



PRIVACY NO LOG AUDIT REPORT

For

Fast Technology Limited

January 29, 2023

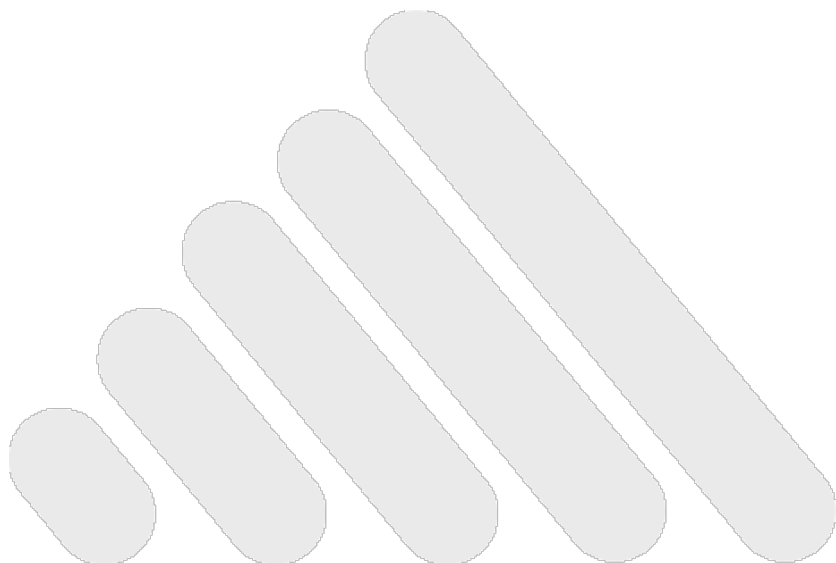


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I. Executive Summary

A. INTRODUCTION

With the emergence of various privacy laws, organizations are required to ensure that their personnel and service providers comply with the organization's stated privacy practices.

Transparency is one of the Fair Information Practice Principles that underlie privacy laws and regulations globally. Beyond good security and privacy policies, transparency requires proof of proactive compliance. Independently verifying or "auditing" is a practical solution to determine the quality and integrity of privacy practices and to enhance transparency.

Altius IT's audits help ensure your organization operates with transparency, providing openness and clarity to all activities concerning the capture, collection, dissemination, and use of information.

B. CERTIFIED AUDITORS

Altius IT is board certified by the Information Systems Audit and Control Association (ISACA) as:

- Certified Information Systems Auditors
- Certified in Risk and Information Systems Controls
- Certified in the Governance of Enterprise IT

In performing the privacy no log audit, Altius IT complied with the independence and ethical requirements of the Information Systems Audit and Control Association.

Please see Exhibit A – Auditor's Qualifications and Certifications for more information.

C. AUDIT METHODOLOGY

Altius IT's services and scope included a review and evaluation of selected FastestVPN's VPN related documents and systems during the period December 15, 2022 – January 29, 2023.

Altius IT methodology included developing an audit work program to review and evaluate FastestVPN's VPN server configurations and system/service log files. The purpose of the audit work program was to obtain reasonable assurance as to whether FastestVPN's VPN server configurations and/or system/service log files independently, or collectively, could lead to identifying a specific person and/or the person's activity over the FastestVPN's VPN service.

D. DISCLAIMER

This report is based on information available to Altius IT solely on the dates of our review. Any changes to the information available to Altius IT after the review date are

not included in the report. Altius IT's findings and opinions rendered in this report are based only on information and system configurations as existed and available during our review period. Based upon your organization's request for services, our scope did not include, and/or evaluate:

- Security safeguards for sufficiency and effectiveness
- Privacy and security controls at third party service provider organizations

II. VPN Privacy Overview

A. VIRTUAL PRIVATE NETWORK

A virtual private network (VPN) allows a user to send and receive data across shared or public networks (e.g., the Internet) as if he/she were directly connected to a network or private device.

