

DATA PRIVACY TRANSPARENCY STATEMENT

PAIR NETWORKS, INC. D/B/A PAIR

Effective Date: May 3, 2023

Pair Networks, Inc. d/b/a pair Networks has prepared this data privacy transparency statement (this “**Transparency Statement**”) (collectively, “**we**”, “**our**” and/or “**Pair**”), to provide our customers, their employees, and any affected data subjects important information about the personal data we collect, receive, transfer, and process in the course of providing our services as a Web host and Website Distributor (our “**Web Hosting Services**”).

In this Transparency Statement, you will find information about the types of personal data we collect regarding you as the owner of a registered Pair user account through which you may host and distribute content through Pair’s Web Hosting Services (an “**Account Owner**”), (collectively, “**you**”, “**your**”), how and why we process such personal data, with whom we may share such information, as well as how we protect your information. We do not control you, and your users’, Website Information (as defined below), and our responsibilities and liabilities with respect to such Website Information is strictly limited to our commitment to comply with our obligations as data processor in accordance with your instructions as data controllers with respect to such Website Information and our specific services as a website hosting services provider.

In this Transparency Statement, we also describe the processes by which you may contact us in order to exercise your rights, in accordance with applicable law, to: (1) access, correct, restrict, or delete your personal data; (2) object to the processing of certain aspects of your personal data; and (3) ask any questions you may have about our privacy practices. Please take note as well of those practices described in this Transparency Statement specifically stated to be necessary and/or integral, to the performance of our Web Hosting Services. Where specifically noted below, exercising your rights as described herein may affect our ability to continue performing Web Hosting Services as requested.

This Transparency Statement may be updated and/or otherwise revised periodically to reflect changes in our data processing practices and/or policies. We will post notices of all such changes on our applicable websites and/or materials and the “Effective Date” noted above will indicate when this Transparency Statement was most recently revised. Except as may be otherwise required under applicable law, revisions to this Transparency Statement will be effective on the Effective Date noted without any other notice or approval by you. In certain jurisdictions, applicable law may require additional processes and procedures, in which case, revisions to this Transparency Statement will not be effective until we have met our obligations accordingly.

1. **Data Controller; Data Processor**

For purposes of the European Union General Data Protection Regulation (the “**GDPR**”), Pair Networks, Inc. d/b/a Pair is the data controller (the “**Data Controller**”) for the processing of all Personal Data, except for “Website Information”, as set forth herein. With respect to personal data included in Website Information, our customer, the website operator, is the “data controller” and we process Website Information solely as the data processor on behalf of such website operator.

You may contact us as follows:

COO
Pair Networks, Inc.
2403 Sidney Street, Suite 210
Pittsburgh, Pennsylvania 15203
United States of America

