

# Privacy Policy

Welcome to DELAWARE VALLEY ON LINE's privacy policy.

**DELAWARE VALLEY ON LINE respects your privacy and is committed to protecting your personal data.**

## 1. Introduction

This privacy policy tells you how the DELAWARE VALLEY ON LINE and our group of websites use your personal data when you visit our website, interact with us, and buy our goods and services.

It also tells you about your privacy rights and how the law protects you.

It is important that you read this privacy policy, together with any other privacy policies we may provide, so that you are fully aware of how and why we are using your data.

This privacy policy was last updated on 25th of May. 25, 2018.

If you have any questions, or would like to exercise your privacy rights, please follow the instructions in this privacy policy. See How to contact DELAWARE VALLEY ON LINE about privacy below.

## 2. Our website and the DELAWARE VALLEY ON LINE' group of websites.

Our website at [www.dvol.com](http://www.dvol.com) – offers **Web Hosting & Server Management, Web Design & Applications, Social Media Management, and SEO, Branding, Online Marketing.**

This website, while safe for minors, is not intended for children and we do not knowingly collect data relating to children.

DELAWARE VALLEY ON LINE is located at 204 Owen Avenue, Lansdowne, PA 19050

When we mention "DELAWARE VALLEY ON LINE", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the DELAWARE VALLEY ON LINE group of websites responsible for processing your data.

## 3. Personal data which we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect a variety of information about our users, customers, members and visitors to the DELAWARE VALLEY ON LINE' websites. This personal data falls into these categories:

**Identity Data** includes title, first name, last name, username or similar identifier and an encrypted version of your login/password. If you interact with us through social media, this may include your social media user name.

**Contact Data** includes billing address, delivery address, email address and telephone numbers.

**Financial Data** includes payment card details.

**Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

**Profile Data** includes your username and password, purchases or orders made by you, preferences, feedback and survey responses, as well as any profile data which we have added (for example, using analytics and profiling).

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Usage Data** includes information about how you use our website, products and services.

**Tracking Data** includes information we or others collect about you from cookies and similar tracking technologies, such as web beacons, pixels, and mobile identifiers.

**Marketing and Communications Data** includes your preferences in receiving direct marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. To provide better content and service, DELAWARE VALLEY ON LINE's website uses the Google web analytics service.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. If you use any of these types of personal data on products you design or create on Dvol.com, we will not be able to tell. We will treat all the personal data included in designs or products as ordinary personal data.

Remember, if you choose not to share personal data with us, or refuse certain contact permissions, we might not be able to provide the products and services you've asked for.

#### 4. How your personal data is collected

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or through chat or social media.

This includes personal data you provide when you:

- sign up to receive any of the DELAWARE VALLEY ON LINE's newsletters;
- make enquiries or request information be sent to you;
- create an account on our website;
- order our products or services;
- ask for marketing to be sent to you;
- engage with us on social media;
- enter a competition, promotion or survey;
- contact customer services; or
- leave comments or reviews on our products or services.

**Automated technologies or interactions.** As you interact with us, including via the Dvol.com website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may also collect Tracking Data when you use our website, or when you click on one of our adverts (including those shown on third party websites).

Third parties or publicly available sources. We may receive personal data about you from various types of third parties, including:

- Technical Data and/or Tracking Data from analytics providers, advertising networks and search information providers;
  - Contact, Financial and Transaction Data from providers of payment and fraud prevention services;
  - Identity and Contact Data from data partners; and
  - Data from any third parties who are permitted by law or have your permission to share your personal data with us, such as via social media or review sites We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
5. **How we use your personal data**
- Where we need to perform the contract we are about to enter into or have entered into with you. For example, when you purchase our products, that's a contract.
  - Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, when we carry out fraud screening as part of the check-out process.
  - Where we need to comply with a legal or regulatory obligation. For example, keeping records of our sales for tax compliance.

Generally, we do not rely on consent as a legal basis for processing your personal data other than where the law requires it, for example in relation to sending certain direct marketing communications. Where our legal basis is consent, you have the right to withdraw consent any time.

See Explaining the legal bases we rely on to process personal data to find out more about the types of lawful basis that we will rely on to process your personal data.

## 6. Explaining the legal bases we rely on to process personal data

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

We do not carry out any automated decision making.

If you ever have any questions about this, all you have to do is ask. See How to contact DELAWARE VALLEY ON LINE about privacy below.

