

**Ving!® Privacy Policy**  
**Last Modified: July 1, 2020**

via680®, LLC (“the Company,” “we,” “us” and “our”) respects your privacy and is committed to protecting your privacy through our compliance with this Privacy Policy (the “Policy”). This Policy should be read in conjunction with our Terms of Service, into which this Policy is incorporated by reference.

In compiling this Policy, we have taken steps to ensure that we have incorporated the standards and principles outlined in data collection and privacy frameworks, including the European Union’s General Data Protection Regulation (“GDPR”). This Policy describes:

- The types of information we collect from you or that you may provide when you visit our website <https://vingapp.com/> (“the Website”) as well as any websites and blogs directly owned by the Company (“our websites”). Together, the Website and our websites, as well as any related mobile and 3<sup>rd</sup> party applications that access our service, constitute Ving (“Ving”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy does not apply to websites or other domains that are maintained or operated by third parties or our affiliates. Ving may link to third party websites and services, but these links are not endorsements of these sites and this Policy does not extend to them. Because this Privacy Policy is not enforced on these third party websites, we encourage you to read any posted privacy policy of the third party website before using the service or site and providing any Personal Information. “Personal Information” is any information that can be used to individually identify you from a larger group, and can include details such as your name, email address, age and address.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, then please do not use Ving. By using Ving, you agree to the terms of this Policy. This Policy may change from time to time (see below, “Changes to this Policy”). Your continued use of Ving after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

**Information We Collect and How We Collect It**

To ensure that we provide you with the best possible experience, we will store, use, and share information about you in accordance with this Policy. For example, when you request information, subscribe to our emails, ask for support materials, or register yourself for an account, we will ask you to provide Personal Information to complete these transactions.

*Information You Provide to Us*

The sort of information that you provide in each case will vary and could include Personal Information. The Personal Information we collect is limited to your first name, last name, email address, mobile telephone number, and your industry or job role. In some cases, we may ask you to create and share a username and password that should only be known to you.

*Automatic Information Collection*

In addition to the information that you provide to us, we may also collect information about you during your visit to Ving. We collect this information using automated tools that are detailed below. These tools may collect information about your behavior and your computer system, such as your Internet address (IP Address), the pages you have viewed, and the actions you have taken while using Ving. Some of the tools we use to automatically collect information about you, including:

- (a) **Cookies.** A “cookie” is a small data file transmitted from a website to your computer’s hard drive. Ving may use cookies to provide you with services and features. For example, we will use cookies to help you login to your account and provide a personalized experience. We may also use cookies to connect your activity together across multiple visits. Ving uses session cookies, which stay on your computer until you log out of Ving. We use this type of cookie to make it easier to log onto Ving. We do not use persistent cookies, which remain on your computer until you delete them or they expire. Most browsers automatically accept cookies by default, but you can usually refuse cookies or selectively accept cookies by adjusting the preferences in your browser. We may use cookies on Ving to monitor your interaction with our marketing campaigns. These cookies may be delivered by a trusted third party, but will provide us with information when you visit Ving. One such trusted third party partner is HubSpot. Ving sends aggregated, non-Personal Information to HubSpot for the purpose of providing the Company with the ability to conduct technical and

statistical analysis on Ving. To learn more about HubSpot, please visit their website at <https://www.hubspot.com/>. Please be aware that a number of features on Ving may require cookies to operate correctly, turning off cookies may affect your experience on Ving.

