Privacy Policy

Your privacy is critically important to us. At WireSpeed, we have a few fundamental principles:

- We are thoughtful about the personal information we ask you to provide
- We collect as little information as possible
- We only store personal information for as long as we have a reason to keep it.
- We aim for full transparency on how we gather, use, and share your information.

Below is our Privacy Policy, which incorporates and clarifies these principles.

Who We Are and What This Policy Covers

This Privacy Policy applies to information that we collect about you when you use WireSpeed VPN, visit our website, or purchase a license on wirespeedvpn.com

Throughout this Privacy Policy we will refer to WireSpeed VPN, related services, our website, licensing portal, and operating system-specific applications collectively as "WireSpeed VPN Services"

Below, we explain how we collect, use, and share information about you, along with the choices that you have with respect to that information.

Information We Collect

We only collect information about you if we have a reason to do so—for example, to provide WireSpeed VPN Services, communicate with you, or to improve our services. We collect information in three ways (i) if and when you provide information to us (ii) automatically, and (iii) from outside sources. Let's go over the information that we collect.

Information You Provide to Us

It's probably no surprise that we collect information that you provide to us. The amount and type of information depends on the context and how we use the information. Here are some examples:

- **Basic Account Information:** We ask for basic information from you in order to set up your account. For example, we require individuals who use WireSpeed VPN to provide an email address—and that's it.
- **Transaction and Billing Information:** If you purchase a license, you will also provide additional personal and payment information. We only collect information that is required to process the transaction and your payment—such as your name, credit card number, and contact information.

• **Communications With Us:** You may also provide us with additional information when you request support, respond to surveys, or post a question in our public forum(s).

Information We Collect Automatically

We also collect some information automatically:

- **Server Information:** WireSpeed VPN periodically collects information about the server on which it is installed—such as CPU, RAM, and other hardware specifications.
- Log Information: Like most online service providers, we collect information that web browsers, mobile devices, and servers typically make available, such as the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information. We collect log information when you use WireSpeed VPN Services—for example, when you create or make changes to your account on wirespeedvpn.com.
- **Usage Information:** We collect basic usage information for billing and analysis purposes.
- Location Information: We may determine the approximate location of visitors to wirespeedvpn.com, and users of the WireSpeed VPN Service from your IP address. We collect and use this information to, for example, calculate how many people use WireSpeed VPN Services from certain geographic regions.
- Information from Cookies & Other Technologies: A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Pixel tags (also called web beacons) are small blocks of code placed on websites and emails. WireSpeed VPN Services use cookies and other technologies like pixel tags to help us identify and track visitors, usage, and access preferences for our services, as well as track and understand email campaign effectiveness and to deliver targeted ads.

Information We Collect from Other Sources

We may also get information about you from other sources. For example, if you install WireSpeed VPN, we will receive information from that instance (such as your cloud server specifications) via authorized procedures.

How And Why We Use Information

Purposes for Using Information

We use information about you as mentioned above and for the purposes listed below:

- To provide WireSpeed VPN Services for example, to set up and maintain your account or charge you for our services;
- To develop and improve our services for example by adding new features that we think our users will enjoy;
- To better understand how users interact with WireSpeed VPN Services, which helps us improve, and make things easier to use;

- To measure, gauge, and improve the effectiveness of our advertising, and better understand user retention and attrition—for example, we may analyze how many individuals purchased a license after receiving a marketing message, or continue to use WireSpeed VPN Services after a certain length of time;
- To prevent and monitor any problems with WireSpeed VPN Services, protect the security of our services, detect and prevent fraudulent transactions and other illegal activities, fight spam, and protect the rights and property of WireSpeed VPN, and others;
- To communicate with you—for example, through email about offers and promotions offered by WireSpeed VPN that we think will be of interest, solicit your feedback, or keep you up to date on WireSpeed VPN and our products; and
- To personalize your experience using our WireSpeed VPN Services, provide recommendations, and target our marketing messages.

Legal Basis for Collecting and Using Information (EU)

A note for those of you in the European Union—our legal grounds for processing information about you under EU data protection laws is that our use of your information is based on the grounds that:

(1) The use is necessary in order to fulfill our commitments to you under our Terms of Service or other agreements with you or is necessary to administer your account—for example, in order to enable access to services on your device or charge you for a license; or

(2) The use is necessary for compliance with a legal obligation; or

(3) The use is necessary in order to protect your vital interests or those of another person; or (4) We have a legitimate interest in using your information—for example, to provide and update our Wirespeed VPN Services, so that we can offer you an even better user experience, to safeguard our services, to communicate with you, to measure, gauge, and improve the effectiveness of our advertising, and better understand user retention and attrition, to monitor and prevent any problems with our services, and to personalize your experience; or (5) You have given us your consent—for example before we place certain cookies on your device..

Sharing Information

How We Share Information

We do not sell our users' private or personal information.

We may share information about you in the limited circumstances spelled out below, with appropriate privacy safeguards:

- Legal Requests: We may disclose information about you in response to a subpoena, court order, or other governmental request.
- **To Protect Rights, Property, and Others:** We may disclose information about you when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of WireSpeed VPN, third parties, or the public at large.

