



Privacy Policy

Last Updated December 30th, 2018

I. Statement. By ordering from Winstri Hosting, Inc (“Us”, “We”, “Our”, “Winstri Hosting”), using our services or viewing our site you (“You”, “The User”) are agreeing to this privacy policy. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy or our practices with regards to your personal information, please contact us at legal@winstrihosting.com

When you visit our website and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please immediately stop using our website and services.

This privacy policy applies to all information collected through our website (<https://www.winstrihosting.com>), and/or any related services, sales, marketing or events (we refer to them in this policy as “Sites”)

II. Personal Information We Collect. *In Short: We collect personal information that you provide to us such as name, street address, contact information, passwords security data, and payment information.*

We collect personal information that you voluntarily provide to us when registering for an account, ordering a service, using our site or contacting us.

The information we collect depends on the interactions with us and how you use our website.

The information we collect can include the following:

- **Name and Contact Information.** We collect your first and last name, email address, postal address, phone number or other similar contact information.
- **Credentials.** We collect password, password hints, and similar security information used for authentication and account access.
- **Payment Data.** We collect the data necessary to process your payment if you make purchases, such as payment instrument number (such as the last 4 digits of your debit/credit card number). All payment Credit/Debit card payment data is processed by Stripe, Inc. you can view their privacy policy here: <https://stripe.com/us/privacy>

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes.

We do not knowingly collect information from children under thirteen and if any services or accounts are found to be owned by a user under thirteen it will be immediately wiped and deleted.

III. Automatically Collected Information. *In Short: Some information such as IP Address, and/or browser and device information is automatically collected when you visit/use our website.*

We automatically collect certain information when you visit, use or navigate our website. This information does not reveal your specific identity (like your name our contact information), but may include device and usage information, such as your IP Address, browser & device information, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our website and other technical information. This information is primarily needed for the security and operation of our website and for our internal analytics and reporting purposes.

Like many other businesses, we also collect information through cookies and similar technologies.

IV. Information We Collect from Other Sources. *In Short: We may collect limited data from public databases, partners and other outside sources.*

We may obtain information about you from other sources such as public databases, partners, as well as from other third parties. Examples of this information that we receive are as follows:

- Social Media Profile
- Marketing Leads
- Search Results
- Paid Listings

V. How We Use Your Information. *In Short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with consent, and/or compliance with our legal obligations. We indicate specific processing grounds we rely on next to each purpose listed below:

We use the information we receive or receive to:

- Create your account.
- Send you marketing or promotional communications.
- Send administrative information to you.
- Fulfill and manage your orders.

- Request Feedback.
- Enforce our Terms and Policies.
- Respond to legal requests.
- Respond to support requests.

VI. Information Shared with Others. *In Short: We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.*

We may process or share data based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or act regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person or illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process or share your information in the following situations:

- **Third Party Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on behalf and require access to such information to do that work. Examples include payment processing, data analysis, email delivery, customer service, and marketing efforts. We may allow third parties to use tracking technology on our website which will enable them to collect data about you interact with our website over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. We do not rent, sell or trade any of your personal information under any circumstances.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Third-Party Advertisers.** We may use third-party advertising companies to serve ads when you visit our website. These companies may use information about your visit to our website and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about the goods and services of interest to you.

VII. Who We Share Your Information With. *In Short: We only share your information with the following third parties.*

We only share your information with the following third parties:

For Communication & Support Purposes:

- Tawk.to – <https://tawk.to> (Automatically collects the users' IP Address and stores the users' email if provided in the livechat pre-chat form)

For Billing Purposes:

- PayPal – <https://paypal.com> (Automatically collects the users' payment details upon paying for an invoice or ordering from us)
- Stripe – <https://stripe.com> (Automatically collects the users' payment details upon paying for an invoice or ordering from us and stores the last 4 digits of your card number)

For Analytics:

- Google Analytics – <https://analytics.google.com> (Automatically collects your site activity, location, and device information)

For Domain Registration:

- Namecheap & ICANN (We share the information you inputted for your WHOIS record upon registering a domain through us so that we can fulfill the domain registration)

VIII. Cookie Policy. *In Short: We use cookies to collect and store your information so that we can improve your experience on our website.*

We use cookies to improve your experience on our website and are automatically set. If you do not wish to allow cookies, leave the site immediately and remove them from your computer.

