

## **Privacy Policy**

*Last Modified: May 21st, 2018*

### **Introduction**

If you have been billed by this Merchant, you have agreed to the Privacy Policy of one or several digital adult content Websites. The exact Website you have signed up to can be identified on the email receipt obtained at the time of purchase, by contacting our customer service department at the phone number on this site, or by chat or email via the links on this site.

The Privacy Policy you have accepted for your purchase is available on the Website you have purchased a membership from. A summary can be found herein. For more information about that Privacy Policy, or to view a more complete Privacy Policy, please visit the Website you have purchased a Membership to or contact our customer service department. The present Privacy Policy Statement details important information regarding the use and disclosure of user information and/or data gathered regarding Subscribers ("you") of adult Websites billed by the entity appearing on your cardholder statement, the Merchant. In addition, this Privacy Policy sets forth relevant policies and practices while using <http://www.mdh-support.com/> ("the Support Site").

### **DEFINITIONS**

"**Merchant**" as referred to in this document shall mean: The billing identifier or purchase description appearing on your credit card statement which has led you to the Support Site. Examples include but are not limited to: MFREEL.COM, PAYBZ.COM, PROBILLER.COM.

"**Subscriber**" as referred to in this document shall mean: The Subscriber or "purchaser" of a Membership to a website billed by Merchant. The use of "you" in this document is synonymous with Subscriber.

"**Website**" as referred to in this document shall mean: The adult website, billed by the Merchant, to which a Membership has been purchased by Subscriber.

### **USE**

The Adult Website you have purchased a membership from does not knowingly seek or collect any personal information or data from persons under the age of 18. All persons under the age of 18 are strictly prohibited from accessing or viewing the contents on the Website without exception. If you are under the age of 18 and/or under the age of majority in the jurisdiction you reside and from which you access the Website, then your account will be terminated without notice or delay.

Please read this Privacy Policy carefully, as your access to and use of the Support Site signifies that you have read, understand and agree to all terms within this privacy policy. If you do not agree with any part of this privacy policy or our terms, please do not access or continue to use

the Support Site or otherwise submit your personal data. We respect your privacy and are committed to protecting your personal data

If you have any questions about our privacy practices, please see “*Contact Information*” below for information on how to contact us.

We collect, process and retain personal data to the extent it is necessary to provide users with our service. This privacy policy applies to information we collect:

- on the Support Site,
- in e-mail, text and other communications between you and the Support Site,
- through mobile applications you download from the Support Site, which provide dedicated non-browser-based interaction between you and the Support Site, or
- when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Privacy Policy.

## **THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified by (“**Personal Information**”). It does not include data that has been anonymized or pseudonymized.

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- ***Identity Data*** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- ***Contact Data*** includes billing address, email address and telephone numbers.
- ***Financial Data*** includes bank account and payment card details.
- ***Transaction Data*** includes details about payments to and from you and other details of products and services you have purchased or received from us.
- ***Technical Data*** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Support Site.
- ***Profile Data*** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- ***Usage Data*** includes information about how you use the Support Site, products and services.
- ***Marketing and Communications Data*** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share your data to produce and share aggregated insights that do not identify you. Aggregated data may be derived from your personal data but is not considered personal data as this data does not directly or indirectly reveal your identity.

We do not collect special categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data).

## **HOW IS YOUR PERSONAL INFORMATION COLLECTED**

- **Direct interactions.** Information that you provide when you contact us for support or by filling in forms on the Support Site, in particular at the time of registering to use the Support Site, posting material, report a problem with the Support Site or requesting further services.

## **INFORMATION COLLECTED THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES**

See “Choices About How We Collect, Use and Disclose Your Personal Information” below for information on how you can opt out of behavioral tracking on the Support Site and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking. The technologies we use for this automatic data collection may include:

Cookies (or browser cookies). Cookies are small text files that are stored in your web browser or downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie, and allow a website to recognize a user’s device.

