

## MojoHost Privacy Policy

Last Updated: April 1, 2022

### Introduction

Easy Online Solutions, Ltd. d/b/a MojoHost (“**MojoHost**,” “**we**,” “**us**,” and “**our**”) respects your privacy and is committed to protecting it through our compliance with this privacy policy. Unless otherwise stated or governed by law, this privacy policy applies to information we collect from everyone who has a relationship with us, including customers, partners, and website visitors.

### Scope

This privacy policy explains the different ways that we collect, use, and share personal information of:

- visitors and users of our website;
- prospective and current customers using MojoHost hosting and information technology services and support (“**Services**”);
- service providers and business partners; and
- other individuals with whom we interact.

Occasionally, we may send you other information about our data collection, use, and sharing practices. These additional notices might supplement this privacy policy; provide you with further options related to how we process your data; or clarify our privacy practices as described in the notice. When we make material changes to this privacy policy, we will take reasonable measures to notify you in a way that is consistent with the significance of the changes made and as required by law. Please review this privacy policy regularly to be informed of how MojoHost is collect and protecting your Personal Information.

### What Personal Information We Collect About You and How We Collect It

“**Personal Information**” or “personal data” means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular, by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural, or social identity.

**Information we collect automatically:** When you visit our website or email us, we collect information sent to us by your computer, mobile phone, or other access device, some of which might be deemed Personal Information. The information sent to us might include but is not limited to the following: information about the pages you access, computer IP address, device ID or unique identifier, device type, geolocation information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad information, and standard web log Information and other information. We may also collect anonymous information through our use of cookies and web beacons. This privacy

policy and our [Cookie Policy](#) provide additional information about our use of cookies and other similar tracking technologies.

**Information you provide to us:** We may collect Personal Information, including your name, address, phone, email, payment information (including credit or debit card number), and other information that you enter directly onto or in connection with our website. Generally, Personal Information is requested when: (1) MojoHost customers log into the website for products and services and (2) when visitors to our website request certain information about MojoHost products and services. If you do not provide the requested Personal Information, you might not be able to access all or parts of the website or purchase products and services.

**Information we are contractually required to collect by ICANN:** For TLD registrations authorized by the Internet Corporation for Assigned Names and Numbers (“ICANN”), we are required to collect and retain the information set out in the [Domain Registration Services Privacy Policy Addendum](#).

**Information we receive from other sources:** We work closely with third parties (for example, business partners, service providers, subcontractors, advertising networks, analytics providers, social media platforms, event organizers, credit reference agencies, fraud protection services, channel partners, or resellers) and might receive information about you from them. Examples of the information we might receive from the other sources include account information, name, address, telephone number, job role, office location, publicly available employment profile, approximate location (based on reverse IP lookup), service and support information, product or service preferences, browsing habits, credit history, or other publicly available information. We may use this information with your contact details, transaction history, and professional information for the reasons outlined in this privacy policy including, but not limited to, providing relevant marketing or support, better understanding you and your preferences, and detecting or preventing fraud.

**Co-branding:** MojoHost’s website might offer links to other websites. If you visit one of these websites, you should review the privacy policy on that website. In addition, you might have visited our website through a link or a banner advertisement on another website. In those cases, the website you linked from might collect information from people who click on the banner or link. You should refer to the privacy policies on those websites to see how they collect and use this information.

**Social media platforms or other forums:** We may receive information that’s stored or processed by nonparties, including the social media platforms Facebook®, Twitter®, and LinkedIn® when you interact with us through these social media platforms. MojoHost websites might include social media features including the Facebook “Like” button and widgets including the “share this” button. These features might collect your IP address and details of the pages you are visiting on MojoHost websites. Social media features and widgets are either hosted by a nonparty or hosted by MojoHost websites. Each social media platform might have its own privacy policies that specifically govern its use of social media features.

