



## HOSTING SOLUTIONS

### PRIVACY STATEMENT

Your privacy is important to 3W Infra B.V. (“3W INFRA”), therefore 3W INFRA takes great care in handling the personal data of its customers in order to protect customer privacy. 3W INFRA believes you should know what information they collect from you, as well as how that information is used, disclosed, and protected. 3W INFRA has created this Privacy Statement to explain their privacy practices and policies. This statement does not cover data hosted, transmitted or processed on infrastructure leased from 3W INFRA by its customers. The customer leasing 3W INFRA infrastructure will be responsible for the personal data processing, acting as a data controller. If at any time 3W INFRA has access to personal data stored on infrastructure leased from 3W INFRA, 3W INFRA shall be the data processor, and any actions performed by 3W INFRA in relation to such data shall be solely governed by the agreement concluded between 3W INFRA’s customer and 3W INFRA.

3W INFRA will not sell or disclose your personal information to unaffiliated third parties without your consent except as otherwise provided in this statement or our General Terms and Conditions of Sale and Services, and Acceptable Use Policy.

By using 3W INFRA websites, products and services you agree and give consent to the terms set out in this Privacy Statement.

This Privacy Statement was most recently changed on 01 August 2020.

#### 3W INFRA MAY COLLECT YOUR DATA WHEN

- You order a product or service from 3W INFRA;
- You participate in a 3W INFRA survey;
- You subscribe to a 3W INFRA newsletter;
- You ask 3W INFRA for information about a 3W INFRA service, or contact 3W INFRA with a question, comment or complaint;
- You submit an abuse notification to 3W INFRA.

In addition, 3W INFRA may collect data about you from fraud-prevention agencies, referral partners, business directories and credit reference agencies.

3W INFRA does not intentionally collect information from children under the age of 16.

#### 3W INFRA MAY COLLECT THE FOLLOWING DATA ABOUT YOU

- Your name, (business/private) address, phone number, date of birth, email address, personal identification numbers (including but limited to social security number), documents and information that certify your identity;
- Your 3W INFRA account information – such as 3W INFRA products and services you ordered, your customer ID, service charges, and the use of 3W INFRA services;
- Your IP address when placing an online order through 3W INFRA’s website. At the moment of securely entering your personal details and payment information;



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- Your contact with 3W INFRA – such as a note or recording of a call you make to 3W INFRA, a chat record when you engage in a chat session with 3W INFRA, an email or letter you send to 3W INFRA or other records of any contact you have with 3W INFRA;
- Information about your payment methods, such as credit card number, bank account number or other banking information;
- Information provided by you to 3W INFRA when you notify 3W INFRA of a (suspected) breach of 3W INFRA's Acceptable Use Policy.

### **PAYMENT INFORMATION**

Your payment transaction may be processed by one of our third-party payment vendors: PayPal or Pay.nl. These vendors are payment providers who can process your payment on behalf of 3W INFRA.

### **3W INFRA MAY SHARE DATA ABOUT YOU WITH**

- Partners or agents involved in delivering the services you've ordered with 3W INFRA;
- Debt collection agencies or other debt recovery organizations;
- Law enforcement agencies, regulatory organizations, courts or other public authorities to the extent required by law;
- A 3W INFRA customer, if you notify 3W INFRA that this customer use of 3W INFRA services violates the 3W INFRA's Acceptable Use Policy or applicable law;
- A third party that has claimed that your use of the 3W INFRA services violates the 3W INFRA's Acceptable Use Policy or applicable law (to the extent such sharing is required by law).

### **3W INFRA MAY PROCESS YOUR DATA FOR THE FOLLOWING PURPOSES:**

- Processing of orders and provision of products and services;
- Conducting market research, conducting retention and customer satisfaction surveys, conducting marketing (including social media) and sales activities;
- Communicating with customers to provide information about services of 3W INFRA and affiliated companies, to provide information about offers, orders, provision of services, order status and payment, to provide support and maintenance services, to handle complaints, and to answer questions from (potential) customers;
- Performing financial processes (including calculating, invoicing and collection of service charges), processing financial transactions regarding the acceptance of orders, checking solvency and granting debt collection rights to third parties;
- Investigating and processing suspected violations of 3W INFRA's Acceptable Use Policy;
- Ensuring the security of persons, goods, objects, and performing fraud detection;
- Conducting legal processes, including conducting legal proceedings, and collecting evidence for civil legal proceedings;



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- Complying with statutory obligations, including the provision of data to authorized authorities in the context of criminal investigations, complying with (applicable) data retention obligations, and the provision to third parties of data concerning customers in connection with an infringement of these third parties' rights.

