

PRIVACY POLICY

Last Updated: 11 May 2018

Welcome to Internet.BS Privacy Policy.

Internet.BS respects your privacy and is committed to protecting your personal data. This privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. Internet.BS intends to comply with the EU General Data Protection Regulation (GDPR). Looking after your personal information is important to us and we would like you to be confident that your data is kept securely.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy [here](#).

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1. IMPORTANT INFORMATION AND WHO WE ARE

This Privacy Policy applies to information collected through internet.bs, internetbs.net, transfer-approval.biz and all it's subdomains including tmch.topdns.com and verification.topdns.com (the "website") from where ever in the world it is accessed. The website is operated by Internet Domain Service BS Corp which is a company incorporated in the Bahamas with Company Number 1715438 ("ISBS") In this Policy ISBS is sometimes referred to as 'we' or 'us'. This Policy describes how ISBS collects, uses, shares, protects, or otherwise processes your personal information.

Please also read the Privacy Policy of the Registry Operator for the Top Level Domain (TLD) when registering a domain to see how they process your data and what data they require for you to register domains in a particular TLD.

2. AMENDMENTS TO THIS PRIVACY POLICY

This Policy was last updated on 11 May 2018. ISBS may amend this Privacy Policy on one or more occasions by posting a revised policy on this website or a similar website that replaces this website.

3. LINKS TO OTHER WEBSITES

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy notice of every website you visit.

4. COLLECTION AND USE OF INFORMATION

Collection of Information ISBS collects personal information to set up and manage accounts for our e-commerce services and to fulfil orders of domain name products and services under contract with you.

You will need to provide ISBS with such personal information as:

- name; address; phone number; billing information, email addresses, username or similar identifier. This will also include the organisation details if applicable for the purposes of
- bank account information; or credit and debit card information for the purpose of taking payments
- you may be requested to supply date of birth; and identification documents in limited circumstances to comply with fraud checks or specific registry policies.

If you are an Online Pharmacy as defined in our Terms and Conditions and you appear on the NABP's list of Not Recommended Sites you will need to provide information such as:

- the online pharmacy accreditation service which your online pharmacy is certified by;
- if applicable, the date your online pharmacy received its certification from an online pharmacy accreditation service;
- if applicable, the expiry date of your online pharmacy's certification.

How we use your information. We use your information provided to fulfil our contract to provide you with requested products and services. Specifically ISBS uses such information for:

- domain name registration and related internet services; enabling sales and other transactions; processing payments and settlement; handling orders; providing receipts;
- providing customer service; providing dispute resolution, chargebacks, refunds, and/or related issues;
- investigating online pharmacy certification status where necessary;
- sending service update notices;
- recovering debt and collections; detecting and preventing fraud; detecting and preventing violations of our legal agreements and other agreements;
- measuring, improving, and customizing our services; and
- fulfilling other technical, logistical, financial, tax, legal, compliance, administrative, and/or back office functions.
- personalise the content you will see based on your personal characteristics or preferences
- ensure, as far as is practical, that the website is compatible with the browsers and operating systems used by the majority of visitors.

Where we obtain your freely given consent, we collect information for the following:

- marketing and surveys;
- notify you of relevant new products and features
- notify you of promotions

Public Whois Lookup Services

ISBS may also publish your data if you explicitly request the publication of your data in the public WHOIS or if this is a strict mandatory requirement of a Registry Operator based upon legitimate interest and you have agreed to this publication. This consent may be withdrawn by you at any time.

ISBS may also collect publically available information and credit checks from third parties to verify your identity; verify that your website has obtained online pharmacy certification from an accredited online pharmacy certifier; deter, detect, and prevent fraud and illegal activity; and make business decisions.; As part of our legal obligations ISBS retains such information for as long as reasonably required for business purposes or as reasonably required to comply with our legal obligations. We may also request and process additional personal data if required for the specific service you requested.

Transaction Information

ISBS collects information on each transaction conducted through our website. Such information may include the amount of the transaction; the services and products ordered; the identity of the seller, affiliate, and customer; payment type; currency; location; Internet Protocol address; and websites visited.

ISBS uses such information for refunds, for customer service, for website optimization, or for other administrative or business purposes.

Customer Service Communications

ISBS also collects information involving customer service teams. This information may include emails, internet chats, faxes, or telephone calls directed to our customer service centres. ISBS processes this information to provide customer service, handle complaints or disputes, measure and improve our customer service, detect and prevent fraud, and detect and prevent violations of our legal agreements. ISBS retains customer service information for as long as reasonably required for business purposes or as reasonably required to comply with our legal obligations.

If we record any calls for training purposes you will be advised at the time for your consent.

Cookies

This notice is designed to help you understand what cookies, web beacons and logs are how ISBS uses them and the choices you have in regards to their use. By continuing to use the website you are agreeing to our use of the cookies, web beacons and logs in the manner described below.

What are cookies?

Cookies are small files containing strings of text stored on your computer. ISBS uses cookies to authenticate you as a user when you log in, track your session, deliver content specific to your preferences and interests, store the contents of your shopping cart, provide features related to payment and customer service, and provide other functions.

