# Retail Value Chain Federation, LLC (RVCF) Privacy Policy

Your privacy is important to us. It is RVCF's policy to respect your privacy regarding any information we may collect from you across our websites, <a href="http://www.rvcf.com">http://www.rvcf.com</a> or <a href="http://www.complianceclearinghouse.com">http://www.rvcf.com</a> and other sites we own and operate.

#### **Definitions**

In this privacy policy, "we," "us," and "our" refer to RVCF. "Services" refers to those offered and operated by RVCF. "You" and "your" means, depending on the context, either a member of the RVCF organization, a site or services user, a site visitor.

#### Information we collect

## Log data

When you visit our websites, our servers may automatically log the standard data provided by your web browser. This data is considered "non-identifying information," as it does not personally identify you on its own. It may include your computer's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, and other details.

We may also collect data about the device you are using to access our websites. This data may include the device type, operating system, unique device identifiers, device settings, and geo-location data. What we collect can depend on the individual settings of your device and software. We recommend checking the policies of your device manufacturer or software provider to learn what information they make available to us.

#### **Personal information**

We may ask for personal information, such as your:

- Name
- E-mail
- Phone/mobile number
- Mailing address
- Work address
- Payment information

This data is considered "identifying information," as it can personally identify you. We only request personal information relevant to providing you with a service, and only use it to help provide or improve this service.

#### How we collect information

We collect information by fair and lawful means, with your knowledge and consent. We also let you know why we're collecting it and how it will be used. You are free to refuse our request for this information with the understanding that we may be unable to provide you with some of your desired services without it. Data collection sources include:

- Registering or requesting access to our websites
- Ordering services or products
- Subscribing to our newsletter, marketing, and/or e-mail notifications
- Responding to surveys
- Filling out forms or otherwise submitting via our websites
- Directly contacting RVCF staff

#### **Use of information**

We may use a combination of identifying and non-identifying information to understand who our visitors are, how they use our services, and how we may improve their experience of our websites in future. We do not disclose the specifics of this information publicly, but may share aggregated and anonymized versions of this information, for example, in website and customer usage trend reports.

We may use your personal details to contact you with updates about our websites and services, along with promotional content that we believe may be of interest to you. If you wish to opt out of receiving promotional content, you can follow the "unsubscribe" instructions provided alongside any promotional correspondence from us or contact RVCF staff directly at <a href="mailto:admin@rvcf.com">admin@rvcf.com</a>.

# Data processing, storage, and security

The personal information we collect is stored and processed in United States, or where we or our partners, affiliates and third-party providers maintain facilities. We only transfer data within jurisdictions subject to data protection laws that reflect our commitment to protecting the privacy of our users.

We only retain personal information for as long as necessary to provide a service, or to improve our services in future. While we retain this data, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorized access, disclosure, copying, use or modification. That said, we advise that no method of electronic transmission or storage is 100% secure and cannot guarantee absolute data security.

If you request your personal information be deleted, or where your personal information becomes no longer relevant to our operations, we will erase it from our system within a reasonable timeframe.

Our websites are scanned on a regular basis for security holes and known vulnerabilities in order to make your visits to our sites as safe as possible.

We use regular malware scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.

We use BluePay Processing LLC to process credit card transactions, which are not stored or processed on our servers. Their privacy policy may be viewed at <a href="https://www.bluepay.com/privacy-policy/">https://www.bluepay.com/privacy-policy/</a>.

In the unlikely event of a data breach, we will notify you via e-mail within 30 business days.

#### **Cookies**

We use "cookies" to collect information about you and your activity across our sites. A cookie is a small piece of data that our websites store on your computer, and accesses each time you visit, so we can understand how you use our sites. This helps us serve you content based on preferences you have specified. Please refer to our Cookie Policy for more information.

## Third-party access to information

We use third-party services for:

- · Analytics tracking
- User authentication
- E-mail marketing
- Payment processing

These services may access our data solely for the purpose of performing specific tasks on our behalf. We do not share any personally identifying information with them without your explicit consent. We do not give them permission to disclose or use any of our data for any other purpose.

We may, from time to time, allow limited access to our data by external consultants and agencies for the purpose of analysis and service improvement. This access is only permitted for as long as necessary to perform a specific function. We only work with external agencies whose privacy policies align with ours.

