

# Privacy Policy pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

Last updated April 29, 2026

Zeromist LLC, operating as Lakenetworks (referred to as "Lakenetworks", "we", "us", "our", or the "Company"), with legal address at 15442 Ventura Blvd., Ste 201-955, Sherman Oaks, California, 91403, United States, as data controller (the "Controller"), provides this Privacy Policy to inform its clients, potential clients, website visitors, users, and every third party (including delegates, legal representatives, technical contacts, billing contacts, or other representatives acting on behalf of clients or potential clients) (the "Data Subjects") about the methods and purposes of processing personal data ("Data") collected or otherwise processed in connection with Zeromist.net, Lakenetworks-branded services, client areas, support channels, and related hosting, connectivity, network, virtual machine, managed database, security, web application hosting, and other services (the "Services").

Data controller	Zeromist LLC, operating as Lakenetworks 15442 Ventura Blvd., Ste 201-955 Sherman Oaks, California, 91403, United States contact@zeromist.net
Data Protection Officer (DPO)	Paulo Murineddu - dpo@lakenetworks.it
Website	Zeromist.net

Data subject to processing and collection by the Controller may be acquired:

- directly from the Data Subject, including through websites, client areas, order forms, contracts, email, support tickets, telephone, chat, or other communication channels used by the Controller;
- from third parties, including payment providers, domain registrars, Internet registries, anti-abuse sources, business information providers, service providers, delegates, technical contacts, or entities acting on behalf of the Data Subject;
- from public sources, including public registries, company registries, WHOIS/RDAP databases, routing databases, public documents, public lists, and other publicly available sources where relevant to the Services.

## Processed data

Category	Examples of data
<b>Account and identity data</b>	Name, surname, company name, business role, billing and service address, country, state/province and city of residence or establishment, telephone number, email address, tax identification number, VAT number, EIN or equivalent business identifier, company registry data, and details of identification documents where verification or KYC checks are required.
<b>Billing and payment data</b>	Invoice details, payment status, transaction IDs, payment method information, billing history, account balance, and limited payment information received from payment providers. Lakenetworks does not receive or store full payment card numbers, CVV codes, or equivalent sensitive payment authentication data.
<b>Technical, network, and log data</b>	IP addresses, assigned IP resources, ASN/routing information, DNS and domain data, WHOIS/RDAP or registry contact data where applicable, system logs, network logs, access logs, timestamps, service identifiers, security events, DDoS and abuse-related logs, device/browser information, and similar technical records.
<b>Customer content and service data</b>	Data uploaded, stored, transmitted, hosted, backed up, or otherwise processed by the Client through the Services, including website files, databases, virtual machine data, configurations, backups, snapshots, and support-relevant service metadata.
<b>Communications and support data</b>	Emails, support tickets, abuse reports, sales and billing communications, chat or telephone support notes, review-invitation data, and other communications exchanged with

Category	Examples of data
	Lakenetworks.

### Purposes of Data Processing

- pre-contractual relationship management, including quotations, availability checks, sales communications, onboarding, account creation, verification, fraud prevention, and KYC or business checks where required;
- fulfillment of contractual obligations, including provision, operation, maintenance, renewal, suspension, cancellation, support, and troubleshooting of the Services;
- billing, invoicing, payment processing, accounting, tax, debt recovery, and administrative management;
- compliance with legal, regulatory, tax, accounting, registry, network, telecommunications, Internet governance, security, and public authority obligations;
- communication with IP registry operators, domain registrars, domain registries, Internet exchanges, upstream providers, routing databases, and other technical or operational parties when needed to provide IP, ASN, routing, domain, DNS, peering, connectivity, or related Services;
- network monitoring, security, abuse prevention, spam prevention, malware filtering, intrusion detection, DDoS detection and mitigation, incident response, and protection of Lakenetworks, its infrastructure, its clients, and third parties;
- protection, exercise, and defense of the Company's rights, contractual rights, and legal claims;
- compliance with orders, requests, or lawful instructions from judicial authorities, independent authorities, law-enforcement bodies, regulators, or competent public authorities;
- customer support, service communications, operational notices, status notifications, review invitations, and service improvement.

