

PRIVACY POLICY/INFORMATION

INTRODUCTION

This policy outlines how we use your data, what data we collect and store, how we protect stored data, data retention and waivers of rights. It also outlines our procedures for the General Data Protection Regulations of the European Union.

1. ALLOCATED DATA PROTECTION OFFICER

- a. The allocated Data Protection Officer (DPO) following ICO and EU Commissioner Guidelines is Chief Compliance Officer, Mr Jake W.

2. BINDING TERM

- a. Sparked Host LLC agrees to be bound by the European Union's General Data Protection Regulations.
- b. By using our site, you automatically and indefinitely agree to be bound by this policy.
- c. You agree to regularly check this policy as a matter that it will/may be updated regularly.

3. DATA RETENTION

- a. Data is retained for a period of 5 years (dependant on data type).
 - i. Client data is kept for a period of 2 years (unless or otherwise erasure request).
 - ii. Site requests are retained indefinitely (the cookies and data collected from accessing our site).
 - iii. Service files are retained indefinitely for as long as we decide unless you delete them manually.

4. DATA ERASURE

- a. You do not waiver your right to data erasure, but data erasure can only be carried out in exceptional circumstances
- b. Procedure of Data Erasure:
 - i. Data erasure can be requested using Form ICO3.
 - ii. Your request will receive a response in 14 days (maximum). Sparked Host LLC reserves the right to exercise a rejection of the data erasure request – in which case they must provide an appeal process and a written response concluding under what grounds the data erasure request was rejected.
- c. The circumstances in which you may exercise your right to data erasure are; -
 - i. **EXAMPLE:** You have cancelled your subscription/service with us.
 1. The organisation no longer needs your data.
 - ii. **EXAMPLE:** You provided a response regarding market research.
 1. You initially consented to the use of your data, but have now withdrawn your consent (we may reject your request if this is your request reasoning)
 - iii. **EXAMPLE:** Sparked Host LLC has failed to abide by the binding privacy policy.
 1. The organisation has collected or used your data unlawfully
 - iv. **EXAMPLE:** We haven't complied with the rules on data protection.
 1. The data was collected from you as a child for an online service.
 - a. The law gives children special protection because they may be less aware of the risks and consequences of giving their

data to organisations. Even if you are now an adult, you have a right to have your data erased if it was collected from you as a child.

5. RIGHT OF APPEAL

- a. Requests of execution of erasure or requests for information to be provided to you under the General Data Protection Regulations follow strict standards, in some circumstances, we may refuse to erase or otherwise provide something in which you may retain a right to do.
- b. You will receive a form/letter headed **FORM ICO4-LOC** with a notice of rejection or acceptance of your request (14 days after the request being acknowledged). – If you believe the decision we have made is incorrect or would like us to reconsider our decision please write to us at dpo@sparkedhost.us.
- c. You may be asked to fill a form out headed **FORM ICO5-RECON**

6. DATA WE COLLECT

- a. We collect a series of your data such as:
 - i. Personal Identification Information (“PII”)
 1. Your name, email, phone number, postal address, IP address, geo-location.
 - ii. Cookies
 - iii. Log Data
 1. Internet Protocol (“IP”) address, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages and other statistics.
- b. Third party services may additionally collect data. Our third-party services include (but are not limited to):
 - i. Tawk.to
 - ii. Google
 - iii. FontAwesome
 - iv. WHMCS
 - v. TrustPilot
 - vi. Cookie declaration services
 - vii. Discord
- c. We collect any data entered into the site as part of providing our service.

