

Relevant Name Search - PRIVACY POLICY

Donuts Inc. (together with its subsidiaries, “Donuts”, “us” or “we”) recognizes that you, our Partner (“you” or “Partner”), as a subscriber to ‘Relevant Name Search’ (“RNS” or “the Service”), value your privacy. This policy (“Privacy Policy”) explains how and why we collect and use the personal information you provide to Donuts.

Personal information includes data such as: your name, address, telephone number, email address, and other data collected that could directly or indirectly identify you (“Personal Information”).

This Policy details important information regarding the use and disclosure of your Personal Information in conjunction with the Service you have chosen to use, as well as options we make available to you to update, access, or otherwise take control of the Personal Information you provide to Donuts.

If, at any time, you have any questions about this Policy, or you wish to discuss your rights as described herein, please reach out to us at privacy@donuts.email. Our dedicated team will be happy to provide you with support.

Relevant Name Search (“RNS”)

INFORMATION WE COLLECT FOR RNS

In order to provide you with the RNS service, Donuts must receive the following information upon signup from you, the Partner:

- Name
- Email
- Username
- Address

Although RNS is intended as a business to business service, we understand that there is potential for such data to include your Personal Information, including potentially the Personal Information of your employees, therefore, where appropriate, account data shall be subject to the protections as outlined in this Privacy Policy.

Donuts would urge you, where possible, to choose generic contacts and usernames that do not contain Personal Information. Failure to do so however does not, in any way, affect the provision of the service and where processed, Personal Information shall, where necessary, only be processed as per the terms of this Privacy Policy.

THE WAYS WE USE RNS ACCOUNT INFORMATION

Donuts uses RNS Account data you provide to provision the RNS service to you at your request. Additionally, Donuts may use the data provided to: (i) improve our RNS product; (ii) develop and collect aggregate statistics regarding our systems and services; and (iii) communicate with you regarding your use of the RNS service.

DATA CONTROLLER

For the purposes of our RNS account information, Donuts is the data controller.

For the purposes of the RNS service itself, Donuts has designed the system, so as not to knowingly collect Personal Information, except as detailed herein. The RNS service itself does not require any personal data, nor does it knowingly retain any Personal Information.

NOTE: The RNS service does retain individual search queries, and as such given the free form nature of such queries, it is possible, if not probable, that an end-user may submit Personal Information to RNS. Donuts does not knowingly process any such data, and where deemed necessary, Partners should provide the pre-requisite privacy warnings to their users.

Partners who, in the use and presentation of the RNS service, collect additional data not associated with the RNS service, and which may be capable of further identifying an 'End User', such processing is wholly outside of the control of Donuts, and Donuts shall not be responsible for any such additional processing activities.

DISCLOSURE OF ACCOUNT DATA

There are instances where Donuts may have to disclose your Personal Information. At all times however, such disclosure shall be limited and subject to the required safeguards.

THIRD PARTIES PROCESSING DATA ON OUR BEHALF

We ordinarily require that third parties receiving data agree, by way of a written agreement, to process such information in compliance with this Privacy Policy. Donuts will use reasonable efforts to limit any third party's use of such information in compliance with applicable data privacy laws.

[Email Provider / Cloud Storage](#)

Donuts uses the third-party services of Google Inc.'s G-Suite for both email and associated cloud services. Your data may be stored on Google's servers, subject to industry standard encryption and security protections.

[Client Relationship Management System](#)

Donuts uses third party services to ensure the proper management of our client and customer service queries. Your data may be stored on each of these vendor's servers, however, subject to industry standard encryption and security protections.

EXCEPTIONS TO DISCLOSURE LIMITATIONS

Donuts shall always limit its disclosure of your Personal Information to the terms of this Privacy Policy. There are however times where we may disclose information. Such instances are limited to the following permitted disclosures:

- necessary to fulfill a transaction or provide information you have requested;
- in your vital interests or in the vital interests of another person, including events of an emergency that poses a threat to your safety;
- required by law or necessary to respond to legal process;

- in circumstances in which Donuts believes that the RNS service is being used in the commission of a crime;
- necessary to enforce the [Terms of Services](#);
- as necessary to establish, assert, defend, or protect our rights or property; or
- as necessary to meet the requirements of requests, lawfully made by public authorities, including requests to meet national security or law enforcement requirements.

