

## **Privacy Policy**

This Privacy Policy outlines the methods of collecting and using information related to Fort VPN (hereinafter referred to as the "Application"). This policy explains how we collect, use, and protect the information you provide to us. We understand the importance of privacy and security and are committed to protecting your information. This Privacy Policy aims to provide clear and concise explanations of our information collection and usage methods. It also outlines your rights regarding your personal information. By using our Application, you agree to the terms and data processing actions described in this Privacy Policy. Please take the time to read and understand this Privacy Policy carefully before using our application and services. This will help you make informed decisions and ensure that you agree with our information practices.

### **What Information Do We Collect About You?**

This section describes the various categories of personal data (also referred to as "personal information") that we collect from you and about you. This information is not collected in all situations but only in circumstances related to a specific product. For example, as stated in the Privacy Notice of our VPN products, our VPN services collect only a limited amount of personal data and specify that the history of websites or applications visited during a VPN session is not linked to any customer information unless the customer provides their identity and associated information in a customer support request.

#### **1.1. Information You Provide to Us**

**Account Information.** Some services require or allow you to create an account before you can access them. During the account registration process, we may collect information such as your name, username, email address, and password.

**Billing and Payment Information.** To purchase a service, you may need to provide us with details such as billing name, billing contact information (street addresses, email addresses), and payment instrument data. Our payment processing partners handle this essential payment information to process payments and refund requests.

**Messages and Submissions.** You may want to provide us with information when you communicate with us (e.g., via email, phone, or chat for support or inquiries about our services), including when you fill out online forms, respond to surveys, leave feedback, post comments on our website, participate in promotions, or submit information through our services.

#### **1.2. Information Collected When You Use Our Services**

**Usage Information.** We collect information about how you interact with our services, including when you visit and use our websites or applications, which web pages or features of the Fort VPN application are used, and when and how long you use our services. We may use cookies and/or other technologies to collect this information. See below for more information.

**Device Information.** We collect information from and about the device you use to access our services, including the browsers and Fort VPN applications you use to access our services. For example, we may collect device identifiers, browser types, device types and settings, operating system versions, mobile, wireless, and other network information (such as ISP name, carrier name, and signal

strength), as well as app version numbers. We may use cookies and other technologies to collect this information. See below for more information.

**Diagnostic Information.** We may collect information about the nature of the requests you send to our servers, such as what is being requested, information about the device and application used to send the request, timestamps, and URLs being referenced.

**Location Information.** Unless explicitly stated otherwise or with your consent, we do not collect information about your location based on your device's GPS or data from other device sensors. However, we may determine your approximate location by calculating inaccurate latitude and longitude based on your IP address to provide you with a better service (for example, connecting you to the nearest and fastest VPN server).

**VPN-Related Information.** Our VPN products do not log any information that associates your account credentials or identifying information with your activity during a VPN session. We do not keep records showing which websites you have visited or which applications were accessed through the VPN connection. However, we will:

- Log the amount of bandwidth used during the VPN session
- Identify the locations of the VPN servers used
- Collect diagnostic information similar to that mentioned above.
- We ask you to rate your connection and provide more detailed information for a survey if you are not satisfied with the service. This information is not tied to a specific user.

We may also assign a "hash" to your device, which is a random identifier generated when you first launch one of our VPN applications. Device hashes are not linked to browsing activity on VPN or user identification, but can be used to measure individual user activity.

### **1.3. Information Provided to Us by Third Parties**

If you were invited to use the Fort VPN service, the person who invited you may provide your personal data, such as your email address or other contact information.

**Third-Party Accounts.** Some services may allow you to register an account using third-party accounts (e.g., Google or Microsoft account). In this case, the third party may send us some information about you that they have. You can control what information they send us through the privacy settings for that third-party account.

**Threat Information.** We receive information from trusted representatives in the security industry, who provide data that helps us deliver, develop, test, and improve our services (e.g., lists of malicious URLs, spam blacklists, blacklists of phone numbers, and malware samples). Some of this information may inadvertently contain personal data.

