

# GRENT PRIVACY Policy

GRENT TECHNOLOGY PTE. LTD (GRENT) TAKES YOUR PRIVACY SERIOUSLY.

Our Privacy Policy is intended to describe to you how and what data we collect, and how and why we use your personal data. It also describes options we provide for you to access, update or otherwise take control of your personal data that we process. Your privacy is very important to us. We do not sell any personal data of our customers to another company for marketing purposes.

By “personal information”, we mean information that could include such as: name, address, telephone number, date of birth, Email address, Credit card number, and other data collected that could directly or indirectly identify you.

## YOUR ACCEPTANCE OF OUR PRIVACY

By using our services (the “Services”) you agree to the use, collection and disclosure of the data that we collect in accordance with this Privacy Policy. This Privacy Policy applies to all users, members registered with us.

## WHAT INFORMATION WE COLLECT

GRENT collects personal information in accordance with requirements or technical standard by its collaborating registrars, TLD’s operating registries and ICANN. In most instances, you provide the information directly to GRENT TECHNOLOGY PTE. LTD, such as when you create an Account, sign up for a newsletter, purchase GRENT’s products and services, or request further information from us.

## SIGN-UP FOR SERVICES

- Information you provide in any registration process, such as your email, name, mailing address when you provide it to us;
- Information that you provide during any registration process (such as your name, company name, email address, phone number, billing address or credit card information, geographic location and industry), when you call or email us (for support or otherwise) or when you use our products or services; and
- Payment information that you provide to us (by way of our Services or otherwise) when you purchase some of our products and services, including credit card data.

## USE OF OUR SERVICES

- Information you provide when you contact our support for assistance;
- Information you provide when you participate in marketing program and surveys, or otherwise participate in activities we promote that might require information about you.
- Information you provide during your interactions with our website such as social media features or other similar widgets.
- Information you provide for DOMAIN REGISTRATION SERVICES (DOMAIN REGISTRATION SERVICES PRIVACY POLICY ADDENDUM is part of this privacy policy) or other service/products we provide.

## OTHER RESOURCES

- Information that is publicly available; and
- Information you consent to us receiving from third parties.

## COOKIES and TRACKING

We may collect information about your computer, including where available your IP address, operating system and browser type in order to administer our website, to customize your experience, to temporarily record session information and/or to assist you in browsing the site. This may in some instances only be statistical data about how you browse our site.

We use cookies on this site to:

- improve your experience on our site
- save your preferences and login information, and to provide personalized functionality
- “required cookies” are necessary for our website to work properly, understand your usage of our site
- help identify you and maintain your signed-in status
- measure the effectiveness of our advertising
- provide more focused marketing communications to you

You may refuse to accept cookies by activating the setting on your browser. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser so that it will refuse cookies, our system could issue cookies when you log on to our site.

## HOW WE USE YOUR INFORMATION

We use the information we collect both on its own and combined with any other information we collect about you, for the purposes that may include, but not limited to, the following:

- To communicate with you. The contacts may include: Email, Telephone calls, mail address, etc.
- To comply with legal, regulatory and law enforcement requests.  
We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (such as subpoena requests), to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical.
- To comply with ICANN or any TLDs' rules, regulations and policies.
- To share with trusted third parties who provide services such as payment processing, order fulfilment, customer service, website hosting, data analysis, infrastructure provision, IT services, email delivery services, auditing services and other similar services to enable them to provide services.
- To share with THIRD PARTY VENDORS, include serving advertisements, conducting survey, and website analytics companies such as Google Analytics. We use the information provided by these vendors to improve services on this site. These partners and vendors use cookies, web beacons and other technologies such as tags and scripts to collect information about your online activity (e.g., the sites and pages you have visited at the site and at times other 3rd party sites) in order to: help manage ad campaigns, understand user interests and trends and deliver personalized content and advertising to you while you are on the site or on other sites. Each cookie cannot be used by anyone other than the service provider. GRENT's websites is currently using Google Analytics, which is a web analytics service provided by Google, Inc. ("Google"), to evaluate your use of the GRENT's website. Google Analytics place a third-party cookie on your computer that is then used to compile reports of visitor traffic and internet usage. Google Analytics does not have a database of individual profiles for each visitor and only collects aggregate data. For information on how Google Analytics uses data please visit "How Google uses data when you use our partners sites or apps", located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can prevent Google Analytics from recognizing you on return visits to this site by disabling the Google Analytics cookie on your browser.
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). Any prospective purchasers or new owners will be similarly bound by this Privacy Statement.
- To share with a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or

stock (including in connection with any bankruptcy or similar proceedings). Any prospective purchasers or new owners will be similarly bound by this Privacy Statement.

- The AUTHORIZED USERS that have access to your account can view personal information stored in the account. A primary account holder can view personal information saved in subaccounts to which they have authorized access. We share information about authorized users only for legitimate purposes consistent with this privacy policy, including servicing your account and marketing products and services to you.
- We also share non-personal information that does not reveal your specific identity, such as:
  - Browser information
  - Information collected through cookies, pixel tags and other technologies such as scripts
  - Demographic information and other information provided by you
  - Aggregated information) with certain third parties

GRENT is not responsible for the privacy practices or the content of third-party sites linked in our website or any own-managed applications. Please read the privacy policy of any website you visit.

## SECURITY

GRENT do our best to protect data under control. The technical security measures include but not limited to: physical, electronic and managerial procedures to safeguard and secure the information we collect online. When we collect financial account information, such as credit card numbers, we protect its transmission through the use of encryption such as the Transport Layer Security (TLS) protocol.

