

Privacy Policy

NewHomePage Limited and its subsidiaries (collectively, “NewHomePage,” “we,” “our,” and “us”) knows you care about how your personal data is used and shared, and we take your privacy seriously. Please read the following Privacy Policy to learn more about how we collect, store, use, and disclose information about you when you interact or use our websites (collectively the “Websites”) or any related events, sales or marketing, and/or if you use any of our products, services, or applications (including any trial or testing) (collectively the “Services”) in any manner.

What does this policy cover?

This Privacy Policy covers our treatment of information that we gather when you are accessing or using our Websites or Services or when you contact us in any manner. We gather various types of information, including information that identifies you as an individual (“Personal Data”) from our users, visitors, and customers as explained in more detail below.

What information does NewHomePage collect?

INFORMATION YOU PROVIDE TO US

When you use our Websites: We may collect any Personal Data that you choose to send to us or provide to us, for example, on our “Request a Quote” (or similar) online form or if you register for NewHomePage emails. If you contact us through the Websites, we will keep a record of our correspondence.

When you use our Services: We receive and store information you provide directly to us. For example, when setting up new users, we collect Personal Data, such as name and e-mail address, to provide them with Services. The types of information we may collect directly from our customers and their users include: names, usernames, email addresses, postal addresses, phone numbers, job titles, credit card details, bank account information, tax ID number, transactional information (including Services purchased), as well as any other contact or other information they choose to provide us or upload to our systems in connection with the Services. We may

need to store credit card information (or arrange for it to be stored) and use it for both billing and payment purposes.

INFORMATION WE AUTOMATICALLY COLLECT

When you use our Websites: When you visit the Websites, we collect certain information related to your device, such as your device's IP address, referring website, what pages your device visited, and the time that your device visited our Website.

When you use our Services: Usage information – we keep track of user activity in relation to the types of Services our customers and their users use and performance metrics related to their use of the Services. *Log information* – we log information about our customers and their users when you use one of the Services including Internet Protocol (“IP”) address and information collected by cookies and other similar technologies. We use various technologies to collect information which may include saving cookies to users' computers. For additional information, please refer to our Cookie Policy.

How do we use the information?

When you access or use the Services, we collect, use, share, and otherwise process your Personal Data as described in this Policy. We rely on a number of legal bases to use your information in these ways. These legal bases include where:

- necessary to perform the contractual obligations in our Terms of Service and in order to provide the Services to you;
- you have consented to the processing, which you can revoke at any time;
- necessary to comply with a legal obligation, a court order, or to exercise or defend legal claims;
- necessary for the purposes of our or a third party's legitimate interests, such as those of visitors, members, or partners;
- you have expressly made the information public;
- necessary in the public interest; and
- necessary to protect your vital interests, or those of others.

Websites

We use the information we collect via the Websites as follows:

- To administer our Websites and for internal operations, including troubleshooting, data analysis, testing, statistical and survey purposes;
- To improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
- Analyze use of the Website for monitoring and marketing purposes;
- For purposes made clear to you at the time you submit your information. For example, to fulfil a request a quote form or to provide you with information you have requested about our Services; and
- To keep the Website safe and secure.

Services

We may use the information we collect from our customers and their users in connection with the Services we provide for the following reasons:

- To set up a user account;
- Provide, operate, and maintain the Services;
- Process and complete transactions, and to send related information, including transaction confirmations and invoices;
- Manage our customers' use of the Services, respond to enquiries and comments, and to provide customer service and support;
- Send customers technical alerts, updates, security notifications, product updates, and administrative communications;
- Investigate and prevent fraudulent activities, unauthorized access to the Services, and other illegal activities; and
- For any other purposes about which we notify our customers and users.

We may also use the information you send to us via the Websites and/or Services, to communicate with you via email and, possibly, other means, regarding products, Services, offers, promotions and events we think may be of interest to you. However, you will always be able to opt-out of such communications at any time by using the unsubscribe link in the email communications we send.

How do we share and disclose information to third parties?