- **Business Transfers:** In connection with any merger, sale of company assets, or acquisition of all or a portion of our business by another company, or in the unlikely event that WireSpeed VPN goes out of business or enters bankruptcy, user information would likely be one of the assets that is transferred or acquired by a third party. If any of these events were to happen, this Privacy Policy would continue to apply to your information and the party receiving your information may continue to use your information, but only in a manner consistent with this Privacy Policy.
- With Your Consent: We may share and disclose information with your consent or at your direction. For example, we may share your information with third parties with which you authorize us to do so.
- Aggregated or De-Identified Information: We may share information that has been aggregated or reasonably de-identified, so that the information could not reasonably be used to identify you. For instance, we may publish aggregate statistics about the use of WireSpeed VPN Services and we may share a hashed version of your email address to facilitate customized ad campaigns on other platforms.
- **Published Support Requests:** If you send us a request (for example, via a support email or one of our feedback mechanisms), we reserve the right to publish that request in order to help us clarify or respond to your request or to help us support other users.

How Long We Keep Information

Unless we are legally required to retain it, we generally discard information about you when we no longer need it for the purposes it was collected—which are described in the section above on How and Why We Use Information.

For example, we keep web server logs that record information about visitors to wirespeedvpn.com such as the visitor's IP address, browser type, and operating system in order to, among other things, analyze traffic to wirespeedvpn.com and investigate issues if something goes wrong.

Security

While no online service is 100% secure, we work very hard to protect information about you against unauthorized access, use, alteration, or destruction, and take reasonable measures to do so, such as monitoring WireSpeed VPN Services for potential vulnerabilities and attacks.

Choices

You have several choices available when it comes to sharing information about you:

- Limit the information you provide: You can choose not to provide account information, profile information, and transaction and billing information. Please keep in mind that if you do not provide this information, certain features of WireSpeed VPN Services may not be accessible.
- **Opt-out of electronic communications:** You may opt-out of receiving promotional messages from us by following the instructions in those messages. If you opt out of

promotional messages, we may still send you other messages, like information about your account, or legal notices.

- Set your browser to reject cookies: At this time, we do not respond to "do not track" signals across all WireSpeed VPN Services. However, you can usually choose to set your browser to remove or reject browser cookies before using wirespeedvpn.com, with the drawback that certain features may not function properly without the aid of cookies.
- **Close your account:** If you no longer want to use WireSpeed VPN Services, you can cancel your account. Please keep in mind that we may retain your information after closing your account, as described in the "How Long We Keep Information" section above—for example, when that information is reasonably needed to comply with (or demonstrate our compliance with) legal obligations such as law enforcement requests, or reasonably needed for our legitimate business interests.

Your Rights

If you are located in certain countries, including those that fall under the scope of the European General Data Protection Regulation (AKA the "GDPR"), data protection laws give you rights with respect to your personal data, subject to any exemptions provided by the law, including the rights to:

- Request access to your personal data;
- Request correction or deletion of your personal data;
- Object to our use and processing of your personal data;
- Request that we limit our use and processing of your personal data; and
- Request portability of your personal data.

You can usually access, correct, or delete your personal data using your account settings, and tools that we offer, but if you aren't able to do that, or you would like to contact us about one of the other rights, scroll down to 'How to Reach Us' to find our contact information.

EU individuals also have the right to make a complaint to a government supervisory authority.

Controllers and Responsible Companies

WireSpeed VPN Services are offered worldwide. WireSpeed VPN is owned and operated by Portal Cloud Inc., who is the controller (or co-controller) of personal information collected in connection to WireSpeed VPN Services. This means that Portal Cloud Inc. is the company responsible for processing information related to WireSpeed VPN Services.

The chart below explains the controllers for processing your personal information. We use the term "Designated Countries" to refer to Australia, Canada, Japan, Mexico, New Zealand, and all countries located in the European continent.

If you reside outside of the	Portal Cloud Inc.
Designated Countries	privacy@wirespeedvpn.com
If you reside in the Designated Countries	Portal Cloud Inc. privacy@wirespeedvpn.com

How to Reach Us

If you have a question about this Privacy Policy, or you would like to contact us about any of the rights mentioned in this policy, please contact us at privacy@wirespeedvpn.com

Other Things You Should Know (Keep Reading!)

Transferring Information

Because WireSpeed VPN Services are offered worldwide, the information about you that we process when you use the service in the EU may be used, stored, and/or accessed by individuals operating outside the European Economic Area (EEA) who work for us, other members of our group of companies, or third party data processors. This is required for the purposes listed in the How and Why We Use Information section above. When providing information about you to entities outside the EEA, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this Privacy Policy and as required by applicable law. These measures include:

- In the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the <u>EU-US</u> <u>Privacy Shield</u>; or
- In the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them.

You can ask us for more information about the steps we take to protect your personal information when transferring it from the EU.

Privacy Policy Changes

Although most changes are likely to be minor, WireSpeed VPN may update its Privacy Policy from time to time. WireSpeed VPN encourages visitors to check this page for any changes to its Privacy Policy. We will notify you of any changes by revising the change-log below, and in some cases, we may provide additional notice such as adding a statement to our homepage, or sending an email notification). Your further use of WireSpeed VPN Services after a change has been made to our Privacy Policy constitutes acceptance of that policy, and is subject to the updated policy.

That's it! Thanks for reading.

Change log

• March 13, 2021: Published Privacy Policy