



# Privacy Policy

This document describes the privacy policy of the Rightside registry.

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Rightside Domains Europe Ltd. (RDEL), is the registry operator for United TLD Holdco Ltd. t/a Rightside Registry

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Rightside Privacy Policy - Version 1.1

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## 1. Introduction

United TLD Holdco Ltd. ("UTLDH," "we" or "us") wishes to protect the privacy of registrants, registrars, clients and business partners ("you" and "your"). This Privacy Policy describes how we process information that identifies you personally ("Personal Information"), when you visit websites operated by UTLDH ("Registry Websites"); or register for, or reserve any, UTLDH generic top-level domain names ("Registry TLDs") or sign up to receive any products or services offered by UTLDH.

This policy applies only to Personal Information that UTLDH collects from and about you. It does not apply to information collected by domain name registrars or third parties when you apply to register or reserve a United TLD with them nor does it apply to information collected on third party sites that you may access via a link to the Registry Websites.

By registering or reserving a United TLD, you consent to the collection, use, processing, and transfer of your Personal Information in accordance with the terms of this Privacy Policy. You consent to the collection, use, processing, and/or disclosure of your sensitive information and your Personal Information in the United States in accordance with the provisions of this Privacy Policy. If you are registering a Registry TLD from a country other than the country in which the UTLDH servers are located, including without limitation visiting from the European Union, your communications with the Registry may result in the transfer of Personal Information across international boundaries and you hereby acknowledge and consent to such transfer.

## 2. Collection, Use, & Disclosure of Personal Information

UTLDH collects Personal Information when you apply to register or reserve a domain name with United TLD through any of our approved registrars or sign up to receive any services offered by our registry. We are required by the Internet Corporation for Assigned Names and Numbers ("ICANN"), the organization that assumes responsibility for domain name allocation, to collect information about you during the domain name registration process. This information includes your full name, mailing address, phone number, email address, technical and administrative contacts (if different), expiration date, and DNS server name and IP address(collectively, "Registration Information"). ICANN then requires

all registrars to make your full name, mailing address, phone number, email address, and, where provided, your facsimile number, as well as the creation and expiration dates of your domain name registration and the name server information associated with your domain name, to the public via an interactive Web page and a "port 43" WHOIS service. For the purposes of this Privacy Policy we will refer to this information as your "WHOIS Information." Please note that we may not be able to control how members of the public may use the WHOIS Information.

If you are applying to become a registrar for any Registry TLDs, we collect additional data via the [Registrar Sign-Up Portal](#) ("RSP"). We may supplement the Personal Information you provide with demographic data from third parties. If you disagree with this Policy, please do not submit Personal Information on United TLD Websites.

When you visit United TLD websites, our servers automatically log certain information including without limitation: the type of browser you are using (e.g., Safari, Chrome, Internet Explorer), the type of operating system you are using (e.g., Windows XP or Mac OS), CPU type (e.g. Pentium), the way you access the Internet (e.g., connection speed through narrowband or broadband access), IP address, other information about your geographic location, and the domain name of your Internet service provider. Our servers also log header information forwarded by the Internet site you navigated from to reach any Registry Websites. Please note that UTLDH does not control the information included in the header by a referring website, which may include search terms and other information about your activities on that site. Our servers also log information about your activity on UTLDH websites, including without limitation the time and date of your visits, the pages you view on any UTLDH website, your responses to offerings and advertisements (if any) presented on the UTLDH websites, and the searches you perform, including without limitation any WHOIS searches.

Unless you have provided Personal Information directly, for example by registering for updates, UTLDH cannot and does not attempt to use log data to identify you personally.

UTLDH uses Personal Information collected on all UTLDH Websites to operate and improve those websites, to fulfill your requests and respond to your inquiries, to understand how you use the websites, and to personalize the content and advertisements you see on those Registry Websites.

### **3. Sunrise Participation and the TMCH**

If you participate in any of the UTLDH "Sunrise" pre-registration service, you will also be required to provide information about your registered trademark(s) which may include, depending upon which Sunrise service you use, the registered trademark, the trademark registration number, the ICANN Trademark Clearing House (TMCH) SMD file. UTLDH uses this information to validate your eligibility to participate in the Sunrise program.

