

# Privacy Policy

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By using our services you leave data behind, which may contain personal data. We save this data when its directly submitted by you or when its been clearly stated that the submitted data will be provided to us. We consider the handling of personal data of great importance, therefore we process and secure this data with great care. In this Privacy Policy we describe which (categories of) personal data we collect, for which purpose we use them, and with which (categories of) parties involved and recipients we share this data.

When processing your data we adhere to the General Data Protection Regulation (GDPR) and although you can use our services as a corporate entity, please note that corporate data does not fall under the General Data Protection Regulation (GDPR). This policy is therefore primarily intended for those who use our services as a private individual.

The last changes to this Privacy Policy were made on 17-05-2018.

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## **1. Collection of personal data**

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To use any of our products and services you will need to register for an account first. After registration we save any personal data provided by you and tie them to an internal customer ID. We save these details for billing purposes, to be able to deliver a service (registering a domain name for example) and to provide support when needed.

### **1.1. Creating an account**

We collect the following information when you complete your registration with PCExtreme:

- First and last name, so we know who we're doing business with
- Email address, so we can contact you by email when needed
- Phone number, so we can contact you by phone when needed

- Primary address, so we can contact you by post when needed
- Billing address, in case you'd like us to send our invoices to a different address
- Billing details, given to us by our payment provider so we know your services have been paid for
- IP address used to register or to place an order, used to combat fraud/abuse if applicable

## **1.2. Contacting us**

We collect the following information when you contact us by email:

- Your email address
- The information provided by you in the email

We collect the following information when you contact us by phone:

- Your phone number
- Recording of the conversation

## **2. Usage of personal data**

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The information that we collect is used for various purposes. Below we describe how we use your data and for what purposes.

### **2.1. Customer service**

Whenever you contact us by using our contact form or when you contact us by email, your submitted information will be saved and archived in our secured self hosted ticket system. Firstly we do this so we can answer and process your request, and secondly to be able to properly help you in the future.

Aside from contacting us by email, you also have the possibility to contact us by phone. Whenever you do so, your telephone number and your name (if known to us) shows up in our internal communication tool (Slack). This allows to quickly see who has called and whoever we may need to call back.

After a support request has been finalized, whether that is by email or phone, we send you a message asking to rate our service level. Responses are archived in our self hosted survey system and are used for evaluation purposes.

### **Recording of phone calls**

When calling our service number, each conversation is recorded. On the one hand we do this for training purposes, and on the other hand to help assist with disputes.

### **Restoring account access**

If you no longer have access to your account with the e-mail address known to us, we ask you to provide the following information in order to restore access to your account:

#### *individual*

- Proof of identification (copy of passport, driving license or identification card)

#### *business*

- Digitally certified extract Chamber of Commerce (not older than 3 months)
- Copy of identification of an independent competent director, or all joint competence directors

After we have used these documents to restore access to your account, these will be removed by us.

## **2.2. Third party verification**

With the help of third parties we may verify certain information, such as your address and your phone number when you disclose your personal data with us.

After creating an account with us, we ask for your primary address and an optional billing address. When an address is entered in either fields, we automatically check whether the address is valid by using the Google Maps API.

In some situations we may also verify your phone number. This is done by sending you a text message with a code, which you can enter inside our control panel. For this we use a third party called Messagebird, who we provide your phone number.

### **2.3. Delivering a service**

Some of the services that we provide require your personal information, such as domain names and SSL certificates.

For the creation of a domain name, we collect and use at least the following personal information:

- First & last name
- Gender
- Primary address
- Phone number
- Email address

For the creation of an SSL certificate (excluding Let's Encrypt certificates), we collect and use the following personal information:

- Company name or first and last name
- Company address or personal address
- Email address

In order to create domain names and SSL certificates, we forward the details provided by you to our supplier for these products. Once forwarded, they will finalize the actual registration with the organizations in question: domain name registries and certificate authorities.

### **2.4. Billing**

In order to keep providing our services for many years to come, we have to charge for the usage of them. To be able to do this we create an invoice which contains personal data. All invoices that we create are archived for seven years in order to comply with Dutch tax laws. Additionally we use Multisafepay as our payment gateway. While we do not actively share any personal data with them, they do acquire your name, bank

account number, or credit card information when you make a payment to us.

We also might share personal data with our collection agency (DAS Incasso) when an invoice is past its due date. If no payment has been made after several reminders, the collection agency takes over. When the requirements are met, DAS Incasso receives the following information from us:

- First and last name
- Primary address or billing address
- Invoices that we sent
- Communication that we sent

## **2.5. Data center access**

If you use our colocation services then we provide a way to access the data center so you can maintain your hardware. In order to be granted access, a request has to be made from within our control panel. For the request to be accepted we forward the following information to our data center supplier:

- First and last name

## **2.6. Spam filtering**

In order to deflect unwanted email such as spam from your inbox and to prevent outgoing spam message being sent from our platform, we make use of a self hosted spam filter from SpamExperts. This system scans ingoing and outgoing email and filters them accordingly on malicious content.

When you as a user manually marks a message as spam, then this is shared with the supplier of the spam filter to increase the effectiveness of the filter.

## **2.7. Sending quotations**

When contacting our sales department for more information regarding our Managed services, we may send you a quotation by the use of third party software.

A quotation may include the following personal information:

- First and last name
- Primary address
- Email address

- Online signature

## **2.8. External communication**

When using our services, we like to keep you up to date regarding the service(s) you have running, inform you of news about PCextreme that we think you shouldn't miss and how you can get the most out of your products.

### **Emails about your product**

These emails come with the services you are using and generally include helpful information. Whether your traffic limits are almost reached or when an interruption of service occurs, we may email you about it.

