

PRIVACY POLICY

Version 1.0 – 10/29/2015

Summary

This document sets forth the Privacy Policy (the “Privacy Policy”) that is designed to provide information about the privacy practices of the Registry. This Privacy Policy applies to information collected and received by the Registry and to information collected through the Registry Website (collectively, the “Services”).

Disclaimer

By applying for, registering or reserving a TLD domain name, or visiting a website owned or operated by the Registry, you consent to the collection, use, processing, transfer and/or disclosure of information about you in accordance with the terms of this Privacy Policy.

If you are visiting a website hosted on the TLD from a country other than the country in which the Registry servers are located, including without limitation visiting from the European Union, your communications with the Registry may result in the transfer of information about you across international boundaries, and you consent to such transfer. (All information collected by the Registry pursuant to this Policy shall be referred to herein as “Registrant Data”)

Registry may use agents and contractors in order to help operate Registry or any websites operated by the Registry, provide its product and service offerings, and to operate its business. You expressly consent to the sharing of your Registrant Data with its agents, contractors and service providers.

Collection of Information

The Registry collects or receives the following types of information, including without limitation Registrant Data, in connection with its domain name registry services:

- **Information Provided Directly to the Registry.** Third parties may provide information directly to the Registry in several different ways. For example, Registry may collect information including name, address, phone number, and email address when a third party is corresponding with the Registry.
- **Information the Registry Receives from Others.** The Registry 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 to fulfill its role as the Registry.

- **Information Collected by the Registry.** Registry may collect certain information about third parties and the device third parties use to access the Registry Website. The collected information may include:
 - The type of web browser and operating system used;
 - IP address (which is a number automatically assigned to your device when one access the Internet and can be used to derive general geographic location);
 - The referral URL that lead to the Registry Website; and
 - If enabled, information about the content viewed and the features accessed on the Registry’s website that we collect using cookies and similar technologies.

For purposes of clarity, If you are an individual, the information collected or received by the Registry may include personal details, which you may consider sensitive and from which you may be personally identifiable (“Personal Details”)

Use of Information

Registry may use the information collected and received for the following general purposes:

- To provide third parties with domain name services and information requested and with legal notices or information about changes to this Privacy Policy, other Registry Policies or Registry’s Use Policy;
- To continually improve its domain name services and enhance the third party experience in connection with the TLD, which may include providing relevant content, surveys, questionnaires and other materials;
- To respond to requests, questions, and comments;
- As the Registry believes is necessary to protect its rights and the rights of others, including by enforcing Registry’s Use Policy;
- For statistical analysis or other business purposes; and
- For any other purpose disclosed at the time the Registry collects information, or pursuant to consent.

Sharing of Information

Registry may share your information with the following entities:

- **Affiliates.** Registry may share your information with the Registry’s affiliates—companies that control, are controlled by, or are under common control with, Registry.
- **Service Providers.** Registry may share information with entities that provide services to Registry or on its behalf, including without limitation

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 and its users. Such providers will be bound by contractual agreement to keep the information confidential.

- **Other Parties as required or allowed by the Internet Corporation for Assigned Names and Numbers (“ICANN”).** Registry 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 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. Notwithstanding the foregoing, Registry cannot control the use made by third parties of such information, which is in the public domain and is searchable globally. Registry disclaims all liability for any misuse of such data made by a third party.
- **Other Parties When Required by Law, by ICANN, or as Necessary to Protect Registry’s Services.** There may be instances when Registry discloses your information to other parties in order to:
 - Protect the legal rights, safety and security of the users of Registry’s domain name services, Registry and its affiliates;
 - Prevent fraud (or for risk management purposes); or
 - 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.
- **Other Parties in Aggregated Form.** Registry may also share your information with third parties in aggregated or non-personally identifiable form.
- **Other Parties in Connection With a Transfer of Assets.** If Registry makes a sale or transfer of assets, or are otherwise involved in a merger or transfer, or in the unlikely event of bankruptcy, Registry may transfer your information to one or more third parties as part of that transaction, reorganization, or liquidation.
- **Other Parties With Consent.** In addition to the sharing described in this Privacy Policy, Registry may share information with unaffiliated third

parties when consent is given or when such sharing is specifically requested.

- *Registry will not disclose confidential age-related information, credit card information, or other supplemental Personal Details to the public.*

Security and Unauthorized Access Prevention

The Registry's technical infrastructure contains reasonable security measures to protect the Registrant Data, including internal security procedures that restrict unauthorized access to and use of Personal Details. However, the Registry cannot guarantee that Registry Data will never be disclosed in a manner inconsistent with this Policy (for example, as a result of unauthorized acts by third parties that violate applicable law or the Registry's policies).

All websites hosted on TLD domains name may be scanned for viruses, malware, phishing activities, browser exploits, and other behaviors or code posing a security threat to any of (i) the websites; (ii) website users; or (iii) the TLD. In addition, all websites hosted on a TLD domain name may be scanned for content that suggests the presence of child abuse images or that is intended to appeal to pedophiles. Such monitoring may involve the incidental collection of Personal Details by our service providers.

The Registry will also cooperate with law enforcement agencies regarding any allegations of abuse or violation of system or network security as set out in the Registry's Use Policy.

International Transfer of Data

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

Accessing or Changing Your Personally Identifiable Information

Third parties may have the right to request details about the information Registry collects and to correct inaccuracies in that information. If a third party has submitted personally identifiable information (such as name, address, email address, or credit card number) through a website operated by the Registry and would like to access, change or delete that information, please contact the Registry at gtldscontact@despegar.com.

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 Website currently does not take action in response to these signals. If and when a final standard is established and accepted, the Registry will reassess how to respond to these signals.

Amendment

Please note that Registry may amend or modify this Registration Policy from time to time, in its sole discretion. Any amendments or modifications to this Registration Policy shall be effective thirty (30) days after the initial date of posting such amendments or modifications on Registry Website and such amendments shall be binding upon all affected parties, including without limitation, domain name Registrants, registrars, and ICANN.

Questions and Contact Information

The Registry wants to provide assurance that it is dedicated to protecting privacy. For questions or comments about this Privacy Policy, please contact gtldscontact@despegar.com.

Cookies

The Registry may use a variety of technologies to learn more about how people use the Registry 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 one does not have to enter them each time one returns to a website. Cookies also may be used to store a unique identification number tied to a computer so that a website can recognize that person as the same user across different visits to the website. One can configure their Internet browser to provide a warning each time a cookie is sent or to refuse cookies completely. The Registry may use cookies to enable functionality of the Registry Website. Third parties should be aware that disabling cookies may affect the appearance of the Registry Website on a device and limit browsing experience including preventing access to some areas of the website. The Registry does not use cookies to serve targeted advertising.