We do not rent or sell your Personal Data to anyone. We may share and disclose information (including Personal Data) about you in the following limited circumstances:

- *Vendors, Consultants, and Other Services Providers:* We may share your information with third party vendors, consultants and other service providers who we employ to perform tasks on our behalf. These companies include (for example) our payment processing providers (e.g. Paypal), website analytics companies (e.g., Google Analytics), product feedback or help desk software providers (e.g. Intercom), CRM service providers (e.g., Salesforce), email service providers, and others.
- *Business Transfers:* We may choose to buy or sell assets and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Data could be one of the assets transferred to or acquired by a third party.
- *NewHomePage Group Companies:* We may also share your personal data with our parent companies, subsidiaries and/or affiliates for purposes consistent with this Privacy Policy.

- *Protection of NewHomePage and Others:* We reserve the right to access, read, preserve, and disclose any information as necessary to comply with law or court order; enforce or apply our agreements with you and other agreements; or protect the rights, property, or safety of NewHomePage, our employees, our contractors, our users, or others.
- *Law Enforcement:* Under certain circumstances, we may be required to disclose your Personal Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

Is Personal Data about me secure?

We use appropriate technical, organizational, and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. However, no company or service can guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. Among other practices, your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Personal Data by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

Cookies and Other Tracking Technologies

Cookies

Our Websites and some of our Services use cookies (small text files containing a string of alphanumeric characters that we put on your computer) and other similar tracking technologies (like web beacons, tags, and scripts) to uniquely identify your browser and to gather information about how you interact with the Websites and Services. We use this information for the following purposes:

- To assist you in navigation;

- To assist you in registration, login, and your ability to provide feedback;
- To analyze your use of our products, Services, or applications; and
- To assist with our promotional and marketing efforts.

Please consult our [Cookie Policy](#) for more information about the type of cookies and tracking technologies that we use on this Website and why, and how to accept and reject them.

Email Tracking

We also may use clear gifs in HTML-based emails sent to our users to track which emails are opened by recipients. This information is used to enable more accurate reporting, improve the effectiveness of our marketing, and make our Services and Websites better for our users.

Google Analytics

We also utilize Google Analytics, a web analysis service provided by Google, to better understand your use of our Websites and Services. Google Analytics collects information such as how often users visit the Website, what pages they visit and what other sites they used prior to visiting. Google uses the data collected to track and examine the use of the Websites, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the Websites to contextualize and personalize the ads on its own advertising network. Google's ability to use and share information collected by Google Analytics about your visits to the Websites is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). Google offers an opt-out mechanism for the web available [here](#).

How long do we keep your information?

To meet our legal and regulatory obligations, we hold your information while you are a customer and for a period of time after that. We do not hold it for longer than necessary. We may also hold your information if we have obtained your consent.

Consent

Sometimes we need your consent to use your Personal Data. With direct marketing for example, we need your consent to make you aware of products and Services which may be of interest to you. We may do this by email, text, or other digital media.

You can decide if you want to accept direct marketing communications from NewHomePage when you sign up for our products or Services, or when you fill out any of our Website or other online forms.

You can remove your consent at any time by using the unsubscribe link in the email communications we send.

Your Privacy Rights

WHAT CHOICES DO I HAVE?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features and/or Services.

MARKETING COMMUNICATIONS

You can opt-out of receiving certain promotional or marketing communications from us at any time, by using the unsubscribe link in the email communications we send.

If you have any account for our Services, we will still send you non-promotional communications, like service related emails.

How can I exercise my Data Subject Rights (update, access, delete, or modify my information)?

If you would like to access, review, update, rectify, and/or delete any Personal Data we hold about you, or exercise any other data subject right available to you under the EU General Data Protection Regulation (GDPR), you can complete this [Web Form](#) directly.

Once we receive the completed [Web Form](#), our Privacy Team will examine your request and respond to you as soon as possible.

Please note that we may still use any aggregated and de-identified Personal Data that does not identify any individual, and may also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our contractual agreements.

