



# CleanDNS, Inc. Privacy Policy

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This privacy policy will explain how our organization uses the personal data we collect from you when you use our website and generally the data we process as a Service Provider for the CleanDNS, Inc. ("CleanDNS") Platform and Services.

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## What PII do we collect?

### CleanDNS as Controller

In certain circumstances, CleanDNS is considered the controller of the PII processed by us. Ordinarily this is in connection with the processing of the data of our own employees and contractors, or in the processing of the contact information of our clients and vendors. In general we will therefore process the following PII :

- Employer organization information (company name, address, domain, etc)
- Employee/Agent data (name, email, phone number, position and/or other contact details)
- Domain Name System data (IP address etc.)
  - Registration Data Directory Services ('RDDS') data
  - NOTE: We ordinarily do not process PII in whois data. Where publicly available whois data inadvertently includes, PII or is included under the terms of access, CleanDNS continues to Restrict our intake to non PII elements i.e to registrar, timestamps, nameservers, reseller [if applicable])
- Screenshots of publicly resolving content of a domain or URL reported for abuse which may or may not contain personal information

### CleanDNS as Processor

In the provision of our services, CleanDNS is ordinarily considered a processor for our clients. In such instances the relevant client will continue to be the Controller and we will process data under the terms of our agreements with those clients (Controller Instructions).

Such data ordinarily includes the following :

- Screenshots of a publicly resolving domain or URL reported for abuse which may or may not contain personal information.
- Non-Public Whois data (limited to only those clients who specifically provide such data to us in the provision of our Services to them)
  - Name
  - Address
  - Phone Number
  - Email
  - Fax Number



## 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. CleanDNS does not ordinarily or knowingly require or collect Sensitive Personal information. As such, we will not knowingly use or disclose such information with third parties without your explicit consent.

## How do we collect your data?

### 1) Directly from you

We collect data and process data when you:

- Register for an account online or place an order for any of our products or services.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser’s cookies.
- Submit an abuse report on a domain to us.
- Other content that you voluntarily disclose online (on discussion boards, in messages and chat areas) From our Clients (in the provision of CleanDNS Platform and Services)

### 2) Indirectly

CleanDNS may also receive your PII data indirectly from the following sources:

- RDDS (Registration Data Directory Services) records
- Abuse reports
- From a Registrar, Registry or other DNS Infrastructure provider

## How will we use your data?

### 1. Website Users Information

If you submit Personal Information to us through the Website, then we may use it to carry out analytics, understand trends and usage of materials, as well as monitoring, operating, maintaining, and providing you the features and functionality of the Website, including, when applicable, sending you information.

Personal Information or other content that you voluntarily disclose online (on any discussion boards, in messages and chat areas) may become publicly available and can be collected and used by others, including CleanDNS, without any additional permission. We may use your email address to send commercial, marketing, or other messages regarding the Website or our Services without additional consent.



We may share non-personally-identifiable information (such as anonymous user usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with third parties to assist us in understanding the usage patterns for certain content, services, advertisements, promotions, and/or functionality on the Website.

## **2. CleanDNS Reporting Forms**

If you submit Personal Information to us through the Website, then we may use it to :

- Create your account (where applicable), process your orders;
- manage your account; and
- To process abuse reports and communicate the report status to you.

## **3. CleanDNS Platform & Services**

CleanDNS may use data relating to you, where a domain name (or similar online identifier) registered by you has been flagged for an abusive use, as defined by there terms of service of your relevant registrar, or registry operator or other similar entity. Our processing of this data will be, at all times, under the instructions of the Controller.

We may disclose Personal Information and/or non-personally-identifiable information if required to do so by law, or in the good faith belief that such action is necessary to comply with state and federal laws or respond to a court order, subpoena, or search warrant. CleanDNS reserves the right to disclose Personal Information and/or non-personally-identifiable information that CleanDNS believes, in good faith, is appropriate or necessary to take precautions against liability, to investigate and defend itself against any third-party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of our Website, and to protect the rights, property, or personal safety of CleanDNS, our users or others.

## **4. Other Uses of Data**

CleanDNS also collects your data so that we can:

- Create your account (where applicable), process your orders, and manage your account.
- Email you with special offers on other products and services we think you might like, which are reasonably connected to the services you have obtained, or in line your preferences on the site
- To process abuse reports and communicate the report status to you.
- If you agree, CleanDNS will share your data with our partner companies so that they may offer you their products and services.
- When CleanDNS processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.
- When CleanDNS processes your abuse report, it may send your data to, and also use the resulting information from, clients for the purpose of reviewing the abuse report in order to decide on an action.



## Third-Party Links

The Website may contain links to other sites. We are not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our Website and to read the privacy statements of every website that collects your personal information. This Privacy Policy applies only to information collected by the Website and CleanDNS directly.

## Analytics

We may share non-personally-identifiable information (such as anonymous user usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to assist us in understanding the usage patterns for certain content, services, advertisements, promotions, and/or functionality on the Website.

## How do we store your data?

CleanDNS, Inc securely stores your data at data centers around the world certified to at least a SOC2 standard. All data is encrypted when at-rest or in-transit.

CleanDNS will keep your account data until you close your account. Once you close your account, we will delete your data by removing records from relevant databases. CleanDNS may retain data relating to you for a reasonable period in reasonable contemplation of legal proceedings, or to ensure we are able to fulfil any legal obligations on us.

Where retained, such data will be securely archived, and only processed for these limited purposes.

CleanDNS, Inc will ordinarily keep your abuse report data for a minimum of a three year period. Once this time period has expired, we will delete your personal data by removing records from relevant databases.

## Marketing

Where you have opted in to marketing, CleanDNS may send you information about products and services of ours that we think you might like, as well as those of our partner companies.