Phone: 412 381-7247
Email: privacycompliance@pair.com
Website: pair.com

2. **Personal Data & Special Categories of Data** - For the purpose of providing Web Hosting Services, we collect the types of personal information described below about you (as further detailed below, "Personal Data").
 - a. **Personal Information** – We collect personal contact information about Account Owner and, where relevant, alternate contacts for Technical and Billing contacts (as described below), including without limitation name, organizational affiliation (for Professional Accounts), VAT id, mailing address, phone numbers, and email addresses.
 - b. **Payment and Billing Information** – We process payment information through a third-party service provider called a secure payment processor. Anytime you are asked to provide payment card information for payment to Pair, you are actually entering your payment card information directly to our payment processor's systems. We enter into written contracts with our payment processors pursuant to which they are obligated to process your payment card information securely in accordance with the Payment Card Industry Data Security Standard ("PCI-DSS"), an information security standard for organizations that handle branded credit cards from major credit card brands. We do not collect, store or otherwise process your payment card information on our systems except for the limited, redacted information described below. As of the Effective Date first noted above, our secure payment processor is Stripe. You should review information about Stripe's data handling policies and terms of service, available from their website (<https://stripe.com/us/privacy>).
 - c. **Account Information** – We collect certain account information about our Account Owners and other users with whom we may interact, including without limitation: user name, password, domain, IP Address, browser user agent, Web Hosting Services subscriptions under a given account, the email headers (including IP address) of messages that you choose to send to us, and history of correspondence between you and Pair. For purposes of utilizing Account Owner informational dashboards, we generate a unique identifier that is provided to Pendo (please see disclosures regarding Pendo below). This includes account information we receive from third-parties when you access our content hosted by them, such as webinars.
 - d. **Website Information** – We are in the business of providing hosting services for our customers' websites ("Customer Websites"). Our customers are the website operators and data controllers with respect to the respective Customer Websites they choose to host with us, and with respect to such Customer Websites and the data our customers and their website users transmit, collect, store, and otherwise process through such Customer Websites, including without limitation any personal data ("Website Information"), we act solely as data processors for our website operator/customers, processing such Website Information solely as necessary to provide hosting services for Customer Websites. We do not access or process Website Information for our own purposes, other than to provide such hosting services, and we do not control, nor are we responsible or liable for, any act or omission by our customers for Website Information processed through Customer Websites. Users should refer specifically to data privacy statements and terms of use for Customer Websites for information about how the respective website operators of such Customer Websites process Website Information, including personal data, and comply with applicable law.
 - e. **Special Categories of Data** – We do not collect or otherwise process any special categories of data as defined under the GDPR in a personally identifiable way. If any special categories of data are collected or processed by our customers through Customer Websites, we do not control, nor are we responsible or liable for, any act or omission by our customers for any special category of data processed through Customer Websites. Users of Customer Websites should refer specifically to data privacy statements and terms of use for Customer Websites for information about how the respective website operators of such Customer Websites process any special categories of data, and comply with applicable law.
3. **How We Obtain Personal Data** – We collect Personal Data from data subjects or from Account Owners through Pair websites, your interactions with Pair websites, and other information you provide directly to us, including by email or in conversation with our staff.

4. **Personal Data Processing and Data Retention** – We use Personal Data that we collect hereunder as necessary to provide Web Hosting Services. Subject always to your rights as set forth in Section 8 below:

a. Pair Owner Accounts – In order for you to use Web Hosting Services, we require you to register an Owner Account through Pair websites. During the signup process, you will be prompted to set up a user name and password for account login purposes and personal contact information as follows: Name, Organization (for Professional Accounts), Physical Address, Phone Number and Email Address (as further detailed above, “**Account Information**”). Your login information is necessary to protect your vital interests as it enables you to secure your own Owner Account and establish your identity with Pair for purposes of transactions in the course of using our Web Hosting Services. Your Account Information is necessary for the performance of Web Hosting Services as we use Account Information to contact you regarding your Owner Account, contact you regarding Web Hosting Services, issue notices and alerts about the status of the Web Hosting Services, billing, invoices, collections, provide you with information through your account dashboard, etc.

b. Accounting and Billing – As noted above, your payment card information is collected, stored and processed primarily by our secure payment processor, subject to their terms and conditions of service, privacy policy and data security policies. Pair can access only expiration date, and the first and last 4 digits of your payment card account number. Generally, we may use Personal Data for our own administrative, accounting, and business needs including billing, invoicing, internal accounting and record-keeping requirements as well as other related administrative and business purposes. Certain processing is undertaken as necessary to complete a contract for services (collecting payments, making payments for authorized transactions, payment for services rendered, etc.). In other instances, our processing of Personal Data as described in this paragraph is required for us to fulfill legal obligations to which we are subject (e.g., record keeping mandated by applicable law).

c. Service Notices – We send service-related notices, alerts and other messages to the email address(es) indicated in your Owner Account regarding account registration, account set up, billing and other service related communications. We use your Personal Data to send you such service-related messages as a necessary, and integral, part of our Web Hosting Services.