## 7. Advertising, marketing and your communications preferences

We may use your Identity, Contact, Technical, Tracking, Usage and Profile Data to form a picture of what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you and tell you about them. This is what we call direct marketing.

We may carry out direct marketing by email, phone, text or post. For example, you might have the DELAWARE VALLEY ON LINE's newsletter hit your inbox or a cool promotion land on your door mat.

On our website, we always try hard to make it really clear what we are doing and what communications you will be sent, whether it's you deciding to sign up to the DELAWARE VALLEY ON LINE's newsletter or as part of creating an account or conducting a purchase – and you have a right at any time to change your mind and say no thank you and opt out The easiest way to opt out is to use the unsubscribe link at the bottom of the communication.

Of course, there are lots of different ways you'll see adverts for DELAWARE VALLEY ON LINE out and about, and not all of these are based on using personal data – sometimes we just buy good old-fashioned advertising space in the real world and websites and social media. If you see DELAWARE VALLEY ON LINE's adverts on

websites and in social media, these may not be directed specifically at you, we might just have bid for the space. But here's some things we may do that may be specifically directed at you:

- emails, for example the DELAWARE VALLEY ON LINE's listserv and newsletters;
- text messages, for example with discount codes;
- promotions by post, such as discounts, or from our trusted partners; and/or
- phone calls, to tell you something that might be relevant to you and your organization.

We also work with partners to try and promote the reach of our adverts and use analytics and retargeting for this reason. We use Tracking Data to deliver relevant online advertising, including via websites and social media.

Tracking Data, and in particular cookies, help us to deliver website and social advertising that we believe is most relevant to you and to potential new customers of DELAWARE VALLEY ON LINE. The cookies used for this purpose are often placed on our website by specialist organisations – and this is also why when you've been on the Dvol.com website, you might a variety of third party advertising. This includes retargeting.

Cookies can also tell us if you have seen a specific advert, and how long it has been since you have seen it. This is helpful, because it means we can control the effectiveness of our adverts and control the number of times people might be shown our adverts (you know, before we risk become annoying). Cookies also help us understand if you've opened a marketing email because we don't want to send you things you don't read.

If you want more information about Tracking Data, in particular cookies, see Cookies below.

Almost all the cookies relate to advertising are part of third party online advertising networks. If you'd like to read about how you can control which adverts you see online, see opt-out programs established by the [Digital Advertising Alliance](#) (United States), the [Digital Advertising Alliance of Canada](#) and the [European Interactive Digital Advertising Alliance](#). We do not control cookies which are set by advertising networks.

## 8. Cookies

You can see from Advertising, marketing and your communications preferences above, that cookies are a tool which we (and everyone one else who operates online) uses for advertising. That is just part of why cookies are used. Generally, they are pretty clever.

Cookies help dvol.com work better and provide lots of help in the background to make the process of being a Dvol.com customer a lot easier. You'd miss a lot of these things if they were gone – like it being easy to log in and move from page to page, and things staying in your cart while you go off and look at other pages.

Other cookies collect information about how visitors use Dvol.com, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and used to improve how Dvol.com works.

There are also cookies that allow Dvol.com to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.

There are cookies that collect information about your browsing habits in order to make advertising delivered to you more relevant to you and your interests (see Advertising, marketing and your communications

preferences above). They are usually placed by advertising networks with our permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

When you use Dvol.com, your device or browser may be sent cookies from third parties, for example when using embedded content and social network links. It's important for you to know that we have no access to or control over cookies used by these companies or third-party websites. We suggest you check the third-party websites for more information about their cookies and how to manage them.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **9. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in this privacy policy. We may also share your personal data if the law otherwise allows it.

We may share personal data with the following categories third parties:

- Suppliers and service providers (such as technology service providers, payment processing and fraud prevention providers, manufacturers and post and courier services);
- DELAWARE VALLEY ON LINE affiliates;
- auditors and professional advisers like bankers, lawyers, accountants and insurers; and
- government, regulators and law enforcement.

We share personal data with the following specific third parties:

- Google Analytics
- Stripe payment processing
- PayPal payment processing
- Delaware Valley On Line (ISP)
- Wells Fargo Bill Pay

We also share data with third parties connected to advertising, retargeting and analytics. Please see Cookies above, including the cookie list, for more information about who those third parties are.