FAMILY OF COMPANIES

As part of the Family of Companies, we may share information we have about you within the Family of Companies. Such sharing however shall be strictly limited in use. We will only share information about you to such members of the Family of Companies to facilitate, support and integrate their activities in a manner that is consistent with, and related to, the original stated use of the information, as explained to you upon collection, and to improve the provision of our services to you.

The Family of Companies includes the following companies: Dozen Donuts, LLC; Rightside Group, Ltd; Nametrust, LLC; Rightside Operating Co.; Domain Protection Services, Inc. Name.com, Inc.; Name.net, Inc.; Name104, Inc.; Name105, Inc.; Name106, Inc.; Name107, Inc.; Name108, Inc.; Name109, Inc.; Name110, Inc.; Name111, Inc.; Name112, Inc.; Name113, Inc.; Name114, Inc.; Name115, Inc.; Name116, Inc.; Name117; Name118, Inc.; Name119, Inc.; Name120, Inc.; Name121, Inc.; Name122, Inc.; Name123, Inc.; Name124, Inc.; Mobile Name Services Incorporated; Sipence, Incorporated; Hot Media, Inc.; Acquire This Name, Inc.; Vedacore.com, Inc.; Binky Moon, LLC; Corn Lake, LLC; Dog Beach, LLC; John Island, LLC; Pixie North, LLC; Blink Global LLC. The Family of Companies also includes the following non-U.S. based companies: Donuts (HK) Limited; Capable network Technology (Shanghai) Co., Ltd.; Rightside Domains Europe Limited; Name.com Canada Corp; and Rightside Canada, Inc.

GENERAL PRIVACY CONDITIONS

INFORMATION SECURITY

Donuts has physical, electronic, and managerial procedures to help safeguard, prevent unauthorized access, maintain data security, and correctly use your Personal and non-personal information. To that extent, we employ security measures that are deemed commensurate to the quality of data held, with due regard to the state of the art and cost of the available security measures, and the risk to the privacy rights of you, as data subject. We do not, nor can we, guarantee security. Neither people nor security systems are foolproof, including encryption systems.

DATA BREACHES

Where a breach occurs, Donuts shall, upon discovering such a breach, ensure that our obligations are met under applicable data privacy requirements, and with specific acknowledgement of Articles 33 and 34 of the GDPR, where applicable.

RETENTION OF DATA

Donuts does not retain any Personal Information for longer than is necessary.

Account Information

Donuts ordinarily retains account details of our Partners so as to ensure that we are capable of meeting our legal obligations, or where such retention is considered necessary in contemplation of the establishment, exercise or defense of legal claims against us. Such data is ordinarily retained for a period of 6 years after the closure/dormancy of all accounts; financial transaction data, is held for a period of 10 years, to satisfy the requirements of audit (taxation/revenue).

For the avoidance of doubt, where retained, and where data protection legislation applies, such data will only be used for those purposes, as stated.

NOTE REGARDING SENSITIVE PERSONAL INFORMATION

“Sensitive Personal Information” refers to personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying sex life of the individual.

Donuts does not ordinarily or knowingly require or collect Sensitive Personal information. As such shall not use or disclose such information with third parties without your explicit consent.

NOTE REGARDING CHILDREN (under 18 years of age)

Please note that we do not knowingly permit or solicit information from individuals under eighteen (18) years of age. In addition, we do not knowingly market our products or services to individuals under eighteen (18) years of age.

DATA SUBJECT RIGHTS

ACCESS TO PERSONAL INFORMATION

Where applicable, you have the right to obtain from us a confirmation as to whether or not Personal Information concerning you is processed by us. In addition, where such processing is confirmed, and you request it, we will arrange access to the Personal Information along with the following information:

- a) the categories of Personal Information collected and processed;
- b) the recipients or categories of recipients to whom the Personal Information has been or will be disclosed, in particular recipients in third countries (outside of the European Economic Area (“EEA”) or international organizations;
- c) the period for which the Personal Information will be stored, or, if not possible to be determined, the criteria used to determine that period;

- d) the existence of the right to request from us, rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- e) the right to lodge a complaint with a supervisory authority;
- f) where Personal Information was not collected directly from the you, any available information as to its source;
- g) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where your Personal Information is transferred to a third country, you also have the right to be informed of the appropriate safeguards we have put in place pursuant to Article 46 of the GDPR relating to the transfer.