### COOKIES AND SIMILAR TECHNOLOGIES

A cookie is a small amount of information that our websites can store on your computer or any other device used. Your device provides this cookie when visiting the same website in the future. Cookies are used to enhance your experience with a website.

3W INFRA uses cookies to identify visitors and track visits to their websites, store login session information and remember your user preferences.

Visitors can disable the storage of cookies in their web browser, but should be aware that doing so may affect the quality of the experience with a website.

### WHERE DOES 3W INFRA STORE YOUR PERSONAL DATA

Personal data collected by 3W INFRA is stored and processed in a data center in Amsterdam, the Netherlands, being its primary and only location. Personal data collected by affiliates, service providers or payment providers of 3W INFRA may be stored and processed in any other country where they maintain facilities.

### HOW TO ACCESS AND CONTROL YOUR PERSONAL DATA

You can view and edit part of your personally identifiable information by logging into the 3W INFRA Client Area (<https://www.3winfra.com/clientarea.php>).

If you cannot access certain personal data collected by 3W INFRA via the link above or directly through the 3W INFRA services you use, you can always contact 3W INFRA using the contact details listed below this statement. 3W INFRA will respond to requests to access (make available) or delete your personal data within 5 business days.

You can choose whether you do not wish to receive promotional communications from 3W INFRA by email, physical mail and telephone, or marketing communications (e.g., news and updates) from 3W INFRA. You can exercise that right at any time by contacting [info@3winfra.com](mailto:info@3winfra.com).

### SECURITY AND SAFETY FEATURES

3W INFRA is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to enable protecting your personal data from unauthorized access, use or disclosure. E.g., we store the personal data you provide on computer systems that have limited access and are in controlled facilities. When we transmit highly confidential data (such as a credit card number or password) over the Internet, we protect it through the use of encryption.



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3W INFRA is ISO/IEC 27001:2013 certified for Information Security Management and compliant with Payment Card Industry Data Security Standard (PCI DSS). These certifications help 3W INFRA ensure that they have enterprise-grade controls in place to protect customer information and payment data.

### WI-FI CONNECTION

On-premises, you have the option to access 3W INFRA's Wi-Fi network, which is made available to customers and other visitors. The network is secure, but nonetheless the user should be careful using this network to do something online that requires sensitive or personal data, such as making a banking transaction or a purchase.

A username and password may be provided to you in order to access this Wi-Fi network. You can also save this sign-in information so you do not have to sign in each time you wish to use the Wi-Fi network.

3W INFRA uses the information related to the Wi-Fi connection to store login session information.

### CHANGES TO THIS PRIVACY STATEMENT

3W INFRA will update this Privacy Statement when necessary to reflect customer feedback and changes in their products and services, or if changes in the law so require. Changes to this statement will be made at 3W INFRA's sole discretion. When they post changes to this Privacy Statement, 3W INFRA will revise the "recently changed" date in introduction of the statement above and describe the changes in the announcement which is also made available on their website. If there are changes to the statement or in how 3W INFRA will use your personal data, they will notify you by sending you an announcement. 3W INFRA encourages you to periodically review this Privacy Statement to learn how it is protecting your data.

### HOW TO CONTACT US

Based on the principal place of business, 3W INFRA falls under the supervision of the Dutch Data Protection Authority (Dutch DPA). To learn more about or to contact the Dutch DPA, please visit <https://autoriteitpersoonsgegevens.nl>.

If you have a privacy concern, complaint, or question for the Data Protection Officer of 3W INFRA, please contact the DPO by sending an email to [info@3winfra.com](mailto:info@3winfra.com). The DPO will respond to the questions or concerns within 5 business days.

Unless otherwise stated, 3W INFRA is a data controller for personal data it collects through the products and services it provides. 3W INFRA's address is: 3W Infra B.V., Capronilaan 2, 1119 NR, Schiphol-Rijk, the Netherlands. Email: [info@3winfra.com](mailto:info@3winfra.com). Telephone: +31 (0) 20 894 33 44.

Company Data Protection Officer: Ersin Findik

To learn more about 3W INFRA, please visit <https://www.3winfra.com/>.