Data Request Policy

- Privacy Notice. Please see AntForce, LLC's <u>Privacy Notice</u> for further information on what information AntForce LLC collects, how it is used and when it may be disclosed. Subject to AntForce LLC's Privacy Notice, this Data Request Policy describes the types of data requests that AntForce LLC may receive and how AntForce LLC may respond to such requests.
- 2. Types of Requests. AntForce LLC may receive the following types of requests concerning its Subscribers:
 - a. Data Requests. A data request is a request for information or documents relating to Subscriber accounts in connection with official criminal investigations or other legal proceedings. Except in limited emergency situations (see below), AntForce LLC requires data requests to be made through formal U.S. legal process and procedures, and such requests will be handled in accordance with applicable law. Examples of acceptable data requests include:
 - i. Subpoenas
 - ii. Court Orders
 - iii. Search Warrants iv. Legal process received from outside the United States may require a Mutual

Legal Assistance Treaty (MLAT) with the United States

- v. Other forms of legal process such as Civil Investigative Demands
- **b. Preservation Requests.** A preservation request asks AntForce LLC to preserve Subscriber account records in connection with official criminal investigations or other official legal proceedings. Preservation requests must include the following information:
 - i. Identification of the account(s) at issue (as further described in Section 6 below);
 - ii. Identification of the investigating agency and/or specific pending official proceedings (requests must be signed on law enforcement letterhead);
 - iii. Assurances that the requesting agency or individual is taking steps to obtain appropriate legal process for access to the data that AntForce LLC is being asked to preserve; and iv. A valid return email address and phone number.
- **3.** Emergency Requests. An emergency request is only appropriate in cases involving imminent serious bodily harm or death. We respond to emergency requests when we believe in good faith that such harm may occur if we do not respond without delay.
- 4. Disclosure of Non-Public Domain Registrant Information. As the sponsoring registrar or reseller of certain domain names governed by the Internet Corporation for Assigned Names and Numbers ("ICANN"), AntForce LLC must permit third parties with a legitimate interest to access masked (non-public) registrant information subject to the data subject's rights under the General Data Protection Regulation ("GDPR") or other similar privacy laws as applicable.
- Notice to Newfold Digital Subscribers. AntForce LLC's policy is to notify its Subscribers of requests for their data unless AntForce LLC is prohibited from doing so by applicable law or court order.

- 6. Information to Include in a Request. The following information must be included in a request for Subscriber data:
 - a. First and last name of the Subscriber and email address associated with the account; and
 - b. Domain name, username and/or IP address associated with the account.

NOTE: A Request that only includes an IP address may be overly broad and insufficient for AntForce LLC to locate a Subscriber account. Please include additional identifiers such domain name or username whenever possible. AntForce LLC may not be able to respond to a request without this information.

Additionally, AntForce LLC reserves the right to request a copy of the complaint and any supporting documentation that demonstrates how the information requested is related to any pending litigation, formal legal proceeding or investigation.

7. Sending a Request to AntForce LLC. All data requests should be sent to:

E-mail: support@antforce.com

- 8. Fees. AntForce LLC may seek reimbursement for costs in responding to requests as provided by law and may charge additional fees for costs in responding to unusual or burdensome requests.
- **9. Available Information.** Subject to receiving a valid request, AntForce LLC may provide data as follows:
 - a. **Non-Content**. AntForce LLC will produce non-content information such as basic Subscriber information which may include the following:
 - i. Name
 - ii. Email address iii. Date and time of account creation iv. Billing information
 - v. IP Logs
 - **b. Content**. AntForce LLC will only produce Subscriber content (such as website files and email content) pursuant to a valid search warrant from an entity with proper jurisdiction.

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