

HOSTKEY Complaint Procedure

September 17, 2025

HOSTKEY promotes a high level of responsible behavior in connection with the use of its services. The Company respects the rights of others and requires that users of its services do the same.

HOSTKEY needs to suppress abuses that threaten its ability to provide the Services, and HOSTKEY asks that everyone abide by the rules below to help achieve this goal. If you have identified that HOSTKEY services are used in violation of the HOSTKEY's Terms and Conditions or any applicable law, or if you believe that your content has been used in any manner that infringes upon your rights, you can send an abuse notification.

The procedure and requirements for the abuse notifications are set forth below. Please, study this document carefully. HOSTKEY would like to emphasize that if the necessary information related to the abuse was not presented, HOSTKEY cannot take appropriate measures.

Definitions • Applicant – An individual or legal entity submitting an abuse notification. • Customer – An individual or legal entity using HOSTKEY services. • Content – Data, information, or material transmitted, stored, or hosted via HOSTKEY services. • Services – All products and services provided by HOSTKEY.

1. Principles

When processing an application in accordance with the present document, HOSTKEY is guided by the following principles:

Limitation of liability

HOSTKEY complies with the laws and does not have control over the use of its services by its Customers.

HOSTKEY does not assume the functions of a judicial or law enforcement agency.

HOSTKEY cannot define whether or not the content posted is illegal. In case of any disputes, an Applicant should contact a law enforcement agency or a court.

Presumption of good faith

Customer:

HOSTKEY respects its Customers and proceeds on the basis that they comply with the legal requirements and HOSTKEY's Terms and Conditions while using the services.

Applicant:

The application procedure should not interfere with the necessary legal actions. An Applicant must understand that evidence tampering is illegal.

2. General Conditions

2.1. A complaint will only be considered if it meets the requirements set out in this document.

2.2. The application must be sent to the correct HOSTKEY legal address:
HOSTKEY B.V., Willem Frederik Hermansstraat 91, 1011 DG Amsterdam, the Netherlands.

2.3. Urgent complaints should be sent to abuse@hostkey.com. At the same time, the original complaint must also be sent to the correct legal address.

2.4. The application must include a statement that the applicant agrees to indemnify HOSTKEY for losses incurred in the case of unjustified server suspension, if it is later proven that the copyright violation information was false.

2.5. The applicant is required to maintain their contact email addresses and respond promptly to emails sent to these addresses.

3. Complaint Requirements and Procedure

The complaint must contain the following identification information:

- For individuals: first, middle, and last name; passport details (number, issuing authority, issue date); contact information (phone and/or fax, email).
- For legal entities: company name; actual and legal addresses; contact information (phone and/or fax, email).

When submitting a notice regarding content hosted or transmitted through HOSTKEY services, the following requirements must be met:

- Ensure that the notice is sent in plain text format.
- Submit the notice in English.
- Do not send notices from no-reply email addresses.
- Include your name, address, phone number, and email address.
- The notice must specify a static URL from which the disputed content is hosted or the disputed activity originated. This URL must resolve to a HOSTKEY IP address and be mentioned in the body of the notice.
- Only one IP address should be specified per notice. If you wish to submit notices for

multiple IP addresses, please submit separate notices for each.

- Include only those URLs or domains for which you are requesting action.
- Describe the content or behavior being reported and explain why it violates your rights, applicable law, or HOSTKEY's Acceptable Use Policy.
- For reports of hacking, VOIP/SIP scanning, (D)DoS attacks, and malware: provide a description of the illegal activity, including date and timestamp, IP addresses of affected servers, destination and source ports, and log files.
- The body of the notice must include one of the following keywords: [Child abuse] [Live streaming] [Copyright] [Trademark] [Voip/SIP] [Phishing] [DDOS] [Spam] [Hack] [Malware] [Gambling] [Zoophilia] [Defamation] [Personal data] [Photos of persons].

For copyright or trademark infringement notices submitted to HOSTKEY, the following additional requirements apply:

1. Information about the rights holder or authorized representative (if submitted by such a representative), hereinafter referred to as the applicant:
 - For individuals: surname, first name, middle name; contact information (phone and/or fax, email).
 - For legal entities: company name, location, and address; contact information (phone and/or fax, email).
2. Information about the intellectual property object posted on the Internet site without the consent of the rights holder or other legal basis.
3. Indication of the domain name and/or network address of the site where the intellectual property object is used without the consent of the rights holder or other legal basis.
4. Proof of the rights holder's ownership of the intellectual property object posted without permission, with supporting documents attached.
5. Confirmation of the absence of authorization for posting information containing the intellectual property object.
6. Consent of the applicant to the processing of their personal data (if the applicant is an individual).

If the complaint is submitted by an authorized representative instead of the rights holder, a copy of the document confirming their authority must be attached.

The complaint must state the grounds for its submission and the substance of the claim. If materials, documents, or information infringing exclusive rights are posted on a site, full links to the specific pages where the information is located must be provided.

Certified copies of documents confirming the applicant's rights must be attached to the complaint. All copies must be certified on each page by the head of the applicant organization and sealed.

A complaint from a legal entity must be signed by the head of the organization with a seal affixed or by an authorized representative with a power of attorney attached.

Anonymous complaints will not be accepted or processed.