We currently use the following types of cookies:

Cookies that are strictly necessary: These are cookies that are required for the operation of the Support Site. These include, for example, cookies that enable a user to log in to the Support Site and to check if a user is allowed access to a particular service.

- **Functionality cookies:** These cookies are not essential, but help us to personalize and enhance your online experience on the Support Site. This type of cookies allows us to recognize you when you return to the Support Site and to remember, for example, your choice of language.

## **USE OF PERSONAL SUBSCRIBER INFORMATION**

We will only use your personal data when the applicable local law allows us to. Most commonly, we will use your personal data in the following circumstances:

- For purposes of providing the support, services, customer management and functionality and security as is necessary to perform the services provided to you under our term and conditions and any other contract that you have with us.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

If a Subscriber sends any personal communication or correspondence by any means, to the Support Site, or any of its employees, agents or representatives, the Support Site may collect the information regarding that communication and include that information in its customer database. The Support Site may also automatically collect traffic and click-through data as well as information regarding the online behavior of Subscribers by the use of "cookies" or other programming means - any information about Subscribers collected by the Support Site through the use of cookies or other programming means will generally not be associable to the specific user in any way.

## **PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION**

In general, we use information that we collect about you or that you provide to us, including Personal Information, for following purposes:

- **Provision of services:** to provide you with support in case you need to validate items on your Credit Card or bank statement for SEPA, offer clear and detailed information, which will help you identify purchases of our products easily on your according statement (Credit Card, SEPA) in case of issues. Confirm transactions in case descriptions on your statements are confusing or do not match a product you have recently purchased.
- **Customer management:** to manage a registered users' account, to provide customer support and notices to the registered user about his account or subscription, including expiration and renewal notices, and notices about changes to the Support Site or any products or services we offer or provide through it;
- **Advertising:** to communicate with you about products or services that may be of interest to you either from us, our affiliates or other third parties (For more information, see "*Choices About How We Collect, Use and Disclose Your Personal Information*");
- **Analytics:** to determine whether users of the Support Site are unique, or whether the same user is using the Support Site on multiple occasions, and to monitor aggregate metrics such as total number of visitors, pages viewed, demographic patterns;
- **Functionality and security:** to diagnose or fix technology problems, and to detect, prevent, and respond to actual or potential fraud, illegal activities, or intellectual property infringement;
- **Compliance:** to enforce our terms and conditions and to comply with our legal obligations;
- in any other way we may describe when you provide the information; or for any other purpose with your consent provided separately from this privacy policy.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We do not disclose your Personal Information except in the limited circumstances described here.

- We may disclose your Personal Information to members of our corporate group (that is, entities that control, are controlled by, or are under common control with us) to the extent this is necessary for the purposes of provision of services, customer management, customization of content, advertising, analytics, verifications, functionality and security, and compliance.
- **Service providers.** To our authorized service providers that perform certain services on our behalf. These services may include fulfilling orders, processing credit card payments, risk and fraud detection and mitigation, providing customer service, performing business and sales analysis, customization of content, analytics, security, supporting the Support Site functionality, and supporting contests, sweepstakes, surveys and other features offered through the Support Site. These service providers may have access to Personal Information needed to perform their functions but are not permitted to share or use such information for any other purposes.
- **Legal successors.** To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us about the Support Site users is among the assets transferred. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy policy.

We access, preserve and share your Personal Information with regulators, law enforcement or others where we reasonably believe such disclosure is needed to (a) satisfy any applicable law, regulation, legal process, or governmental request, (b) enforce applicable terms of use, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address illegal or suspected illegal activities, security or technical issues, (d) protect against harm to the rights, property or safety of our company, our users, our employees, or others; or (e) to maintain and protect the security and integrity of the Support Site or infrastructure. In such cases, we may raise or waive any legal objection or right available to us, in our sole discretion.

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. We also may share aggregated information with third parties for conducting general business analysis. This information does not contain any Personal Information and may be used to develop content and services that we hope you and other users will find of interest and to target content and advertising.

