

PRIVACY POLICY FOZZY

FOZZY demonstrates its commitment to customers' privacy by providing this statement. We will do everything in our power to ensure your right to privacy. We are committed to developing long lasting relationships that are built on trust. FOZZY will never violate that trust.

FOZZY (referred to as 'we', 'us', 'our', 'FOZZY' or the 'Company') is committed to protecting your privacy and handling your data in an open and transparent manner. The personal data we collect and process depends on the product or service requested and agreed in each case.

In this privacy statement, 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.

Consent shall mean any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her.

Data Controller - the entity that determines the purposes, conditions and means of the processing of personal data

Data Processor - the entity that processes data on behalf of the Data Controller

Data Subject - a natural person whose personal data is processed by a controller or processor

Children's data

We understand the importance of protecting children's privacy. We may collect personal data in relation to children only provided that we have first obtained their parents' or legal guardian's consent or unless otherwise permitted under law. For the purposes of this privacy statement, "children" are individuals who are under the age of sixteen (16).

Whether you have an obligation to provide us with your personal data

During a client's registration and later on FOZZY's platform, you provide information such as name, company name, email address, telephone, credit-card number and other relevant data. This information is used by FOZZY to identify you and provide you with support services, mailings, sales and marketing actions, billing and to meet contractual obligations we have with you. Kindly note that if you do not provide us with the required data, then we will not be allowed to commence or continue our business relationship either to you as an individual or as the authorized representative/agent or beneficial owner of a legal entity.

Why we process your personal data and on what legal basis

A. For the performance of a contract

We process personal data in order to provide services based on contracts with our customer but also to be able to complete our acceptance procedure so as to enter into a contract with prospective customers.

B. For compliance with a legal obligation

There are various supervisory authorities whose laws and regulations we may be subject, such obligations and requirements impose on us necessary personal data processing activities for identity verification, compliance with court orders, or other reporting obligations and controls.

C. For the purposes of safeguarding legitimate interests

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you.

Examples of such processing activities include:

- o Initiating legal claims and preparing our defence in litigation procedures,
- o Measures to manage business and for further developing products and services. Provided that you have given us your specific consent for processing then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

Transfer of your personal data to a third country or to an international organization

Your personal data may be transferred to third countries [i.e. countries outside of the European Economic Area] in such cases as e.g. to execute your payment orders or you have given us your consent to do so. Processors in third countries are obligated to comply with the European data protection standards and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR Article 46.

How long we keep your personal information for

FOZZY will retain personal data it processes on behalf of you for as long as needed to provide its services. FOZZY will retain this personal information as necessary to comply with its legal obligations, resolve disputes and enforce its agreements.

Your data protection rights

You have the following rights in terms of your personal data we hold about you.

(a) The right to access

You have the right to confirmation as to whether or not FOZZY process your personal data and, where FOZZY does, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, FOZZY will supply to you a copy of your personal data.

(b) The right to rectification

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

(c) The right to erasure

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

(d) The right to object to processing

Where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms. You also have the right to object where we are processing your personal data, for direct marketing purposes. This also includes profiling in as much is related to direct marketing.

If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

(e) The right to restrict processing

In some circumstances you have the right to restrict the processing of its personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; FOZZY no longer needs the personal data for the purposes of FOZZY processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, FOZZY may continue to store your personal data. However, FOZZY will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

(f) Therighttodataportability

You have the right to request to receive a copy of your personal data in a format that is structured and commonly used and transmit such data to other organisations. You also have the right to have your personal data transmitted directly by FOZZY to other organisations you will name.

(g) The right to complain to a supervisory authority

If you have exercised any or all of your data protection rights and still feel that its concerns about how the Company uses your personal data have not been adequately addressed by the Company, you have the right to complain.

(h) The right to withdraw consent.

You have right to withdraw the consent that you have given to the Company with regard to the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by the Client.

You can also contact our Abuse Officer at abuse@fozzy.com We endeavor to address all of your requests promptly.

Cookies

When you use our services, always upon your consent, we send one or more cookies - a small file containing a string of characters - to your device that uniquely identifies your browser. We use cookies to improve the quality of our service, including for storing user preferences, tracking user trends, and providing you with a better experience. When you send messages,

publish content, post material, transmit information or email through our services, we may retain the same in order to process your inquiries, respond to your requests and improve our services.

Our infrastructure consists of servers deployed at multiple datacenters that are owned and operated by us or our partners. All information collected within our services resides on this network of servers.

