

## SAIPAN DATACOM, INC. PRIVACY STATEMENT

This Saipan DataCom, Inc. Privacy Statement ("Saipan DataCom Privacy Statement" or "Privacy Statement") explains Saipan DataCom's use and disclosure of personally identifiable information that participants in the CHI.MP service ("CHI.MP Owners," as that term is defined in the CHI.MP Services Addendum) or registrants of .MP domain names who are not also CHI.MP Owners ("Paid .MP Domain Name Registrants") (collectively, "Customers") and visitors to web sites residing at .MP domain names (collectively, "Visitors") provide to Saipan DataCom. The term "User" refers to a Customer or a Visitor. This Privacy Statement is effective as of SEPTEMBER 3, 2008.

Saipan DataCom gathers certain types of information about its Users and their content. The following discloses our information gathering and dissemination practices. It also describes Saipan DataCom's practices regarding WHOIS, a searchable database maintained by generic top-level domain registries and/or registrars and many country-code top level domain registries and/or registrars, that, among others, contains contact information associated with specific domain names. Please review the following statement so you will understand how the information we collect may be treated and used.

### 1. Collection, Use, and Disclosure of Personally Identifiable Information

- a. **CHI.MP Owners.** Saipan DataCom will not maintain a public WHOIS for CHI.MP Owners. For CHI.MP Owners, Saipan DataCom will collect only an email address and a CHI.MP Owner's chosen password as part of initial registration for the CHI.MP Service (as defined in the CHI.MP Services Addendum). After the CHI.MP Owner registers for and begins using the applicable Service, Saipan DataCom may collect information that the CHI.MP Owner voluntarily posts, submits, or uploads, in his or her sole discretion, or allows to be posted, onto the Owner's Dashboard or Public Site (as defined in the CHI.MP Services Addendum) where applicable. This information may include the CHI.MP Owner's full name, postal address, including street address or post office box, city, state or province, postal code and country, voice telephone number, and facsimile number, if available (information that Saipan DataCom collects from CHI.MP Owners and Paid .MP Domain Name Registrants, see below, collectively is referred to as "Customer Personally Identifiable Information").
- b. **Paid .MP Domain Name Registrants.** For those Paid .MP Domain Name Registrants who do not chose to maintain their Customer Personally Identifiable Information private, Saipan DataCom will maintain a public WHOIS. As part of the .MP Domain Name Registration Process, Saipan DataCom may collect the Paid .MP Domain Name Registrant's full name, postal address, including street address or post office box, city, state or province, postal code and country, e-mail address, voice telephone number, facsimile number, if available, and if the Paid .MP Domain Name Registrant is an organization, association or corporation, the name of the authorized person (or office) for administrative or legal contact purposes. Except as otherwise provided in this Privacy Statement, Saipan DataCom will not disclose Customer Personally Identifiable Information of Paid .MP Domain Name Registrants that correctly follow the procedures on the Saipan DataCom web site to make their Customer Personally Identifiable Information private.
- c. **Visitors.** Saipan DataCom may also collect information that any Visitor posts, submits or uploads onto a Customer's web site or Public Site where applicable ("Visitor Personally Identifiable Information") (Customer Personally Identifiable Information and Visitor Personally Identifiable Information are collectively, "Personally Identifiable Information").

Saipan DataCom may use Personally Identifiable Information to confirm or fulfill a request that you make; to communicate with you about services that Saipan DataCom provides ("Service"); to improve the Service; or for web site administration, analysis, research or other internal purposes.

SAIPAN DATACOM DOES NOT GIVE, SELL, RENT, LOAN, OR OTHERWISE DISCLOSE ANY PERSONALLY IDENTIFIABLE INFORMATION TO THIRD PARTIES EXCEPT WHEN WE HAVE

YOUR EXPRESS PERMISSION OR UNDER CERTAIN CIRCUMSTANCES DESCRIBED IN THIS PRIVACY STATEMENT.

Saipan DataCom may disclose Personally Identifiable Information (i) for Paid .MP Domain Name Registrants who do not choose to make their Personally Identifiable Information private by following the procedures on Saipan DataCom's web site; (ii) when we believe in good faith that disclosure is reasonably necessary to comply with legal process as described below, (iii) to enforce the terms and provisions of any agreements with respect to which you and Saipan DataCom are a party, including without limitation any .MP domain name registration agreement or any CHI.MP Service Addendum, (iv) to protect the rights, property or personal safety of Saipan DataCom, its customers or the public; (v) to enforce Saipan DataCom's Terms of Use; and (vi) in connection with the sale or other transfer of ownership of Saipan DataCom.

Saipan DataCom may disclose Personally Identifiable Information to comply with legal process. For example, Saipan DataCom complies with lawful requests, such as subpoenas, court orders, or applicable laws, originating from or arising under the courts or laws of the United States, including U.S. federal, state, and territorial courts and laws. In complying with such requests, Saipan DataCom may be required to disclose Personally Identifiable Information. We do not reveal information until we have a good faith belief that an information request by law enforcement meets applicable legal standards.

Saipan Datacom may disclose Personally Identifiable Information to third parties (including without limitation the applicable dispute resolution service provider and any Complainant) in accordance with the requirements of Saipan DataCom's Sunrise Challenge Policy and Rules and its Uniform Dispute Resolution Policy and Rules. You may review our dispute policies and rules on our web site at <http://get.mp/docs>.

Saipan DataCom may disclose Personally Identifiable Information to third-party contractors or vendors who are employed by or work for Saipan DataCom in order to perform services for Saipan DataCom or for its Customers (including without limitation to process credit card payments, if any, or for web site technical or administration services) ("Third Party Contractors"). Saipan DataCom requires its Third Party Contractors to agree to comply with the terms of this Privacy Statement with respect to any Personally Identifiable Information that we disclose to them, and to use such information only for the purposes for which they have been retained or hired.