MojoHost websites might also feature bulletin boards, blogs, or forums. Any Personal Information that you choose to submit through such a forum might be read, collected, or used by others who visit these forums and might be used to send you unsolicited messages.

You may have the opportunity to connect to our website through Facebook’s or Google’s API when you register for our website or after you have registered for our website. If you connect to our website through Facebook or Google, either when you register or after you have registered, we will collect, store, and use under this privacy policy all information you have agreed that Facebook or Google could provide to us through their API. Your agreement (and our access to your information) takes place when you instruct, accept, or allow Facebook or Google to register you for a MojoHost account or otherwise connect to MojoHost through Facebook or Google.

**Other methods of collection:** We may also collect Personal Information from or about you in other ways, including through your contact with our customer support teams, your results when you respond to a survey, and your interactions with members of the MojoHost corporate family or other companies.

**End-user collection and processing:** In some cases, MojoHost administers the site for our customers, and in these circumstances, we have no direct relationship with the individuals about, for, or from whom Personal Information is collected. If you are a customer or end user of a MojoHost customer (for example, you are an end user of our customer’s product or service) and you have questions or complaints about how your Personal Information is processed, please contact our customer directly. You understand that your use of the site might depend on terms and policies provided by our customer and that MojoHost is not a party to those agreements.

**Collection of information from children:** Our Services are available for purchase only for those who over 18-years old. We do not knowingly collect Personal Information from individuals under 18-years old. MojoHost does not target the website toward children. We encourage parents and guardians to monitor their children’s online activities and ask that they do not submit any Personal Information. Adults who interact with MojoHost should further take care that they do not provide any information about children.

### **How We Use the Personal Information We Collect; Purposes and Legal Bases for Processing**

Our primary purpose for collecting and processing Personal Information is to provide you with a secure, smooth, and efficient visitor and customer experience. We may also use your Personal Information to:

Purpose	Legal Basis
Process data according to our contractual relationship or employment relationship	(1) Necessary for performing a contract or similar arrangement to which you are a party; and

	(2) Managing the employment relationship
Operating this website	(1) Performing the agreement between you and Mojohost; and (2) Legitimate interest, including our economic interest in offering you products and services
Collecting registration data from the registered name holder	Performing the agreement between you and MojoHost or its registrar, Hexonet
Providing support or carrying out the service(s) you have requested or authorized	Performing the agreement between you and MojoHost
Troubleshooting your issue and providing you with more effective customer service	Performing the agreement between you and MojoHost
Distributing alerts concerning product upgrades, special offers, white papers, upcoming events and webinars, updated information about existing and new products and services from MojoHost or our partners, and to measure the effectiveness of these communications	(1) Explicit consent; (2) Performing the agreement between you and MojoHost; and (3) Legitimate interest, including our economic interest in making you personalized offers
Processing payments for products or services you purchased	Performing the agreement between you and MojoHost
Facilitating account creation and login if you choose to register or login to our website using Facebook or Google	Your consent
Providing or operating products or services that might engage in automated decisionmaking or profiling	Explicit consent, which you may withdraw at any time
Operating and manage our business operations	(1) Performing the agreement between you and MojoHost; and (2) Legitimate interest in ensuring the proper functioning of our business operations
Improving the security and functioning of our website, networks, and information	Legitimate interest in providing a good user experience and ensuring networks and information are secure

For those other purposes as required or permitted by law	Complying with legal obligations
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### How We Share Personal Information with Third Parties

MojoHost partners with and occasionally hires other companies to provide services on its behalf. Examples include partners or vendors who provide hosting, domain registration (Hexonet), technical support, data analysis and insight, customer service, marketing, billing, and those that assist with financial transactions. Personal Information may be shared with these companies; however, we will only share your Personal Information to accomplish the purposes for which we collected the Personal Information. These third parties are contractually required to maintain the confidentiality of your Personal Information and are contractually prohibited from using that information for any purpose not defined in the contract.

