

KINSTA INC. PRIVACY AND COPYRIGHT

This website is owned and run by Kinsta Limited, whose address and other contact details are listed below. We are registered with the Office of the Information Commissioner under registered number ZA290018.

Website visitors

Like most website operators, Kinsta Ltd collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Kinsta Ltd's purpose in collecting non-personally identifying information is to better understand how Kinsta Ltd's visitors use its website. From time to time, Kinsta Ltd may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website.

Gathering of personally-identifying information

Certain visitors to Kinsta Ltd's websites choose to interact with Kinsta Ltd in ways that require Kinsta Ltd to gather personally-identifying information. The amount and type of information that Kinsta Ltd gathers depends on the nature of the interaction.

- 1. Information you provide with us**

Those who engage in transactions with Kinsta Ltd are asked to provide additional information, including as necessary the personal and financial information required to process those transactions. In each case, Kinsta Ltd collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with Kinsta Ltd.

- 2. Information collected by our clients**

Our clients may collect personal data in connection with the Services we provide to them. Kinsta Ltd's customers control the personal data they collect, and Kinsta will not use or disclose that personal data except as authorized or directed by the client in the course of our provision of the Services. If your personal data is controlled by one of our clients and you have concerns about the way that data is managed, please contact that client directly.

- 3. Web server logs**

We gather certain information automatically through your use of the Site. This information may include IP addresses, browser type, Internet service provider (ISP),

referring or exit pages, the files viewed on the Site, operating system, date/time stamp, and clickstream data to analyze trends in the aggregate and administer the site. We use analytical software to help us understand this information. This software sends information to its licensor. Other sites and companies may also use this software. As a result, the licensor may collect information that, when aggregated by them, allows them to identify you individually. We have no responsibility for this collection and use.

4. Cookies

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.

Kinsta Ltd and its partners use cookies and similar technologies to help us identify and track users' movements around the Site, their usage of Kinsta website, their website access preferences; analyze trends, administer the Site, and gather demographic information about our user base as a whole. Kinsta visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Kinsta's websites, with the drawback that certain features of Kinsta's websites may not function properly without the aid of cookies. More information about cookies can be found at www.aboutcookies.org.

How we use personally-identifying information

Kinsta Ltd will only use the personal data we collect as reasonably necessary for the following purposes:

1. to allow you to use and interact with the Site;
2. to provide the Services to you as our client;
3. to inform our development of the Site and the Services;
4. to communicate with you from time to time in response to your requests for information or as may be relevant to your account with us;
5. to send marketing communications related to the services we provide;
6. as required by applicable law or legal requirements pertaining to records retention or for internal administrative purposes;
7. as specifically authorized by you in writing.

Kinsta Ltd does not disclose personally-identifying information other than as described below. Visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain website-related activities.

Protection of certain personally-identifying information

Kinsta Ltd discloses potentially personally-identifying and personally-identifying information only to those of its employees, contractors and affiliated organizations that

- (i) need to know that information in order to process it on Kinsta's behalf or to provide services available at Kinsta's websites, and
- (ii) that have agreed not to disclose it to others.

Kinsta will not rent or sell potentially personally-identifying and personally-identifying information to anyone. Other than to its employees, contractors and affiliated organizations, as described above, Kinsta Ltd discloses potentially personally-identifying and personally-identifying information only in response to a subpoena, court order or other governmental request, or when Kinsta Ltd believes in good faith that disclosure is reasonably necessary to protect the property or rights of Kinsta Ltd, third parties or the public at large.

If you are a registered user of a Kinsta Ltd website and have supplied your email address, Kinsta Ltd may occasionally send you an email to tell you about new features, solicit your feedback, or just keep you up to date with what's going on with Kinsta Ltd and our products. We primarily use our various product blogs to communicate this type of information, so we expect to keep this type of email to a minimum. If you send us a request (for example via a support email or via one of our feedback mechanisms), we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users. Kinsta Ltd takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally-identifying and personally-identifying information.