Prohibited Illegal Actions and Content

Customers and end users must use HOSTKEY services only for lawful purposes and refrain from any use that violates HOSTKEY's policy or applicable law.

For a list of illegal actions and prohibited content, please refer to the HOSTKEY Acceptable Use Policy.

How to submit a notice of abuse or illegal content?

You may submit a complaint using abuse@hostkey.com

4. Process for Handling Abuse

Please note that HOSTKEY follows a zero-tolerance policy.

Main categories of complaints under the zero-tolerance policy:

1. Child Exploitation Content (Child Abuse / Child Exploitation)

- Images and videos of child sexual exploitation
- Any material covered by child protection laws
- Action: immediate removal, account suspension

2. Malware / Illegal Content

- Viruses, trojans, spyware, ransomware
- Software used to hack other systems
- Action: IP address blocking

3. Phishing

- Creation of sites/domains imitating other services to steal logins and passwords
- Fake login or payment pages
- Action: immediate suspension, client notification

4. Hacking and Brute-force Attacks

- Attempts to hack accounts or servers, password guessing
- Exploiting client server vulnerabilities to attack third parties
- Action: immediate suspension of attacking account/IP, analysis and notification of affected clients

5. Illegal Content

- Terrorist content
- Distribution of prohibited materials (e.g., drugs, weapons, banned services)

- Action: immediate removal, service suspension

6. Serious Financial Fraud (Fake Shops / Fraud)

- Fake online shops collecting payments without delivering goods/services
- Action: IP address blocking

For all cases falling under the zero-tolerance policy, no warnings or delays apply — the service is suspended or blocked immediately. Other complaints not falling under this policy will be processed in accordance with the law of the country where the server is located.

5. Copyright Complaint Handling Procedure

Verification of the complaint:

- Check that the complaint was submitted by the rights holder or an authorized representative.
- Compare the reported content with proof of copyright ownership.

Violation classification:

- High severity: clear infringement of copyright or registered trademark.
- Medium severity: questionable cases requiring further verification.
- Low severity: minor matches, possible fair use.

Action:

After confirming a violation, the Abuse Team takes the following steps:

- Verify content compliance.
- Compare hosted content with the rights holder's evidence.
- Determine whether the hosted material indeed infringes copyright or trademark.

Copyright:

- Removal or blocking of infringing content.
- Notification of the client about the violation, with links to the complaint and evidence.
- In case of repeat violations — temporary or permanent suspension of the account.

Trademark:

- Suspension or removal of content using a registered trademark without authorization.
- Notification of the client about the violation and required actions.
- Repeat violations — suspension or removal of account/domain.

6. Counter-Notice

A client whose materials have been removed may submit a counter-notice if they believe no violation occurred.

Counter-notice requirements:

- Contact information of the content owner.
- Description of the removed content and links.

- Explanation of why the removal was unlawful (e.g., fair use).
- Signature of the owner.

All Compliance actions comply with the legislation of the country where the servers are located.

7. Application processing

7.1 After submission, an Applicant will receive an automated reply with an acknowledgment of the receipt and a ticket number.

7.2 If a report does not meet the requirements, the Applicant is given an opportunity to modify the message or clarify. If the application afterward still does not meet the requirements, the claim will be dismissed.

7.3 Once updated application is submitted, HOSTKEY will consider the accuracy of the application.

7.4 HOSTKEY evaluates reports referred to in the document to determine whether they are unequivocally unlawful and/or punishable.

7.5 HOSTKEY does not disclose information on the status of the application except for the cases stipulated by law.

8. Interfering with application processing

There shall not be any interference with the procedure set out in this document.

The following actions are construed as an abuse by HOSTKEY:

- Repeated applications, formally corresponding to the requirements of this document, but containing false information based on the inspection results.
- Falsification of documents (including electronic) and information.
- Filing of the complaint in a way that violates HOSTKEY's Terms and Conditions, Terms of Services, this document or using unreliable information.

- Use of automatic mailings and/or “robots” to access and/or to communicate with HOSTKEY.

- Appeal by the Applicant after claim submission containing the same complaint in relation to the same subject in any other way, if there is no reference to the number of the originally submitted claim (ticket number).

9. Objection

9.1 In some cases, HOSTKEY may grant a Customer an option to contest the alleged violation by submitting a counter-notice.

9.2 HOSTKEY shall review the submitted information and may (at its sole discretion) decide to reject Customer’s counter-notice, and require Customer to take immediate remedial action, if, at HOSTKEY’s sole discretion, Customer’s or the end user’s content or actions are unmistakably unlawful and/or may subject HOSTKEY to third party applications and/or litigation.

10. Modification

The document is not exhaustive, HOSTKEY reserves the right to modify it from time to time. Such modifications shall become immediately effective upon posting of the modified document to www.hostkey.com/about-us/legal/ and will be communicated electronically to the Customers. The continued use of the Services after a modification has been communicated, constitutes Customer’s acceptance of the document.

11. Miscellaneous

11.1 Nothing in this text should be construed as a legal advice. For the definitive word on the law, legal help, etc. HOSTKEY highly recommends to seek qualified legal counsel.

11.2 Never send abuse applications directly to personal email addresses of HOSTKEY employees and never call about abuse to personal mobile telephone numbers of HOSTKEY personnel.