Personal Data Transmissions Are Encrypted.

When you order from FOZZY, all your personal information is protected. We use Secure Sockets Layer (SSL), the industry standard, for encrypting all personal information. FOZZY will not sell your personal information. FOZZY keeps all your information confidential.

Policy Changes.

FOZZY is dedicated to providing the best hosting and domain name registration services possible to every one of our clients. We are also dedicated to staying on top of available technology. While FOZZY strives to provide our clients with reasonable notification, FOZZY reserves the right to change its policy at any time to meet the needs of our customers, changing laws and new technology

Cookie Policy Statement.

FOZZY understands that many of you are concerned about cookies. We provide this Cookie Policy Statement to let you know how we use this technology. FOZZY uses cookies to help us improve our website and web hosting services, and, most importantly, provide our existing customers with the opportunity for continued savings and increased convenience.

Cookies For Improving Our Web Site.

FOZZY uses cookies to inform us of a repeat visit. The cookie does not tell us who you are, your name, email address, or passwords.

Cookies For Banner Rewards Program.

To offer our customers continued savings, FOZZY uses cookies to help monitor the traffic generated from FOZZY banners and logo buttons displayed on third-party websites. For every new FOZZY customer that was introduced to FOZZY through an affiliated third-party website, our affiliate may receive a credit

Cookies For Customer Account Management.

Upon customer's consent, FOZZY uses cookies to store user names for added convenience for customers. As part of our service offerings, FOZZY offers password-protected, web-based management tools. By storing the customers' Usernames in a cookie, the user will not have to keep filling out form fields when they desire to manage their account. (The cookie does not store Passwords.) FOZZY is dedicated to using the newest technologies in order to simplify our customers' lives.

Information Collection and Use

We respect each visitor's right to personal privacy. To that end, we collect and use information throughout our web site only as disclosed in this Privacy Policy.

The following is what we normally collect about you to help us provide you with our services, where we can:

- Personal attributes, name, address, gender, date of birth, email, telephone number, and service details;
- Information on how you use our website, including details of your domain name and Internet Protocol address, operating system, browser, time spent on a page or content, and the route you took to navigate through the pages;
- Other data, from time to time, to help us provide you with improved products and services.
- If you choose not to provide us with certain information we may not be able to provide you with a particular service.

Automated decision-making

Fozzy will only engage in profiling and automated decision-making where it is necessary to enter into, or to perform, a contract with the Data Subject or where it is authorized by law.

Where Fozzy utilizes profiling and automated decision-making, this will be disclosed to the relevant Data Subjects. In such cases the Data Subject will be given the opportunity to:

- Express their point of view.
- Obtain an explanation for the automated decision.
- Review the logic used by the automated system.
- Supplement the automated system with additional data.
- Have a human carry out a review of the automated decision. • Contest the automated decision.
- Object to the automated decision-making being carried out.

Each FOZZY entity must also ensure that all profiling and automated decision-making relating to a Data Subject is based on accurate data.

In addition, when you use FOZZY, you may make some of your personal information public. If you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return and FOZZY will not be responsible for the use or misuse of such information. The main uses of your personal information are to verify your identity; to help provide our services; to administer those services; to enable us to review and improve our service to provide access to certain areas of the website; to personalize your visit to our site; to run competitions and games and to assist with advertising and other revenue generation functions. Upon customer's approval, we collect information that is also used to notify visitors about events, changes and other information about this web site. The information we collect is never shared with other organizations for commercial or other purposes.

This information may be used for marketing (where you have agreed to this) and for market research purposes, including internal demographic studies, to provide, optimise and personalise our services and to send you newsletters and information (where you have agreed to this) about our products and services.

Company can only use your personal data to promote our products and services to you if we have your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so.

You have the right to object at any time to the processing of your personal data for marketing purposes.