- (b) Web Beacons. A Web Beacon is an electronic image. Web Beacons can track certain things from your computer and can report activity back to a web server allowing us to understand some of your behavior. If you choose to receive emails from us, we may use Web Beacons to track your reaction to our emails. We may also use them to track if you click on the links and at what time and date you do so. Some of our marketing partners may use Web Beacons to track your interaction with online advertising banners. This information is only collected in aggregate form and will not be linked to your Personal Information. Keep in mind that any image file on a webpage can act as a Web Beacon.
- (c) Shared Objects. 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 email address or other Personal Information unless they willingly provide such information.
- (d) Embedded Web Links. Links provided in our emails and, in some cases, on third party websites may include tracking embedded in the link. The tracking is accomplished through a redirection system. The redirection system allows us to understand how the link is being used. Some of these links will enable us to identify that you have personally clicked on the link and this may be attached to the personal data that we hold about you. This data is used to improve our service to you and to help us understand the performance of our marketing campaigns.
- (e) Third Party Websites and Services. We work with a number of service providers of marketing communications technology. These service providers may use various data collection methods to improve the performance of the marketing campaigns we are contracting them to provide. The information collected can be gathered on our websites and also on the websites where our marketing communications are appearing. For example, we may collect data where our banner advertisements are displayed on third party websites.
- (f) Google User Data. We use your email as your Ving username, your first and last name is used to complete your Ving profile, and our read-only access to your Google contacts are used to pre-populate your Ving contact list.

### **Do Not Track Disclosure**

We do not track customers over time and across third party websites to provide targeted advertising. Therefore, Ving does not operate any differently when it receives Do Not Track (DNT) signals. The information we collect automatically is statistical data and does not include personal data.

### **Children's Information and Privacy**

Ving is not directed for use by children who have not reached the "Minimum Age" (as defined below) without adult supervision and consent, or the express written authorization of the user or its sponsoring organization (the "Sponsoring Organization") that will warrant and represent a child's use complies with applicable law and these Terms of Service. Otherwise, children under such a Minimum Age must not use Ving or Services offered on it without adult supervision, and are not permitted to become members of Ving or to otherwise submit any personally identifiable information. We do not knowingly collect personal information from children under the applicable Minimum Age. If you are under the applicable Minimum Age for your jurisdiction, do not use or provide any information on Ving or on or through any of its features/register on Ving, make any purchases through Ving, use any of the interactive or public comment features of Ving or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under the applicable Minimum Age without verification of parental consent, we will delete that information. If you are a Sponsoring Organization making Ving available for children or otherwise enabling the Company to collect, use and process the personal information of children, you warrant and represent that you have obtained all necessary consent and authorizations to do so.

"Minimum Age" means (a) 18 years old for the People's Republic of China, (b) 16 years old for the Netherlands, (c) 14 years old for the United States, Canada, Germany, Spain, Australia and South Korea, and (d) 13 years old for all other countries. However, if law requires that you must be older in order for The Company to lawfully make Ving available to you (including the collection, storage and use of your information) then the Minimum Age is such an older age. In all cases Ving is not for use by anyone under the age of 13.

## **How We Use Your Information**

The information we gather and that you provide is collected and used to improve our service to you and your experience when engaging with Ving and our products. For example, we may use your information to:

- Assist you 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 the Company.
- Prevent malicious activity and provide you with a secure experience.
- Provide service and support for services you request.
- Provide marketing communications that are effective and optimized for you.
- Keep you up-to-date with the latest benefits available from us.
- Avoid sending you something that will not be of interest.
- Define what content you might be interested in.
- Measure performance of marketing programs.
- Learn about your behavior and try to improve what we do for your benefit.
- Contact you about services and offers that are relevant to you.
- Display testimonials, reviews, or “success stories” on Ving with the express consent of the owner of that statement.

From time-to-time Ving 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 Ving and the services provided to you by the Company and its partner organizations.

## **How We Share Your Information**

The Company does not sell or lease your information to any third party. We may disclose your Personal Information to our partners in accordance with this Policy. We work with a number of partners that help us to process your requests, deliver customer service and support, send email marketing communications, and provide experiences that you have come to expect from us. We will share your information with these suppliers in order to fulfill the service that they provide to us. These suppliers are under contract to keep your information secure and not to use it for any reason other than to fulfill the service we have requested from them.

On occasion, we may provide you with the ability to communicate with third parties for the purpose of, for example, securing a referral. Where this is the case, we will provide you with the ability to instruct us to share your information with the selected third party. We will only ever share your information in this way if you have told us that you are willing to allow us to do so.