We follow generally accepted standards to protect the personal data submitted to us, both during transmission and once it is received. We have put in place reasonable measures and appropriate procedures for implementing these policies and for safeguarding the personal data we collect. However, we cannot guarantee that personal data we collect will never be disclosed in a manner inconsistent with this Privacy Policy.

Third parties

We will not disclose your personal data to third parties except as follows:

1. when we believe disclosure is reasonably required to comply with any law or legal request;
2. to enforce our legal and contractual rights, or to protect the rights and safety of others;

3. to third parties who help us provide any part of the Site or the Services, to the limited extent required for such help, and on condition that they may not further disclose your data or use it for any other purpose; or
4. as part of a sale of our assets or a merger of our company.

We remain responsible for compliance with this Privacy Policy by third parties to whom we disclose your personal data.

Google Cloud Platform

We use Google Cloud servers to host our clients' sites and store data related to their sites. See <https://cloud.google.com/security/privacy/> for Google Cloud's security and privacy policy.

Stripe

We use Stripe for processing online payments See <https://stripe.com/us/privacy/> for Stripe's security and privacy policy. When purchasing the service using your credit card, we ask for:

- Credit Card Information. This data is sent to Stripe, and is never stored on our servers.
- Billing details, City, Zip/Postal Code, company name, EU VAT ID for companies based in Europe.

Packet

We collect and analyze logs – that are necessary for operating our infrastructure – for security reasons on Packet servers. We keep these logs for 30 days. You can check their privacy policy here: <https://www.packet.net/about/terms/privacy/>.

Heroku

We use Heroku to host and run application code used for internal reporting tools as well as to power certain MyKinsta features. While your personal data is not stored at Heroku, the application code at Heroku does access and process personal data when the associated internal tools and MyKinsta features are in use. You can see Heroku's (a Salesforce company) privacy policy here: <https://www.salesforce.com/company/privacy/>.

Intercom

We use Intercom to communicate with our customers and provide them support. Also, it is used to manage leads. Intercom's privacy policy can be found here <https://www.intercom.com/terms-and-policies#privacy>.

Keymetrics

Keymetrics monitors the performance of our MyKinsta server(s), logs and manages running processes (that might contain personally identifiable information). We use it to optimize performance, monitor resource usage and detect errors. Their privacy Policy can be found here: <https://keymetrics.io/privacy-policy/>.

Vatlayer

We use Vatlayer's API for instant & secure EU VAT number validation upon registration, company data sourced directly from the European Commission's databases, VAT compliant price calculations and accurate VAT rates for all 28 EU member states. Their privacy policy can be found here: <https://vatlayer.com/privacy>.

Secthemall

We use Secthemall for security purposes. Secthemall distributes and syncs a blacklist on our load balancers using iptables. It can store our logs on the secthemall.com cloud, and make us able to create special rules to block brute force attacks. Their privacy policy can be found here: <https://secthemall.com/>.

Email

- **Google Apps**
We use Google/Google Apps to process email communication, manage online documents. Google's privacy policy is available here: <https://policies.google.com/privacy>.
- **Sendgrid**
SendGrid is a cloud-based SMTP provider that we use to send transactional and marketing emails. Their privacy policy can be found here: <https://sendgrid.com/policies/privacy/>.
- **Mailchimp**
We use MailChimp for email marketing. Mailchimp's privacy policy can be found here: <https://mailchimp.com/legal/privacy/>.

Advertising

We may use social media and other providers to manage web advertising campaigns. These service providers use cookies on our sites and/or pixel tracking to serve ads, remarketing, and personalization across the different platforms.

If you are a Kinsta client or affiliate, your email address may be securely shared with the following platforms so we can exclude you from seeing our advertisements.

- **Google AdSense & DoubleClick:** <https://policies.google.com/privacy>
- **Twitter:** <https://twitter.com/en/privacy>
- **Facebook:** <https://www.facebook.com/about/privacy/> (first-party cookies)
- **LinkedIn:** <https://www.linkedin.com/legal/privacy-policy>
- **Quora:** <https://www.quora.com/about/privacy>
- **Adroll:** <https://www.adrollgroup.com/privacy>.