### Legal bases of processing

Where Regulation (EU) 2016/679 (GDPR) or equivalent privacy laws apply, processing is based on one or more of the following legal bases, depending on the context:

- performance of a contract or pre-contractual measures requested by the Data Subject;
- compliance with legal obligations applicable to the Controller;
- legitimate interests pursued by the Controller or by third parties, including service operation, security, fraud prevention, abuse handling, network integrity, debt recovery, business administration, and defense of legal claims, provided that such interests are not overridden by the rights and freedoms of the Data Subject;
- consent, where consent is specifically requested for optional processing activities;
- necessity for the establishment, exercise, or defense of legal claims, or other bases permitted by applicable law.

### Types of Processing

- data collection through contract forms, order forms, account registration, client areas, websites, support tickets, email, telephone, chat, and other communication channels;
- input, organization, consultation, storage, modification, extraction, search, filtering, backup, deletion, and other processing in IT, billing, support, security, and administrative systems;
- communication of data to IP registry operators and Internet registries, including ARIN, RIPE NCC, and other registries where applicable, for IP address, ASN, routing, WHOIS/RDAP, IRR/RPKI, or similar Internet resource management purposes;
- communication of data to domain registrars, domain registries, ICANN-related systems, and WHOIS/RDAP systems where needed for domain registration, transfer, renewal, verification, or dispute management;
- sharing with contractors, consultants, service providers, subsidiaries, affiliated companies, and operational partners for customer support, network operations, billing, security, and administrative management;
- selective and automated traffic filtering, monitoring, and mitigation through antivirus, antispam, intrusion detection, firewall, DDoS protection, abuse prevention, logging, and security systems;
- processing, filtering, searching, extraction, preservation, disclosure, or other actions required to comply with public authority, judicial, regulatory, or law-enforcement orders.

### Data Location

Lakenetworks is operated by Zeromist LLC, a United States company. IT systems, network infrastructure, service providers, registries, payment providers, domain providers, support systems, and other recipients may be located in the United States, the European Union/European Economic Area, Switzerland, the United

Kingdom, and other countries. Data may be stored, routed, backed up, or otherwise processed in any country where Lakenetworks, its infrastructure, or its service providers operate, subject to the safeguards described in this Privacy Policy and applicable law.

## **Data Communication and Dissemination**

Clients and Data Subjects are informed that:

- sent and received data may travel outside the European Union or the Data Subject's country. This may happen due to the normal operation of the TCP/IP protocol, Internet routing decisions made by network providers, peering and transit relationships, CDN or DDoS protection systems, email delivery, domain services, and other technical processes. Communications with Zeromist.net and other encrypted web interfaces are protected with encryption where HTTPS or another secure protocol is used;
- data provided for IP address allocation, ASN/routing services, domain registration, WHOIS/RDAP records, DNS, abuse handling, peering, or registry operations may be communicated to or published by Internet registries, domain registrars, registries, routing databases, upstream providers, Internet exchanges, PeeringDB, RPKI/IRR databases, or similar technical databases where required or customary for the Service;
- activities connected with judicial, regulatory, law-enforcement, or security purposes, including lawful interception, access to traffic data, preservation requests, emergency requests, or other technical operations, may be subject to secrecy, confidentiality, or legal restrictions. Without a specific authorization or order from the competent authority, Lakenetworks may be unable to inform the Client or provide details about such activities.

## **Data recipients**

External service providers, contractors, consultants, payment providers, domain registrars, Internet registries, upstream providers, data center and connectivity providers, security providers, communications providers, review platforms, professional advisers, public authorities, and business partners may receive or access Customer data when necessary to provide, protect, administer, bill, support, or improve the Services, or when required or permitted by law. These recipients may act as independent controllers, processors, sub-processors, or other recipients depending on the activity and applicable law.

## **Third-Party Data Access**

In particular, third-party access or disclosure may occur in the following cases:

### **Website builder:**

When Sitejet Builder is chosen, data such as website design and content may be sent to Sitejet Builder (the "Service"), a service managed by WebPros International L.L.C. located in the United States. The shared data will be processed, on Lakenetworks' side, in compliance with applicable personal data protection regulations, including the GDPR where applicable. The privacy policy of WebPros International L.L.C. and the WebPros group regarding the service can be consulted at: <https://www.sitejet.io/en/privacy-policy>.