A VPN can use encryption and other security mechanisms to ensure that unauthorized persons do not have access to the data during transmission. A VPN with encryption provides a secure tunnel to transmit data between the user and the network.

The VPN encrypted connection helps ensure that sensitive data is securely transmitted. Encryption prevents unauthorized persons from viewing traffic and activities and allows the user to conduct work remotely.

B. USER PERSONAL INFORMATION

Organizations may capture data necessary to provide services to their customers and users. The types of personal information that can be captured and maintained include:

- Account information – username, e-mail address, password
- Payment information – name, address, credit card/bank account
- Communications – e-mails, text messages, chats, faxes, etc.

C. USER ACTIVITY MONITORING

User activity monitoring is the process of monitoring and recording user actions. User activity may include:

Connection logs

- Incoming and outgoing Internet Protocol (IP) addresses
- Connection success/failure, dates, times
- Types and amounts of data transmitted/received
- Servers/devices accessed

Usage logs

- Browsing history, web sites visited
- Files downloaded and uploaded
- Software/applications used
- Application crashes including device information, username, and e-mail address if user chose e-mail address as a VPN username

Technical data

- Application/device – Windows, iOS, Android, etc.
- Username/e-mail if the service allows multiple VPN connections at the same time
- Timestamp of the last session
- Service performance data, used to identify most suitable servers for connectivity

D. USER PRIVACY

Many organizations require its personnel to comply with policies and procedures authorizing the specific type and extent of user activity that may be monitored and logged by the organization.

Compliance with these policies and procedures help ensure the organization's products and services are delivered in a timely and consistent manner while also ensuring the need for user privacy.

III. Audit Process

A. FASTESTVPN PRIVACY POLICY

Altius IT reviewed privacy-related logging statements in FastestVPN's Privacy Policy <https://fastestvpn.com/privacy-policy> (included in this report as Exhibit B – FastestVPN Privacy Policy).

No Records or Logs

FastestVPN's Privacy Policy stated there was no log or record of:

- Browsing activities
- Connection logs
- VPN IPs, original IPs
- Connection time
- History of browsing
- Sites visited
- Origin IP address
- Assigned VPN server IP address
- VPN session timestamp
- Browsing activities
- DNS queries

General Statements

FastestVPN's Privacy Policy stated in pertinent part:

- We collect minimal data
- Systems, processes, and servers are designed not to keep any sensitive/personally identifiable data
- We don't know what you access or browse
- We have nothing personally identifiable to share

Information Captured

FastestVPN's Privacy Policy stated that the following information was captured:

- Date the user connects to the FastestVPN service
- Email address
- Minimal connection statistics that do not include uniquely identifiable user data or behavior

FastestVPN's Privacy Policy stated that tools were used to gather software analytics, stats, and diagnostics. Examples of tools listed include Google Analytics, Firebase, Tawk, Postmark, BugSnag, and Facebook Pixel.

FastestVPN's Privacy Policy listed emails, live chats, and Feedback forms as information collected and retained. Information retained include e-mail addresses

B. TECHNICAL EVALUATION PROCESS

Prior to our technical evaluation, Altius IT interviewed client personnel and reviewed written documents/documentation made available to Altius IT by Client. Information evaluated by Altius IT included:

- System description
- System operation

Altius IT's technical evaluation process included a comparison of FastestVPN Privacy Policy's no log statements against technical configurations and logs. Altius IT:

- Inspected a target sample of FastestVPN servers
- Installed FastestVPN application on mobile device
- Used FastestVPN mobile application in various modes (e.g., Privacy/Security, Streaming, Internet Freedom, and File Sharing) to connect to selected servers, perform browsing of various sites, and other activities
- Inspected a target sample of FastestVPN server log files
- Evaluated server logs for consistency with privacy statements

Altius IT acted independently and did not receive guidance or direction from Client regarding the devices to be evaluated.

IV. Audit Findings and Opinions

A. PURPOSE

Altius IT 's audit process evaluated testimony and examined selected written documents, system configurations, and user processes to obtain reasonable assurance as to whether Client's VPN server configurations and/or system/service log files, independently or collectively, could lead to identifying a specific person and/or the person's activity over FastestVPN service.

