

APH Inc. d/b/a Codero Hosting (Codero Hosting, we, us, or our) is committed to protecting your privacy. This Privacy Policy (Policy) will explain to you (you, or your) our policies for collecting, using, and disclosing personally identifiable information that you provide to us. If you are a customer of Codero, or you represent a customer of Codero, you agree to the terms of this Policy by becoming a customer and/or by submitting your personally identifiable information (personal data) to us . If you are not a customer of Codero (or a representative of a Customer), by visiting and using Codero's website, you agree to the terms of this Policy as they relate to Codero's collection and use of information collected through the website, as described below.

## **Compliance & Dispute Resolution**

Codero Hosting is the controller of personal data collected under this Policy. We comply with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce, with respect to the collection, use and retention of personal information that is transferred from European Union member countries and Switzerland to the United States, respectively. We have certified our participation in the Privacy Shield to the Department of Commerce. If there is any conflict between the policies in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern; we are committed to subjecting to the Principles all personal data received from the EU or Switzerland in reliance on the Privacy Shield. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

Codero Hosting also complies with the European Union's General Data Protection Regulation (GDPR), enforceable as of May 25, 2018.

In compliance with the Privacy Shield Principles, we are committed to resolving complaints about our collection or use of personally identifiable information. If you have any questions or complaints about this Policy or our adherence to Privacy Shield, please contact us. EU citizens also have the right to lodge a complaint with a supervisory authority but should first contact Codero Hosting to attempt to resolve any dispute. Codero Hosting and its Data Protection Officer can be reached at:

**Rob Ossian, VP & Chief Operations Officer**

privacy@codero.com

(877) 275-8763 (U.S.)

(858) 410-6929 (Worldwide)

6805 N Capital of Texas Hwy #210, Austin, TX 78731

Our representative located in the European Union is:

**Mike Robski, VP of Development**

bul. Gen. Skobelev N 30, ap. 22

Sofia, 1606

Bulgaria

We have designated the panel established by the EU data protection authorities (DPAs) as our independent dispute resolution body to address complaints and provide appropriate recourse free of charge with respect to data transferred from the EU to the U.S., and we commit to comply with the advice given by the panel with regard to data transferred from the EU to the U.S. We have designated the Federal Data Protection and Information Commissioner (Commissioner) as our independent dispute resolution body to address complaints and provide appropriate recourse free of charge with respect to data transferred from Switzerland to the U.S., and we commit to comply with the advice given by the Commissioner with regard to data transferred from Switzerland to the U.S.

The Federal Trade Commission has jurisdiction over Codero Hosting's compliance with Privacy Shield, and we are subject to the investigatory and enforcement powers of that agency. Under certain conditions, you may have the right to invoke binding arbitration for complaints regarding Privacy Shield not resolved by any of the other Privacy Shield mechanisms.

## Why We Collect Personal Data

Codero Hosting collects personal data necessary for the performance of the contract between us and you (or an entity you represent). Specifically, we collect personal data in order to

- a) set up and provide services to customers;
- b) process customer payments;
- c) improve our services; and
- d) communicate with customers. Providing certain personal data described in this Policy is required to become a customer. We receive and collect personal data from a variety of sources as we interact with our customers and with the public. You may opt out of providing personal data covered by this Policy by declining to be a customer or by ceasing to continue as a customer, as applicable.

## What Information We Collect

- First and last name of an individual (as a customer or as contact person for a business customer)
- Address
- Telephone number(s)
- Email address
- Credit card number

Information obtained through cookies, URLs, web beacons, pixel tags and other web identifiers we receive from visitors to our website does not identify you personally.

## Third-Party Disclosures

Codero does not sell or rent any personal data we collect to third parties. However, we may disclose or transmit personal data to third parties for specific purposes and situations, including:

- To public authorities, in response to lawful requests, including to meet national security or law enforcement requirements;
- To litigants in response to a subpoena, court order, or other valid legal process;
- To business partners who assist us in processing and/or collecting customer payments;
- To third-party vendors to enable them to provide specific services to Codero, including, among others, retargeted ad placement services and website tracking, recording, testing, and optimization services;
- To our attorneys and other third-party business partners, to prevent, investigate, or stop illegal or malicious activities including violations of our acceptable use policy, threats to our facilities, and threats to the physical safety of any person;
- To any entity that acquires majority control of us or one of our business units through merger, acquisition, consolidation, or otherwise.

The Privacy Shield Principles describe our obligations with respect to personal data that we transfer to third parties as described in this Policy. Codero Hosting remains responsible and liable as provided in the Principles if the third party processes the personal data in a manner that is not consistent with the Privacy Shield Principles, unless we prove that we are not responsible for the event giving rise to the damage.

## Data Storage and Retention

Personal data will be stored on our internal business support systems at our Phoenix, Arizona datacenter. Some of the above third-parties who may receive personal data under this Policy are also located outside of the European Union. Personal data will be stored for the duration of any applicable contract(s) and for a period of no more than seven (7) years thereafter.

## Your Rights With Respect to Personal Data

If applicable, you have the right to:

- obtain access to your personal data and information about the processing thereof;
- ask for incorrect, inaccurate or incomplete personal data to be corrected;
- request that personal data be erased when it's no longer needed or if processing it is unlawful;
- object to the processing of personal data for marketing purposes or on grounds relating to your particular situation;
- request the restriction of the processing of your personal data in specific cases;
- receive your personal data in a machine-readable format and send it to another controller ('data portability'); and
- lodge a complaint with an EU Data Protection Authority.

If applicable, you also have the right to withdraw consent to processing of your personal data at any time; provided that, in such case, you will be unable to continue using the Services, and the customer with which your personal data is associated (if other than you personally) will be required to provide substitute information to continue as a Codero Hosting customer.