

via680® Privacy Policy

Updated 8/4/2016

Our Commitment to Privacy

Your privacy is important to us. To better protect your privacy we provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used. Via680® (aka Ving) does not sell, rent or lease its customer lists to third parties.

EU Privacy Shield

Via680, LLC complies with the US-EU Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Via680, LLC has certified that it adheres to the Privacy Shield Principles of notice, choice, accountability for onward transfer, security, data integrity, and purpose limitation, access, recourse, enforcement and liability. To learn more about the Privacy Shield Program, and to view our certification page, please visit <http://www.privacyshield.gov/>.

The Information We Collect:

This notice applies to all information collected or submitted on the Ving® website (vingapp.com, vingnow.com, go.vingapp.com and via680.com). The type of personal information required on the sites is limited to your email address, name and industry type/role (optional). You may edit your Ving Account Information, including your personal profile through your user profile.

The Way We Use Information:

- “via680 utilizes 3rd party tools in order to assist users with items such as: personalized experiences, facilitation of product usage, and enforcement of terms of service. This data is -and always will be - solely used by via680.
- In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, via680 is potentially liable.
- From time-to-time our site requests information via surveys and assessments. Participation in these surveys or contests is completely voluntary unless otherwise specified, and you may choose whether or not to participate and therefore disclose certain information. Survey information will be used for purposes of monitoring or improving the use and satisfaction of this site and the services provided to you by via680 and its partner organizations.
- To respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims.
- If we believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of via680’s Terms and Conditions of Use, or as otherwise required by law.
- We also may be required to disclose an individual’s personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.
- We will transfer information about you if via680 is acquired by or merged with another company. We will post a notice on our site before this occurs and/or if a new privacy policy will be applicable as a result.
- Finally, we never use or share the personally identifiable information provided to us online in ways unrelated to the ones described above without also providing you an opportunity to opt-out or otherwise prohibit such unrelated uses.

Cookies, Web Beacons, and Shared Objects:

- **Cookies:** We use “cookies” on these sites. A cookie is a piece of data stored on a site visitor’s hard drive to help us improve your access to our site and identify repeat visitors to our site. Usage of a cookie is in no way linked to any personally identifiable information on our site.
- **Web beacons**, also known as clear GIFs or single-pixel GIFs, are small image files that we may place on Web pages and within certain email. Working in conjunction with cookies, Web beacons allow us to accurately count the number of unique users who have visited a specific page and the number of times those pages are displayed. We can also use Web beacons to let us know how many people opened certain types of email. This information is only collected in aggregate form and will not be linked to your personally identifiable information. Keep in mind that any image file on a Web page can act as a Web beacon.
- **Shared Objects** are used to store data on your computer in much the same way that data is stored in a cookie created through a web browser. Various uses of Shared Objects include remembering a user’s favorite color, or the last frame of a video watched. The data can only be read by files originating from the same domain that created the Shared Object. Shared Objects cannot remember a user’s e-mail address or other personal information unless they willingly provide such information.

Ving uses **cookies, Web beacons, and Shared Objects** to enable us to know which services you are currently signed for or to offer you all the services and functionality that we do. Cookies enable us to identify you upon login so you are taken to the correct sub web site with the corresponding set of controls.

Our Commitment to Data Security:

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

Our Commitment to Children’s Privacy:

Protecting the privacy of the very young is especially important. For that reason, no part of our website is structured to attract anyone under 13.

How You Can Access or Correct Your Information:

- You can access all your personally identifiable information that we collect online and maintain by viewing your Ving profile. We use this procedure to better safeguard your information.
- You can correct factual errors in your personally identifiable information by changing your profile or sending us a request that credibly shows error.
- To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections.

Complaint Resolution

In compliance with the EU-US Privacy Shield Principles, via680 commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact via680 at via680, LLC 241 W. Federal Street, Youngstown, Ohio. 44503. Attention: Operations/Resolutions or send us an email: privacy@via680.com.

via680, LLC has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles BBB EU Privacy Shield, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgement of your complaint, or if your

complaint is not satisfactorily address please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

via680 is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

How to Contact Us:

Should you have other questions or concerns about these privacy policies, please call us at 330-599-4582 or send us an email at privacy@via680.com or write us: 241 W. Federal Street, Youngstown, Ohio 44503 Attention: Security and Privacy Officer.

Changes to this Privacy Policy

via680 may update this policy. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account or by placing a prominent notice on our site.