

## MojoHost Privacy Shield Policy

This privacy shield policy (“Policy”) describes how Easy Online Solutions, Ltd. d/b/a MojoHost (“MojoHost,” “we,” or “us”) collects, uses, and discloses certain personally identifiable information that we receive in the US from the European Economic Area (“EEA Personal Data”), the United Kingdom (“UK Personal Data”), and Switzerland (“Swiss Personal Data”). This Policy supplements our Website Privacy Policy located at <https://www.mojohost.com/wp-content/uploads/gdpr/MojoHost-Privacy-Policy.pdf>, and unless specifically defined in this Policy, the terms in this Policy have the same meaning as the Website Privacy Policy.

MojoHost recognizes that the EEA, UK, and Switzerland has established strict protections regarding the handling of EEA Personal Data, UK Personal Data, and Swiss Personal Data, including requirements to provide adequate protection for EEA Personal Data, UK Personal Data, and Swiss Personal Data transferred outside of the EEA, UK, and Switzerland. To provide adequate protection for certain EEA Personal Data, UK Personal Data, and Swiss Personal Data about MojoHost customers, suppliers, and business partners received in the US, MojoHost has elected to self-certify to the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework administered by the US Department of Commerce (“Privacy Shield”). MojoHost adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability.

For purposes of enforcing compliance with the Privacy Shield, MojoHost is subject to the investigatory and enforcement authority of the US Federal Trade Commission. For more information about the Privacy Shield, see the US Department of Commerce’s Privacy Shield website located at: <https://www.privacyshield.gov>. To review MojoHost’s representation on the Privacy Shield list, see the US Department of Commerce’s Privacy Shield self-certification list located at: <https://www.privacyshield.gov/list>.

### Personal Data Collection and Use

Our Website Privacy Policy located at <https://www.mojohost.com/wp-content/uploads/gdpr/MojoHost-Privacy-Policy.pdf> describes the categories of EEA Personal Data, UK Personal Data, and Swiss Personal Data that we may receive in the US as well as the purposes for which we use that EEA Personal Data, UK Personal Data, and Swiss Personal Data. MojoHost will only process EEA Personal Data, UK Personal Data, and Swiss Personal Data in ways that are compatible with the purpose that MojoHost collected it for, or for purposes the individual later authorizes. Before we use your EEA Personal Data, UK Personal Data, or Swiss Personal Data for a purpose that is materially different than the purpose we collected it for or that you later authorized, we will provide you with the opportunity to opt out. MojoHost maintains reasonable procedures to help ensure that EEA Personal Data, UK Personal Data, and Swiss Personal Data is reliable for its intended use, accurate, complete, and current.

### Data Transfers to Third Parties

**Third-Party Agents or Service Providers.** We may transfer EEA Personal Data,

UK Personal Data, and Swiss Personal Data to our third-party agents or service providers who perform functions on our behalf as described in our Website Privacy Policy. Where required by the Privacy Shield, we enter into written agreements with those third-party agents and service providers requiring them to provide the same level of protection the Privacy Shield requires and limiting their use of the data to the specified services provided on our behalf. We take reasonable and appropriate steps to ensure that third-party agents and service providers process EEA Personal Data, UK Personal Data, and Swiss Personal Data in accordance with our Privacy Shield obligations and to stop and remediate any unauthorized processing. Under certain circumstances, we may remain liable for the acts of our third-party agents or service providers who perform services on our behalf for their handling of EEA Personal Data, UK Personal Data, and Swiss Personal Data that we transfer to them.

**Disclosures for National Security or Law Enforcement.** Under certain circumstances, we may be required to disclose your EEA Personal Data, UK Personal Data, or Swiss Personal Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

## **Security**

MojoHost maintains reasonable and appropriate security measures to protect EEA Personal Data, UK Personal Data, and Swiss Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction in accordance with the Privacy Shield.

## **Access Rights**

You may have the right to access the EEA Personal Data, UK Personal Data, or Swiss Personal Data that we hold about you and to request that we correct, amend, or delete it if it is inaccurate or processed in violation of the Privacy Shield. These access rights may not apply in some cases, including where providing access is unreasonably burdensome or expensive under the circumstances or where it would violate the rights of someone other than the individual requesting access. If you would like to request access to, correction, amendment, or deletion of your EEA Personal Data, UK Personal Data, or Swiss Personal Data, you can submit a written request to the contact information provided below. We may request specific information from you to confirm your identity. In some circumstances we may charge a reasonable fee for access to your information.

## **Questions or Complaints**

You can direct any questions or complaints about the use or disclosure of your EEA Personal Data, UK Personal Data, or Swiss Personal Data to us at [privacy@mojohost.com](mailto:privacy@mojohost.com). You may also contact our EEA affiliate MojoHost B.V. at [privacy@mojohost.eu](mailto:privacy@mojohost.eu) with any questions or concerns. We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of your EEA Personal Data, UK Personal Data, or Swiss Personal Data within 45 days of receiving your complaint. For any unresolved complaints, we have agreed to cooperate with JAMS, an independent dispute resolution provider located in the United States. If you are unsatisfied with the resolution of your complaint or if you do not receive timely acknowledgment of your complaint from us, you may contact

JAMS at <https://www.jamsadr.com/eu-us-privacy-shield> for further information and assistance or to file a complaint. The services of JAMS are provided at no cost to you.

**Binding Arbitration.** You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (1) raised your complaint directly with MojoHost and provided us the opportunity to resolve the issue; (2) made use of the independent dispute resolution mechanism identified above; and (3) raised the issue through the relevant data protection authority and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you. For more information on binding arbitration, see [US Department of Commerce's Privacy Shield Framework: Annex I \(Binding Arbitration\)](#).

## **Contact Us**

If you have any questions about this Policy or would like to request access to your EEA Personal Data, UK Personal Data, or Swiss Personal Data, please contact us as follows:

Easy Online Solutions, Ltd.  
Chief Privacy Officer  
30300 Telegraph Road, Suite 110  
Bingham Farms, Michigan 48025  
[privacy@mojohost.com](mailto:privacy@mojohost.com)

## **Changes to This Policy**

We reserve the right to amend this Policy from time to time consistent with the Privacy Shield's requirements.

**Effective Date:** March 29, 2019

**Last modified:** February 24, 2019