### **Domain registration:**

For domain registration, transfer, renewal, DNS, and related services, Lakenetworks may use the "Reseller/Registrar Domain Name API" service of Internet Domain Service BS Corp. (the "Registrar"), located in the Commonwealth of the Bahamas, and/or other accredited registrars, registries, or domain service providers depending on the domain extension and service ordered. During registration, transfer, renewal, verification, or dispute management, registrant, administrative, technical, and billing contact data may be shared with the registrar, registry, ICANN-related systems, WHOIS/RDAP systems, escrow providers, and other parties required to complete or maintain the domain service. The privacy policy of Internet Domain Service BS Corp. can be consulted at: <https://internetbs.net/en/privacypolicy.html>

### **IP registry, routing, and network resources:**

If the Client orders or uses Services involving IP address allocation, ASN/routing, BGP, peering, transit, abuse contacts, RPKI, IRR objects, WHOIS/RDAP records, or similar network resources, Lakenetworks may communicate organization, contact, technical, and routing data to Internet registries and network databases, including ARIN, RIPE NCC, other Regional Internet Registries, PeeringDB, Internet exchanges, upstream providers, and routing databases. Some of this data may be published or made available through public WHOIS/RDAP, IRR, RPKI, peering, or routing databases according to Internet registry rules and operational requirements.

### **Credit card payments:**

If the Client pays by payment card, the transaction is handled by an external payment service provider, including Stripe, Inc. (United States) or another Stripe entity depending on the Client's location and the payment flow. Stripe may act as a data controller for payment processing under applicable privacy laws. Stripe's privacy policy is accessible at: <https://stripe.com/privacy>

In accordance with applicable law, Stripe may share with Lakenetworks certain information required to complete the payment and manage administrative requirements, including:

- transaction details, such as amount, currency, date, and time;
- transaction ID and related payment identifiers;
- payment status, such as completed, pending, failed, refunded, or disputed;
- limited payment method information, such as card brand, debit/credit type, last four digits, expiration month/year where available, or payment token/pseudo-number used for recurring payments;
- limited customer data, such as name, email address, billing address, and other information provided during the transaction.

Lakenetworks does not have access to sensitive payment card data such as the complete card number or CVV code. Such data is acquired and processed directly by the payment service provider. For recurring payments, a token or pseudo-number may be stored by the payment provider and associated with the Lakenetworks account so that authorized recurring payments can be billed without requiring the Client to re-enter card information each time. Data received by Lakenetworks is processed exclusively for the indicated purposes, such as completing transactions, issuing invoices, handling disputes, fraud prevention, and administrative management.

#### **PayPal payments:**

If the Customer makes a payment via PayPal, the transaction is managed by PayPal, including PayPal, Inc. (United States) or another PayPal group entity depending on the Customer's location and payment flow. PayPal's privacy information is accessible at: <https://www.paypal.com/privacy>

PayPal may share certain transaction-related information with Lakenetworks, necessary for completing the payment and managing administrative requirements. The data that may be shared includes:

- transaction information, including amount, currency, date, and time of the payment;
- transaction ID or other traceability identifiers;
- payment status, such as completed, pending, failed, refunded, or disputed;
- payment method information, such as the email address associated with the PayPal account used for the payment;
- limited customer data, such as name, email address, and billing information provided by the Customer during the payment process.

Lakenetworks does not have access to sensitive payment method details processed directly by PayPal, such as full credit card numbers, CVV codes, or other banking credentials. Data received from PayPal is used solely for completing the transaction, issuing invoices, managing disputes or refunds, and fulfilling legal and administrative obligations related to the payment.

#### **Reviews and Trustpilot use:**

Lakenetworks may use the Trustpilot service to allow Customers to leave reviews about the products and services offered. A review submission button or invitation link may redirect the Customer to Trustpilot's terms and privacy information, available at: <https://legal.trustpilot.com/for-reviewers/end-user-privacy-terms>

If Lakenetworks directly invites the Customer to leave a review through Trustpilot, the following personal data may be shared with Trustpilot:

- name and surname;
- email address;
- company name, for business customers;

This data will be used exclusively to enable the Customer to leave a review on the Trustpilot platform. The processing of data by Trustpilot is carried out according to Trustpilot's privacy policy. Lakenetworks is not responsible for processing carried out independently by Trustpilot; Customers are encouraged to review Trustpilot's terms for more details.

