

PRIVACY POLICY

- 1.0 Title:** Privacy Policy
Version Control: 1.0
Date of Implementation: DRAFT-20141217

2.0 Summary

This document sets forth the Privacy Policy (the “Policy”) that is designed to provide you with important information about the privacy practices of Registry Operator (“we” or “us”). This Policy applies to information collected and received by Registry Operator for <.TLD> and to information collected through Registry Operator’s website (collectively, the “Services”).

3.0 Collection of Information

Registry Operator collects or receives the following types of information in connection with the Services:

- 3.1 Information You Provide Directly.** You may provide information directly to Registry Operator in several different ways. For example, Registry Operator may collect information including your name, address, phone number, and email address when you correspond with Registry Operator.
- 3.2 Information Registry Operator Receives from Others.** Registry Operator may collect or receive information from service providers (e.g., registrars, resellers, verification agent, etc.) and other parties (e.g., regulators, complainants, etc.). That information is received for Registry Operator to fulfill its role as the registry operator.
- 3.3 Information Registry Operator May Collect.** Registry Operator may collect certain information about you and the device you use to access Registry Operator’s website. The collected information may include:
- 3.3.1 The type of web browser and operating system you have used:
 - 3.3.2 Your IP address (which is a number automatically assigned to your device when you access the Internet and can be used to derive your general geographic location);
 - 3.3.3 The referral URL before you came to the Registry Operator’s website; and
 - 3.3.4 If enabled, information about the content you view and the features you access

on the Registry Operator’s website that we collect using cookies and similar technologies.

4.0 Use of Information

4.1 Registry Operator may use the information we collect and receive for the following general purposes:

- 4.1.1 To provide you with the Services and information you request and with legal notices or information about changes to this Policy or Registry Operator’s Terms of Use;
- 4.1.2 To continually improve the Services and enhance your experience with the Services, which may include providing you with relevant content, surveys, questionnaires and other materials;
- 4.1.3 To respond to your requests, questions, and comments;
- 4.1.4 As Registry Operator believes is necessary to protect our rights and the rights of others, including by enforcing Registry Operator’s Terms of Use;
- 4.1.5 For any other purpose disclosed to you at the time Registry Operator collects your information, or pursuant to your consent; and
- 4.1.6 Registry Operator may also combine this information, to provide and enhance our services.

5.0 Sharing of Information

Registry Operator may share your information with the following entities:

- 5.1.1 **Affiliates.** Registry Operator may share your information with Registry Operator’s affiliates—companies that control, are controlled by, or are under common control with, Registry Operator.
- 5.1.2 **Service Providers.** Registry Operator may share your information with entities that provide services to Registry Operator, including registrars, resellers, back-end registry service providers, and companies that provide processing, escrow, verification, shipping, web analytics, email distribution, and other services. This information is shared only to the extent such providers need it in order to provide services to Registry Operator and our users. Such providers will be bound by contractual agreement to keep the information confidential.
- 5.1.3 **Other Parties as required or allowed by the Internet Corporation for Assigned Names and Numbers (“ICANN”).** Registry Operator is required to maintain a service that provides certain domain registration data, including certain personal information (such as nameserver information, email address, phone, and contact information for the

administrative, technical, and billing points of contract) as part of a public search (the “WHOIS Service”). In addition, Registry Operator is required to share zone file data, including domain names and name servers, to third parties for lawful purposes. Domain names can be obtained via the zone file and those domain names can be used to search for personal information about the registrants from Whois Service.

- 5.1.4 **Other Parties When Required by Law, by ICANN, or as Necessary to Protect Registry Operator’s Services.** There may be instances when Registry Operator discloses your information to other parties in order to:
 - 5.1.4.1 Protect the legal rights of the users of the Services, Registry Operator and its affiliates;
 - 5.1.4.2 Protect the safety and security of users of the Services;
 - 5.1.4.3 Prevent fraud (or for risk management purposes); or
 - 5.1.4.4 Comply with or respond to the law or legal process or a request for cooperation by a government entity or by ICANN, whether or not legally required.
- 5.1.5 **Other Parties in Aggregated Form.** Registry Operator may also share your information with third parties in aggregated or non-personally identifiable form.
- 5.1.6 **Other Parties in Connection With a Transfer of Assets.** If Registry Operator makes a sale or transfer of assets, or are otherwise involved in a merger or transfer, or in the unlikely event of bankruptcy, Registry Operator may transfer your information to one or more third parties as part of that transaction, reorganization, or liquidation.
- 5.1.7 **Other Parties With Your Consent.** In addition to the sharing described in this Policy, Registry Operator may share information about you with unaffiliated third parties when you consent to or specifically request such sharing.

6.0 Protection of Personal Information

Registry Operator uses reasonable physical, technical, and administrative measures to safeguard personal information in our possession against loss, theft and unauthorized use, disclosure, or modification. Please note, however, that no data transmission or storage can be guaranteed to be 100% secure. As a result, while Registry Operator strives to protect the information we maintain, we cannot ensure or warrant the security of any information that you transmit to us.

7.0 Children’s Information

Registry Operator does not knowingly collect or store personal information about children under the age of 13. If we learn that we have collected personal information from a child under age 13, we will delete that information from our database.

8.0 International Transfer of Data

Registry Operator may collect, transfer, store and process your information outside of your country of residence, consistent with this Policy. Please note that the data protection and other laws of countries to which your information may be transferred might not be as comprehensive as those in your country. Registry Operator takes reasonable steps to ensure the confidentiality and security of information sent outside the individual's country of residence.

9.0 Accessing or Changing Your Personally Identifiable Information

You may have the right to request details about the information Registry Operator collects and to correct inaccuracies in that information. If you have submitted personally identifiable information (such as your name, address, email address, or credit card number) through our website and would like to access, change or delete that information, please contact us at ftLD@ftLD.com.

10.0 Your Privacy Rights

Registry Operator does not share your personal information with third parties for those third parties' direct marketing purposes.

11.0 Do-Not-Track Signals and Similar Mechanisms

Some web browsers may transmit "do-not-track" signals to the websites with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they are aware of them. Because there currently is no industry standard concerning what, if anything, websites should do when they receive such signals, the Registry Operator's website currently does not take action in response to these signals. If and when a final standard is established and accepted, we will reassess how to respond to these signals.

12.0 Amendment

Registry Operator reserves the right to modify this Policy at its sole discretion. Such revised Policy shall be posted on Registry Operator's website at www.ftld.com/policies at least 15-calendar days before its effective date. Therefore, it is important to check the effective date of the Policy posted here each time you use the Registry Operator's website. By continuing to use the Services after we make changes, you indicate your consent to those changes.

13.0 Questions and Contact Information

Registry Operator wants to assure you that we are dedicated to protecting your privacy. If you have questions or comments about this Policy, please contact ftLD@ftLD.com.

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Cookies

Registry Operator may use a variety of technologies to learn more about how people use the Registry Operator's website and the Internet. These technologies include cookies, which are small text files that websites and other online services use to store information about users on the users' own computers. For example, cookies can be used to store your sign-in credentials so that you do not have to enter them each time you return to a website. Cookies also may be used to store a unique identification number tied to your computer so that a website can recognize you as the same user across different visits to the website. You can configure your Internet browser to warn you each time a cookie is sent or to refuse cookies completely. Registry Operator may use cookies to enable functionality of the website. You should be aware that disabling cookies may affect the appearance of Registry Operator's website on your device and limit your browsing experience including preventing access to some areas of our website. Registry Operator does not use cookies to serve targeted advertising.