If you publish Personally Identifiable Information on any web site hosted by Saipan DataCom, you grant permission for Saipan DataCom to disclose such Personally Identifiable Information to the third parties to the same extent and to the same audience that you allow to view such content or data.

## **2. Collection, Use, and Disclosure of Aggregated Customer Content**

Saipan DataCom automatically gathers certain information about all its Customers and Visitors. We analyze the content in order to understand aggregate User behaviors, aggregate trends, demographics, and to monitor system performance. We may use this data to serve advertising and marketing materials relevant to you.

To the extent that the data we gather associates Personally Identifiable Information with a specific User, we will not share that personally identifiable data with third parties except as provided in Section 1 of this Privacy Statement. Saipan DataCom may, however, share aggregated data that does not contain personally identifiable information with third parties.

## **3. Cookies, Web Beacons, and IP Address Logs**

Saipan DataCom uses cookies. Cookies help us better understand and improve areas of the site that our Users find valuable. If you have set your browser to warn you before accepting cookies, you will receive the warning message with each cookie. Although parts of the Saipan DataCom Service require the use of cookies, Users always have the option of disabling cookies via their browser preferences. You can refuse cookies by turning them off in your browser. However, parts of the Service may not work if you have cookies disabled.

Saipan DataCom may also use web beacons, which are also known as pixel tags, Internet tags, clear GIFs, and single-pixel GIFs). These are electronic images embedded into a web page. In addition, Saipan DataCom may log Internet Protocol (IP) addresses – the location of your computer on the Internet.

#### **4. Third Party Advertising**

Third party advertisements displayed on the Service may also contain cookies set by Internet advertising companies or advertisers. Saipan DataCom does not have access to or control over these third party cookies, and users of the Service should check the privacy policy of the Internet advertising company or advertiser to see whether and how it uses cookies. Third party advertisers have no access to your Personally Identifiable Information unless you choose to share it with them or, for .MP Domain Name Registrants, unless you do not choose to make your Customer Personally Identifiable Information private by following the procedures on Saipan DataCom's web site.

#### **5. Customer Feedback**

Saipan DataCom encourages its Customers to provide us with feedback and especially suggestions. We want to make our offerings as useful and enjoyable as possible. We will never be able to figure out everything our Customers want, so we rely on you, our Customer, to ask for new features and functions. Please understand that all Customer feedback and suggestions shall be deemed non-confidential and once submitted shall be the sole property of Saipan DataCom. Without limitation to the foregoing, by providing any such material, you hereby grant Saipan DataCom an unrestricted, irrevocable, royalty-free and perpetual right to freely reproduce, use, disclose, modify, perform, publish, translate, adapt, create derivative works from, distribute and display any such information you send Saipan DataCom, without limitation, for any and all commercial and non-commercial purposes. Saipan DataCom is free to use any ideas, concepts or techniques contained in customer feedback or suggestions for any purpose whatsoever including, but not limited to, developing, manufacturing, and marketing products incorporating or adapting such ideas, concepts or techniques.

#### **6. Changes to the Privacy Statement**

If Saipan DataCom changes this Privacy Statement, we will post those changes on this web page, so that you will always know what information we gather, how we might use that information, and whether we will disclose it to anyone. By using the Service, you signify your assent to the Saipan DataCom Privacy Statement. If you do not agree to this statement, please do not use the Service. Your continued use of the Service following the posting of changes to these terms will mean you accept those changes.

#### **7. Updating Customer Data**

Customers have a duty to promptly update the information you provide to Saipan DataCom by logging into your Service and updating your information. For information on logging into your Service, please see the applicable .MP Domain Name Registration Agreement or CHI.MP Services Addendum or contact Saipan DataCom at the contact information below.

#### **8. Limited to Saipan DataCom**

This Privacy Statement applies only to Saipan DataCom's actions and its collection, use, and disclosure of Personally Identifiable Information. We cannot control, of course, what third parties or operators of web sites located at .MPdomain names do with any Personally Identifiable Information that they obtain independently through their own actions, including while visiting any Public Site or gathering information you input on their web site. Therefore, this Privacy Statement does not apply to the collection, use, or disclosure of Personally Identifiable Information by third parties, including individual operators of web sites which reside at any .MP domain name.

#### **9. Children's Online Privacy**

Saipan DataCom believes that it is especially important to protect children's privacy online. Saipan DataCom does not knowingly collect or use any personally identifiable information from children under the age of 13, and Saipan DataCom does not knowingly provide any personally identifiable information, regardless of its source, to any third party for any purpose whatsoever from visitors younger than 13 years old. No information should be submitted to or posted at Saipan DataCom by visitors younger than 13 years old.

If you are younger than 13 years old, please do not try to register for a .MP domain name and do not send, post, or upload onto any .MP web site any personal information, including your name, address, telephone number, cell phone number, or email address. If you believe that we might have information from or about a child younger than 13 years old, please contact [privacy@get.mp](mailto:privacy@get.mp).

**10. Security**

Saipan DataCom uses commercially reasonable measures to protect Customer Data. Despite these measures, Saipan DataCom cannot guarantee that the Customer Data that you submit will not be intercepted or otherwise disclosed.

**11. Contact Information**

If you have any questions about the Saipan DataCom Privacy Statement or this web site, please contact:

**[Saipan DataCom, Inc.  
PMB 542, Box 10,000  
Saipan, MP 96950  
[privacy@sdc.co.mp](mailto:privacy@sdc.co.mp)]**