We may also share your information as follows:

- with our subsidiaries and affiliates;
- with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of MojoHost’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by MojoHost is among the assets transferred;
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of MojoHost, its customers, or others. This includes exchanging information with other companies and organizations for the purposes of cybersecurity, fraud protection, and credit risk reduction;
- to investigate fraud or comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to comply with any ICANN, registry, or ccTLD rules, regulations, and policies when you register a domain name with us (for reasons critical to maintaining the security, stability, and resiliency of the Internet, this includes the transfer of domain name registration information to the underlying domain registry operator and escrow provider and publication of that information as required by ICANN in the public WHOIS database or with other third parties that demonstrate a legitimate legal interest to that information);
- to enforce or apply our terms of use and other agreements, including for billing and collection purposes;
- to fulfill the purpose for which you provide it;
- for any other purpose disclosed by us when you provide the information; and
- with your consent.

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

## **How We Protect and Store Personal Information**

We try to protect the security of your Personal Information. MojoHost has implemented appropriate administrative, technical, and physical safeguards designed to prevent unauthorized access, use, or disclosure. For example, we store the Personal Information you provide on computer servers with limited access that are located in controlled facilities. We will retain Personal Information collected from you where we have a justifiable business need to do so and for as long as is needed to fulfill the purposes outlined in this privacy policy, unless a longer retention period is required or permitted by law (including legal, tax, or accounting reasons).

## **How We Use Tracking Technologies**

MojoHost and its partners use cookies or similar technologies to expedite the user login process, remember user experience settings, analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole to the extent legally permissible in certain jurisdictions. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it might limit your use of certain features or functions on our website or service. For more information, please see our [Cookie Policy](#).

We may partner with a third party to display advertising on our website or to manage our advertising on other websites. Our third-party partner might use cookies or similar technologies to provide you advertising based on your browsing activities and interests. If you wish to learn more about opting out of interest-based advertising, please click [here](#) or [here](#). Please note you might continue to receive generic ads.

**Do-Not-Track (DNT):** DNT is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other nonparties. We do not currently respond to DNT signals. Thus, nonparty web analytics companies might collect information about your online activities over time and across our website and other online properties.

## **How You Can Opt Out of Marketing Communications**

We may contact you to alert you of upcoming events, webinars, white papers, and promotional campaigns for our products and services. If we decide that your explicit consent is needed to send marketing communications, we will obtain that consent before or at the time of Personal Information collection.

MojoHost honors your choices. You can choose whether you wish to receive promotional emails, SMS messages, telephone calls, and postal mail from us by using the opt-out methods described in that communication. For example, if you wish to stop receiving email marketing communications from us, you may click the "unsubscribe" link at the bottom of the relevant email marketing communication or by following the instructions detailed in the communication. You may also submit a request by emailing [privacy@mojohost.com](mailto:privacy@mojohost.com).

Please note that this might not unsubscribe you from all other communications. If you wish to opt-out of all marketing communications, please contact us using the details provided at the end of this privacy policy. Please note that you might not be able to unsubscribe from service-related messages.

### **How You Can Access or Change Your Personal Information**

You may contact us at any time to inquire about the Personal Information we collect about you. Depending on the website you use, you may access, correct, or request deletion of your Personal Information by logging into your account or you may email [privacy@mojohost.com](mailto:privacy@mojohost.com). We will respond to your request within a reasonable time.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information about your request to speed up our response.

If MojoHost processes information about you for one of our customers, please direct your privacy inquiries and requests for access, correction, or deletion of Personal Information to the customer. If a customer requests that we remove information, we will respond within a reasonable time.

We may need to retain your information for a period to continue providing a service to you, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce our customer or use agreement, or take other actions as required or permitted by law.

### **What Additional Privacy Rights Are Available in Certain Locations**

Besides the rights described elsewhere in this privacy policy, you might have additional Personal Information protection rights under information protection legislation in your state, country, or region. These rights might include but are not limited to the right to access, the right to correction, the right to erasure, the right to information portability, the right to withdraw consent for processing, the right to object to or restrict the processing of your Personal Information, and the right to lodge a complaint with the supervisory/regulatory authority in the state, country, or region where you live.