B. FINDINGS AND OPINIONS

On the dates of our review, Altius IT did not find any evidence of system configurations and/or system/service log files that, independently or collectively, could lead to identifying a specific person and/or the person's activity when using FastestVPN service.

Exhibits

EXHIBIT A

Auditor's Qualifications and Certifications

EXHIBIT A – AUDITOR’S QUALIFICATIONS AND CERTIFICATIONS

A. Altius IT

Altius IT offers a full range of asset protection, security audit, privacy audit, and risk management services. Founded in 1993, Altius Information Technologies, Inc. (Altius IT) is a California Corporation providing IT security audits, security consulting, risk management, and privacy audit services. Over 1,000 organizations have relied on our expertise to help them develop and implement strategies to reduce risks.



B. Nationally Recognized Leadership

Elected by our peers into leadership roles, we are experienced information security auditors and have served on the Boards of Directors of international and national associations:

- International Association of Professional Security Consultants
- NetTeCH nationwide association of IT companies
- Association of Professional Consultants
- Technology Professionals Association



INTERNATIONAL
ASSOCIATION OF
PROFESSIONAL
SECURITY
CONSULTANTS

C. Expert Authority

As a leading authority, our track record of helping organizations manage risks has been featured on national television and in over 40 publications. Please visit www.altiusit.com/news.htm to view televised clips and articles.



D. Project Team Certifications

Altius, meaning "higher", embodies our philosophy of delivering higher performance and results to our clients. We believe we are uniquely qualified to provide security audit services to your organization.

Our project team certifications include:

- *Certified Information Systems Auditor (CISA)*
- *Certified in Risk and Information Systems Controls (CRISC)*
- *Certified in the Governance of Enterprise IT (CGEIT)*

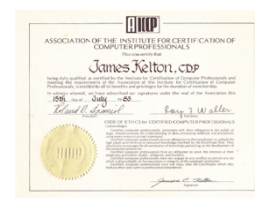


EXHIBIT B

FastestVPN Privacy Policy

EXHIBIT B – FASTESTVPN PRIVACY POLICY

The information listed below was obtained from <https://fastestvpn.com/privacy-policy>.

I. ONLINE SECURITY AND PRIVACY

FastestVPN is streamlined to create maximum online security and privacy for our users. Our privacy policy encourages pure transparency required for our users to understand what information is collected, how it's used and with whom it's shared.

We've designed our policies strategically to collect as minimal data as possible that will neither harm our customers nor the service we provide. FastestVPN processes your data very selectively and at a minimum. Our aim via the information collected is to maintain the service, process payments, and smoothen the entirety of the FastestVPN apps and website.

II. TABLE OF CONTENTS

- FastestVPN Does Not Store Any Logs
- What Information Is Collected
- What We Do Not Store
- How We Use This Information
- Tools That We Use
- Sharing Personal Data
- Rights To Personal Data
- Legal Basis Including the Child Protection Law
- Affiliates
- Important Note
- Contact information

III. FASTESTVPN DOES NOT STORE ANY LOGS

We do not store your logs in any way. Any information or logs related to your browsing history - the websites you visit, the content you download or stream, the amount of data you download, the time of how long you connect and disconnect to servers, your traffic destinations, or your DNS queries - stays with you and you alone.

We understand your concerns about IP address surveillance and device tracking. However, we do not log or store them. This defeats the purpose of using a VPN for online protection and security. You're free to visit our websites and scan through our tutorials, how-to guides, etc., and you can continue to do so privately.

IV. WHAT INFORMATION IS COLLECTED

When you sign up and create your FastestVPN account, only minimal information is collected to ensure the smooth running of operations between the service and our users. All the information stated below, (neither sensitive or a risk to your privacy) is not tracked or stored. We only collect small, minute detailed to make sure FastestVPN is up to standards for our users.

We only ask for:

- Email address.
- Payment methods.

