

NCC Group Domain Services Privacy Policy

Personal privacy rights are a high priority for NCC Group, and NCC Group is committed to protecting them. As the services of NCC Group Domain Services (the “Services”) require the use of personal information from time to time, this document explains the context and framework in which NCC Group may do so.

NCC Group Domain Services (“NCC Group”) reserves the right to modify this privacy policy from time to time without notice. The current privacy policy will be available on the NCC Group website at <https://whodoyou.trust/resources/policies/>

Personal Information

Unless an individual visiting the NCC Group website elects to use the Services or requests to be contacted, NCC Group won’t store personal information that is provided. Additionally, individuals will always be given the option to opt out of any further contact from NCC Group or its affiliated companies, except to the extent that use of such information is required for the continued use of the Services or the services of our affiliated companies.

NCC Group uses state-of-the-art technology to keep personal information highly secure. Additionally, every NCC Group employee is obligated to follow the company’s privacy policy. Employees who violate the policy are subject to disciplinary action up to termination.

Individuals have the right to access the information NCC Group stores, or modify the information, or have the information removed from NCC Group’s servers, at any time. However, if such information is removed at the request of an individual, NCC Group may not be able to continue providing Services to the individual.

Information Collected for Registry Services

NCC Group collects certain data from registrars that have contracted to provide registrar services to NCC Group. Such data includes domain name registration information provided by registrants to registrars, including, but not limited to: registered domain name; nameserver delegation; registrant name; contact name, address, phone number, email address; and IP address (“Whois Data”). While NCC Group will comply with all requirements related to the accuracy of Whois Data under its registry agreements with the Internet Corporation for Assigned Names and Numbers (“ICANN”), NCC Group cannot guarantee that all personal data received is accurate or up-to-date and will not, therefore, be responsible for any inaccuracies.

To support the security of the Internet and ensure continuity in service, NCC Group is required to maintain a service that provides Whois Data (the “Whois Service”). The

Whois Service is available to any Internet user, and its use does not require prior authorization or permission by NCC Group or ICANN. For example, the Whois Service discloses Whois Data to third parties to ascertain the registrant or the registrar of a domain in cases of (i) addressing technical problems that might occur when accessing the registrant's domain; (ii) assisting law enforcement authorities in investigations, crime prevention, and matters of national security; (iii) helping to counter the infringement of third-party legal rights; (iv) preventing fraud; and (v) other lawful queries. In essence, Whois Data from a registrant is publicly available. In case of a registrar's failure, loss of registrar accreditation, court order, or other emergency event that prompts the temporary or definitive transfer of domain names from one registrar to another registrar, NCC Group may provide ICANN or another third party with Whois Data.

NCC Group may share zone file data (such as domain names and name servers) with third parties for lawful purposes in accordance with NCC Group's Acceptable Use Policy, available at <https://whodoyou.trust/resources/policies/>. NCC Group may also share personal data with vendors, escrow agents, consultants and other service providers ("**Service Providers**") engaged by or working with NCC Group and who need access to such information to carry out their work for NCC Group, and who have committed to NCC Group to protect the data as provided in this policy.

NCC Group may from time to time use data submitted by registrars for statistical analysis, provided that any such analysis will not disclose individual non-public personal data and such non-public personal data only is used for internal business purposes.

Correcting or Removing Data

NCC Group will receive some registrant information from registrars. If an individual wishes to access, update, and correct, rectify or delete the personal information that was provided to a registrar, the individual should contact the relevant registrar.

If the registrar fails to take appropriate action within the timelines it specifies, the individual may contact NCC Group directly at info@whodoyou.trust.

Deactivation of an account with a registrar does not mean all registrant data from the account has been deleted from NCC Group's database. NCC Group may need to retain and use such registrant data for a variety of purposes, including compliance with legal obligations, and to resolve disputes or enforce agreements.

Transfer of Ownership

NCC Group reserve the right to transfer ownership of NCC Group, its affiliated companies, or the Services (including the personal data collected by NCC Group) to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of NCC Group, an affiliated company or line of business associated with NCC Group. Such a transaction may involve the disclosure of personal data to prospective or actual purchasers, or the receipt of it from sellers.

