Hide My Ass! Privacy I Hide My Ass!

1. Introduction

Hidemyass.com ("our Site") and the services available through it are operated by Privax Limited (referred to as "we", "us" and "our"). We are a limited company registered in England under company number 07207304 and have our registered office at 110 High Holborn, London WC1V 6JS, UK.

We are a leading provider of web privacy and anonymity tools and therefore we are deeply committed to protecting and respecting your privacy. This <u>Privacy Policy</u> (together with any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we, as data controller of your personal data that you provide to us, will treat it.

Section 3 below explains how we use cookies to operate our site.

Privax Limited has received TRUSTe's Privacy Seal signifying that this privacy statement and our practices have been reviewed for compliance with the TRUSTe program viewable on the validation page available by clicking the TRUSTe seal. The TRUSTe program does not cover information that may be collected through downloadable software. The TRUSTe program covers only information that is collected through this Web site, www.hidemyass.com.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe here.

If you have any questions regarding these terms, you can contact us by email (info@hidemyass.com). Our privacy policy (referred to from now on as the "Privacy Policy) applies when you use our Site. Please read the Privacy Policy and that you agree to abide by it. If you do not agree to our Privacy Policy, please refrain from using our Site.

2. Information we may collect from you, why we need it and how we use it

We may collect and process the following data about you:

On registration:

- What data we collect: When you register we will collect your username, email address, password (encrypted) and IP address.
- Why we need this data: We will need your username and password in order to provide you with access to the web based control panel and to our downloadable VPN software. We will need your email address in case you forget your password or wish to receive email newsletters. Your IP address is logged by us so that we can prevent any spam, fraud or abuse of our Site and our services. If you do not use any of our services, we shall store this data for up to two years.. If you continue to use one of our services, we will store your registration data for as long as you are using one of our services or have an active account, and for up to two years after

- that. We may keep your registration data for an extended period as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.
- How we use this data: we use this data to provide our services to you, prevention of fraud and abuse. From time to time we may email you news, updates and sales offers which you can easily opt out of receiving by clicking the "unsubscribe" in the relevant email.

When you contact us:

If you contact us through our website for any reason (e.g. by email or LiveChat) we will generally store these communications for up to 6 months, unless we are required, for legal reasons or under exceptional circumstances, to retain this information for an extended period. Where you contact our staff members outside of our helpdesk (e.g. using their individual corporate email addresses), we may store your communication for as long as necessary to provide you services or to comply with our legal obligations, resolve disputes, and enforce our agreements.

Payments:

- If you opt to pay for use of our services, we will use a third party payment processor to take payment from you. These third parties are properly regulated and authorised to handle your payment information and are prohibited from using your personal information for promotional purposes or for any other purposes other than providing these services to us.
- What data we collect: We collect payment information, which will vary depending on the payment method chosen by you, but may include your name, address and credit card information. We never handle or store complete credit card numbers, as this is done on our behalf by our payment processors.
- Why we need this data: We store this information as we require a record of your payment for accounting purposes and to manage your account. We may also use your payment information to detect and prevent fraud. If you continue to use one of our services, we will store your payment data for as long as you are using one of our services or have an active account, and for up to two years after that. We may keep your payment data for an extended period as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

We are not responsible for any third party payment provider handling your transaction and you should refer to the third party payment provider's <u>Privacy Policy</u> to see how they use your data.

Web proxy service:

- What data we collect: This is a free service and the only data we store through log files are website logs. This log details your IP address, the address of the website you visit, date, time and the files/sites you viewed via the web proxy. We do not link this data to your personal information.
- Why we need this data: The website logs are needed to tell us what websites and files you have accessed via our network. We store these logs for 30 days.

VPN service:

What data we collect: We will store a time stamp and IP address when you connect and disconnect to our VPN

service, the amount data transmitted (up- and download) during your session together with the IP address of the individual VPN server used by you. We do not store details of, or monitor, the websites you connect to when using our VPN service.

- Why we need this data: We do this so that we can monitor the performance of our Site, for example it enables us to sort server nodes by the number of users connected, to limit your account to one concurrent IP address per VPN connection (to prevent shared accounts), resource analytics (to carry out usage analysis for administrative purposes) and to prevent abuse and fraud. This data is stored on our system for between 2 and 3 months unless we are required, for legal reasons or under exceptional circumstances (including our own investigations of fraud or abuse), to retain this data for an extended period.
- For more information about logging on our VPN Service, please see our separate VPN Logging Policy.