This is the minimal amount of data collected to ensure successful client and user operations.

Email Address:

Your email address is collected when you sign up for the service. This way, we can stay in contact with existing customers, send them updates and news alerts, and respond to queries or complaints lodged. However, once you end your subscription, your email is deleted from our systems. FastestVPN has tools to perform mass email campaigns. Once you interact with the service via email, like clicking on the unsubscribe button or troubleshooting via your operating system, our service is alerted. However, we have no information on your device or OS. Once you contact us, we ask you to provide your device model or version number to help solve the existing issue.

Information on Payments:

- Payment data - There are several payment methods included on the FastestVPN account creation page that you can choose from, like Credit Card, PayPal, or Crypto. FastestVPN processes payments through a well known payment processor Fastspring. So no credit card details are collected at our end, once the transaction has been placed.
- Country details - Most VPNs collect the customer's location for VAT calculation; however, we do not. Our customer base is scattered worldwide, but a particular customer's location is never stored; it interferes with privacy protection plan. However, if users are looking for specific country-related queries, like "Does Netflix work with FastestVPN?" we ask you to state your region or country to help further resolve your problem.
- Payment fraud prevention - When a fraud transaction is reported, we ask our users to provide a transaction ID, transaction date, and payment amount. Your email ID is then verified via our payment management partners. However, if there is a high risk of payment transactions, we decide whether to process them or not.

Information collected for service improvements:

- We collect data on VPN app statistics and analytics.
- Any communication data from live chat, email, or feedback forms.
- Cookies - To keep you anonymous and prevent cookie trail collection, we do keep a connection with our affiliates to understand where our customers are coming from once they make a purchase via affiliate sites. No amount of identification is stored for a particular user, apart from keeping tabs on traffic coming in through partners. Other than the above, no cookies are stored.

V. WHAT WE DON'T STORE

- We do not store or track a particular server you're using, nor the IP address assigned to it.
- We do not track or store the time you connected to our services.
- We do not store or track data caps for every session. The amount of bandwidth used is stored for maintenance purposes.
- We know where our users are coming from, to better offer them servers closer to their locations, but we do not store nor track your IP or the service provider associated to your physical location.
- Even though FastestVPN has social networking accounts to stay connected with future or current customers (Facebook, Instagram, Pinterest, LinkedIn, and Twitter,) we do not collect nor store any email addresses or personal data.
- Browsing history - What websites you visit are solely for your viewership. Neither FastestVPN nor your ISP has access to them.
- VPN IP address - Whenever you connect to a VPN server, only the server you choose is taken into account, but not the server IP address assigned to you.
- Connection entries - We only take into note the first time you connect to the VPN. No connection logs are stored thereafter.
- Connection timestamps - As mentioned, only a log of the day you connect to our service is noted, but not the timestamps.
- Additionally, FastestVPN does not store or monitor any DNS user queries, outgoing traffic or the kind of content you engage in or access.
- Browsing activity and sites visited - Visit any website, or download an app with FastestVPN, and we won't know about it.

VI. HOW WE USE THIS INFORMATION

FastestVPN takes several measures to safeguard user-information, both technically and physically in our offices. Only people designated to perform certain duties are able to access user-information. But a service can only do so much to protect its users. You, as a user, must always remain vigilant about sharing your FastestVPN account and user-information on the internet. Because FastestVPN does not store activity logs, a government's request to share data cannot be tied to any specific user.

Fulfillment of contract upon purchase - Once you make a purchase, your email ID can be used to give you access to our service and to ensure smooth purchase transactions. This secures the best security, privacy, and exemplary performance of our website and software.

Consent provided by users - We process your information when our users or affiliates give us consent. Through this, we send out marketing emails, or new promotion alerts, keeping you in the loop. However, apart from that, no identifiable information is stored nor manipulated in any way.

Legal obligations - We do not store personal information but keep records of your email addresses to stay in connection with existing users. If legally required to make or break a contract upon abuse of service, we are at liberty to process it via your email.