d. Support and Customer Service – When you contact us for technical support or customer service, we will process Personal Data that you provide at such time to associate you with the Web Hosting Services that is the subject of your request and the Owner Account that is associated with such Web Hosting Service. Such Personal Data includes email address, name, account numbers, and email headers (including IP address). You may contact us and provide Personal Data for such technical support and/or customer service by email, phone call, self-serve online support portals through websites operated by, or on behalf of, Pair. We use such Personal Data as necessary to respond to your request and/or provide the requested technical support and/or customer service, including without limitation communicating with you, internal communications, maintaining a history of correspondence, service tickets, outcomes, outstanding issues, etc. Our processing of Personal Data as described in this Section is also in furtherance of legitimate interests, including without limitation management reporting, quality assurance, reviewing historical support issues and requests for support or customer service, and to verify identity. We will process Personal Data in furtherance of this legitimate interest only when that is not overridden by your data protection rights under applicable law.

e. Helpdesk – We use a proprietary ticketing system developed in-house to manage customer requests and customer service communications and send customer support and customer service messages to the email address(es) indicated in your Owner Account.

f. System Security and Data Privacy Protection – We monitor information on user activity within our system in order to protect the security of our systems and the privacy of our customers, for example, as an investigatory tool in case of a dispute or an unauthorized hack. Such information includes information reported by your browser, Account Information when you login, IP addresses, User Agent, account activity and usage levels to better assist with service delivery

and/or security. We process this data because it is necessary to protect the vital interests of our customers, audience, users and other visitors to our website. Additionally, we process this information to protect our legitimate interests of process improvement, system security and protecting our customers, audience, users and other visitors to our website in a manner that, given the limited nature of the data processed as described above, is not overridden by the interests or fundamental rights and freedoms of the data subjects.

g. Compliance with Legal Obligations – In addition to processing Personal Data for the purposes of providing Web Hosting Services, we process Personal Data collected hereunder and Website Information to comply with our own legal and regulatory obligations. For example, we may process personal information to comply with: applicable international sanctions, “know your customer”, anti-money laundering regulations, anti-bribery compliance requirements, record keeping requirements, required public filings, reporting requirements, court order, law enforcement order, and other legal and/or regulatory requirements.

h. Legitimate Interests – We may also use Personal Data collected hereunder in circumstances other than as expressly described above in connection with the services we provide; provided, however that any such additional processing may only occur when there is a legitimate interest to do so that is not overridden by your data protection rights as required by applicable law. The types of processing/uses contemplated hereunder may include, without limitation, for our own administrative and business needs (tracking time, billing, invoicing, collection), audits and self-assessments for compliance with applicable laws, regulations, court order, law enforcement order, and applicable workplace policies, and for information technology purposes including without limitation trouble shooting, business continuity, disaster recover, data backup and recovery.

i. Data Retention – We generally retain Personal Data for the periods specified applicable law, regulation, and/or court order, and in our document retention/filing polices, currently set at seven (7) years. We may also retain Personal Data for longer periods where there is a reasonable basis for retaining such data, including without limitation in connection with the establishment, exercise or defense of legal claims. We retain Web Hosting account information for a period of six (6) months after account closure due to an automated suspension process for nonpayment but credit card information is not retained by our third-party processor after account closure.

5. **Optional Data Processing.** In addition to processing Personal Data in the ways set forth above for purposes related to the provision of Web Hosting Services, you may also choose to allow us to use certain Personal Data as detailed below. The types of data processing described in this Section 5 are not necessary or integral to the performance of Web Hosting Services and we will not use Personal Data for such optional purposes except as expressly set forth in this Section 5:

- a. **Information Requested** – If you request information about our company, our affiliates, or our respective products and services, you may elect to provide personal contact information such as your name, your email address, your phone number, your company affiliation, and/or your mailing address. We may use your information to respond to your request.
- b. **Opt-In Subscription or Mailing Lists** – From time to time we may offer you the option of signing up, or having us sign you up, for various subscription and/or mailing lists used to send communications from our company for purposes of keeping investors, customers, and other registered recipients updated with respect to investor relations information about our company, news and developments, our company’s products and services, and other communications about our company and our affiliates (“**Updates**”). In order to register you on such subscription and/or mailing lists, we will ask for your name and email address. If you provide your personal information specifically to subscribe to a particular Update (e.g., our Investor Relations Newsletter), we will use the personal information you provide specifically to send you the requested Updates. In other cases, we will specifically ask for your consent to use such information on an opt-in basis; provided, you acknowledge that where particular uses of opt-in information are necessary to our performance of related Domain Name Services, we may not be able to continue performing the affected Web Hosting Service if you exercise your right to refuse, or later withdraw, your consent.