Information Sharing and Disclosure

FOZZY will NOT disclose personally identifiable information about you to third parties except in the following situations:

- We have your consent to share the information;
- We need to share your information to provide the product or service you have requested;
- We need to share the information with certain service partners in order to respond to your comments or to resolve service issues. (Unless we tell you differently, these partners have no independent right to use this information except to respond to your comments or to resolve the service issues.);
- We respond to requests from any domestic or foreign government, security, defence, revenue, regulatory or other authority, agency or officer;
- We respond to subpoenas, court orders or legal proceedings;
- When required by law that such action is necessary to protect and defend the rights of FOZZY property
- When applicable law or regulation requires disclosure of information to protect the safety or security of users of our sites;
- We find that your actions on our web sites violate the FOZZY terms & Conditions or any of our usage guidelines for specific products or services;

- If we sell the business or part of the business of FOZZY group of companies to another organization or merge with other businesses. In this case, the buyer will only be able to use your information as set out in this Privacy Policy;
- If we use third party processors to administer and process your personal information for the purposes notified in the Privacy Policy, e.g. for activities related to the use of our Sites or services; or
- We may need to share details with third parties (such as auditors or legal advisors) to obtain advice. Any such processing will be governed by an agreement in the form required by law, preserving any statutory data protection rights.

Choices for Personal Information

When you sign up for a particular service that requires registration, we ask you to provide personal information. If we use this information in a manner different than the purpose defined herein and in the terms of the services offered then we will ask for your consent prior to such use. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some of our features and services may not function properly if your cookies are disabled. You can decline to submit personal

information to any of our services, in which case we may not be able to provide those services to you.

Use of Information

We only use and process personal information for the purposes described in this Privacy Policy. In addition to the above, such purposes include:

- Communicating with you
- Making the sites or services easier to use by eliminating the need for you to repeatedly enter the same information
- Providing our services
- Auditing, research and analysis in order to maintain, protect and improve our services
- Ensuring the technical functioning of our network
- Protecting our rights or property and that of our users
- Developing new services
- As described in the respective terms of service of each of our services and in the FOZZY Legal Agreements.

Use of information for marketing

In line with any permission you give us, we may send you direct marketing about our own, or carefully selected third parties' goods and services and disclose your information to other organizations that may send direct marketing to you. You can change your marketing

preferences if you are registered with us. In addition, you can unsubscribe from email communications via unsubscribe links provided in communications sent to you

Link from or to Other Sites

As a means of providing useful resources to our users, FOZZY provides links to other web sites. We try to carefully choose web sites that we believe are useful and meet our high standards. However, because web sites can change so quickly, we do not guarantee the standards of any website links we provide nor do we imply endorsement. FOZZY is not responsible for the data and privacy policies, content or security of other websites that are linked to our site. You should be aware that when you are on our sites you could be directed to other sites where the personal information collected is outside of our control. The privacy policy of the new site will govern the information obtained from you on that site.

Information Sharing

We only share personal information with other companies or individuals in the following limited circumstances:

- We have your consent
 - Sharing the information with our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
 - As permitted and described in the respective terms of service of each of our services and in the FOZZY Legal Agreements.
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- We may share with third parties certain pieces of aggregated, non-personal information, such as the number of users by demographic. Such information does not identify you individually.
 - We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to:
 - (a) satisfy any applicable law, regulation, legal process or enforceable governmental request;
 - (b) enforce applicable Terms of Service, including investigation of potential violations; thereof,
 - (c) detect, prevent, or otherwise address fraud, security or technical issues, or
 - (d) protect against harm to rights, property or safety, of our users, us or the public as required or permitted by law.

Security

We take various precautions to keep your personal information secure from unauthorized access and will store your personal information for so long as it is necessary to provide you our services or for archive purposes.

No-Spam Policy

We have a strict No-Spam Policy prohibiting the use of any data collected to send spam. We will not sell any contact information to third parties.

Information Security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data. We restrict access to personal information to our employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Social Media

Social media can place cookies through the FOZZY website to integrate social media (i.e. LinkedIn, Twitter, Google+ and Facebook). You agree to place these cookies on your device by clicking on the social media buttons to activate them. These social media have their own privacy and cookie policies, which FOZZY does not control. Please check the social media websites for more information about their cookies and how to manage them.

Accessing and Updating Personal Information

When you use our services, we make good faith efforts to provide you with access to your personal information and to correct this data if it is inaccurate.

Notification of Changes

FOZZY may amend this Privacy Policy from time to time and we will post the latest version of this and to all our other Sites. If we ever wish to use your personal information in a way that is incompatible with the information in this Privacy Policy, we will only do so with your consent.

Acceptance of Privacy Policy

Your right to access this website is conditional upon your full acceptance of this Privacy Policy and by accessing the Sites you signify your consent that we store and process your personal data in accordance with this Privacy Policy.

ABUSE OFFICER:

If you have any questions, or want more details about how we use your personal information, you can contact our Abuse Officer at email: abuse@fuzzy.com

We endeavor to address all of your requests promptly.