## **2. How We Use Your Information**

We use the information we collect for various purposes described below. For visitors from the European Economic Area (EEA) or the UK, please also note our legal bases for each processing activity listed below:

- To provide, maintain, troubleshoot, and support our services. We use your information for this purpose on the basis that it is necessary for the performance of our contractual obligations to you. Examples include:
- For our VPN products, using information about the bandwidth you use and how long you utilize our services to provide services according to the plan you have subscribed to;

- For our digital threat platform, using threat and device information to determine if certain elements pose a potential security risk; and
- Generally, to ensure the proper functioning of our services.
- For billing and payment. We use your information to perform billing administration actions and process payments that are necessary for the fulfillment of our contractual obligations.
- To communicate with users and potential users. We use your information to contact you, including responding to your inquiries and sending you information and updates about our services. We may do this to fulfill our contract with you, because you have consented to communication, or because we have a legitimate interest in providing you with information about our services.
- To improve our services. We aim to offer you the best services and user experience we can, so we have a legitimate interest in continuously improving and optimizing our services. To do this, we use your information to understand how users interact with our services. Examples: we analyze certain usage, device, and diagnostic information to understand collective usage trends and user engagement with our services (and, for example, invest in technical infrastructure to improve service in regions with growing user demand); we may use device and threat information to conduct spam, threat, and other research to improve our threat detection capabilities; we review customer feedback to understand what we could do better.
- To develop new services. We have a legitimate interest in using your information for planning and developing new services. For example, we may use customer feedback to understand what new services may be needed by users.
- To promote and advertise our services. We may use your information to provide, measure, personalize, and improve our advertising and marketing based on our legitimate interest in offering you services that may be of interest. Examples: we may use information such as who or what directed you to our services to understand how effective our advertising is; we may use information to manage promotional activities, such as giveaways and referral programs. Note that our VPN products do not use your browsing activity on the VPN for these purposes, and we do not keep records showing that you browsed or accessed anything through the VPN connection.
- To prevent harm or liability. We may use information for security purposes (e.g., to investigate security issues or to monitor and prevent fraud) and to prevent abuse. We may do this to fulfill our legal obligations, protect vital interests of a person, or because we have a legitimate interest in preventing harm or liability to Fort VPN and our users. For example, we may use account, usage, and device information to determine if an organization is engaging in misconduct regarding our services.
- To comply with the law. We may use your information in accordance with applicable laws, legal processes, or regulations. We may also be required by contract or court to provide certain information necessary for our business partners to fulfill the terms of a business agreement. To learn about our practices regarding sharing your information with third parties for compliance with the law, see Section 3.1 below. We also use your information to enforce our legal rights and resolve disputes.

### **3. To whom do we share your information and why?**

### **3.1. In general**

We may disclose your information under the following circumstances:

- In accordance with your instructions or consent. For example, some services may allow you to register an account using a third-party account (such as a Google or Microsoft account). If you choose to do this, we will share your information with that third-party account provider.
  
- For your business organization (for our business services). If a business client provides you access to our services through a business account, other employees of that organization may view information necessary for servicing your account and the related personal contact information, as well as manage it (e.g., the administrator). Please note the following information regarding the information shared as a result of these relationships:
  - Commercial organizations do not have access to any information regarding network or Internet usage related to your activities on the VPN, and they do not receive any reports from it.
  - Commercial organizations do not receive any information provided to you by our identification products, such as information related to your credit report, credit alerts, or other identity-related information, unless you provide explicit consent for such use in each instance they request.
- For collaboration with other users on your behalf. Some services may provide different users ways to interact with each other. Your information will be shared in connection with these activities if you choose to participate.
- To a new owner of Fort VPN or any of our assets. In the event of a change of ownership or control over all or part of our services, assets, or business, we may transfer your information to the new owner.
- In accordance with legal proceedings and laws. We may disclose your information if required by applicable law; to fulfill our legal obligations; to comply with legal processes; and to respond to lawful requests from law enforcement agencies concerning criminal investigations or alleged illegal activities that could expose Fort VPN, you, or any of our other users to legal liability. If we disclose your information for these purposes, we limit it to what is legally necessary and challenge information requests that we believe are unlawful, overly broad, or otherwise invalid. Again, our VPN products do not collect information about which websites you visit or which applications you use, so this information is not available upon request from law enforcement.
- To ensure compliance with our rights and prevent fraud and abuse. We may share a limited amount of your information to ensure compliance with our agreements with customers and users and for their administration, as well as to respond to claims made against Fort VPN. We may also share your information to protect against fraud and abuse by Fort VPN, our affiliates, users, and others.

### **3.2. Cookies and Other Tracking Technologies**

Fort VPN uses various technologies in our services to help us collect information about users of our website or application. These technologies include:

- Cookies. Cookies allow Fort VPN or third parties we authorize to place cookies on your device to recognize visitors to our websites. For more information on how we use cookies, please refer to the cookie notice related to each product website listed below. We use cookies for:
- Providing our services. Some cookies are necessary for the proper functioning of our services. For example, cookies allow us to confirm who you are and whether you are authorized to access a resource.
- Saving your preferences. Cookies may save your preferences, such as language preferences or the need to pre-fill your username in login forms. We may also use them to optimize the content we show you.
- Analytics. Cookies are used to inform us how users interact with our services so that we can improve their performance (for example, which screens or web pages you visit and whether our advertising is effective).
- Security. Cookies enable us and our payment systems to detect certain types of fraud.
- Advertising purposes for Fort VPN. We advertise our services online using third parties that place ads about us on websites across the Internet.
- Pixel Tags / Page Tags / Web Beacons / Tracking Links. These tools allow us to determine whether you perform a specific action on a webpage or in an email message. When you access a page, ad, or email or click on a link, these elements inform us that you visited that page, opened the email, or clicked the link. They may also indicate your Internet Protocol (IP) address, which allows Fort VPN to determine your approximate geographic location as assigned by your Internet Service Provider.