## **FINANCIAL INFORMATION**

Financial information (including Personal Information) that you have provided to us will only be shared with our third party processors in order to initiate and complete any orders placed on your account. All credit card transactions and such are processed with industry standard encryption through third party processors who only use your financial information and Personal Information for that purpose. All financial data and related Personal Information will not be shared by us with

third parties except with your authorization or when necessary to carry out all and any transactions requested by you with the understanding that such transactions may be subject to rules, terms, conditions and policies of a third party. All such information provided to a third party is subject to their terms and conditions.

## **TRANSFERS OF YOUR PERSONAL INFORMATION TO OTHER COUNTRIES**

Whenever in the course of sharing information we transfer Personal Information to countries outside of the European Economic Area and other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with this privacy policy and as permitted by the applicable laws on data protection.

By using the Support Site you consent to the transfer of information that we collect about you, including personal information, to any country in which we, members of our corporate group (that is, entities that control, are controlled by, or are under common control with us) or our service providers are located.

## **SECURITY OF INFORMATION COLLECTED BY THE SUPPORT SITE**

We take appropriate security measures (including physical, electronic and procedural measures) to safeguard your Personal Information from unauthorized access and disclosure. For example, only authorized employees are permitted to access Personal Information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of your Personal Information between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your Personal Information. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of Personal Data.

You are responsible for maintaining the secrecy of your unique password and account information at all times. We are not responsible for circumventions of any privacy settings or security measures contained on the Support Site.

## **CHOICES ABOUT HOW WE COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION**

We strive to provide you with choices regarding the Personal Information you provide to us.

- You can choose not to provide us with certain Personal Information, but that may result in you being unable to use certain features of the Support Site because such information may be required in order for you to register as a member; purchase products or services; participate in a contest, promotion, survey, or sweepstakes; ask a question; or initiate other transactions the Support Site.
- You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please

note that some parts of the Support Site may then be inaccessible or not function properly.

- You may opt out of the DoubleClick cookie or of Google Analytics by visiting the [Google advertising opt-out page](#) or by downloading and installing the browser plug-in available at [Google Analytics opt-out page](#).
- When you register on the Support Site, you may be given a choice as to whether you want to receive email messages, newsletters or both about product updates, improvements, special offers, or containing special distributions of content by us. If you no longer want to receive commercial or promotional emails or newsletters from us, you will need to avail yourself of the unsubscribe mechanism set out in the applicable communication. It may take up to seven days for us to process an opt-out request. We may send you other types of transactional and relationship e-mail communications, such as service announcements, administrative notices, and surveys, without offering you the opportunity to opt out of receiving them. Please note that opting out of receipt of promotional email communications will only affect future activities or communications from us. If we have already provided your information to a third party before you have changed your preferences or updated your information, you may have to change your preferences directly with that third party.
- You may opt out of interest-based advertising on mobile devices by activating the “Limit Ad Tracking” or equivalent feature offered by your mobile platform. It will transmit a signal to us and to third-parties that indicates your data should not be used for interest-based advertising.
- If you submit Personal Information, you may delete your account with us at any time. If you delete your account, your Personal Information and any and all other account related information including, but not limited to, user profile data, sharing data and any other data, or content specifically associated with your account will no longer be accessible by you. After deleting your account, if you choose to have an account with us in the future, you will have to sign up for a new account as none of the information you previously provided or saved within your account will have been saved.

## **YOUR RIGHTS RELATED TO YOUR PERSONAL INFORMATION**

Subject to local law, you have certain rights regarding the Personal Information we collect, use or disclose and that is related to you, including the right

- to receive information on the Personal Information concerning we hold about you and how such Personal Information is used (right to access);
- to rectify inaccurate Personal Information concerning you (right to data rectification);
- to delete/erase your Personal Information (right to erasure/deletion, “right to be forgotten”);
- to receive the Personal Information provided by you in a structured, commonly used and machine-readable format and to transmit those Personal Information to another data controller (right to data portability)
- to object to the use of your Personal Information where such use is based on our legitimate interests or on public interests (right to object); and

- in some cases, to restrict our use of your Personal Information (right to restriction of processing).