Copies of the Data: Donuts may provide, where requested, a copy of that data, relating to you, which are being processed. Subject to the restrictions as noted in Article 23 of the GDPR.

RECTIFICATION

All Personal Information held by us, is as disclosed to us by you. Should you believe we hold incorrect or inaccurate data relating to you and/or your use of the RNS service, please contact us at privacy@donuts.email. Donuts will, upon notification of any inaccurate data held, without undue delay and after reasonable verification of your identity, make the necessary updates to your data, where appropriate to do so.

DELETION/ERASURE

Where you, as the data subject, wish the erasure of your Personal Information, Donuts will fulfill your request should one of the following grounds apply:

- the Personal Information is no longer necessary in relation to the purposes for which it was collected or otherwise processed, e.g. the provision of our Services;

- where processing is based solely upon your required consent, and you withdraw this consent on which the processing is based;
- where you object to the processing, and where there are no overriding legitimate grounds for the processing;
- where you can demonstrate that the Personal Information has been unlawfully processed;
- where you provide notice that the Personal Information must be erased for compliance with a legal obligation as contained in a stated Union or Member State law to which the controller is subject; or
- where Donuts is unable to demonstrate proper reliance on an exception under 17 (3) of the GDPR.

RIGHT TO BE FORGOTTEN

Where you have made a valid request to erase your Personal Information, Donuts will, taking into account the available technology and the cost of implementation, take reasonable steps, including technical measures, to inform any third parties which are processing that personal data, of your request for erasure.

CHANGES AND UPDATES TO THIS PRIVACY POLICY

This Privacy Policy may be revised periodically and this will be reflected by the date below. Please revisit this page to stay aware of any changes. We only use your Personal Information in the manner described in the Privacy Policy in effect when we received the personal information you provided.

SPECIAL NOTES FOR INTERNATIONAL USERS

FOR EUROPEAN UNION & SWISS CITIZENS

Transfer of data outside of the European Economic Area (“EEA”): Donuts is a US registered entity, and all our primary servers are located within the USA. Depending on where you are located, the use of our Service may involve the transfer of data outside of the EEA.

PRIVACY SHIELD FRAMEWORKS

We comply with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. We have certified that we adhere to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access and Recourse, Enforcement and Liability. If there is any conflict between the policies in this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

Note that you have the right to access, correct, or delete your Personal Information processed by us. For assistance with accessing, correcting, or deleting your personal data, please contact us at privacy@donuts.email. Please be aware that deleting your Personal Information may result in termination of the services you receive through us.

In compliance with the Privacy Shield Principles, we commit to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this Policy should first contact our Legal Department at privacy@donuts.email, or by certified mail (return receipt requested) at: Donuts Inc., Attn: Legal Department, 5808 Lake Washington Blvd NE, Suite 300, Kirkland, WA 98033 USA.

We have further committed to refer unresolved privacy complaints under the Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider

located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint. In addition, it is possible, under certain limited conditions, for individuals to invoke binding arbitration before the Privacy Shield Panel to be created by the US Department of Commerce and the European Commission. Note that the US Federal Trade Commission has enforcement authority over our compliance with this Policy.

The RNS website is hosted in the United States and is intended for and directed to users in the United States. If you are accessing the Website from the European Union, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure, that differ from United States laws, please be advised that through your continued use of the Website, which is governed by U.S. law, this Website Privacy Policy, and our Website Terms of Use, you are transferring your personal information to the United States and you consent to that transfer.

CONTACT US

If you have any questions, concerns or complaints about our Privacy Policy and how it related to our products and services, you may contact us by email at privacy@donuts.email or by mail to one of the following addresses:

Donuts Inc.

ATTN: Data Privacy Section, Legal Department

5808 Lake Washington Blvd NE

Suite 300

Kirkland, WA 98033

USA

Or for customers established in the EEA:

Donuts Inc.

ATTN: Data Privacy Section, Legal Department

Suite 106

The Victorians

15-18 Earlsfort Terrace

Dublin 2, County Dublin

Ireland

If you are a resident of the EEA and believe we maintain your personal data subject to the General Data Protection Regulation, you may direct questions or complaints to our lead supervisory authority, the Office of the Data Protection Commissioner, as noted below:

Office of the Data Protection Commissioner.

Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23, Ireland.

Phone +353 (0761) 104 800 | LoCall 1890 25 22 31 | Fax +353 57 868 4757

Email info@dataprotection.ie

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