#### Your Choices Regarding Our Use of Cookies

- Fort VPN collects certain information through automated means when you interact with our website. Like many companies, Fort VPN uses various technologies, including "cookies" and related technologies such as pixel tags on our website to help us collect certain information. Our service providers (e.g., analytics providers) may also place cookies and similar technologies on our website. For more information on the use of cookies on the Fort VPN website, please refer to the privacy notices or cookie notices related to that website.
- You have the option to manage cookie settings in your web browser settings, including deleting cookies and blocking their placement in those browsers or devices. Visit the "Help" section of your browser to understand what control it provides you over cookies. Please note that deleting or blocking certain cookies may negatively impact the proper functioning of our services.

## 4. Security

Fort VPN employs a range of administrative, organizational, technical, and physical security measures designed to protect your data from unauthorized access, loss, or alteration. Access to information about your account and services is restricted to our employees who need such access to perform their job duties. Although our security controls are robust, no data security measure can guarantee 100% protection.

### 4.1 Key Guarantees

- Fort VPN does not record your actions while browsing via the VPN in any way that can be linked to you. When you use the VPN connection, we do not store any information that identifies what you browse or do online through this VPN connection. Although we log domain names visited by users (but not full URLs), we do not log them in combination with anything that identifies a person or device.
- Our VPN connection data is encrypted, and Fort VPN does not inspect or log the content of what you browse or do through it (unless, of course, you are using the VPN connection to communicate with Fort VPN). For your protection, we may block access to certain resources known to be malicious.

For ease of use in this product privacy notice, we use the term “VPN Browsing Activity” to refer to the online actions you take through VPN connections initiated via our VPN products. This includes what you browse or do online, or the applications you access on your mobile device through the VPN connection.

#### **4.2 What Information We Collect and Do Not Collect Regarding VPN Use**

When you participate in a VPN session, we do not log or otherwise record IP addresses, device identifiers, or any other form of identifier in conjunction with your VPN browsing activity.

In simple terms, this means our VPN products do not store any information about what any specific user has browsed or accessed through the VPN connection. However, please see “How We Use IP Addresses” below.

When you establish a VPN connection, we collect your device's IP address, immediately encrypt it, and delete it at the end of your VPN session. The IP address is not linked to your VPN browsing activity. This means we cannot share your VPN browsing activity with anyone — be it an ad network or a government entity — because we simply do not store that information. However, please see below for information on how we may use IP addresses to improve our products or for other internal business purposes.

When you visit a website through a VPN connection, your IP address is displayed on that website as the IP address of one of our VPN servers (what we call a “public” IP address). Since these public IP addresses are used by multiple users, and we do not record the actual IP addresses of users using these public IP addresses, we cannot link actions originating from a public IP address to actions taken by any individual user.

#### **4.3 Logs of Our VPN Products:**

- Duration of VPN sessions and consumed bandwidth. We do this for monitoring, supporting, and optimizing our VPN services, as well as to enforce usage limits on free apps.
- Domains accessed by our users, but on an anonymous basis so we do not know which user accessed which domain, nor do we retain a full URL that would indicate which web pages were visited. We also collect information about these domains approximately monthly. We do this for monitoring, supporting, and optimizing our VPN services.
- Device hashes, which are used to identify devices and link them to other data we collect (e.g., for measuring bandwidth usage, providing support, understanding how you interact with our VPN, and other analytical and marketing purposes). Device hashes are not linked to VPN browsing activity. We use device hashes because we do not require users to

register an account to use some of our products and need a way to differentiate users and perform the actions described above.

#### **4.4 How We Use IP Addresses**

As stated above, we do not log IP addresses in connection with your activity on the VPN. For the sake of transparency, we collect and use IP addresses in these other contexts:

- Fraud protection associated with financial transactions with us.
- Gathering unidentified elements of information, such as your approximate geographic location and information about your Internet service provider or mobile carrier (we use this information to enhance user experience, such as connecting to the nearest VPN servers and analyzing connection quality with various Internet providers).

Our VPN servers are hosted by infrastructure providers that do not require us to collect any information about what our users do through the VPN connection. If any such provider requires us to collect such information, we will cease doing business with them and will seek an alternative provider.