Except as described in this Policy, we will not share your information with third parties unless it is under one of the following circumstances:

- Respond to duly authorized information requests from law enforcement or other governmental authorities.
- Comply with any law, regulations, subpoena, or court order.
- Investigate and help prevent security threats, fraud, or other malicious activity.
- Enforce/protect the rights and properties of the Company or its subsidiaries.
- Protect the rights or personal safety of the Company’s employees.

There are circumstances where the Company may decide to buy, sell, or reorganize business in selected countries. Under these circumstances it may be necessary to share or receive Personal Information with prospective or actual partners or affiliates. In such circumstances, the Company will ensure your information is used in accordance with this Policy.

## **For Ving Users Outside of the United States**

Many users of Ving may be located outside of the United States. To provide you with our services, we may store, process, and transmit information in the United States and locations around the world. This may include those locations outside of your country. Information may also be stored locally on the devices you use to access these services.

## **For Ving Users in the European Union (“EU”) and the United Kingdom**

Under the General Data Protection Regulation (“GDPR”), data subjects in the European Union (“EU”) and the United Kingdom, possess specific rights with respect to their Personal Information, or “personal data” as defined under the GDPR.

If you are an entity or Sponsoring Organization submitting personal data to Ving on behalf of data subjects in your Sponsoring Organization (i.e. company, school) you represent and warrant that you are a data controller under the GDPR, and the Company is a data processor under the GDPR. You agree that you shall obtain consent from all data subject users of Ving for the use of their personal data, and it shall be your responsibility to provide all necessary wording, notices, and policies (“Privacy Notices”) in respect of the acquisition of that personal data for use by the Company in the delivery of the Services to ensure compliance with any data protection law governing both the acquisition of that personal data and the subsequent use thereof by you or the Company.

#### *Data Subject Rights Under GDPR*

Individual Ving users, or data subjects, in the EU can exercise any of the following rights by notifying us as described below:

- Access: You may email us at [privacy@vingapp.com](mailto:privacy@vingapp.com) to request a copy of the personal data Ving currently contains.
- Correction or Rectification: You can correct what personal data Ving currently contains by emailing us at [privacy@vingapp.com](mailto:privacy@vingapp.com) to request that we correct or rectify any personal data that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.
- Restrict Processing: When applicable, you may restrict the processing of your personal data by submitting a request via email to [privacy@vingapp.com](mailto:privacy@vingapp.com). In your email, please explain how you wish for us to restrict processing of your personal data. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data.
- Object to Processing : When applicable, you have the right to object to the processing of your personal data by submitting a request via email to [privacy@vingapp.com](mailto:privacy@vingapp.com). When such objections are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data.
- Portability: Upon request and when possible, we can provide you with copies of your personal data. You may submit a request via email to [privacy@vingapp.com](mailto:privacy@vingapp.com). When such a request cannot be honored, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent. Where applicable, we will ensure such changes are shared with any trusted third parties.
- Withdraw Consent: At any time, you may withdraw your consent to our processing of your personal data through Ving by notifying us via email at [privacy@vingapp.com](mailto:privacy@vingapp.com). Using the same email address associated with your Ving account, simply type the words “WITHDRAW CONSENT” in the subject line of your email. Upon receipt of such a withdrawal of consent, we will confirm receipt and proceed to stop processing your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- Erasure: If you should wish to cease use of Ving and have your personal data deleted from Ving, then you may submit a request by emailing us at [privacy@vingapp.com](mailto:privacy@vingapp.com). Upon receipt of such a request for erasure, we will confirm receipt and will confirm once your personal data has been deleted.
- Submit Complaints or Questions: If you wish to raise a complaint on how we have handled your personal data, you can contact us as described below. If you reside in a European Union member state, you may also lodge a complaint with the supervisory authority in your country. A list of Supervisory Authorities is available here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

#### *EU-US Privacy Shield Framework*

via680, LLC complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union and the United Kingdom (UK) transferred to the United States pursuant to Privacy Shield. The Company has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, the Company is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

Pursuant to the Privacy Shield Frameworks, EU individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to [privacy@vingapp.com](mailto:privacy@vingapp.com). If requested to remove data, we will respond within a reasonable timeframe.