Anonymous email service:

- What data we collect: We store the date and time of registration for the anonymous email service, your IP
 address, password, your actual email address (if you choose to supply it), and of course the actual emails
 themselves. You can delete your account and emails at any time but your registration details are stored for no
 more than 2 years following the deletion of your account to be used as an identifier in case of any potential
 legal issues.
- Why we need this data: We need this data so that you can receive emails (although please note that you can't send emails). You can use this anonymous email service as a temporary email inbox for when websites you do not necessarily trust that require an email address.

IP:PORT premium service:

- What data we collect: We store the date and time of order for the IP:PORT Proxy List premium service, and the
 email address provided to us for receipt of the proxy list emails and your payment information. You can delete
 your account at any time but your email address will be stored by us for no more than 2 years after you have
 deleted your account.
- Why we need this data: We need this data so that we can send you emails containing the proxy lists and so we have a record of the transaction for accounting purposes.

We will not share any of your data with anyone except in the circumstances referred to in section 5 (Disclosure of Your Information).

3. Cookies

We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Technologies such as: cookies, beacons, tags and scripts are used by Privax Limited and our marketing partners, affiliates, or analytics or service providers [e.g. payment processor, etc]. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. By accepting this Privacy Policy, you agree that we may place cookies or tracking technologies on your computer. For more information about cookies, please visit aboutcookies.org.

We use the following cookies:

- Google Analytics cookies: __utma, __utmb, __utmc, __utmz. These cookies allow us to count page visits and
 traffic sources so we can measure and improve the performance of our site, using a service provided by Google
 Analytics. For more information please visit: http://www.google.com/analytics/learn/privacy.html
- Affiliate cookies: aff_tag, ruid. These cookies allow us to identify if you have been referred to us by an affiliate, so we can pay commission to that affiliate.
- Refer- a-friend cookies: raf_tag. These cookies allow us to identify if you have been referred to us by another user under our refer-a-friend scheme, so we can credit that user.
- Login cookies: PHPSESSID, CAKEPHP, be. We use these cookies so you remain logged in when you are using your account.

We partner with a third party to either display advertising on our Web site or to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking here (or if located in the European Union click here) Please note this does not opt you out of being served ads. You will continue to receive generic ads.

4. Where we store your personal data

- All information you provide to us is stored on our secure servers. The data that we collect from you may be
 transferred to, and stored at, a destination outside the European Economic Area. By submitting your Personal
 Data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure
 that your data is treated securely and in accordance with this <u>Privacy Policy</u>.
- When you enter sensitive information (such as credit card numbers) on our order forms, we encrypt the transmission of that information using secure socket layer technology (SSL). We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

5. Disclosure of your information

- We will share your personal information with third parties only in the ways that are described in this privacy policy. We do not sell your personal information to third parties.
- Privax Limited is part of the Privax group of companies, and we may disclose your data to any member of the
 Privax group, which means any subsidiaries of Privax, or its ultimate holding company and its subsidiaries, as
 defined in section 1159 of the UK Companies Act 2006. All group companies have entered into strict
 confidentiality agreements with Privax and all employees and contractors of the Privax Group are also under

strict confidentiality obligations in respect of customer information.

- We may disclose your personal information to third parties:
- If Privax Limited is, or substantially all of its assets are, acquired by a third party, in which case personal data held by it about its users will be one of the transferred assets, but will remain covered by this Privacy Policy; or
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of service and other agreements; or to protect the rights, property, or our safety, our users, or others.

If we receive a report from any person or organisation (including law enforcement) that leads us to suspect that your account has been used in connection with any wrong-doing, we may at our discretion suspend your account, but we will not disclose any personal information that may identify you unless we are legally compelled to do so.

6. Access to information

The UK Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Act. Any access request may be subject to a fee of 10GBP to meet our costs in providing you with details of the information we hold about you. To make an access request please email: info@hidemyass.com

You may also correct, update, or delete your personal information by making the change on your account page or by emailing us at info@hidemyass.com. We will retain your information for as long as your account is active or as needed to provide you with services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

7. Links to 3rd Party Sites

Our sites includes links to other Web sites whose privacy practices may differ from those of Privax Limited. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Web site you visit.

8. Blog

Our Web site offers publicly accessible blogs or community forums that may require you to register to post a comment. You should be aware that any information you provide in these areas may be read, collected and used by others who access them. We do not have access or control of the information posted to the blog. You will need to contact or login into the third party application if you want the personal information that was posted to the comments section removed. To learn how the third party application uses your information, please review their privacy policy.

9. Social Media Widgets

Our Web site includes Social Media Features, such as the Facebook Like button and Widgets, such as the Share this button or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these

Features are governed by the privacy policy of the company providing it.

10. Changes to This Policy

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Updated: September 2014