What are Web Beacons?

Web beacons are objects embedded into web pages that allow us to determine whether and for how long users view web pages. We use web beacons for site traffic reporting, unique visitor counts, auditing and reporting, personalization, and other functions.

What are Logs?

Log information may include website requests, Internet Protocol address, operating system, browser type, browser language, date and time of your request, and cookies that may uniquely identify your browser. ISBS uses this information to enhance the functionality of the website and to make your access more convenient, secure, and efficient.

ISBS also uses information gathered from logs, cookies, and web beacons to monitor website performance; improve website design, functionality, and security; and assemble web analytics and activity trends. ISBS retains such information for as long as reasonably required for business purposes or as reasonably required to comply with our legal obligations.

How to Turn off Cookies

You may stop your browser from accepting cookies or web beacons. The Help portion of your browser should explain how to configure your browser's cookie handling. Your browser may have add-ons that may help you block web beacons. You may have limited functionality if you block cookies or web beacons set by our website.

Google AdWords

ISBS might use Google AdWords, a web analytics and search engine advertising campaign management service. Google AdWords uses cookies, web beacons, and other means to help ISBS analyse how users use the site. You may find Google's Privacy Policy at <http://www.google.com/intl/en/privacypolicy.html>.

Google Analytics

ISBS might use Google Analytics, a web analytics service. Google Analytics uses cookies, web beacons, and other means to help ISBS analyse how users use the site. You may find Google's Privacy Policy at <http://www.google.com/intl/en/privacypolicy.html>.

Opting out – Google Analytics

If you do not wish to have your data used by Google Analytics you can install the Google Analytics opt-out browser add-on. To opt-out of Analytics for the web visit Google Analytics opt-out page and install the add-on for your browser.

You can also opt-out of Google Analytics for Display Advertising and customise Google Display Networks using the Ads Settings.

Usage of Hotjar

Our websites use [Hotjar](#) web analytics service. Hotjar may record mouse clicks, mouse movements and scrolling activity. Hotjar collects information regarding pages visited, actions which are taken, country, device used, operating system, and browser used. Hotjar does not collect personally identifiable information that you do not voluntarily enter in this website. Hotjar does not track your browsing habits across web sites which do not use Hotjar services. For more information: <https://www.hotjar.com/>

5. CHILDREN

ISBS does not sell products to children. We do not knowingly collect, maintain, or use personal information from children.

6. CHOICE

If we are unable to rely on legitimate interests, fulfilment of a contract or any other ground set out in the GDPR or other applicable laws, to process your information we will seek your consent at the time of collection. At any time you may choose not to provide any personal information to ISBS, in which case we may be unable to provide services to you where the data is required by law or under the terms of the contract with you. Withdrawal of your consent won't affect any processing we have carried out prior to you withdrawing consent.

7. SHARING OF INFORMATION

ISBS only shares information as described in this Privacy Policy. ISBS shares information with the following categories of third parties. Such third parties are prohibited by law or by contract from processing personal information for purposes other than those disclosed in this Privacy Policy.

Organizations that Provide Services to Us

ISBS discloses personal information to other organizations that perform services on our behalf. We require third parties to respect the security of your personal data and to treat it in accordance with this Privacy Policy. We do not allow our third-

party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes detailed in this Privacy Policy and in accordance with our instructions.

Such organizations include financial institutions; payment processors; money transfer service providers; acquirers; auditors; background and credit check organizations; fraud prevention service providers and anti-fraud networks; marketing service providers; database managers; customer service providers and representatives; debt collectors; and others who perform technical, logistical, financial, tax, legal, compliance, or administrative functions on our behalf.

These organizations may perform functions such as processing credit and debit card payments, sending wire transfers, providing background and credit checks, providing background checks for online pharmacy certification, providing fraud checks, providing customer service, analyzing data, supplying marketing assistance, fulfilling orders, delivering packages, sending postal mail and email, debt collections, and providing other financial, technical, logistical, tax, legal, compliance, or administrative functions.

Financial institutions, payment processors, and acquirers may share the information that ISBS provides to them with other financial institutions or card networks in order to provide financial services, payment services, and to process payments. Fraud prevention service providers and anti-fraud networks may share the information ISBS discloses to them with other fraud prevention service providers and anti-fraud network participants in order to provide fraud checks.

Online Pharmacy Certification Organizations

ISBS may share personal information with an online pharmacy accreditation service to investigate and determine whether your website is a properly certified online pharmacy. These accreditation services include the Canadian International Pharmacy Association ("CIPA"), PharmacyChecker.com, Pharmacy Accreditation Services ("PAS") and Verified Internet Pharmacy Practice Sites (VIPPS).