### **How We Transfer Personal Information Across Borders**

You acknowledge (a) that you are accessing a website that is based in the United States, (b) that you are providing Personal Information to a company in the United States, and (c) that MojoHost must adhere to United States federal and state law. You acknowledge that Personal Information collected on our website might be stored and processed in the United States or any other country in which MojoHost, its affiliates, partners, service providers, or agents maintain facilities, and while in those jurisdictions might be subject to access under the laws of those jurisdictions. Each

of these countries has different privacy laws that afford varying levels of protection for your Personal Information, and those laws might be less stringent or might not be as comprehensive as those laws that exist in your country.

MojoHost will protect your Personal Information according to this privacy policy wherever it is processed and will take appropriate contractual and other steps to protect the relevant Personal Information according to law. In certain situations, MojoHost has created and entered into data processing or data protection agreements with relevant parties (i.e., vendors with whom we share your Personal Information). Where appropriate, these agreements incorporate the European Commission's Standard Contractual Clauses (SCCs), which have been approved by the European Commission, as well as additional guarantees to protect the rights of data subjects.

MojoHost previously certified that it adhered to the Privacy Shield Frameworks regarding the collection, use, and retention of Personal Information transferred from the European Union, United Kingdom, and Switzerland to the United States. We later withdrew from the Privacy Shield Frameworks because of the decision of the European Court of Justice (ECJ). MojoHost will continue to use data transfer agreements that include the SCCs and supplementary measures where applicable, to legitimize transfers of Personal Information.

MojoHost's privacy practices described in this privacy policy also comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of Personal Information transferred among participating APEC economies. More information about the APEC framework can be found [here](#).

### **Your California Privacy Rights**

If you are a California resident, California law provides you with additional rights regarding our use of your Personal Information. To learn more about your California privacy rights, visit our [CCPA Policy](#). As a "Service Provider" as defined in the California Consumer Privacy Act (CCPA), MojoHost will not sell, retain, use, or disclose Personal Information for any purpose other than as set out in an agreement with our customer or as otherwise permitted or required by the CCPA.

California's "shine the Light" law (Civil Code Section 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please email [privacy@mojohost.com](mailto:privacy@mojohost.com).

### **Your Nevada Privacy Rights**

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address: [privacy@mojohost.com](mailto:privacy@mojohost.com). However, please know we do not currently sell data triggering that statute's opt-out requirements.



## **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the website home page. If we make material changes to how we treat Personal Information, we will notify you by email to the primary email address specified in your account or through a notice on the website home page. The date the privacy policy was last updated is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our website and this privacy policy to check for any changes.

## **How You Can Contact Us**

Customers may contact MojoHost with any questions or comments about this privacy policy and our privacy practices. If you would like to make a formal complaint, please email [privacy@mojohost.com](mailto:privacy@mojohost.com). Although we prefer electronic notice, you may also write to us at:

Chief Privacy Officer  
Easy Online Solutions, Ltd.  
21671 Melrose Ave.  
Southfield, MI 48075

If you have an unresolved privacy or information security concern that we have not addressed satisfactorily, you may submit your dispute in the International Institute for Conflict Prevention & Resolution for resolution under its privacy dispute resolution rules available at <https://www.cpradr.org/resource-center/rules/international-other/other/privacy-dispute-resolution-rules>.

Where applicable, individuals may also reach out to their national privacy authorities and ask for their support. MojoHost is committed to coordinate and collaborate with applicable privacy regulators or authorities.

Under Article 27 of the General Data Protection Regulation (GDPR), we have designated Kathy Dolk of New Business Support as our EU Representative. You may contact her by email at [kathy@newbusiness.support](mailto:kathy@newbusiness.support), by phone at +31 20 250 2333, or by mail at PO Box 14899, 1001 L J Amsterdam.