6. **Onward Transfers – Data We Exchange With Others.** We will not sell, share, transfer, disclose, rent, use, or distribute Personal Data hereunder for purposes other than as set forth in this Transparency Statement, unless required by law or as expressly authorized by a data controller as described above.
- a. **Updates** – We send Updates to the email address(es) provided at the time you subscribed and/or otherwise opted-onto various subscription lists for Updates using an email service provider called MailChimp. Information about MailChimp’s data handling policies are available from their website (Mailchimp Privacy FAQs: <https://eepurl.com/hL3y0v>). We also use a marketing automation platform called ActiveCampaign to process and manage our marketing outreach so that we can tailor Updates to you. ActiveCampaign may collect contact data such as email address, which are used only to provide its services.
 - b. **Weebly (Provision of Services)** – With every web hosting account registered with us, Pair offers a website builder tool from a third-party called “Weebly” at no additional charge to customers. We do not transmit your personal information to Weebly. Instead, upon successful registration of a web hosting account with us, Pair shares the domain name for Customer Websites hosted under such web hosting account with Weebly, along with a unique, special purpose “@weeb.pairdomains.com” or “@weeb.mypair.com” email address that is not personally identifiable to any actual person by anyone other than Pair. Any email that Weebly would like to send to you is sent to this special purpose email address, directed to Pair’s email servers. This address only accepts email sent from Weebly (all other senders are rejected.) Whenever we receive mail sent to that address, we scrub it for spam and viruses and then forward it to the real email address that we have for you as reflected in Account Information. In this manner, Weebly never has access to your name or your real email address, but is able to communicate with you about their service. You acknowledge that Weebly needs to have a way to communicate with you about your use of their website builder tool in order for you to be able to continue using their services. You should review information about Weebly’s data handling policies and terms of service, available from their website (<https://weebly.com/privacy>).
 - c. **Extendify (Provision of Services & Performance of Contract)** – We offer a WordPress design and formatting tool from a third-party called “Extendify” for an additional fee. If you choose to use the Extendify tool on your website, your user name and password will be used for purposes of authenticating you as an authorized Extendify user though Pair to enable you to use the Extendify tool. You should review information about Extendify’s data handling policies and terms of service, available from their website (<https://extendify.com/privacy-policy/>).
 - d. **ShopSite (Provision of Services)** – We offer online commerce through the third-party ecommerce platform ShopSite. If you choose to use ShopSite to power ecommerce functionality on your website, after you have chosen to purchase ShopSite’s services, we will forward your designated domain names and hosting account user name (or such other user name as you may designate) to ShopSite to help establish your ShopSite store administration account, and your login for such account. You should review information about ShopSite’s data handling policies and terms of service, available from their website (<https://help.shopsite.com/help/ShopSitePrivacyPolicy.html>).
 - e. **Sectigo (Provision of Services & Performance of Contract)** – Pair offers secure certificates (SSL certificates) for online commerce through the third-party provider Sectigo. If you choose to obtain digital certificates through Sectigo, depending on what level of digital certification you are seeking from Sectigo, Sectigo will require you to provide varying levels of information for Sectigo. You will be requested to complete a form with the information required by Sectigo, depending on the extent of validation required for the type of digital certificate you wish to purchase. Once you have completed such form, we will forward all such information to Sectigo for processing. You should review information about Sectigo’s data handling policies and terms of service, available from their website (<https://sectigo.com/privacy-policy>).
 - f. **Pendo (Provision of Service)** – We use a third-party service provider, Pendo, for dashboard services which allow us to provide an optimized customer experience for Account Owners. Pendo may collect your IP address, timestamps, and the unique identifier we assign to you when you

create your Pair account. You should review information about Pendo's data handling policies, available from their website (<https://www.pendo.io/legal/privacy-policy/>).