If you have agreed to receive marketing, you may always opt out at a later date. *NOTE: CleanDNS shall never market to data provided to us in our capacity as processor.*



You have the right at any time to stop CleanDNS from contacting you for marketing purposes or giving your data to other members of the CleanDNS.

If you no longer wish to be contacted for marketing purposes, please message [privacy@cleandns.email](mailto:privacy@cleandns.email) with the subject UNSUBSCRIBE; Alternatively click the Unsubscribe button on any marketing email that you may have received from us.

## Exercising Your Data Protection Rights

### CleanDNS as Processor

Where CleanDNS processes your personal data as a processor (see above), we are not the appropriate party to whom you should raise requests or inquiries regarding your Data Subject Rights.

In the first instance, please contact the relevant data controller (usually the registry operator or your registrar). For more information you should seek out the relevant Controller's Privacy Policy.

Where we are in receipt of a Data Subject Request, and we are not the controller, CleanDNS will make all reasonable efforts to provide a notification to the correct controller on your behalf, however we cannot guarantee a response to your request. CleanDNS, shall provide all reasonable assistance to the relevant controller, where requested by them, in answering relevant data subject requests made of them.

All queries relating to outstanding data subject requests, should be directed to the relevant controller only.

### CleanDNS as Controller

#### Access to PII

Where, by applicable legislation, you have the right to obtain from us a confirmation as to whether or not Personal Information concerning you is processed by us. If there is no applicable legislation, we will nonetheless and in good faith review your request. In addition, where such processing is confirmed, and you request it, we will arrange access to the Personal Information along with the following information where applicable:

- the categories of Personal Information collected and processed
- 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"), the State of California in the United States of America or international organizations)
- the period for which the Personal Information will be stored or, if not possible to be determined, the criteria used to determine that period
- 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



- the right to lodge a complaint with a supervisory authority where applicable
- where Personal Information was not collected directly from you, any available information as to its source; and
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and in other relevant legislation, 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 and other applicable legislation.

CleanDNS may provide, where requested, a copy of that data relating to you, which is being processed, subject to the restrictions as noted in Article 23 of the GDPR and per other applicable legislation.

## **Rectification**

Should you believe we hold incorrect or inaccurate data relating to you, please provide us with all relevant details relating to this inaccuracy, so that we may 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, CleanDNS 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 CleanDNS is unable to demonstrate proper reliance on an exception under 17 (3) of the GDPR or applicable legislation.

## **Supplemental Erasure**

Where CleanDNS has publicly disclosed your data and where you have made a valid request to erase your Personal Information, CleanDNS will, taking into account the available technology and the cost of implementation, take reasonable steps, including technical measures, to inform any controllers which are processing that personal data, of your request for erasure, in accordance with applicable legislation.



## Data Portability

CleanDNS where necessary under law, shall ensure the portability of all relevant categories of PII.

## FOR EUROPEAN ECONOMIC AREA (EEA), SWISS & UNITED KINGDOM CITIZENS

CleanDNS is a US registered entity, and all our primary servers are located within the USA.

Transfer of data outside of the European Economic Area (“EEA”):

If you make a request, we have one month to respond to you. Should your request be specifically complex, or we are of the belief it may take longer than one month, we shall advise you of this, providing all required reasoning.

## California Consumer Privacy Act (CPRA)

The California Consumer Privacy Act (CPRA) gives California residents certain rights over their personal information. These rights include the right to know what personal information is collected about them, the right to delete their personal information, and the right to opt out of the sale of their personal information.

We collect and use your personal information for a variety of purposes, including to provide you with our services, to improve our services, and to communicate with you. We may share your personal information with third parties, but we will only do so with your consent or as permitted by law.

You have the following rights under the CPRA:

- The right to know what personal information is collected about you, the sources of that information, the purposes for which it is used, and the third parties to whom it is disclosed.
- The right to access your personal information.
- The right to delete your personal information.
- The right to opt out of the sale of your personal information.

To exercise any of these rights, please contact us at [privacy@cleandns.email](mailto:privacy@cleandns.email).

## Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

## How do we use cookies?

CleanDNS, Inc uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in





- Understanding how you use our website
- Performance and error monitoring

### **What types of cookies do we use?**

There are a number of different types of cookies, however, our website uses:

**Functionality** – CleanDNS, Inc uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

**NOTE FOR CLEANDNS USERS:** Use of the CleanDNS Platform itself requires cookies, turning off of cookies may affect your system experience.

### **Advertising**

CleanDNS, Inc uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. CleanDNS, Inc sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website .

### **Performance and Error Monitoring**

CleanDNS, Inc uses these cookies so that we may monitor our sites 'performance and capture any errors you may experience.

### **How to manage cookies**

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

### **Privacy policies of other websites**

The CleanDNS, Inc website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

### **Changes to our privacy policy**

CleanDNS, Inc keeps its privacy policy under regular review and places any updates on this web page.

### **How to contact us?**

If you would like to exercise any of these rights, please contact us at our Data privacy Contact



email: [privacy@cleandns.email](mailto:privacy@cleandns.email)

or write to us: Data Protection Contact, CleanDNS, Inc. PO Box 364, Yardley, Pennsylvania 19067, United States of America

### **How to contact the appropriate authority?**

Although CleanDNS is a US based organization, should you wish to report a complaint or if you feel that CleanDNS, Inc has not addressed your concern in a satisfactory manner, you may contact the Irish Data Protection Commissioner, as our expected Lead European

Data Protection Commission,  
21 Fitzwilliam Square South,  
Dublin 2,  
D02 RD28,  
Ireland

<http://www.dataprotection.ie>