Google Analytics

We use Google Analytics to track visitors and aggregating information about the traffic to our websites. The Google Analytics privacy policy can be found here:

<https://policies.google.com/privacy>. We've turned on the IP Anonymization feature in Google Analytics. You can learn more about this here:

<https://support.google.com/analytics/answer/2763052?hl=en>.

Backups

Automatic backups are taken on a daily basis, but clients can increase the frequency in which these are taken by purchasing one of our add-ons. Only 14 backups (manual and automatic included) are available for restoration. If a client terminates their account with us, we keep the last 14 backups of their site for 14 additional days.

Affiliates

If you visit our site through a link provided by one of our affiliates, a cookie will be added to your browser in order to remember the affiliate. Potential referrals are tracked via cookies which are set to a 60-day expiration.

Publishing Content (Comments, Posts)

Your Profile Picture (aka Gravatar), Display Name, Website (URL) (if any) and Biographical Info (if any) may be visible to website visitors (e.g. if you leave a comment, forum post, or contribute an article/post).

If you author an article/post, your Username, User ID, Profile Picture (Gravatar), Display Name, Website (URL) (if any) and Biographical Info (if any) are provided to any visitor using the website's REST API interface.

When visitors leave comments on one of our sites we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection.

You'll only be able to leave a comment if you opt-in to saving your name and email address in our database. Published content and comments are stored indefinitely unless deletion/removal is requested by the original author.

Your rights over personal data

Upon request, we will provide you with details regarding your personal data that has been collected by us or which is under our control. If you would like to change information that we maintain about you, you may log into your account and change it or submit a support request for any information to which you don't have access or the ability to change yourself. Information covered by this Privacy Policy may be deleted upon your request, provided that such deletion may impact our ability to provide you with the Services.

You may opt-out of receiving most e-mails from us by following the "unsubscribe" instructions provided in the e-mails.

We may keep your personal data for as long as reasonably required to meet the purposes described herein. Additionally, we will retain this information as required by law, as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Privacy policy changes

Although most changes are likely to be minor, Kinsta Ltd may change its Privacy Policy from time to time, and in Kinsta Ltd's sole discretion. Kinsta Ltd encourages visitors to frequently check this page for any changes to its Privacy Policy. Should Kinsta Ltd decide to change its Privacy Policy, we will post such changes on this page so that our Clients are always aware of how we use their personal information and in what circumstances it discloses it. Client's

continued use of this site after any change in this Privacy Policy will constitute Client's acceptance of such change.

If you are a customer who is subject to EU privacy laws, the Data Privacy Addendum located at <https://kinsta.com/data-privacy-addendum/> as it may be updated from time to time governs the obligations between us with regard to personal data as defined by such laws.

DMCA website notice

If you believe a Kinsta Ltd customer on a site hosted by Kinsta Ltd is infringing your copyright, please send a written notice to one of the following:

- **Physical Address:**
Kinsta WordPress Hosting
Unit 22 Bulrushes Business Park
Coombe Hill Road
East Grinstead
West Sussex
RH194LZ, UK
- **Email:** dmca@kinsta.com

Section 512(c) of the DMCA requires that a notice include all of the following in order to be valid:

- A physical or electronic signature of a person authorized to act on behalf of the owner of an exclusive right that is allegedly infringed;
- Identification of the copyrighted work claimed to have been infringed, or if multiple copyrighted works at a single site are covered by a single notification, a representative list of such works at that site;
- Identification of the material that is claimed to be infringing or to be the subject of infringing activity and that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit Kinsta Ltd to locate the material;
- Information reasonably sufficient to permit Kinsta Ltd to contact you, such as an address, telephone number, and, if available, an e-mail address;
- A statement that you have a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law;
- A statement that the information in the notification is accurate, and under penalty of perjury, that you are copyright owner or authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

You acknowledge that if you fail to comply with all of the foregoing requirements your DMCA notice may not be valid and Kinsta Ltd may take no action. If you have any questions about this

Privacy Policy, the practices of this site, or your dealings with this site, please contact us through the website at <https://kinsta.com/contact> or via email at info@kinsta.com