We will provide an individual opt-out or opt-in choice before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to [privacy@vingapp.com](mailto:privacy@vingapp.com).

The Company's accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, the Company remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless the Company proves that it is not responsible for the event giving rise to the damage.

In compliance with the Privacy Shield Principles, the Company commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union individuals with Privacy Shield inquiries or complaints should first contact us at 241 W. Federal Street, Youngstown, Ohio 44503, to the attention of "Operations/Resolutions." You may also contact us via email at [privacy@vingapp.com](mailto:privacy@vingapp.com).

The Company has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/EU-privacy-shield/for-eu-consumers](http://www.bbb.org/EU-privacy-shield/for-eu-consumers) for more information and to file a complaint. This service is provided free of charge to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

### **Your Choices and Selecting Your Privacy Preferences**

We want to provide you with relevant information that you have requested. If we provide subscription-based services, such as email newsletters, we will allow you to make choices about what information you provide at the point of information collection or at any time after you have received a communication from us while you are subscribed to the service. This assumes that any transactional or service-oriented messages are excluded from your preference, as they are not intended to be for the purpose of marketing communications, and rather to fulfill a service you have requested.

Email newsletters will not be sent to you unless you consent to receive such a newsletter. After you request to receive these emails, you may opt out of receiving them by selecting the "unsubscribe" link included in each email communication. Please note that by opting out or unsubscribing you may affect other services which you have requested we provide to you where email communication is a requirement of the service provided.

The communication that you receive from us will be in accordance with your preferences and this Policy. Some of the communications you receive could include automatic information collection tools.

### **Access to and Accuracy of Your Information**

The Company strives to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant frameworks, and take steps to monitor its accuracy. We employ technologies designed to help us maintain information accuracy on input and processing.

You can access all of your Personal Information that we collect online and maintain by viewing your Ving profile. You can correct factual errors in your Personal Information by changing your profile or sending us a request via email to [privacy@vingapp.com](mailto:privacy@vingapp.com) that credibly demonstrates the error.

To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections. Where we enable you with access to your private information, we will always ask you for a username and password to help protect your privacy and security. We recommend that you keep your password safe, that you change it periodically, and that you do not disclose it to any other person or allow any other person to use it.

### **Keeping Your Personal Information Secure**

Ving has implemented commercially reasonable measures designed to secure any information, both Personal Information and non-Personal Information, stored by Ving against accidental loss and from unauthorized access, use, alteration, and disclosure. We employ physical, technical, and administrative procedures to safeguard the information that we collect to prevent unauthorized access or disclosure. You may utilize a username and password to enjoy Ving. It is your responsibility to keep confidential your username and password. When we collect or transmit information over the internet, we protect it through the use of encryption, such as the Secure Socket Layer (SSL) protocol. All of our information is stored in secure facilities with limited access and security procedures. We have a team dedicated to keeping your information secure and testing for vulnerabilities. We also continue to work on features to keep your information safe in addition to measures like two-factor authentication, encryption of files at rest, and alerts when new devices and apps are linked to your account. We deploy automated technologies to detect abusive behavior and content that may harm our Services, you, or other users.

### **Retention of Your Information**

When you sign up for an account with us, we will retain information you store on Ving for as long as your account is in existence or as long as we need it to provide you with requested services. If you wish to delete your account, just contact us and we will initiate the process of removing your account.

### **Changes to this Policy**

If we make any changes to this Policy, they will be posted on this page. You can get to this page from any of our web pages by clicking on the Privacy Policy link (usually at the bottom of the screen). We will always date these changes so you know if you are looking at a changed version.

### **How to Contact Us**

We value your opinions and welcome your feedback. To contact us about this Privacy Policy, or your personal information, please contact us at:

via680, LLC  
ATTN: Security and Privacy Officer  
25 E. Boardman Street, STE 242  
Youngstown, Ohio 44503  
[privacy@vingapp.com](mailto:privacy@vingapp.com)

In your correspondence, please ensure that you inform us that your request pertains to information protection and privacy so that it is routed to the correct team.