

# Data Protection Policy

This Data Protection Policy contains information on **how your personal data is processed** and **what rights you have** with regard to data processing on our website.

## EASYNAMÉ DATA PROTECTION POLICY

The protection of your personal data is a matter of great importance to easyname GmbH, Fernkorngasse 10/3/201, 1100 Vienna, Austria, Tel.: +43 1 353 2222, E-mail address: [datenschutz@easyname.com](mailto:datenschutz@easyname.com) („easyname“, “we“, „us“). Your data is not part of our business model and we process your data solely on the basis of statutory regulations, in particular the Data Protection Act (“DPA”) in its current version, the Telecommunications Act 2003 (“TA 2003”) and the General Data Protection Regulation (“GDPR”).

## DEFINITIONS

### Account holder

The natural or legal person who forwards orders and contracts to easyname, concludes said orders and contracts and in whose name the easyname account is registered.

### Domain owner

The natural or legal person who is registered as the owner of the domain.

## User

The natural person who uses the services offered by easyname. A user can be a third party authorised by the account holder.

## easyname Controlpanel

Password-protected area of easyname and management interface for the account holder or user.

### PURPOSES OF DATA PROCESSING

## Contacting us

If you contact us, we will use your personal data to process your request and any follow-up questions, to implement measures prior to entering into a contract and, where no contractual relationship exists, to reply to your question within the scope of our legitimate interests.

## Newsletter

We will send you e-mails containing information about new easyname products and services to the e-mail address provided by you, if you ticked the consent checkbox during the registration process or on the Controlpanel of your easyname account. In order to provide you with customised information, we process your e-mail address, name, address and the products purchased by you from easyname.

You may withdraw your consent at any time by clicking on the unsubscribe link in the newsletter and/or in your control panel.

## **Contract fulfilment and creating an account**

We process the data provided by you upon entering into a contract with us or when creating an account for the purpose of fulfilling and managing the contract and for customer service. Without this data, we cannot enter into a contract with you, nor can we perform services.

## **SMS verification**

Where free promotional offers are concerned, easyname processes your contact data and sends a text message to the phone number provided by you to verify the account holder. easyname has a legitimate interest in ensuring that the free promotional offer is not used for improper purposes.

## **Use of the website**

We use log files to process your visits to our website. We have a legitimate interest in processing this information, as it not only enables us to offer you support, but also serves as a protective measure against unauthorised access and attacks against the easyname infrastructure.

## **Backups**

To safeguard your legitimate interests in IT safety, easyname performs backups to protect you from data-loss. In this process, all files and their contents are saved on the easyname backup servers.

## JOINT USERS OF YOUR EASYNAME ACCOUNT

Please inform any joint users of your easyname account (e.g. employees or relatives) of this processing of their data, for example by referring them to this Data Protection Policy. Do not give us any consent unless all joint users of your account agree to it.

## STORAGE PERIOD <sup>1</sup>

The personal data used to contact you, your basic data, purchased products, e-mail traffic and purchase date shall be automatically stored in our ticket system for 10 years. This lengthy storage period is necessary for the enforcement of legal claims.

When the contract has ended, all invoicing information from the contractual relationship shall be stored until the statutory retention period for tax purposes (7 years) has expired.

Certain categories of data will be deleted earlier:

- If you call us, your phone number will be stored in the **log files** and anonymised after 8 weeks. Logs from live chats, e-mail logs, traffic data logs, and access logs collected during your visits to our website will also be deleted after 8 weeks.
- The **payment methods** selected by you (credit cards, SEPA mandates, etc.) will likewise be deleted 8 weeks at the latest after you have removed them in the Controlpanel.

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1. We regret that complete implementation of the deletion periods will not be possible before 31.10.2018.

- If you purchase an **SSL certificate**, easyname will delete the certificate, including all the personal data contained in it, 4 weeks after the certificate has expired.
- The linked **Cloudflare account** data will be erased upon deactivation.
- Where a **domain transaction** has been carried out with a domain contact (e.g. change of owner, registration, etc.), historical data will only be erased after the statutory retention obligations (e.g. compensation claims) have been met.
- easyname will perform precautionary **backups** of all kernel systems to ensure the safety of your data. For technical reasons, the backups will be deleted six months at the latest after the source data has been erased.

#### TRANSMISSION OF YOUR DATA

We send your **payment details** to the banks/payment service providers that will be processing your payments to enable them to conduct the transaction.

If you **register or transfer a domain**, the domain contact data provided by you will be sent to the respective domain registry or the respective domain registrar for fulfilment.

When **registering SSL certificates**, we send the data provided by you to the SSL certification authority in the US for fulfilment.

We send your phone number to messaging and verification services for **sending text messages for the purpose of verification and for contract notification** as part of our customer service.

If you purchase a **website builder**, we send the data provided by you to the manufacturer for fulfilment.

If you add your **Cloudflare account**, we send the access data for your account to Cloudflare. As Cloudflare is a stand-alone product, you have to accept its Data Protection Policy when using it: <https://www.cloudflare.com/security-policy/>

If you order an **Internet connection** (easyname Fiber Connect), we send the data provided by you to OpenNet GmbH to enable us to fulfil the contract with you.

