

PRIVACY PRACTICES

Last Updated: August 2020

YOU ARE ADVISED TO READ THESE PRIVACY PRACTICES AND FULLY UNDERSTAND AND AGREE TO SAME PRIOR TO YOUR USE OF OUR SERVICES.

References herein to the “Company,” “we,” “us,” “our”, means best5vpn. You may contact us by email at our Contact Form available [here](#) with respect to any notice required by these privacy practices or with respect to any questions you have regarding these Privacy Practices.

References herein to “you” or “your” means the individual using our Services and any entity on behalf of whom the Services are accessed.

Capitalized terms not defined herein have the meanings ascribed to them in our End User License Agreement (“EULA”), available at <http://www.best5vpn.top/legal/terms.pdf?source=-lp0-tst0-&ft=1>

We have developed these Privacy Practices to disclose and explain to you how we may collect, retain, process, share and transfer information collected from you when you use our Services. By referring to these Privacy Practices and our rights herein, you may make an informed decision about how you will use and interact with our Services. By accessing our Services, you are agreeing to these Privacy Practices.

Section 1. Our Privacy Practices Generally

For purposes of these Privacy Practices, “Personal Information” means information that you provide to us that personally identifies you, such as your first and last name, email address, physical address, telephone number and billing information.

For purposes of these Privacy Practices, “Non-Personal Information” means information that does not specifically identify you.

Our Privacy Practices can be summarized as follows:

- We may collect information from you based on information collected resulting from your use of our Services and information that you provide to us. Such information collected may include both Non-Personal Information and Personal Information.
- We may share your Personal Information with third parties in many ways and for many reasons, such as providing you with the Services, or for our own or such third party’s business purposes. You can learn more about your rights with respect to information sharing by reviewing the section below titled Our Information Sharing Practices.
- To the extent permitted by us or required by applicable law, you can review and update your Personal Information by contacting us at our Contact Form available [here](#).
- We cannot guarantee and you should not expect, that your information will remain secure at all times and in all circumstances, though we do use commercially reasonable efforts to secure your information.
- Children under 13 are prohibited from using our Services. The Age Restriction section below further discusses this prohibition.

Section 2. Information We Collect

We may collect information from you based on information collected resulting from your use of our Services and information that you provide to us. The information collected may include both Non-Personal Information and Personal Information.

The information we collect about you may include the following:

- Information you provide – Includes any information you enter into the Services or provide in connection with your use of the Services, such as name, email, and phone.
- Device Information – This is information related to the device by which you access the Services, such as a hardware model and operating system version.
- Log Information – This is information about your use of our Services and the Services Content you access, which we automatically collect and retain in our server logs, including:
 - Your Internet protocol address (“IP Address”)
 - Your browser type when using our Services, including the browser’s user agent (e.g., Chrome, Safari, and Internet Explorer) Device
 - event information such as hardware settings, browser language, system activity, crashes, and the date and time of your request and referral URL
 - Diagnostic information about other extensions you have on your device, including a listing of those extensions you have prior to adding best5vpn and those extensions you add to your device after adding best5vpn
 - Your geographic location (lat./long.)
 - The Domain name of your Internet service provider
 - Traffic acquisition source and date of acquisition
 - Time and date of certain browser events

Section 3. Our Use of Your Information

We use your information to provide our Services, including personalizing and improving such Services, such as by using this information to better understand how you utilize and interact with our Services. Specifically, we use your information to:

- Provide, maintain, improve, and develop our Services, the Service Content and features related to each of them.
- Respond to you in connection with whatever requests, comments, and questions you provide us, including through contact information you might provide us, such as text or email.
- Assist third parties, such as advertisers and publishers, to connect with you to promote advertising in their apps and websites.
- Generate analytics and reports for our business purposes, which reports may aggregate or anonymize information.
- Detecting and defending against fraudulent, abusive, or unlawful activity.

When performing the foregoing functions, your Personal Information may be combined with information we obtain about you from other sources. To the extent we combine your Personal Information with Non-Personal Information, we will treat such combined information as Personal Information for so long as it remains combined.