We will refuse government and law enforcement requests for data if we believe a request is too broad or unrelated to its stated purpose. However, we may cooperate if we believe the requested information is necessary and appropriate to comply with legal process, to protect our own rights and property, to protect the safety of the public and any person, to prevent a crime, or to prevent what we reasonably believe to be illegal, legally actionable, or unethical activity.

We do not otherwise share or supply personal information to third parties. We do not sell or rent your personal information to marketers or third parties.

## **Children's Privacy**

These websites do not knowingly target children or collect personal information from children. As a parent/guardian, please contact us if you believe your child is participating in an activity involving personal information on our websites, and you have not received a notification or request for consent. We do not use your supplied contact details for marketing or promotional purposes.

#### **CAN SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial e-mail, establishes requirements for commercial messages, gives recipients the right to have e-mails stopped from being sent to them, and spells out tough penalties for violations. To be in accordance with CANSPAM, we agree to the following:

- Not use false or misleading subjects or e-mail addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business headquarters.
- Monitor third-party e-mail marketing services for compliance.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each e-mail or by contacting RVCF staff directly at admin@rvcf.com.

## Limits of our policy

This privacy policy only covers RVCF's own collecting and handling of data. We only work with partners, affiliates and third-party providers whose privacy policies align with ours; however, we cannot accept responsibility or liability for their respective privacy practices.

Our websites may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites and cannot accept responsibility or liability for their respective privacy practices.

### Changes to this policy

At our discretion, we may change our privacy policy to reflect current acceptable practices. We will take reasonable steps to let users know about changes via our websites. If you are a registered user on <a href="http://www.rvcf.com">http://www.rvcf.com</a> or <a href="http://www.rvcf.com">http://www.rvcf.com</a> or <a href="http://www.complianceclearinghouse.com">http://www.complianceclearinghouse.com</a>, we will notify you using the contact details saved in your profile. Your continued use of these sites after any changes to this policy will be regarded as acceptance of our practices around privacy and personal information.

## Your rights and responsibilities

As our user, you have the right to be informed about how your data is collected and used. You are entitled to know what data we collect about you, and how it is processed. You are entitled to correct and update any personal information about you, and to request this information be deleted. You may amend your profile information at any time, using the tools provided in your profile control panel.

You are entitled to restrict or object to our use of your data, while retaining the right to use your personal information for your own purposes. You have the right to opt out of data about you being used in decisions based solely on automated processing.

Feel free to contact us if you have any concerns or questions about how we handle your data and personal information.

RVCF Data Controller Database Administrator admin@rvcf.com

# **Contacting us**

If there are any questions regarding this privacy policy, you may contact us using the information below.

rvcf.com
51 Cragwood Road
Suite 200
South Plainfield, NJ 07080
United States
webmaster@rvcf.com

This policy is effective as of August 31, 2019.

# Retail Value Chain Federation, LLC (RVCF) Cookie Policy

We use cookies to help improve your experience of <a href="http://www.rvcf.com">http://www.rvcf.com</a> and/or <a href="http://www.complianceclearinghouse.com">http://www.complianceclearinghouse.com</a>. This cookie policy is part of RVCF's privacy policy and covers the use of cookies between your device and our sites. We also provide basic information on third-party services we may use, who may also use cookies as part of their service, though they are not covered by our policy.

If you do not wish to accept cookies from us, you should instruct your browser to refuse cookies from <a href="http://www.rvcf.com">http://www.rvcf.com</a> and/or <a href="http://www.complianceclearinghouse.com">http://www.complianceclearinghouse.com</a>, with the understanding that we may be unable to provide you with some of your desired content and services.

#### What is a cookie?

A cookie is a small piece of data that a website stores on your device when you visit, typically containing information about the website itself, a unique identifier that allows the site to recognize your web browser when you return, additional data that serves the purpose of the cookie, and the lifespan of the cookie itself.

Cookies are used to enable certain features (e.g., logging in), to track site usage (e.g., analytics), to store your user settings (e.g., time zone, notification preferences), and to personalize your content (e.g., advertising, language).

Cookies set by the website you are visiting are normally referred to as "first-party cookies," and typically only track your activity on that particular site. Cookies set by other sites and companies (i.e., third parties) are called "third-party cookies," and can be used to track you on other websites that use the same third-party service.

## Types of cookies and how we use them

#### **Essential cookies**

Essential cookies are crucial to your experience of a website, enabling core features like user logins, profile management, shopping carts, and payment processing. We use essential cookies to enable certain functions on our websites.

