Changes To This Policy</u>

- <u>Resellers and Private Label Partners</u>
- <u>Contacting Us</u>

What Data We Collect.

Contact Information. We collect and retain personal contact information that you submit to us voluntarily in ordering or otherwise signing up for 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 Websites.

Financial Information. We collect and retain financial and payment information you provide when you order our products and services. For example, when you register a domain name we require you to provide a credit card number and billing address before we can process that registration.

Account and Order Information. We collect and retain information regarding your selection and use of our Sites and services. This includes your order, billing and renewal history, along with other related transactional and account information.

Access Information. We collect and retain information about the device with which you access and use our Sites and other information on your use of the Websites, 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, and for more information, please review our <u>Cookies Policy</u>.

Demographic Information. We may collect and store demographic information (such as your zip code, gender, date of birth, and/or 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 Information. 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 orders;
- 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 or otherwise stop using our Sites and Websites.

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 dialing 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.

For 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 <u>customersupportuk@web.com</u>.

For 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 Sites and Our Business. We monitor use of the Sites and we use the collected information, including personal data, to pursue our legitimate interests in protecting you, others and the Sites 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 Sites and Services. In order to pursue our legitimate interest in improving our Sites, we also use personal data to conduct research and analysis:

- 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 so, please click <u>here</u> to update your communication preferences. Please note, if you object this may affect our ability to carry out tasks above for yourbenefit.

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. This includes full name, mailing address, phone number, email address, and fax number (when provided), as well as the creation and expiration dates of your domain name registration and the nameserver information associated with your domain name ("WHOIS Information"). This does not involve the demographic, financial or Internet usage information listed above. 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 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 as long as needed to provide you with our Sites and services, manage our business, or as otherwise required by law or contract. For example, 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 the termination or expiration of your services with us in order to allow 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 authorized to use your personal data only as necessary to provide these services. Additionally, 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 organizations 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 <u>here</u> 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 largely operated in the United States. If you are located in the United Kingdom please be aware that in order to fulfil your request or provide access to our Sites, the 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 United Kingdom, but some data may still be hosted in the United States.

Your personal data may also be processed by staff operating in other countries outside the United Kingdom, such as the Philippines, who work for us and/or for one of our suppliers. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this notice.

For transfers of personal information within the Web.com corporate family, such transfer will be under the European Commission's model contracts for the transfer of personal data to third countries (i.e., the Standard Contractual Clauses), pursuant to Commission Decision 2004/915/EC and 2010/87/EU.

For transfers of data to third parties, such transfers will be under the European Commission's model contracts for the transfer of personal data to third countries (i.e., the Standard Contractual Clauses), pursuant to Commission Decision 2004/915/EC and 2010/87/EU.. Although not currently relied upon as a legal basis for transfers, 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 NameJet, LLC) 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.

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 your complaint, you may contact JAMS 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: (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 via the following: 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 organization; 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 legitimate business purpose we may continue to process and/or retain 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 our DSAR portal <u>here</u> or logging into your online account manager, if applicable. You are also welcome to send questions, concerns and requests to <u>privacy@web.com</u> or by calling our Customer Service department. 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 Websites.

You also have the right to make a complaint if you feel your personal data has been mishandled by contacting privacy@web.com. 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 UK Information Commissioner's Office (the "ICO").

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.

Children.

You must be at least eighteen (18) 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 (18).

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/or post a notice on our Website 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 our DSAR portal <u>here</u>, and submitting the appropriate form. All data collected through this relationship will be treated in accordance with this Privacy Policy.

Contacting Us.

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

If you are located in the United Kingdom, you may also contact our UK representative at:

Bird & Bird GDPR Representative Services UK 12 New Fetter Lane London EC4A 1JP United Kingdom UKrepresentative.web.com@twobirds.com