Business Sale or Merger

ISBS may share information with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

Other

ISBS may disclose your personal information where:

- We may provide access to your data to other group companies affiliated with ourselves strictly for the purpose of providing you with a better service;
- We may forward your personal data to third-party service providers directly involved in the provision of our service to you, such as a registry operator of a Top Level Domain in which you have requested a registration (please review terms of registration applicable to each relevant TLD in order to determine the registry operator and its terms of registration). We are unable to influence the data requirements of such parties. Such transfers may require the transfer of your personal data to organizations and/or servers located outside the European Union and privacy laws may vary.
- If applicable, your personal data may be provided to operators of registration database (formerly whois) services and the users of such services if required and such provision and use is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, as permitted under Art. 6 I f) of the GDPR.
- To ensure business continuity, your personal data may be provided to escrow service providers as well as to backup storage providers.
- We may disclose your personal information to law enforcement agencies, to other government and/or civil authorities similarly authorized by applicable laws and regulations and to courts of appropriate jurisdiction if so required by law. To ensure data accuracy and to prevent abusive use of our services, we may use third-party verification service providers to check the data you have provided. To assess our business operations, we may also provide access to your data to our auditors.

- For support purposes, we may provide access to your personal data to providers of third-party support services but always where they are subject to adherence with this privacy policy.
- ISBS has reasonable grounds to believe that use or disclosure is necessary to protect the rights, privacy, property, and/or safety of our users or others;
- ISBS has reasonable grounds to believe that the information relates to the breach of an agreement or violation of the law that has been, is being, or is about to be committed;
- ISBS receives a complaint from a third party or through its own investigation believes that a website is operating as an online pharmacy, is on the NABP's list of Not Approved Sites and/or the website is not certified by an online pharmacy accreditation service;
- ISBS needs to investigate and determine whether an online pharmacy is on the NABP's list of Not Recommended Sites and/or is certified by an online pharmacy accreditation service;
- it is necessary for fraud protection, risk reduction, or the establishment or collection of funds owed to us;
- it is necessary to enforce or apply our legal agreements, to pursue remedies, or to limit damages to ISBS;
- the information is already public;
- you have provided consent or with your direction; or
- other reasons allow it or other laws require it.

When we are required or permitted to disclose information, we will not disclose more information than is necessary to fulfil the disclosure purpose. Where it is to third parties they must always comply with this privacy policy.

ISBS may disclose aggregate or statistical information to our business partners, for public relations purposes, or other purposes. In such cases no personal identifiable information will be shared.

8. MARKETING COMMUNICATIONS

If you have opted-in to receive marketing communications we may send you information about our products and services. You may log into the Profile Center and update your Preferences to stop receiving this information or by following the "unsubscribe" link found on the bottom of such communications. You may also opt out of ISBS's marketing list or update your information by notifying us at privacy@internet.bs at any time.

9. SECURITY

ISBS follows strict security procedures to protect your information. We work to protect your personal information during transmission by using Secure Sockets Layer software, which encrypts the information that you provide online at our website. We will use commercially reasonable efforts to protect your information. However the Internet is not a secure environment and we cannot guarantee the security of information you send to us via email, voip, or phone. We will also continue to assess new technology for protecting information and upgrade our information security systems when appropriate.

Further, we permit only authorized ISBS employees and third parties to access any personal information. If an employee misuses personal information, we may take disciplinary action, up to and including termination of employment. If any third party individual or organization misuses personal information, we will take action, up to and including termination of any agreement between ISBS and that individual or organization.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. DATA ACCURACY

ISBS processes personal information only for the purposes it was originally collected and in accordance with this Privacy Policy. ISBS takes commercially reasonable steps to ensure that the personal data is relevant, reliable for its intended use, accurate, complete, and current for the purposes for which it is used.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can update your personal information by logging in to our website.

11. DATA RETENTION

ISBS will only retain your personal data for as long as necessary to fulfil the purposes it was collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

12. YOUR RIGHTS

All information that ISBS has collected is available online in your account and you may access such information at any time by logging in to the website.

You are entitled to certain data subject rights which allow you to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to access information we hold about you and receive information about how we process it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us to protect your security and comply with our data accuracy policies.
- Request erasure of your personal data. You may request to delete or remove personal data where there is no good reasons for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in such limited circumstances as: where you wish to cancel all services and close your accounts; or where you need us to hold the data to establish, exercise or defend legal claims when we would normally delete or anonymise the data.
- Request the transfer of your personal data to you or to a third party. We will allow you to copy your information held by us. If you wish to transfer domain names to another registrar please login and go to the “Manage Transfers” tab on the website.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- Automated decision-making Other than the use of cookies, logs and web beacons, set out above which are automated on the website, we do not use automated profiling or decision making in providing you with services. We will not contact you solely as a result of visiting our website.

If you wish to exercise any of the rights set out above, please log in the Profile Center or contact us on privacy@internet.bs.

Further Information

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

13. ENFORCEMENT, DISPUTE RESOLUTION, AND VERIFICATION

Please contact us with any questions or concerns related to this Privacy Policy by using the address listed in the Contact section below. We will investigate and attempt to resolve complaints or disputes regarding personal information in accordance with this Privacy Policy.

14. CONTACT

If you have questions or concerns related to this Privacy Policy, you may contact us by email at privacy@internet.bs or by writing to us at:

From the Bahamas
Attn: Privacy Officer
Internet Domain Service BS Corp.
Ocean Centre
Montagu Foreshore
East Bay Street
Nassau
New Providence
The Bahamas
P.O. Box SS-19084