#### Performance cookies

Performance cookies are used in the tracking of how you use a website during your visit, without collecting personal information about you. Typically, this information is anonymous and aggregated with information tracked across all site users, to help companies understand visitor usage patterns, identify and diagnose problems or errors their users may encounter,

and make better strategic decisions in improving their audience's overall website experience. These cookies may be set by the website you're visiting (first-party) or by third-party services. We use performance cookies on our sites.

# **Functionality cookies**

Functionality cookies are used in collecting information about your device and any settings you may configure on the website you're visiting (like language and time zone settings). With this information, websites can provide you with customized, enhanced, or optimized content and services. These cookies may be set by the website you're visiting (first-party) or by third-party service. We use functionality cookies for selected features on our sites.

## Targeting/advertising cookies

Targeting/advertising cookies are used in determining what promotional content is more relevant and appropriate to you and your interests. Websites may use them to deliver targeted advertising or to limit the number of times you see an advertisement. This helps companies improve the effectiveness of their campaigns and the quality of content presented to you. These cookies may be set by the website you're visiting (first-party) or by third-party services. Targeting/advertising cookies set by third-parties may be used to track you on other websites that use the same third-party service. We do not use this type of cookie on our sites.

## Third-party cookies on our sites

We may employ third-party companies and individuals on our websites – for example, analytics providers and content partners. We grant these third parties access to selected information to perform specific tasks on our behalf. They may also set third-party cookies in order to deliver the services they are providing. Third-party cookies can be used to track you on other websites that use the same third-party service. As we have no control over third-party cookies, they are not covered by RVCF's cookie policy.

## Our third-party privacy promise

We review the privacy policies of all our third-party providers before enlisting their services to ensure their practices align with ours. We will never knowingly include third-party services that compromise or violate the privacy of our users.

# **Google Analytics**

We use Google Analytics to collect information about use of our websites. Google Analytics collects information such as how often users visit these sites, what pages they visit when they do so, and what other sites they used prior to coming to these sites. We use the information we get from Google Analytics only to improve our sites. Google Analytics collects only the IP address assigned to you on the date you visit our sites, rather than your name or other

identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit our sites, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to our sites is restricted by the Google Analytics Terms of Use (as amended for government websites) and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to these sites by disabling cookies on your browser.

#### LeadLander

One of the third parties we use to collect and track user statistics and trends related to our sites and services is Visitor Queue, Inc. (Visitor Queue). Visitor Queue's privacy policy and how the Visitor Queue services operate and use data from our sites and services is available at: <a href="https://www.visitorqueue.com/privacy">https://www.visitorqueue.com/privacy</a>. As part of our use of our websites we will install cookies onto your computer on behalf of Visitor Queue. You acknowledge and accept the placement of such cookies which will collect data about your use of our sites and services and other sites and services which utilize Visitor Queue's services.

## **MailChimp**

We use Mailchimp for newsletter and marketing e-mails (you can unsubscribe at any time). Through Mailchimp we track e-mails, including who opens the e-mails and who clicks on which links (disable loading external images in your e-mail client and don't click on links if you do not want it to be tracked). A copy of Mailchimp's privacy policy is published at <a href="MailChimp's Legal Policies">MailChimp's Mailchimp's Policies</a>.

# YourMembership

We use YourMembership as our association management software. Periodically we use YourMembership to send e-mails regarding services and event updates (you can unsubscribe at any time). Through YourMembership, we track e-mails, including who opens the e-mails and who clicks on which links (disable loading external images in your e-mail client and don't click on links if you do not want it to be tracked). A copy of YourMembership's privacy policy is published at YourMembership Privacy Policy.

### How you can control or opt out of cookies

If you do not wish to accept cookies from us, you can instruct your browser to refuse cookies from our websites. Most browsers are configured to accept cookies by default, but you can update these settings to either refuse cookies altogether, or to notify you when a website is trying to set or update a cookie.

If you browse websites from multiple devices, you may need to update your settings on each individual device.

Although some cookies can be blocked with little impact on your experience of a website, blocking all cookies may mean you are unable to access certain features and content across the sites you visit.

# **Contacting us**

If there are any questions regarding this cookie policy, you may contact us using the information below.

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Suite 200
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This policy is effective as of August 31, 2019.