If we ask for your consent to use your Personal Information, you can withdraw your consent at any time. Note that in case of a withdrawal of your consent you may no longer be able to use several functionalities of the Support Site and our services.

You may, at any time, send us an e-mail at [mail@mdh-support.com](mailto:mail@mdh-support.com) to exercise your above rights in accordance with the applicable legal requirements and limitations. If you are located in the European Economic Area, you have a right to lodge a complaint with your local data protection authority.

Note that some requests to delete certain Personal Information will require the deletion of your user account as the provision of user accounts are inextricably linked to the use of certain Personal Information (e.g., your e-mail address). Also note that it is possible that we require additional information from you in order to verify your authorization to make the request and to honor your request.

## **CHANGES TO OUR PRIVACY POLICY**

We may modify or revise our privacy policy from time to time. Although we may attempt to notify you when major changes are made to this privacy policy, you are expected to periodically review the most up-to-date version found on the Support Site so you are aware of any changes, as they are binding on you.

If we change anything in our privacy policy, the date of change will be reflected in the “last modified date”. You agree that you will periodically review this privacy policy and refresh the page when doing so. You agree to note the date of the last revision to our privacy policy. If the “last modified” date is unchanged from the last time you reviewed our privacy policy, then it is unchanged. On the other hand, if the date has changed, then there have been changes, and you agree to re-review our privacy policy, and you agree to the new ones. By continuing to use the Support Site subsequent to us making available an amended version of our privacy policy in a way that you can easily take notice of it, you thereby consent to such amendment.

## **TERMS AND CONDITIONS OF MEMBERSHIP**

Each Subscriber should carefully read each of the terms and conditions of membership for the Support Site. By accepting membership to the Website, Subscriber is unconditionally accepting all of those terms and conditions. Some of those terms and conditions may also affect the right of the Support Site to use information that it has gathered from Subscribers.

## **ENFORCEMENT; COOPERATION**

We regularly review our compliance with this privacy policy. Please feel free to direct any questions or concerns regarding this privacy policy or our treatment of Personal Information by contacting us through the Support Site at [mail@mdh-support.com](mailto:mail@mdh-support.com). When we receive a formal



written complaint, it is our policy to contact the complaining party regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the collection, use and disclosure of Personal Information that cannot be resolved by an individual and us.

## **NO RIGHTS OF THIRD PARTIES**

This privacy policy does not create rights enforceable by third parties or require disclosure of any Personal Information relating to users of the Support Site.

## **OUR POLICY TOWARDS MINORS**

The Support Site is not directed to persons under the age of 18 or the applicable age of majority in the jurisdiction from which the Support Site is accessed and we do not knowingly collect Personal Information from minors. If you become aware that your child has provided us with Personal Information, please contact us at [mail@mdh-support.com](mailto:mail@mdh-support.com). If we become aware that a minor has provided us with Personal Information, we take steps to remove such information and terminate that person's account.

## **NO ERROR FREE PERFORMANCE**

We do not guarantee error-free performance under this privacy policy. We will use reasonable efforts to comply with this privacy policy and will take prompt corrective action when we learn of any failure to comply with our privacy policy. We shall not be liable for any incidental, consequential or punitive damages relating to this privacy policy.

## **CONTACT INFORMATION**

If you have any questions about this privacy policy or our information-handling practices, please contact us at [mail@mdh-support.com](mailto:mail@mdh-support.com).

You may also contact us at 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, Cyprus 2540, Phone: +357 22662 320, Fax: +357 22343 282.

## **Manage Your Private Data**

- [Request a Copy of my Data](#)
- [Request Deletion of my Data](#)