#### **Support, communications, and security providers:**

Lakenetworks may use third-party email, ticketing, communication, monitoring, logging, backup, data center, DDoS protection, anti-abuse, fraud-prevention, identity-verification, and security providers. These providers may access limited account, technical, log, communications, or service data where necessary to provide the relevant support, security, operational, or administrative function.

#### **Third countries:**

Data may be transferred to third countries in accordance with applicable legal requirements. Where GDPR applies, transfers to a third country or international organization may occur where necessary for the execution of the contract with the Customer, with the Data Subject's consent where required, for the establishment, exercise, or defense of legal claims, or under another applicable exception. Transfers may also be based on an adequacy decision under Article 45 of the GDPR, Standard Contractual Clauses or other appropriate safeguards under Article 46 of the GDPR, or other mechanisms permitted by applicable law.

#### **Data retention**

Data is retained for as long as necessary to provide the Services, manage the account, comply with legal, tax, accounting, registry, security, and contractual obligations, resolve disputes, prevent abuse, maintain backups, enforce agreements, and protect legal rights. Retention periods may vary depending on the category of data, the Service, applicable law, and operational requirements. Logs, backups, snapshots, account records, and service data may be retained for up to 12 months after termination or expiration of the relevant Service for legal, operational, security, backup, accounting, or compliance reasons, unless a longer retention period is required or permitted by applicable law. Data that must be kept for accounting, tax, legal, registry, anti-abuse, or dispute purposes may be retained for the period required or permitted by the relevant rules.

### **Security measures**

Lakenetworks applies technical and organizational measures designed to protect Data against unauthorized access, loss, misuse, alteration, disclosure, or destruction. These measures may include access controls, authentication, encryption in transit where applicable, logging, monitoring, backups, network filtering, segmentation, DDoS mitigation, incident response procedures, and vendor management. No Internet-based service can be guaranteed to be completely secure, and Clients remain responsible for securing their credentials, applications, virtual machines, software, configurations, and Customer content.

### **Exercise of Rights under Regulation (EU) 2016/679 and applicable privacy laws**

Where GDPR or equivalent privacy laws apply, Data Subjects may have rights including access, rectification, deletion, restriction of processing, objection, data portability, withdrawal of consent where processing is based on consent, and the right not to be subject to decisions based solely on automated processing where applicable. Some rights may be limited by legal obligations, security requirements, anti-abuse measures, registry rules, contractual obligations, public authority orders, or the rights and freedoms of others.

To exercise these rights, Data Subjects may contact the Data Protection Officer at [dpo@lakenetworks.it](mailto:dpo@lakenetworks.it) or Lakenetworks at [contact@zeromist.net](mailto:contact@zeromist.net), clearly specifying the personal data subject to the request, the right they intend to exercise, and the reasons for requesting modification, update, deletion, restriction, portability, objection, or other action. Lakenetworks may request additional information to verify the identity or authority of the requester before responding.

These rights may also be exercised after termination of the contractual relationship, subject to applicable law and retention obligations. Data Subjects may also lodge a complaint with a competent data protection authority or seek judicial remedies before the competent courts or authorities.

### **Contacts**

- Website: [zeromist.net](http://zeromist.net)
- General inquiries: [contact@zeromist.net](mailto:contact@zeromist.net)
- Data Protection Officer (DPO): Paulo Murineddu - [dpo@lakenetworks.it](mailto:dpo@lakenetworks.it)
- Support: [support@zeromist.net](mailto:support@zeromist.net)
- Abuse reports: [abuse@zeromist.net](mailto:abuse@zeromist.net)
- Network Operations Center (NOC): [noc@zeromist.net](mailto:noc@zeromist.net)
- Sales: [sales@zeromist.net](mailto:sales@zeromist.net)
- Phone: +1 (559) 500-4770
- Legal address: 15442 Ventura Blvd., Ste 201-955, Sherman Oaks, California, 91403, United States