Section 4. Our Information Sharing Practices

Unless you have provided your consent to do so, we do not share your Personal Information with any third party for their own marketing purposes. We may share your information in the following ways:

- **With our Affiliates:** Your information may be shared with our parent company and our affiliates, which are entities under common ownership or control of our ultimate parent company.
- **To Prevent Fraud:** To the extent necessary to investigate, prevent, or respond to suspected illegal or fraudulent activity or to protect the safety, rights, or property of us, our users, or others, including our business partners, we may disclose the Personal Information we collect about our users, including you.
- **To our Service Providers:** In connection with the provision of our Services, we often partner with vendors, business partners and services providers to the extent necessary for them to assist us in fulfilling the Services or providing their own Third Party Services. In such a cases, we have contractual restrictions in place with such service providers to prohibit them from sharing such information, as well as the information they collect in performing any portion of the Services or the Third Party Services, for purposes other than in furtherance of our relationship with them.
- **As necessary for Law enforcement purposes and public safety or to protect our legal rights:** If a government authority, such as law enforcement authorities, courts, or regulators, request information or we are otherwise required to disclose information to comply with the law or to meet national security or law enforcement requirements, we may disclose any information we have about our users, including you. Also, to the extent necessary to exercise or protect our legal rights or defend against legal claims we may disclose information collected about our users, including you.
- **In connection with a Sale or merger of our business:** We may transfer your Personal Information to a third party if we or any of our affiliates are involved in a corporate restructuring (e.g., a sale, merger, or other transfer of assets).
- **To Advertisers and advertising networks:** We partner with advertisers and advertising networks to place ads on and through our Services. These companies may also collect information, such as your computer's IP address, browser information, and search queries, in connection with your use our Services and any of their services incorporated into such Services. They also may use cookies and other technologies to collect this information when you visit our site as described below.

Except as set forth above, we do not sell, license or share information that individually identifies our users, including you, with companies, organizations or individuals outside of the Company and its affiliated entities.

When transferring your information, we do comply with all applicable privacy laws. In accordance with our EULA, we disclaim and shall have no liability or obligation in connection with any third party actions or omissions concerning your information, even if such information was obtained from us in accordance with these Privacy Practices. Please contact the applicable third party if you experience any issues with respect to such third party's use of your information. The Section below titled Third Party Practices provides additional information regarding our interaction with and sharing of information with third parties.

Section 5. Cookies and Tracking Technologies

When you use our Services, we may send your computer or mobile device a cookie that uniquely identifies your browser. A "cookie" is a small file containing your preferences that is sent to your browser and sent back by your browser each time your browser accesses our servers. As used in these Privacy Practices, we use the term "cookies" to refer to cookies and all such similar technologies that collect information automatically when you are using our Services. We use cookies and the data derived from such cookies to improve the quality of our Services and your use of those Services, such as to deliver our Services and Service content in your language of choice, to filter results and deliver the Services in accordance with your preferences, as well as to analyze the interaction of our user with our Services. For example, we track user trends and patterns of how people search. The cookies we use can only be read by the server that placed them there. Many browsers are set up to accept cookies unless the user changes the settings for cookies. By properly setting your preferences in your browser, you can control which and what types of cookies are downloaded from the Services. Be advised that, while you can choose to opt out of receiving cookies, our Services may not function correctly without cookies. You can review more information about cookies and how to control and delete cookies in various browsers, such as Chrome, Safari, Internet Explorer and others, please visit <http://www.aboutads.info/consumers/>.

We may currently or in the future use web analytics companies to assist us in measuring the effectiveness of our Services. This requires that we allow such web analytics companies to include their own Web beacons and cookies on the Services. These web analytics companies collect information from Web beacons and cookies such as click-throughs by users and other similar information. We use this information to help us learn things like overall user preferences, click-through rates, means to improve our Services, and what the types of offers that are of most interest to our users. We control how that data may be used, notwithstanding its collection by third party web analytics companies.

We use web analytics companies to assist us in measuring the effectiveness of our Services. In order to do so, we also allow these to include their own Web beacons and cookies on the Services. Information collected by these web analytics companies from Web beacons and cookies includes click-throughs by users and other similar information. This information is used by us to improve our Services, including by understanding overall user preferences, click-through rates, means to improve our Services, and the types of offers that are of most interest to our users. Although this information is collected by third parties, it is done on our behalf and we retain control over the use of such information.