- g. **Crowdcast (Third-Party Collection)** – We use a third-party service provider, Crowdcast, to host our webinars. You may choose to follow our channel on Crowdcast to receive updates when we post new content. If you choose to receive updates, Crowdcast may collect your email address or you may sign up by linking to a social media account. You should review information about Crowdcast's data handling policies, available from their website (<https://www.crowdcast.io/privacy-policy>).
- h. **Service Providers** – We may provide Web Hosting Services, or otherwise process Personal Data or Website Information as detailed above, using third-party service providers we have retained to support us. Such service providers include, without limitation, those who assist us in providing information technology services, backing up of Personal Data or Website Information, billing services, back office support, and other similar services. These entities may be located inside, or outside, the European Economic Area. We take steps to require that such service providers protect Personal Data transferred to them in a manner that is consistent with this Transparency Statement and our commitments as data processors with respect to Website Information. The information shared with each is limited only to that information required for that entity to fulfil its role in assisting us with the performance of the actions described above. Where we have knowledge that a service provider processes your Personal Data or Website Information in a manner contrary to this Transparency Statement or our commitments as data processors with respect to Website Information, we will take reasonable steps to prevent or stop such processing. Where applicable law requires us to obtain your consent to use such third party service providers, you acknowledge that refusal to provide your consent, or withdrawal of your consent, may affect or prevent our ability to provide Web Hosting Services, and that our engagement may need to be terminated for lack of such consent.
- i. **Exigent Circumstances** – In addition to the disclosures set forth above, we will disclose Personal Data about you: (1) if we are required to do so by law or legal process, (2) to law enforcement authorities, judiciary or other government officials, (3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss in connection with an investigation of suspected or actual illegal activity; or (4) if necessary to protect the vital interests of any person. Generally, in the past such requests have been directed and targeted with respect to specific customers, and not general requests to disclose Personal Data of a broad range of our customers.

7. Transfer of Personal Data Outside of the EEA.

- a. **Pair is Headquartered in the United States** – Pair processes Personal Data and Website Information as described above in our home country, the United States of America. The United States of America is a country outside of the EEA (a “**third-country**”) that is not the subject to a European Commission finding of adequacy (the European Commission has not found that U.S. laws ensure an adequate level of protection for personal data with reference to the GDPR). When applicable, we process Personal Data in the U.S. on the basis of your consent and/or applicable Standard Contractual Clauses concluded between Pair and our customer.
- b. **Transfers to Other Third-Country Legal or Natural Persons** – Personal Data and Website Information may be shared with other third-country legal or natural persons (either Data Controllers, or service providers under contract to us or to a Data Controller) for the purposes described in this Transparency Statement. When required by GDPR, we may transfer Personal Data to such third-country legal or natural persons for the limited and specific purpose of providing Web Hosting Services as evidenced by: (1) standard contractual clauses for data protection which have been approved as the basis for transfers of Personal Data to third-countries by the European Commission; (2) binding corporate rules or codes of conduct approved under the terms of the GDPR; or (3) the fact that the European Commission has issued a finding of adequacy with respect to privacy laws in such third country transferee's jurisdiction. For further information, including to obtain a copy of the applicable documents used to protect your information as set forth above, please contact us as described above.