We may also share data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **10. Payment information**

DELAWARE VALLEY ON LINE uses third party payment processors Stripe and PayPal to process payments made for products and services via the Website. All online payments will be conducted in accordance with Payment Card Industry (PCI) data security standards (which are high!) and your billing information (which is only used by these payment processors for the purpose of performing fraud protection) is encrypted before

being communicated to them. Subject to the below exceptions, your credit card details are communicated directly from your browser to these payment processors – DELAWARE VALLEY ON LINE never (ever!) sees your full Permanent Account Number (PAN). This means that the payment form is either off-site or displayed in a frame on the payment page.

For Stripe Payments, if on the payment page you have requested that your card details be remembered and the payment was successful, DELAWARE VALLEY ON LINE stores the card type, a Masked PAN (only the first 6 and last 4 digits) and the card's expiry date as well as an associated token. We store this information so that you and we can identify your stored card and use it for further payments at DELAWARE VALLEY ON LINE. This stored information can be deleted via the payment form on the Website should you wish to do so. We also store separately the last 4 digits and card type so that we can identify transactions made by a particular card.

For PayPal we only store the tokens required to identify the transaction with PayPal, issue refunds and identify transactions made using PayPal.

## **11. International transfers**

We generally do not engage in international transfer, however whenever we transfer your personal data out of the EEA, we will comply with applicable data protection law. Some of the mechanisms we may choose to use when undertaking an international transfer are:

- The transfer of your personal data is to a country that has officially been deemed to provide an adequate level of protection for personal data by the European Commission.
- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe (called the "EU Model Clauses").
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. If the provider is not EU-US Privacy Shield certified, we may use the EU Model Clauses.

We share your personal data within the DELAWARE VALLEY ON LINE Websites, which will involve transferring your data outside the European Economic Area. We do this using the EU Model Clauses.

Many of our external third-party providers are based outside the EEA, so their processing of your personal data will involve a transfer of data outside the EEA.

## **12. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **13. Third-party links**

This website may include links to third-party websites, plug-ins and applications (for example, the ability to sign in with Facebook). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 14. Data retention

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they stop being customers for tax purposes.

We also make a promise to you that you can come back at any time in the future and re-print products you have ordered from us in the past. So, unless you actively delete this information, we keep it, so we can keep our promise to you.

In some circumstances you can ask us to delete your data; see Your legal rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 15. Your legal rights

If the General Data Protection Regulation applies to you because you are in the European Union, you have rights under data protection laws in relation to your personal data:

- The right to be informed – that’s an obligation on us to inform you how we use your personal data (and that’s what we’re doing that in this privacy policy);
- The right of access – that’s a right to make what’s known as a ‘data subject access request’ for copy of the personal data we hold about you;
- The right to rectification – that’s a right to make us correct personal data about you that may be incomplete or inaccurate;
- The right to erasure – that’s also known as the ‘right to be forgotten’ where in certain circumstances you can ask us to delete the personal data we have about you (unless there’s an overriding legal reason we need to keep it);
- The right to restrict processing – that’s a right for you in certain circumstances to ask us to suspend processing personal data;
- The right to data portability – that’s a right for you to ask us for a copy of your personal data in a common format (for example, a .csv file);
- The right to object – that’s a right for you to object to us processing your personal data (for example, if you object to us processing your data for direct marketing); and
- Rights in relation to automated decision making and profiling – that’s a right you have for us to be transparent about any profiling we do, or any automated decision making.

These rights are subject to certain rules around when you can exercise them. You can see a lot more information on them, if you are interested, on the UK [Information Commissioner’s Office website](#).

If you wish to exercise any of the rights set out above, please contact us (see How to contact DELAWARE VALLEY ON LINE about privacy).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details in How to contact DELAWARE VALLEY ON LINE about privacy below.

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### **16. How to contact DELAWARE VALLEY ON LINE about privacy**

If you have any questions about this privacy policy, or would like to exercise any of your rights, please email us at [sysop@dvol.com](mailto:sysop@dvol.com) or write to us with your letter addressed to: Data Privacy Manager, DELAWARE VALLEY ON LINE, 204 Owen Avenue, Lansdowne, PA 19050 USA. If you need help about our products and services, or this website generally, please contact us using the support link available on all of our websites.

#### **18. Changes to this privacy policy**

The General Data Protection Regulation is new and the ICO is still issuing new bits of guidance about how businesses should follow it. So, you may see little updates to our privacy policy over the coming months. Be sure to check in and have read every now and then. Thank you.