You can "opt-out" of receiving cookies from certain of our ad serving partners. For more information on how to do so, please visit: http://www.networkadvertising.org/managing/opt_out.asp.

Section 6. Data Protection

The protection of your Personal Information is of great concern to us. Except as otherwise provided for in these Privacy Practices, we restrict access to your Personal Information to our employees, contractors, affiliates, service providers, and agents. In furtherance of our efforts protect your personal data against loss, misuse, unauthorized access, disclosure, and alteration, we maintain technical, physical, and administrative security measures designed to provide reasonable. The security measures include firewalls, data encryption, physical access controls to data centers we use, and information access authorization controls. Notwithstanding our dedication to securing our systems and Services, you remain responsible for securing and maintaining the privacy of your password, if any, used in connection with your use of our Services. Even given the precautions against possible breaches in our Services and databases, we cannot guarantee that it is completely secure. We can make no assurances you that unauthorized hacking, access, data loss, or other breaches will never occur and disclaim all liability in connection with any such activities. Accordingly, as set forth in our EULA, your use of our Services is at your own risk. You are encouraged to protect your Personal Information when you are on the Internet, including making sure you use a secure Internet browser.

Section 7. Third Party Practices

In connection with the provision of our Services, you may be requested or required by our service providers to provide information, including Personal Information, to them or to download certain software. We assume no responsibility for the privacy practices of our service providers, including Third Party Service providers, or the contents of any software downloaded from them. To the extent our Services are linked to Third Party Services, we have no control over such Third Party Services, as set forth in our EULA. While applicable law obligates our service providers to protect the privacy of certain types of data, we assume no responsibility for the actions or omissions of our services providers, even as relates to information they receive directly from us. Under no circumstances are we responsible for the privacy practices or the content of such Third Party Services, including their information collection, storage, usage and sharing practices. We recommend you contact such Third Party Service providers directly in connection with any questions or concerns you have about their protection of your information and their overall privacy practices. You may also notify us by emailing us at our Contact Form available [here](#), though we maintain no responsibility to reply to such correspondence or to take any action in connection with such correspondence.

Section 8. Information Retention

Unless a longer retention period is required to comply with law or a legal request, we generally retain information collected about you only as long as is necessary for us to fulfill our business purposes. Nevertheless, we may, in certain circumstances, choose to anonymize certain information you provide to us so that it can no longer be attributed to you if we would like to retain it for longer periods of time.

Section 9. Age Restriction

Children under the age of 13 are prohibited from using our Services. Our Services are not directed to children under the age of 13. While we do not knowingly collect information, including Personal Information, from children under the age of 13, in the event that we obtain actual knowledge that we have collected Personal Information from a child under the age of 13, we will promptly delete it, unless we are legally obligated to retain such data. We request that you contact us immediately if you believe that we have mistakenly or unintentionally collected information from a child under the age of 13. Additionally, we comply with the Children's Online Privacy Protection Act; for more information the Act and children's privacy, please visit <http://www.ftc.gov/privacy/coppafaqs.shtml>.

Section 10. International Data Transfers

If you live outside the United States, be advised that the Company may transfer your Personal Information to countries other than the one in which you live. In particular, your Personal Information will be transferred to and processed in the United States where many of our central databases operate. By using our Services, you are consenting to such cross-border data transfers of your Personal Data, as set forth in these Privacy Practices. By using the Services, you consent to your Personal Information being collected, processed and transferred as set forth in these Privacy Practices and U.S. law and you acknowledge that the data protection and other laws of other countries, such as the United States, may provide a less comprehensive or protective standard of protection than those in your country. The Company has entered into European Union Model Clauses, also known as Standard Contractual Clauses, to meet the adequacy and security requirements for our users in the European Union.

We do not represent or warrant that our Services are appropriate or available for use in any particular jurisdiction. Those who choose to access the Services do so on their own initiative and at their own risk, and are responsible for complying with all local laws, rules and regulations. We may limit access to our Services, in whole or in part, to any person, geographic area or jurisdiction we choose, at any time and in our sole discretion.