Even if a government entity physically seizes one of our VPN servers and manages to break the disk encryption on those servers, they will find no logs or information that would disclose what any individual user has browsed or done online through the VPN connection.

#### **5. International Data Transfers**

Fort VPN may transfer your personal data to countries other than the one in which you reside. We do this to facilitate our operations, and recipients may include other companies, service providers, and Fort VPN partners. Laws in other countries may differ from those in your residence. For example, personal data collected in the UK, Switzerland, or the European Economic Area (EEA) may be transferred and processed in the United States for the purposes described in this policy. However, we have implemented appropriate safeguards to ensure that such data receives an adequate level of protection, which typically includes Fort VPN and corporate recipients executing standard contractual clauses (also known as "Model Contracts") adopted by the European Commission or the UK for such transfers to the US. You can contact us for additional information about these safeguards.

If you change your country of residence, the Fort VPN company responsible for your data may change accordingly, and your data may be transferred to this other company.

For users of our VPN products, if you are a resident of the UK or EEA and choose to use our software to route your internet traffic through servers in countries deemed "inadequate" by the UK or EEA, you acknowledge that such transfers are performed at your instruction and with your explicit consent.

#### **6. Data Retention**

Regarding our VPN products, Fort VPN does not collect or store data about your online activity while you are connected to our VPN services. Generally, Fort VPN retains your personal information as long as necessary to provide you with services or while you hold an account or subscription with us.

We may also retain personal information as required by law or in our legitimate interests, such as detecting and preventing abuse and protecting against legal claims. Residual copies of personal data may be stored in backup systems for a limited time as a security measure to protect against data loss. For more information about stored information, please visit our VPN Product Privacy Notice.

## **7. Your Rights**

Depending on your country of residence, you may have certain legal rights regarding your personal data that we hold. Subject to applicable law's exceptions and limitations, these may include the right to:

- Access and obtain a copy of your personal data.
- Rectify your personal data.
- Limit the processing of your personal data.
- Withdraw consent to the processing of your personal data at any time.
- Deletion of your personal data.
- Data portability.
- Withdraw any previously granted consent for data processing (for example, by unsubscribing from marketing communications).
- File a complaint with a data protection authority.
- Request that we provide you with the categories of personal data that we collect, disclose, or sell about you; the categories of sources of that information; the business or commercial purposes for collecting or selling your personal data; and the categories of third parties with whom we share personal data. This information may also be provided in this Privacy Policy.

You may exercise some of these rights using the settings and tools provided in our services. For instance, you can update your account information through the relevant account settings screen in our applications.

You can also unsubscribe from our marketing messages by clicking on the “unsubscribe” or “opt-out” link in those messages.

Certain mobile and web browsers emit “Do Not Track” signals. Currently, we do not take action in response to these signals. Otherwise, if you wish to exercise any of these rights, you can contact us using the information in the “Contact Us” section below. By law, we may ask you to confirm your identity before taking further action on your request. You may also be permitted to designate an authorized agent to submit certain requests on your behalf. In that case, you must provide the authorized agent with written permission to make such requests or a power of attorney. We may also contact you to verify your identity before processing an authorized agent's request.

## **8. Your Privacy Rights in California**

The above information includes categories of personal information that Fort VPN collects, processes, and discloses to service providers and other companies. If you wish to exercise your rights to receive specific pieces of information or other rights as described above applicable to you, please refer to the “Contact Us” section below.

Fort VPN does not "sell" or "share" personal information for our own monetary gain.



## **9. Age Restrictions**

Our services are not intended for and may not be used by minors. In this context, minors are defined as individuals under the age of 16, except for our identity verification and credit monitoring services, which are only available to individuals under 18. Fort VPN does not knowingly collect personal data from minors and does not allow them to use our services. If we discover that we have collected personal data from a minor, we may delete such data without prior notice. Please note that legal terms under which we provide certain services may require users to be older than 16.

## **10. Updates to the Privacy Policy**

Fort VPN may update this Privacy Policy from time to time for reasons such as changes in law, industry standards, or business practices. Fort VPN will post updates on this page and update the indicated "Last Updated" date above. If we make updates that significantly change your privacy rights, we will also provide you with prior notice, such as by email or through our services. If you do not agree to such updates to this policy, you may cancel your account in our services. If you do not cancel your account before the effective date of the update, your continued use of our services will be governed by the updated Privacy Policy.

## **11. Contact Us**

We expect this Privacy Policy to evolve over time and welcome feedback from our users regarding our privacy policy. If you would like to exercise your rights or have any questions or complaints regarding our privacy policy, you can contact us using the following details:

support@fortvpn.net