International Data Transfers

By using the Services, you acknowledge that NewHomePage will use your information in the United States, Ireland, and any other country where NewHomePage operates. We may also transfer your Personal Data outside of the European Economic Area (EEA) to help us provide the products and Services to you. Please be aware that the privacy laws and standards in certain countries, including the rights of authorities to access your Personal Data, may differ from those that apply in the country in which you reside. We will transfer Personal Data only to these countries to which we are permitted by law to transfer Personal Data, and we will take steps to ensure that your Personal Data continues to enjoy appropriate protections.

To the extent that NewHomePage is deemed to transfer Personal Data outside of the EEA, we rely separately, alternatively, and independently on the following legal bases to transfer your information:

Model Clauses

The European Commission has adopted standard contractual clauses (also known as Model Clauses), which provide safeguards for Personal Data that is transferred outside of Europe. We often use these Model Clauses when transferring Personal Data outside of Europe. You can request a copy of our Model Clauses by emailing legal@NewHomePage.com.

Privacy Shield

NewHomePage may rely on the EU-US Privacy Shield to transfer Personal Data to some of our third party service providers in the United States, where they are certified to receive such information under the Privacy Shield Program.

Necessary for the performance of the contract between NewHomePage and its customers

NewHomePage provides a voluntary service; meaning you can choose whether or not you want to use the Services. However, if you want to use the Services, you need to agree to our Terms of Service, which set out the contract between NewHomePage and its customers. As we operate in countries worldwide (including in the US) and use technical infrastructure in the US to deliver the Services to you, in accordance with the contract between us, we need to transfer your Personal Data to the US and to other jurisdictions as necessary to provide the Services. Simply put, we cannot provide you with the Services and perform our contract with you without moving your Personal Data around the world.

Linked Websites

For your convenience, hyperlinks may be posted on the Websites that link to other websites (the “Linked Sites”). We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of any Linked Sites or of any companies that we do not own or control. Linked Sites may collect information in addition to that which we collect on our Websites. We do not endorse any of these Linked Sites, the services or products described or offered on such Linked Sites, or any of the content contained on the Linked Sites. We encourage you to seek out and read the privacy policy of each Linked Site that you visit to understand how the information that is collected about you is used and protected.

Your Responsibilities

If you use our Services, you may in your sole discretion collect certain Personal Data, such as when scraping third party websites. This means you process Personal Data and, to the extent you do so, under EU law, you are an independent controller of data relating to individuals that you may have obtained through your use of the Services. It is your sole responsibility to determine the legality of collecting, storing, controlling, or processing such Personal Data.

You are responsible for protecting Personal Data you collect or process and complying with all relevant legal requirements when you use the Services. This includes applicable data protection and privacy laws that govern the ways in which you can use Personal Data. NewHomePage is

not responsible for, and this Privacy Policy does not apply to, any of the Personal Data that you choose to collect or store as a part of your use of the Services.

If NewHomePage and you are found to be joint data controllers or processors of Personal Data, and if NewHomePage is sued, fined, or otherwise incurs expenses because of something that you did as a joint data controller or processor, you agree to indemnify NewHomePage for the expenses and fees (including any legal fees or fines) it occurs in connection with your control or processing of Personal Data.

Children

NewHomePage does not knowingly collect or solicit Personal Data from anyone under the age of 18. If you are under 18, please do not attempt to register for the Services or send any Personal Data about yourself to us. If we learn that we have collected Personal Data from a child under age 18, we will delete that information as quickly as possible. If you believe that a child under 18 may have provided us Personal Data, please contact us at legal@NewHomePage.com

Will NewHomePage ever change this policy?

We are constantly trying to improve our Websites and Services, so we may amend or update this Privacy Policy from time to time. We will alert you to material changes by either placing a notice on our Websites and/or by sending you an email (if you have registered your e-mail details with us) when we are required to do so. You can see when this Privacy Policy was last updated by checking the date at the top of this page. You are responsible for periodically reviewing this Privacy Policy.

What if I have questions about this policy?

If you have any questions or concerns regarding our Privacy Policy or Cookies Policy, please send us a message to legal@NewHomePage.com, and we will do our best to resolve your concerns.

You also have the right to file a complaint with the Irish Data Protection Commissioner, which is NewHomePage's Lead Supervisory Authority, at www.dataprotection.ie.