## CHILDREN'S PRIVACY

For purposes of the US COPPA laws, we do not knowingly collect Personal Information from visitors under the age of 13. If we become aware that a user is under the age of 13, we will terminate any account that user may have with us and will delete any Personal Information that they have submitted from our records.

## YOUR RIGHTS

If your information changes, or discontinue your services with us and/or unsubscribe our marketing communications, we will endeavor to provide a way to correct, update or remove that your personal data in our records.

You have the right to know whether we process personal information about you, and if we do, to access data we hold about you and certain information about how we use it and who we

share it with. You also have the right to access your Personal Information, the right to correct any inaccuracies in the details we hold about you.

You may send your request to us via email address [GRENT-enduser@GRENT.com](mailto:GRENT-enduser@GRENT.com).

## **RESELLERS**

In addition to all of the terms and conditions set forth above, the following terms apply to GRENT's resellers.

We may collect information under the direction of our Resellers, but we have no direct relationship with the our Resellers' client, customers or users ("end user") or the personal data provided, processed or obtained by our Resellers. Reseller Users should direct all queries to the Reseller.

If end user doesn't want to be contacted by such Reseller, he/she should contact his/her Reseller.

We retain personal data we process on behalf of our Resellers for as long as needed to provide services under the relationship. We will retain, use and disclose this personal information as necessary

- To comply with our legal obligations, resolve disputes and enforce our agreements
- To disclose information to service providers and for domain registration and legal and compliance reasons.

## **RETENTION PERIOD**

We will retain your Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Statement, such as legitimate interest in maintaining the information, law requirement, and regulatory compliance, etc.

## **PRIVACY UPDATE**

We reserve the right to modify this Privacy Policy at any time. If we decide to change this privacy policy in any material way, we will notify you here, by email, or by means of a notice on our website. Your use of the site following these changes means that you accept the revised Privacy Statement.

## **CONTACT US**

If you have any questions, concerns about our Privacy Policy, please contact us via Email:  
[support@GREN.T.com](mailto:support@GREN.T.com).

We will respond to your request within a reasonable timeframe.

## **DOMAIN REGISTRATION SERVICES PRIVACY POLICY ADDENDUM**

The following privacy policy addendum, together with the GRENT's privacy policy (the "Privacy Policy"), is applicable to you if you purchased domain registration services from GRENT TECHNOLOGY PTE. LTD ("we," "us" or "GRENT"). Please review the below in addition to the Privacy Policy.

### **INFORMATION COLLECTION**

When you purchase Domain Registration services for top level domains ("TLDs"), as the domain registrar, we are required to collect the following personal information from you (collectively, "Personal Information"):

- Registrant Name
- Registrant Organization (where applicable)
- Registrant Address
- Registrant Email
- Registrant Fax (where applicable)
- Registrant Phone number
- Administrative Contact
- Administrative Contact Organization (where applicable)
- Administrative Contact Address
- Administrative Contact Email
- Administrative Contact Fax (where applicable)
- Administrative Contact Telephone Number
- Technical Contact
- Technical Contact Organization (where applicable)
- Technical Contact Address
- Technical Contact Email
- Technical Contact Fax (where applicable)
- Technical Contact Telephone Number
- Billing Contact
- Billing Contact Organization (where applicable)
- Billing Contact Address
- Billing Contact Email
- Billing Contact Fax (where applicable)
- Billing Contact Telephone Number

Our collection of Personal Information is necessary to comply with contractual obligations we have with the Internet Corporation for Assigned Names and Numbers ("ICANN"), TLD registries ("Registries"), and collaborating registrars so that you can validly register your domain name. In addition to Personal Information, our contracts with some Registries may require us to collect

other personal information for the registration of a TLD such as certain professional affiliations, identification or other qualifiers ("Additional Personal Information").

## DISCLOSURE OF INFORMATION

- **Public Whois.** We may be required to make certain domain name information ("WHOIS Information") available and accessible to the public through a searchable port 43 "WHOIS" Service via a public webpage operated by the applicable registrar of record ("WHOIS site"). The WHOIS site is a publicly accessible database that lists WHOIS Information, including a particular domain name, the name server(s) to which the domain name points, and the domain name's creation and expiration date. Except for EU/EEA natural persons (as described below), your Personal Information could be displayed on the WHOIS site.
- **EU/EEA natural persons.** Notwithstanding the foregoing, pursuant to the European Union's General Data Protection Regulation 2016/679, or GDPR, if you are a EU/EEA natural person (as defined by the GDPR), other than as specified in this addendum, our publication of WHOIS Information will not contain any Personal Information. Accordingly, we will not display Personal Information of an EU/EEA natural person on the WHOIS site unless you explicitly opt out of this protection.
- **Transfer Out.** If you initiate a transfer out of a domain name away from us as the registrar of record, pursuant to the consensus policies by ICANN, we may need to publish your registrant email address obtained from your Personal Information on the WHOIS site for a period of approximately five (5) calendar days. After this period and assuming a valid transfer has occurred, you would cease to be our customer for that domain name and your WHOIS Information would be managed by the gaining registrar.
- **Certain Registries.** Registries are third party providers of TLDs that are independent of domain registrars. If required by contract with a particular Registry, we may be obligated, as a domain registrar of domains provided by the Registry, to provide Personal Information and Additional Personal Information to such Registry to successfully complete your domain name registration. If we provide your Personal Information and Additional Personal Information to a Registry, the Registry has its own obligation to comply with applicable data privacy laws.
- **Data Escrow.** ICANN, TLD's registries, registrars may require us to deposit the Personal Information collected with a secure third-party escrow provider who acts solely as a holder of the data.
- **Permitted Disclosures.** We may also disclose your Personal Information when required by the rules, regulations and policies of ICANN, including but not limited to the Uniform Domain-Name Dispute-Resolution Policy (UDRP).