7. HOW WE PROTECT YOUR DATA

- a. Your data is protected using a variety of measures such as (but not limited to, due to security reasons):
 - i. Hashing data
 - ii. SSL handshake transactions

8. HOW WE USE YOUR DATA

- a. Cookies
 - i. Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive. We use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.
- b. Personal Identifiable Information (“PII”)
 - i. We collect a record of PII for several reasons such as (but not limited to):
 1. Provisions for Marketing Research (unless requested not to be contacted)
 2. Tax Reasons

3. Legal Use (If arose)
 4. To contact you regarding your services
 5. To report/provide your details to relevant law authorities if required.
- c. Log Data
- i. We take a record of log data for reasons such as:
 1. Improved Firewall/Security Purposes
 2. Marketing
 3. System performance measurements
 4. Potential security concerns
 5. Protection of customers' accounts and services
- d. Fraud Prevention and Protection
- i. We may share your PII with our fraud prevention and protection partner, Fraud Record.

9. ACCESS ARRANGEMENTS

- a. A small number of Sparked Host LLCs employees have access to your full recorded data these staff members are:
- i. Mr Jake W. Chief Compliance/HR Officer & Data Protection Officer.
 - ii. Mr Paul T. Chief Executive Officer.
 - iii. Mr Nik R. Chief Technology Officer.
 - iv. Mr Kole K. Compliance Department/Support Manager.
 - v. Mr Shiva R. Compliance Department/Director of Business Ops.
 - vi. Mr Mason R. Development Operations Team.
 - vii. Mr Raúl M. Systems Administrator.
 - viii. Mr Eric M. Media Team Lead.
 - ix. Mr Johnny D. Partnerships Team Lead.
 - x. Mr Esteban M. Compliance Team.
 - xi. Mr Ashley H. Compliance Team.
- b. Provisions are made for Law Enforcement Agencies to request access to personal customer data with regards to court orders.
- i. Any court orders, subpoena requests and requests from law enforcement agencies can be submitted to dpo@sparkedhost.us for a 24-hour maximum response.
- c. We do not share ANY of your recorded data with third parties, though our third parties may record data on you individually if you access any service provided by them.
- d. Access arrangements are made for a portion of your recorded data to Sparked Host LLC employees. Data under this access arrangement is controlled under their individual non-disclosure agreements.

10. DATA ACCESS

- a. You do not waiver your right to data access and there are no limits on the data access requests.
- b. You may request up to 3 full-data records within any 30-day period.
- c. You may be required to fill in a form requesting your data. The procedure is entirely free-of-cost and there are no fees for the process of your request.

11. DATA BREACHES

- a. In the event of a data breach we will; -
- i. Provide a notification within 72 hours of becoming aware.
 - ii. Provide information on what data was breached.
 - iii. Inform our data controllers and such of any breach.
 - iv. Lock any system, and access to any system where possible where the data breach is occurred.

- b. Our appointed DPO will inform you of any data breaches and we will make you aware of any next steps.
- c. Our appointed DPO will make timely requests of our systems staff to lockdown any services where a data breach has sourced.

12. DATA COLLECTION & CONSENT

- a. By using any of our services included but not limited to, our website, our game servers, our virtual private server services, our dedicated server services, our domain registration services your data may be collected under this policy, you formally by using any of these services (not limited to) allow us to collect your data and consent to said collection and record.

13. LINKS TO THIRD-PARTY SERVICES

- a. Our services may contain links to third-party services. Sparked Host LLC is not liable for third-party data collection, breaches or procedures. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

14. CHANGES TO THIS POLICY

- a. We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

15. CONTACTING THE DATA PROTECTION OFFICER

- a. Sparked Host LLC welcomes your questions or comments regarding this Statement of Privacy. If you believe that Sparked Host LLC has not adhered to this Statement, please contact Sparked Host LLCs Data Protection Officer using the below details:
 - i. Email: abuse@sparkedhost.us
 - ii. DPO Email: dpo@sparkedhost.us

Approved for use on the 23rd October 2020 by:

Mr Jake W.

Chief Compliance Officer, Appointed Data Protection Officer, Chief Human Resources Officer and at **Sparked Host LLC.**

DATE	23 rd October 2020
SIGNED	