### **Newsletter**

We offer a newsletter for those that are interested in what we're up to. The email address that you provide when you place an order or register a PCextreme account is not automatically added to our list of subscribers. You can, however, subscribe and unsubscribe at any given time.

### **Product related communication**

We offer the possibility to subscribe to a mailing list for those interested in deals, complementing services and promotions. Your email address is not automatically added to this list so we only send these emails with your consent. You can subscribe unsubscribe from this list at any given time.

The software we use to send Product Related Communication is called ActiveCampaign, which we supply the following information:

- Your first name
- A placeholder PCextreme email address
- Product count

Emails sent with ActiveCampaign are sent to this email address, which we forward to your real email address.

## **2.9. Internal communication**

Internally we use various tools to communicate and keep track of our progress for certain projects. We try to use email as much as possible when sharing personal information internally, however, this may not always be the case.

### **Slack**

We use Slack in order to communicate in an efficient way between the offices that we have. There are cases where personal information is shared internally with the use of this tool. Also, integrations with other data sources are used within Slack. The only integration that involves personal information is the one referenced to in point 2.1. Customer Service, stating we keep a log of all incoming calls.

## **2.10. Error reporting**

It could happen that you encounter an error when browsing our websites. When this happens, an automated report is sent to an external tool to help our developers in fixing the error. These reports may contain your IP address and email address, which help in establishing a connection between the report and error message.

For example, when a failed log in attempt is detected, a report is created to aid our developers in tracing the source of the problem.

## **2.11. Fraud and abuse**

In case there is suspicion or evidence of fraud or abuse, we may be required to disclose personal data to the relevant authorities.

## **3. Third party tracking**

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We make use of various tracking pixels to help improve the user experience of our websites or to aid us in our marketing activities.

On our websites we use the following pixels:

### **3.1. Google Analytics**

On all of our websites we use Google Analytics to track the duration of a visit, the

physical location of a visitor and which page(s) a visitor has checked. It basically tells us what's happening on our website.

Google Analytics is installed on the following pages:

- www.pcxextreme.nl - All pages
- www.pcxextreme.com - All pages
- secure.pcxextreme.nl - All pages
- cp.pcxextreme.nl - All pages
- wscp.pcxextreme.nl - All pages
- community.pcxextreme.nl - All pages

For more information on how Google collects and uses this data, then please review [Google's Privacy Policy](#).

### **3.2. Google Adwords Conversion Tracking**

On some of our pages we use Google Adwords Conversion Tracking. This helps us measure the performance of our advertisements when someone enters a search query on Google and clicks on one of our ads. This way we can determine the success of our advertising efforts.

The Google Adwords conversion pixel is installed on the following pages:

- www.pcxextreme.nl - All pages
- www.pcxextreme.com - All pages
- secure.pcxextreme.nl - The final page when a successful registration has been made
- cp.pcxextreme.nl - The final page when a new product has been added to your account

For more information on how Google collects and uses this data, then please review [Google's Privacy Policy](#).

### **3.3. Google Remarketing**

On some of our pages we use the Google Remarketing pixel. This enables us to show you personalised ads on websites that are part of the Google Adwords network. We generally use this to remind you of our services from time to time.

The Google remarketing pixel is installed on the following pages:

- www.pcextreme.nl - All pages
- www.pcextreme.com - All pages
- secure.pcextreme.nl - The final page when a successful registration has been made
- cp.pcextreme.nl - The final page when a new product has been added to your account

For more information on how Google collects and uses this data, then please review [Google's Privacy Policy](#).

### **3.4. Bing Ads**

On some of our pages we use the Bing Ads pixel. This helps us measure the performance of our advertisements when someone enters a search query on Bing or Yahoo and clicks on one of our ads. This pixel also allows us to show you personalised ads on the Bing and Yahoo advertising network based on the pages you visited on our website.

The Bing Ads pixel is installed on the following pages:

- www.pcextreme.nl - All pages
- www.pcextreme.com - All pages
- secure.pcextreme.nl - The final page when a successful registration has been made
- cp.pcextreme.nl - The final page when a new product has been added to your account

For more information on how Microsoft collects and uses this data, then please review [Microsoft's Privacy Policy](#).

### **3.5. Facebook Advertising**

On some of our pages we use the Facebook Advertising pixel to reach new potential customers through advertisements. With this pixel we can measure the performance of our ads. We also use this pixel to show you personalised ads on Facebook itself.

The Facebook Advertising pixel is installed on the following pages:

- www.pcextreme.nl - All pages
- www.pcextreme.com - All pages

- secure.pcxextreme.nl - The final page when a successful registration has been made
- cp.pcxextreme.nl - The final page when a new product has been added to your account

For more information on how Facebook collects and uses this data, then please review [Facebook's Privacy Policy](#).

## **4. Third party data sharing**

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In some cases we may share personal data for commercial purposes if we have the explicit consent to do so. You can subscribe and unsubscribe at any given time.

We work with the following third parties:

- Facebook Ads

When you give us your consent, we may provide your first name, last name and email address to the parties listed above, so they can match it with their own data. We do this so we can reach people with our advertisements on these platforms that are most similar to our customer base. The data that we provide is encrypted before being processed.

## **5. Security**

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We employ several security measures to minimize the risk of abuse and unauthorized access to personal data. We comply with current best practices and security standards and our compliance is frequently evaluated.

## **6. Changes in this Privacy Policy**

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We reserve the right to make changes to this Privacy Policy. The last modification date is shown at the top of this document. When significant changes have been made we will notify you by email, our website or any of our control panels. However, we recommend checking this policy regularly to be aware of any potential changes.

## **7. Accessing and modifying your data**

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You can always [contact us](#) for questions regarding our Privacy Policy or requests for access and modifying (including the removal of) your personal data.

PCextreme b.v.

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