### **4. Monitoring Information**

All registered and resolving Registry TLDs 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 Registry TLDs. Such monitoring may involve the incidental collection of Personal Information by our service providers.

## **5. Disclosure of Personal Information**

As mentioned above UTLDH discloses Registration Information to the public in the form of Whois records, as required by ICANN. UTLDH does not disclose age related information, credit card information, or other supplemental information used to validate your Personal Information to the public in the form of Whois records. If you use an UTLDH approved proxy service, the name of that proxy service rather than your name will appear in the Whois records. UTLDH may disclose other Personal Information to fulfill your requests for products and services, to respond to your inquiries, to third parties as necessary to deliver internet services in the United TLDs (including without limitation to security scanning service providers) or in furtherance of our Sunrise policies including the auction rules, and to personalize the content and advertisements you see.

UTLDH does not share your sensitive information, Personal Information or Registration Information with third parties without your affirmative consent unless it is: (i) necessary to fulfill a transaction or provide information you have requested; (ii) as required by law or necessary to respond to legal process; (iii) in circumstances in which UTLDH believes that its UTLDH websites, domain names, or services are being used in the commission of a crime; (iv) when UTLDH has a good faith belief that there is an emergency that poses a threat to your safety or the safety of another person; or (v) as necessary to establish, assert, defend, or protect our rights or property.

UTLDH may use agents and contractors in order to help operate the UTLDH websites, provide our product and service offerings, and to operate our business. You expressly consent to the sharing of your Personal Information with our agents, contractors and service providers under the premise that, if our agents and contractors have access to your Personal Information, they are contractually required to safeguard that information and prohibited from using that information for any other purpose.

## **6. Change of Ownership**

If UTLDH's registry ownership changes as a result of a merger, acquisition or transfer to another company, your Personal Information may be transferred. If that transfer will result in a material change in the use of your Personal Information, UTLDH will notify you and give you the opportunity to permit such a transfer.

## **7. Cookies and Web Beacons**

UTLDH may use cookies, web beacons, or similar technologies in combination with your Personal Information to enhance and personalize your experience on United TLD Websites, including without limitation to operate and improve offerings through United TLD Websites, to help authenticate you, to remember your preferences and registration information, to present and help measure and research the effectiveness of UTLDH offerings, advertisements, and e-mail communications (by determining which UTLDH e-mails you open and act upon), and to customize the content and advertisements provided

to you through United TLD Websites.

UTLDH and its advertisers may also use ad network providers and other service providers to present customized content and advertisements on United TLD Websites and other websites. These providers use cookies, web beacons, or similar technologies on your computer to help present, better target, and measure the effectiveness of their content and advertisements, using data gathered over time and across their networks of web pages to determine or predict the characteristics and preferences of their audience. UTLDH may share certain non-personally identifiable information about you (e.g., zip code) with certain ad network and service providers to help them deliver more relevant content and advertisements through their networks. The use of cookies, web beacons, or similar technologies by content and ad network providers is subject to their own privacy policies, not UTLDH's. To learn more about third party content and ad network providers and the choices you have about these technologies, please visit the Network Advertising Initiative at [www.networkadvertising.org](http://www.networkadvertising.org).

## **8. Security Measures**

UTLDH has implemented reasonable security measures designed to prevent unauthorized access to or misuse of the your Personal Information, but cannot guarantee that this information will never be disclosed in a manner inconsistent with this Privacy Policy (for example, as a result of unauthorized acts by third parties that violate applicable law or UTLDH policies).

## **9. Use by Children.**

Registry Websites and registered domain names are intended for adults. Children under the age of eighteen are not permitted to register for or use United TLD Websites, products, and services. We do not knowingly collect information from children under the age of eighteen.

## **10. How to Contact Us**

If you have any questions or concerns about UTLDH's Privacy Policy, or if you are unable to access and/or correct your Personal Information online, you may contact us via email sent to [privacy@unitedtld.com](mailto:privacy@unitedtld.com).

## **11. Changes to this Privacy Policy**

UTLDH may update this Privacy Policy from time to time, and will provide appropriate online notice of any significant changes. You may be provided other privacy-related information in connection with your use of specific UTLDH offerings, special features and services not described in this Policy, or products and services that may be introduced in the future.