

EXHIBIT 16

GO DADDY PRIVACY POLICY

Last Revised: July 22, 2013

GO DADDY RESPECTS YOUR PRIVACY

This Privacy Policy describes how we collect and use the personally identifiable information you provide on our Site. It also describes the choices available to you regarding our use of your personally identifiable information and how you can access and update that information.



Go Daddy has been awarded TRUSTe's Privacy Seal signifying that its Privacy Policy and practices have been reviewed by TRUSTe for compliance with [TRUSTe's program requirements](#), including transparency, accountability and choice regarding the collection and use of your personally identifiable information. This Privacy Policy covers the website <http://www.godaddy.com> and our mobile application. The TRUSTe program does not cover information that may be collected through downloadable software. TRUSTe's mission, as an independent third party, is to accelerate online trust among consumers and organizations globally through its lead privacy trustmark and innovative trust solutions. If you have questions or complaints regarding our Privacy Policy or practices, please contact us at privacy@godaddy.com or call (480) 505-8800. If you are not satisfied with our response, please contact [TRUSTe](#).

Go Daddy complies with the U.S-EU Safe Harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data from European Union member countries. Go Daddy has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access and enforcement. To learn more about the Safe Harbor program, and to view our certification, please visit <http://www.export.gov/safeharbor/>.

Other than as described in this Policy, we will not give any information about you to others without your express permission.

Information Collection and Use

Our Site and mobile application use forms in which you give us contact information (including your name, address, telephone number, and email address) so you can place orders, request information and support, and make product suggestions. For certain services, we may also request a credit card number, government identification number, or other financial information. We will then create an account number for you.

We receive and store any information you enter on our Site, mobile application, or give us in any other way, including through email, telephone, or other communications with our customer service department. If you contact us for support, we will keep an internal record of what support was given.

We use your information to contact you regarding functionality changes to our products, our Site and mobile application, new Go Daddy services, and special offers we think you'll find valuable. If you would rather not receive this information, please see the "Updating Your Information" section below on how to change your preferences.

We may also use your information to present a co-branded offer with our partners or affiliates. If we collect information from you in connection with a co-branded offer, it will be clear at the point of collection who is collecting the information and whose privacy statement applies.

We use information gathered about you from our Site or mobile application statistics (for example, your IP address or device operating system) to help diagnose problems with our server, and to administer our Site and mobile application. We also gather broad demographic information from this data to help us improve our Site and mobile application and make your browsing and purchasing experience more enjoyable. This is not linked to any personally identifiable information, except as necessary to prevent fraud or abuse on our system.

Our Site and mobile application use cookies to keep track of your shopping cart and receipts. We use cookies to identify you so you don't need to log in each time you visit our Site or mobile application. The cookies are linked to your customer number, which is associated with the information in your account.

Within our mobile application we use tracking technologies such as: CI codes (click tracking), ISC (source tracking), and ITC (item tracking codes, attached to purchases at an item level, used to determine where within the application a product was added). Our mobile application automatically collects the device's operating system, phone model, app version, and device ID, and the user's customer number. We report this data back to our Go Daddy web services. These results are not shared with any third parties and are used solely for deciding when to retire SDKs/OS versions and to identify characteristics of major users so that we may optimize our application for those user types.

We do not ask you for, access, or track any location-based information from your mobile device at any time while downloading our mobile application or services. We do not tie any personally identifiable information you submit within our mobile application to any of the tracking technologies that we use.

This Site and our mobile application contain links to other websites. Unfortunately, Go Daddy is not responsible for the privacy practices or the content of such sites.

For Near.me and Online Advertising Users Only

When you enter your name, telephone number, email address, and/or questions/comments onto a Near.me site Online Advertising Page, you are granting Go Daddy express permission to share that information with the business owner that owns that Online Advertising Page. Go Daddy is not responsible for improper use by business owners of your information.

Any telephone calls or emails initiated by you through the Near.me site will be used (and in the case of telephone calls, recorded) for marketing purposes. If you do not agree to such use, do not initiate any telephone calls or emails through the Near.me site.

If you are a business owner that has created an Online Advertising Page to advertise your business, you will be prompted to enter information about your business, including your business name, business address, and business hours. The business information that you enter will be publicly displayed on your Online Advertising Page.

Security

This Site has security measures in place to protect against the loss, misuse or alteration of the information under our control. When you enter sensitive information (such as a credit card number) on our order forms, we encrypt the transmission of that information using secure socket layer technology (SSL).

We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its

absolute security.

Please view our [Secure Ordering](#) page for further details.

Sending Emails

We use emails to communicate with you, to confirm your placed orders, and to send information that you have requested. We also provide email links, as on our "[About Go Daddy](#)" page, to allow you to contact us directly. We strive to promptly reply to your messages.

The information you send to us may be stored and used to improve this Site, our mobile application, and our products, or it may be reviewed and discarded.