In addition, we send your personal data to authorities and other public bodies (e.g. tax authorities, etc.) to the extent required by law (e.g. in accordance with the provisions of TA 2003).

We also send your data to other third parties to the extent required for the purpose of asserting legal claims, and for compliance with and fulfilment of statutory obligations. These third parties include: Tax advisors, debt collectors, insurance companies in the event of claims, legal representatives if required.

#### COOKIES AND WEB ANALYSIS

You can find information on this topic in the [Cookie Policy on our website](#).

#### SOCIAL MEDIA LOGIN

If you already have an account with a social network, you can use your profile for registration and to log on to our website directly. Therefore the provider sends us the necessary user data (name and e-mail address). You can change these details during the registration process. The data will only be stored when you create an easyname account (see 'Creating an account'). We also store your user ID on the respective platform for future logins.

## Facebook

easyname allows you to log in with your Facebook account: Facebook Connect is a service offered by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA. The use of Facebook Login is subject to Facebook's Data Privacy Policy and Terms and Conditions of Use. If you use Facebook to log in, your Facebook profile data and, according to Facebook's definition, "public information", is transferred from your Facebook profile to easyname. We store and process the data transmitted to us solely for the purpose of registration.

## Google

easyname offers the "Google+ Sign In" function provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. If you wish to use this function, you will first be redirected to Google. There you will be asked to log in with your user name and password. Google will then send your name and contact details to easyname.

Information on the purpose and scope of data collection, and the further processing and use of this data by Google, as well as on your rights with regard to the above and settings to protect your privacy, can be found in [Google's Data Privacy Policy](#).

### RIGHTS OF THE PERSONS AFFECTED

You have the right of access, right to rectification, right to deletion, the right to restriction of processing and the right to data portability with regard to your personal data, and you may withdraw your consent or object to the processing of your data at any time.



**Please note:** If you request the deletion or restriction of contractually essential data, this can affect the function of the products purchased by you!

Your rights include in detail:

### **Right of access**

You have the right to obtain confirmation as to whether or not we process personal data relating to you. Where that is the case, you can also obtain access from us to the information listed in Art. 15 GDPR.

### **Right to rectification**

Where we process personal data relating to you that is incomplete or incorrect, you have the right to obtain rectification and/or completion of said data from us without undue delay.

### **Right to deletion**

You have the right to obtain the deletion of personal data relating to you from us without undue delay, where the data is no longer necessary in relation to the purposes for which said data was processed, where you withdraw the consent on which the processing was based, where you successfully object to the processing, or where the data is unlawfully processed by us. Please note that there may be reasons that would render immediate erasure unfeasible, e.g. in the event of mandatory data retention obligations.

### **Right to restriction of processing**

You have the right to obtain restriction of processing from us, if



- you contest the accuracy of the data, for a period enabling us to verify the accuracy of the data.
- the processing of the data is unlawful and you oppose the deletion of said data and request the restriction of the use of the data instead.
- we no longer need the data for the intended purpose of the processing, but you still need this data for the establishment, exercise or defence of legal claims.
- you have objected to the processing of the data and it has not yet been determined if your legitimate interest in this is overriding.

### **Right to data portability**

You have the right to receive the personal data relating to you, the safekeeping of which you have entrusted us with, in a structured, commonly used and machine-readable format, where

- we process this data on the basis of consent that has been given by you and can be withdrawn by you or for the purpose of fulfilling a contract between us, and
- the processing is carried out by automated means.

### **Right of objection**

As an affected person, you may object to the use of your data at any time, if processing is for the purposes of direct marketing. You also have the right at any time to object, if there are reasons to do so on grounds relating to your particular situation.

## Right to lodge a complaint

If it is your opinion that we are in breach of data protection regulations in the processing of your data, please contact us so that we can discuss these issues. Of course, you also have the right to lodge a complaint with the Austrian Data Protection Authority or with a supervisory authority within the EU.

## Asserting your rights

If you wish to assert any of the aforementioned rights against us, please contact us using the contact details stated.

## Confirmation of identity

In order for us to be able to process your request concerning the aforementioned rights of affected persons, and for the protection of your data, rights, privacy and to prevent misuse, please state exactly which of these rights you wish to exercise and identify yourself clearly.

In the event that there is any suspicion that your data has been misused, you have the right to have this data completely deleted, and to have access to and take possession of this data by appointment only, if you appear in person and if your identity has been checked against official ID and confirmed. The purpose of this is, for example, to prevent individuals who have gained unauthorised access to your account or e-mail address from obtaining other personal data relating to you.

## Costs of repeated requests for information

easyname shall provide a copy of the personal data following a request for information. A reasonable fee shall be charged for each additional copy to cover administrative costs.

### CONTACT DETAILS

#### **easyname GmbH**

Address: Fernkorngasse 10/3/501, 1100 Vienna, Austria

Phone: +43 1 353 2222

E-Mail: [datenschutz@easyname.com](mailto:datenschutz@easyname.com)