Section 11. Your Rights

Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their Personal Information. Subject to any exemptions provided by law, you may have the right to request access to your Personal Information that we retain, as

well as to seek to update, delete or correct this Personal Information. If you wish to exercise any of these rights, please contact our Contact Form available [here](#). While we may be able to provide you access to your Personal Information in some cases, there is no guarantee we will be able to provide access in all circumstances. In circumstances where we are unable to verify your identity or are required to retain such information in accordance with applicable laws, we may not be able to modify or remove your Personal Information. We will remove your Personal Information in accordance with applicable law.

To the extent that our processing of your Personal Information is subject to the General Data Protection Regulation ("GDPR"), the Company relies on your consent. If we have collected and process your Personal Information with your consent, then you can withdraw your consent at any time by contacting us at our Contact Form available [here](#).

Section 12. EEA Data Privacy Rights

European Economic Area residents have the right to restrict the Company's use of your Personal Information and lodge a complaint with your local data protection authorities, subject to applicable law. If you are a resident of the European Economic Area and believe we maintain your Personal Information within the scope of the GDPR, you may direct questions or complaints to us at our Contact Form available [here](#).

Section 13. California Data Privacy Rights

Under California Civil Code Section 1798.83, which is also known as the "Shine The Light" law, users who are California residents may request from us a list of the Personal Information (if any) that we have disclosed to third parties for direct marketing purposes during in the preceding calendar year, this includes the names and addresses of such third parties. Requests may be made only one time per year. These requests are free of charge. To make a request, please contact us at vpn@best5vpn.top and note that we are not able to accept requests through the telephone, mail or by facsimile. We cannot be responsible for notices that are not labeled or sent properly or that do not have complete information. In the body of such request, you must put the statement "Your California Privacy Rights", as well as your name, street address, city, state and zip code and you must provide enough information for us to determine if this applies to you. Additionally, you must attest to the fact that you are a California resident and provide a current California address.

Additionally, California residents have additional rights under the California Consumer Privacy Act of 2018 (CCPA), such as:

- The right to access the data about you that we collect;
- The right to opt-out of the sale by us of any of the information we collect about you to third parties;
- The right to require that we delete any personal data (as defined under the CCPA) that we have collected about you;
- The right to know the categories of third parties to which we have sold data about you; and
- The right to know our reasons for collecting data about you (as is described in the EULA).

You can submit a request to exercise your rights above by mailing, emailing or calling us using the following information:

Eightpoint Technologies Ltd. SEZC
PO Box 10008, Willow House
Cricket Square, Grand Cayman KY1-1001
Cayman Islands
Email: ccpa@eightpoint.ky

You must confirm that you are a resident of the State of when asserting your rights under the CCPA. We reserve the right to request that you provide further evidence as a resident of California before acting on your request.

You can expect a response to your request within 45 days of your submission of same. When responding, we will include the categories of third parties to which we have sold data about you. For more information on why we have collected data about you, please see the rest of this Privacy Policy and our EULA.

To opt-out of the Company from selling any of the information it collects about you to third parties and to delete all such information, we offer an "Opt-Out" Option, which can be accessed by emailing us at vpn@best5vpn.top.

Section 14. More Information

If you have questions about these Privacy Practices, or if you would like access to Personal Information we may have about you in our files, to correct, update or to have us delete it, or if you would like to notify us of your choice to opt-out of any sharing of your Personal Information, please contact us at our Contact Form available [here](#). For additional information to assist with protecting your data privacy, you may visit <http://www.netcoalition.com> and <http://www.privacyalliance.org>.

Section 15. Privacy Practices Updates

At any time and without notice to you, we may update these Privacy Practices by posting a revised version on the Services. Your continued use of the Services constitutes your unconditional and binding acceptance of these Privacy Practices, including any updates, amendments, revisions, alterations, modifications and/or supplements that we make from time to time in accordance with the provisions of hereof.

We encourage you to periodically review these Privacy Practices for updates and to ensure that you are familiar with its terms. If you do not agree to these Privacy Practices, you should immediately discontinue accessing or using the Services. These Privacy Practices are not applicable to Third

Party Services or Third Party Content that contain other privacy practices.

Section 16. Contact Us

If you have any questions about this Privacy Policy or the Company's practices, or if you are seeking to exercise any of your statutory rights, you may contact us at support@best5vpn.top.

Eightpoint Technologies Ltd. SEZC
PO Box 10008, Willow House
Cricket Square, Grand Cayman KY1-1001
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