The minute our subscribers/users deactivate or delete their account with us, all email and payment details are deleted with it.

VII. TOOLS THAT WE USE

There are a number of tools that FastestVPN uses to ensure the overall smooth running of operations; like:

- Tawk TO for chat support (read their privacy policy).
- An in-house Support Ticket tool to manage customer queries.
- Postmark for transactional emails (read their privacy policy).
- BugSnag for error logging (read their privacy policy).
- Firebase for app analytics (read their privacy policy).
- Facebook pixel (read their privacy policy).
- Google analytics (read their privacy policy).

VIII. SHARING PERSONAL DATA

Service providers - To ensure the smooth running of operations on our service, we have affiliations with third parties to process payments and attend to live chat requests via Tawk TO, to monitor the conversion attribution systems via Post Affiliate Pro or to run the website or app diagnostics.

Business transfers - We do not share any personal information for business transfers. Only if required it's done on user consent.

Requests for data - If data is requested by law, we have nothing to offer since we do not store any.

IX. RIGHTS TO PERSONAL DATA

- Request FastestVPN to give you access to the personal information collected on you.
- Delete any data you don't want us to have. This is rarely the case since only email addresses are kept logged.
- Restrict how we process your information.
- Update any information that you feel FastestVPN needs access to.
- File a complaint if you're experiencing issues with the service.
- Request a refund for our service if it's incompatible with your device or you're not happy with it. We offer a 15-day money-back guarantee that you can use, which also depends on your case. Read the refund policy for more.

X. LEGAL BASIS INCLUDING THE CHILD PROTECTION LAW

We're based in the Cayman Islands, a jurisdiction that exercises "No Mandatory Data retention laws," and we abide by that law.

FastestVPN in no way allows the collection of personal data from anyone under the age of 18. So, if you're under 18, please refrain from sending information to FastestVPN. We will only accept accounts from legal-of-age users or purchases made through parental

supervision. If, however, we do manage to receive data from minors, we take action to delete it immediately.

Protection of our rights - We are at liberty to disclose data if led to legal issues and to exercise our power of rights. This prevents fraud or other illegal notions that can harm the service.

FastestVPN may change the Privacy Policy, at any given time, without prior notice. Users shall be notified of the updated Privacy Policy through email. Only the most recent version of the Privacy Policy shall be applicable.

XI. AFFILIATES

We have partners affiliated with the service but may practice policies that differ from FastestVPN. If you send sensitive information to third parties with different regulations from ours, make sure you accept full responsibility. We urge you to read the privacy policy of any website you visit., eg: social media, and affiliate sites.

Participation in the FastestVPN affiliate or referral program requires you to submit personal information like your company name, email ID, or website address. We might use it for maintaining your existing account with us, and for the arrangement of services to which this program refers. We also use it to comply with regulations regarding your registration and verification of your information provided to us; to prevent fraudulent acts.

XII. IMPORTANT NOTE

We at FastestVPN are here to protect your rights to the internet, maintaining your online security, privacy, or how you use the web. However, we are not to be held responsible for how our customers choose to exercise those rights. We, FastestVPN, “do not condone the violation of regulations related to the state's laws nor encourage unlawful activities with the affiliation of our services.”

FastestVPN terminates all data when you deactivate or terminate your account. You can opt-out of the service at any time, but a refund may only be requested within 15 days after subscribing to FastestVPN.

As mentioned, FastestVPN only holds on to non-identifiable information for as long as you have an account with us. For information collected or retained, we keep email addresses, billing data, the amount paid, and the method of payments. No other information is stored.

FastestVPN may change the Privacy Policy, at any given time, without prior notice. Users shall be notified of the updated Privacy Policy through email. Only the most recent version of the Privacy Policy shall be applicable.

XIII. CONTACT INFORMATION

If there are any concerns, queries, or complaints related to account creation, use of information, payment transactions, app installment requirements, or others, feel free to contact us:

- Via Live chat
- Email support
- For affiliate partnership