You can choose to allow or disable Cookies via your web browser. By default, your web browser will automatically enable Cookies. This can be modified in your browser settings.

Cookies We Use:

Laravel (Site Framework)

- laravel_session
- XSRF-TOKEN

Tawk.to (Livechat)

- TawkConnectionTime
- TawkCookie

Google Analytics (Analytics and Reporting)

- _ga
- _gat
- _gid

WHMCS (Billing & Ordering System)

- WHMCS

IX. How Long We Keep Your Information. *In Short: We store your information for as long as needed to fulfill the purposes outlined in this Privacy Policy unless otherwise required by law.*

We only keep your information if it is necessary to fulfill the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law (such tax, accounting or other legal requirements). No purpose in this Privacy Policy will require us to keep your personal information longer than 1-year past the client's account termination date.

When we have no ongoing legitimate business need to process your personal information, we will either delete, anonymize it, or, if this is not possible (for example, because your personal information is stored in a backup archive), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

X. How We Keep Your Information Safe. *In Short: We aim to protect your personal information through a system of organizational and technical security measures.*

We use secure data servers for MySQL and other data storage that are protected by high-end encryption and SSH Keys. We also utilize 256-bit encrypted SSL certificates to secure your data on our websites. Although we will do our best to secure your data, we always recommend that you use our website in a secure environment and use our website at your own risk.

XI. Your Privacy Rights. *In Short: In some regions, such as the European Union, you have rights that allow greater access to and control over your personal information. If you are in the EU, you can review, change, or terminate your account at any time.*

If you are in the European Union, you have rights under the new general data protection regulation (GDPR) to have greater access to and control over your personal information. Under this new act. you can review, change or terminate your account at any time. To do this you must open a ticket and select the Data Protection department. If you are not in the European Union, you can still request a review of all your information by contacting our legal department.

If you are in the European Union and you believe we are unlawfully processing your personal information, you have the right to complain to your local data protection authority. You can find their contact details here: https://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

Account Information

If you would at any time like to review or change the information on your account or terminate your account, you can contact us using the information on our website: <https://www.winstrihosting.com/contact> ("Contact Page")

Upon your request to terminate your account. We will deactivate any services associated with your account and delete your account from our active databases. However, some information may be

retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Service and/or comply with legal requirements.

Cookies and Similar Technologies: Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove and to reject cookies. If you choose to reject or remove cookies, this could affect certain features or services of our website. To opt-out of interest-based advertising by advertisers on our site visit: <http://optout.aboutads.info/?c=2&lang=EN>

Opting Out of Marketing Emails: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us via the details on our contact page.

However, we will still need to send you service-related emails that are necessary for the administration of your account and service.

XII. Controls for Do Not Track Features.

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice to not be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

XIII. California Specific Rights. *In Short: California residents have specific rights regarding access to their personal information.*

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and, free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of the all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please contact us via one of the methods on our contact page.

If you are under 18 years of age, reside in California, and have a registered account on our website, you have the right to request removal of unwanted data that you publicly post on our website. To request the removal of such data, please contact using one of the methods on our contact page and include the email address associated with the account with a statement that you reside in California. We will make sure the data is not publicly displayed on our website, but please be aware that the data may not be completely or comprehensively removed from our systems.

XIV. Updates to This Policy. *In Short: We will make updates to this policy as necessary to stay compliant with local laws.*

We may update this privacy policy from time to time. If we update this policy, we will contact you via email within 24 hours of the update being made.

XV. How to Contact Us. You can contact us about this privacy policy via the following methods below:

By Email: contact@winstrihosting.com

By Phone: (833) 946-7874 Press 3 and ask for Winstri Hosting's legal department.

By Mail:

Winstri Hosting, Inc

ATTN: Legal Department

3201 Edwards Mill Road

Suite 141-562

Raleigh, NC 27612

Revision Approved by the Chairman of the Board on December 30th, 2018.