8. **Your Rights and Options** – If we receive a demand from you with respect to your rights of access or rectification, we will refer your demand to the applicable Data Controllers and assist such Data Controllers, to provide you, where appropriate, with access to your Personal Data and, as applicable, with the ability to review and correct inaccuracies, delete Personal Data that is no longer necessary or relevant, receive a copy of your Personal Data in a structured machine-readable format, and otherwise fulfill your demands on the Data Controller(s) to the extent based on the exercise of rights held by you under applicable laws.
 - a. If we receive a demand from you with respect to your rights of erasure, restriction of processing and/or right to object to processing, access or rectification, we will refer your demand to the applicable Data Controllers and assist such Data Controllers to respect your requests, where appropriate. In the event that you inform us in writing that you wish to opt-out of future processing of your Personal Data we will work with the applicable Data Controllers to respect your request. Where we rely solely on your consent, you may withdraw it at any time; subject to the limitations and disclosures set forth above regard the effect such demands or withdrawals may have on our ability to continue providing the Web Hosting Services in the manner for which we have been engaged.
 - b. You may also object to processing that is described above as being based on our legitimate interests alone. In such instances, our business interests must be found to be compelling and to not jeopardize your individual rights before further processing may continue.
 - c. In order to meet our obligations under applicable law, we may take reasonable steps to verify your identity before responding to demands as set forth in this Section 8.
9. **Complaints, Concerns, Recourse** – If you have unresolved concerns about the processing of your Personal Data, you may have the right to complain to a data protection authority where you reside, where you work or where you believe there has been an infringement of data protection laws, all in accordance with, and subject to, applicable local law.
10. **In-House Mechanism to Address Complaints** – In the event you believe Pair has failed to protect your privacy please immediately submit your concerns to our COO at: privacycompliance@pair.com Please provide details regarding your concerns and include full contact information so we can respond as quickly and completely as possible. If you are dissatisfied with the speed or scope of our response you can seek further in-house review by following the appeal procedures that will be provided to you.
11. **Tracking and Traffic Data.**
 - a. In addition to Personal Data that we collect hereunder, we may, through our website, collect data generated automatically by traffic our website (“**Traffic Data**”). Traffic Data may include, without limitation, internet protocol address(es), operating system(s) and browser specifics of your device, device characteristics, geographic (geo-location) information, user ID(s), clickstream data, and specifics regarding your interactions with (i.e., the path you take through) the website. Traffic Data may also include your mobile device information (e.g., device model, operating system version, device date and time, unique device identifiers, mobile network information) and how you use the website. These types of information do not generally identify or relate to you as an individual; however we may associate these types of information with you as an individual.
 - b. Our website may require you to accept session “cookies” to provide customer experience and efficiencies such as enabling you to login, personalizing your experience, and/or automatically filling in standard information on return visits. “Cookies” are small pieces of information that are stored locally on your device by your browser and passed back to the server whenever a request for a new page on the site is made. The session cookie is never saved or written to disk. It is discarded when the browser exits, when you log out of the website, or when you have not visited a page on the website for a given period of time, for example sixty (60) minutes. Most web browsers automatically accept session cookies, but most browsers also allow you to configure your web browser to refuse them or to notify you before a cookie is set. You also can manually view (and delete) any cookies stored on your computer. If you do not allow session cookies to be

set, you may not be able to use our website, access the full content otherwise available through our website and/or use the full features and functionality of our website.

- c. Our website may use Google Analytics, a web analytics service provided by Google, Inc. (“**Google**”). Google Analytics uses “cookies” to help the website analyze how users use and view the website. Any information generated by the cookie about your use of our website (including your IP address, and particulars about your browser and configuration as reported by your browser) may be transmitted to and stored by Google on servers in the United States. Please note any information collected by Google Analytics cookies do not include personalized identification information (such as names, e-mail addresses, and payment information). Google may use the information collected for the purpose of enabling us to evaluate your use of our website, certain aspects of your user experience thereon, compiling reports on activity for us and providing other services relating to our website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. More information on the Google Analytics cookies are available from Google at <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

12. **Do Not Track** – Do Not Track (DNT) is a privacy preference that you can set in certain web browsers. When you turn on DNT, the browser may send a signal or other message to web services requesting that they not track you. At this time, our information collection practices will continue to apply as described in this Transparency Statement, regardless of any DNT signals that are sent by certain browsers or selected by you. For more information about DNT, please visit AllAboutDNT.org.

HOW TO CONTACT US

In order to exercise your rights hereunder, if you have any questions about this Transparency Statement and/or our processing of Personal Data, you may contact us in accordance with the information set forth in Section 1 above.