User Contact – Opt-out

From time to time, NCC Group may notify registrars and registrants (“Users”) of new products, announcements, upgrades and updates. Users may opt-out of these promotional mailings by sending an email with the User’s name to: compliance@nccgroupdomainservices.trust or by contacting NCC Group at the mailing address below:

NCC Group Domain Services, Inc.
123 Mission St., Suite 900
San Francisco, CA USA 94105

NCC Group reserves the right to send Users email related to business practices and systems operations, such as outage notifications and quota warnings, even if the User has opted out of promotional mailings.

No Sharing of Information

Any information received is used only by NCC Group and by its staff and authorized vendors, who are all committed to this privacy policy. NCC Group does not sell or rent user information to anyone. NCC Group does not share or cross-reference personal information gathered through site usage with any other databases or third parties other except when NCC Group is required by law to do so, or when it has expressly authorized us to do so. NCC Group will take reasonable steps to notify affected individuals if relevant personal data is subject to a subpoena or government request.

External Websites

The NCC Group website and the Services may contain links to external websites. NCC Group is not responsible for, and cannot control the content or privacy practices of, other entities. These entities may have their own privacy policies and NCC Group does not accept any responsibility or liability for those policies. Individuals should check those policies before submitting any personal data to the external websites.

Use of Cookies

Similar to other commercial Internet websites, NCC Group utilizes standard technologies called "cookies" and web server logs to collect information about how NCC Group’s website is used and to personalize the Services. A cookie is a small amount of data that is sent to an individual’s browser from a web server and stored on the individual’s computer internal storage. Cookies track activity on a website using the data to identify the individual each time the individual returns to NCC Group’s website. Cookies do not present a threat to privacy, since they can only be used to store information that the user has given to NCC Group. An individual may prevent the storage of cookies by selecting the appropriate settings on the individual’s browser software; however, in this case, the individual may not be able to use all functions of the NCC Group website.

From time to time, the NCC Group website may use Google Analytics, a web analysis service provided by Google Inc. (See Exhibit A “Google Analytics” to this privacy policy for more information).

Security

While NCC Group has state-of-the-art security systems to protect personal information, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while NCC Group attempts to protect all personal information from unintended disclosure, NCC Group cannot ensure or warrant the security of any information transmitted to NCC Group, and an individual transmits information to NCC Group at the individual’s own risk.

International Compliance

As a subsidiary of NCC Group plc, NCC Group Secure Registrar adheres strictly to European privacy guidelines, including the United Kingdom’s Data Protection Act 1998.

California Privacy Rights

California privacy law allows California residents to obtain specific disclosures about a business's privacy practices if the business shares information with other companies for direct marketing purposes. NCC Group does not engage in such disclosures. Nonetheless, to make a request to NCC Group under California's privacy law, please send an email to info@nccgroupdomainservices.trust.

For More Information

NCC Group makes every effort to protect privacy rights. If anyone has any questions, concerns or comments regarding the privacy policy or any other aspect of NCC Group’s service, please send an e-mail to info@nccgroupdomainservices.trust.

Exhibit A Google Analytics

The Google Analytics service from Google Inc. (Google) places cookies on computers used to access websites to help websites analyze how users use the site. The information generated by the cookie about use of the website is transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating use of the website, compiling reports on website activity for website operators, and providing other services to website operators relating to website activity and Internet usage.

NCC Group will only send an “anonymized” version of IP addresses to Google’s servers, so only abbreviated IP addresses will be processed by Google, and there is no direct connection between the data and the individual user. Google will not associate the IP address transmitted under Google Analytics by an individual’s browser with other data held by Google.

An individual may prevent Google from recording the data generated by the cookie and pertaining to the individual’s use of the website (including the IP address) or processing this data by downloading and installing the browser plug-in available through the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

The NCC Group website may also use the Kenshoo advertising platform, which is primarily used with Google AdWords (pay-per-click advertising). Kenshoo places cookies on an individual’s hard drive that track what advert and keyword an individual has used to come to the NCC Group site. These cookies do not access any personal data and the information they collect is not shared with any other party other than NCC Group. For further information on Kenshoo please see www.kenshoo.com .