Third Party Service Providers

We may at times provide information about you to third parties to provide various services on our behalf, such as processing credit card payments, serving advertisements, conducting contests or surveys, performing analyses of our products or customer demographics, shipping of goods or services, and customer relationship management. We will only share information about you that is necessary for the third party to provide the requested service. These companies are prohibited from retaining, sharing, storing or using your personally identifiable information for any secondary purposes.

In the event that we use third party advertising companies to serve ads on our behalf, these companies may employ cookies and action tags (also known as single pixel GIF or web beacons) to measure advertising effectiveness. Any information that these third parties collect via cookies and action tags is completely anonymous. If you would like more information about this practice and your choices, click [here](#).

Google Analytics

We use a tool called "Google Analytics" to collect information about use of this Site, such as how often users visit the Site, what pages they visit when they do so, and what other sites they used prior to coming to this Site. Google Analytics collects only the IP address assigned to you on the date you visit this Site, rather than your name or other identifying information.

Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this Site. This cookie cannot be used by anyone but Google, Inc. The information generated by the cookie will be transmitted to and stored by Google on servers in the United States.

We use the information received from Google Analytics only to improve services on this Site. We do not combine the information collected through the use of Google Analytics with personally identifiable information.

Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the [Google Privacy Policy](#). You can prevent Google Analytics from recognizing you on return visits to this Site by [disabling the Google Analytics cookie](#) on your browser.

For Website Builder Users Only

Website Builder incorporates the Google Places API. Google's ability to use and share information collected by the Google Places API is governed by the [Google Privacy Policy](#).

Supplementation of Information

In order to provide certain services to you, we may on occasion supplement the personally identifiable information you submit to us with information from third party sources (e.g., information

from our strategic partners, service providers, or the United States Postal Service). We do this to enhance our ability to serve you, to tailor our products and services to you, and to offer you opportunities to purchase products or services that we believe may be of interest to you.

Contests/Surveys

From time-to-time, we may provide you with the opportunity to participate in contests or surveys. If you choose to participate, we may request certain personally identifiable information from you. Participation in these contests or surveys is completely voluntary and you therefore have a choice whether or not to disclose the requested information. The requested information typically includes contact information (such as name and address), and demographic information (such as zip code and age level - note that you must be 18 or above to enter). We use this information to notify contest winners and award prizes, to monitor site traffic, and to personalize our Site.

We may use a third party service provider to conduct these surveys or contests. When we do, that company will be prohibited from using our users' personally identifiable information for any other purpose. We will not share the personally identifiable information you provide through a contest or survey with other third parties unless we give you prior notice and choice.

Targeted Advertisements

Go Daddy may display targeted offers to our customers based on the products currently owned by the customer. These offers will display as varying product banners. There is no personal or geolocation information collected within these product banners to build a profile about your activities or that is shared with third party advertising companies.

Tell-A-Friend

If a user elects to use our referral service to inform a friend about our Site or mobile application, we ask the user for the friend's name and email address. Go Daddy will automatically send the friend a one-time email inviting them to visit our Site. Go Daddy stores this information for the sole purpose of sending this one-time email. The friend may contact Go Daddy at support@godaddy.com to request the removal of this information from our database.

What Happens to my Personally Identifiable Information if I Terminate my Go Daddy Account?

When your Go Daddy account is cancelled (either voluntarily or involuntarily) all of your personally identifiable information is placed in "deactivated" status on our relevant Go Daddy databases. However, deactivation of your account does not mean your personally identifiable information has been deleted from our database entirely. We will retain and use your personally identifiable information as necessary in order to comply with our legal obligations, resolve disputes, or enforce our agreements.

Updating Your Information

You may alter, update or deactivate your account information or opt out of receiving communications from us and our partners at any time. We have the following options for changing and modifying your account information or contact preferences.

- i. You may send an email to support@godaddy.com
- ii. You may visit your online [Account Manager](#)
- iii. You may send mail to Go Daddy at the following postal address:
14455 North Hayden Road, Suite 219, Scottsdale, AZ. 85260 USA
- iv. You may call us at: (480) 505-8800
- v. You may fax us at: (480) 505-8844

We will respond to your request for access or to modify or deactivate your information within thirty (30) days.

Transfer of Data Abroad

If you are visiting this Site from a country other than the country in which our servers are located, your communications with us may result in the transfer of information across international boundaries. By visiting this Site and communicating electronically with us, you consent to such transfers.

Compliance with Laws and Law Enforcement

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including without limitation subpoenas), to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical. We will also share your information to the extent necessary to comply with ICANN's rules, regulations and policies.

To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process.

Changes in Our Practices

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

If we make material changes to this Policy, we will notify you here, by email, or by means of a notice on our home page, at least thirty (30) days prior to the implementation of the changes.

Contacting Our Site

If you have any questions about our Privacy Policy, the practices of this Site or our mobile application, or your dealings with this Site or our mobile application, please contact us at:

Go Daddy
ATTN: Web Team
14455 North Hayden Rd.
Suite 219
Scottsdale, AZ, 85260, U.S.A.

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