

# Needed Basics Digital Services Privacy Policy (neededbasics.com)

*Last Updated May 2, 2018.*

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

## Data Protection Principles

We promise to follow the following data protection principles:

- Processing is lawful, fair, transparent. Our Processing activities have lawful grounds. We always consider your rights before Processing Personal Data. We will provide you information regarding Processing upon request.
- Processing is limited to the purpose. Our Processing activities fit the purpose for which Personal Data was gathered.
- Processing is done with minimal data. We only gather and Process the minimal amount of Personal Data required for any purpose.
- Processing is limited with a time period. We will not store your personal data for longer than needed.
- We will do our best to ensure the accuracy of data.
- We will do our best to ensure the integrity and confidentiality of data.

## Data Subject's rights

The Data Subject has the following rights:

1. Right to information – meaning you have to right to know whether your Personal Data is being processed; what data is gathered, from where it is obtained and why and by whom it is processed.
2. Right to access – meaning you have the right to access the data collected from/about you. This includes your right to request and obtain a copy of your Personal Data gathered.
3. Right to rectification – meaning you have the right to request rectification or erasure of your Personal Data that is inaccurate or incomplete.
4. Right to erasure – meaning in certain circumstances you can request for your Personal Data to be erased from our records.
5. Right to restrict processing – meaning where certain conditions apply, you have the right to restrict the Processing of your Personal Data.
6. Right to object to processing – meaning in certain cases you have the right to object to Processing of your Personal Data, for example in the case of direct marketing.

7. Right to object to automated Processing – meaning you have the right to object to automated Processing, including profiling; and not to be subject to a decision based solely on automated Processing. This right you can exercise whenever there is an outcome of the profiling that produces legal effects concerning or significantly affecting you.
8. Right to data portability – you have the right to obtain your Personal Data in a machine-readable format or if it is feasible, as a direct transfer from one Processor to another.
9. Right to lodge a complaint – in the event that we refuse your request under the Rights of Access, we will provide you with a reason as to why. If you are not satisfied with the way your request has been handled please contact us.
10. Right for the help of supervisory authority – meaning you have the right for the help of a supervisory authority and the right for other legal remedies such as claiming damages.
11. Right to withdraw consent – you have the right to withdraw any given consent for Processing of your Personal Data.

## What personal information do we collect from the people that visit our website?

### Information you have provided us with

This might be your e-mail address, name, billing address, home address etc – mainly information that is necessary for delivering you a product/service or to enhance your customer experience with us. We save the information you provide us with in order for you to comment or perform other activities on the website. This information includes, for example, your name and e-mail address.

### Information automatically collected about you

This includes information that is automatically stored by cookies and other session tools. For example, your shopping cart information, your IP address, your shopping history (if there is any) etc. This information is used to improve your customer experience. When you use our services or look at the contents of our website, your activities may be logged.

### Information from our partners

We gather information from our trusted partners with confirmation that they have legal grounds to share that information with us. This is either information you have provided them directly with or that they have gathered about you on other legal grounds. See the list of our partners [here](#).

## When do we collect information?

We may collect information when you engage in any of the following behaviors on our website:

- Fill out a contact form;
- Comment on a blog post or article;
- Subscribe to our newsletter;
- Click-to-call or otherwise engage with communication through our website.

# How we use your Personal Data

We use your Personal Data in order to:

- provide our service to you. This includes for example registering your account; providing you with other products and services that you have requested; providing you with promotional items at your request and communicating with you in relation to those products and services; communicating and interacting with you; and notifying you of changes to any services;
- enhance your customer experience;
- fulfill an obligation under law or contract.

We use your Personal Data on legitimate grounds and/or with your Consent.

On the grounds of entering into a contract or fulfilling contractual obligations, we Process your Personal Data for the following purposes:

- to identify you;
- to provide you a service or to send/offer you a product;
- to communicate either for sales or invoicing.

On the ground of legitimate interest, we Process your Personal Data for the following purposes:

- to send you personalized offers (from us and/or our carefully selected partners);
- to administer and analyze our client base (purchasing behavior and history) in order to improve the quality, variety, and availability of products/ services offered/provided;
- to conduct questionnaires concerning client satisfaction.

As long as you have not informed us otherwise, we consider offering you products/services that are similar or same to your purchasing history/browsing behavior to be our legitimate interest.

With your consent we Process your Personal Data for the following purposes:

- to send you newsletters and campaign offers (from us and/or our carefully selected partners);
- for other purposes we have asked your consent for.

We Process your Personal Data in order to fulfill obligation rising from law and/or use your Personal Data for options provided by law. We reserve the right to anonymize Personal Data gathered and to use any such data. We will use data outside the scope of this Policy only when it is anonymized. We save your billing information and other information gathered about you for as long as needed for accounting purposes or other obligations deriving from law, but not longer than

We might process your Personal Data for additional purposes that are not mentioned here, but are compatible with the original purpose for which the data was gathered. To do this, we will ensure that:

- the link between purposes, context and nature of Personal Data is suitable for further Processing;
- the further Processing would not harm your interests and
- there would be appropriate safeguard for Processing.

We will inform you of any further Processing and purposes.

## Who else can access your Personal Data

We do not share your Personal Data with strangers. Personal Data about you is in some cases provided to our trusted partners in order to either make providing the service to you possible or to enhance your customer experience. We share your data with:

### **Our processing and business partners:**

- PayPal
- Stripe

### **Connected third parties:**

- Google and Google Analytics
- YouTube
- Facebook
- PipeDrive
- OneSignal

We only work with Processing partners who are able to ensure adequate level of protection to your Personal Data. We disclose your Personal Data to third parties or public officials when we are legally obliged to do so. We might disclose your Personal Data to third parties if you have consented to it or if there are other legal grounds for it.

### **Third-party disclosure**

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when it's release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

### **Third-party links**

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore

have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

### **Google**

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users.

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We use Google AdSense Advertising on our website.

Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

### **We have implemented, or may in the future, the following:**

- Remarketing with Google AdSense
- Google Display Network Impression Reporting
- Demographics and Interests Reporting

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

### **Opting out:**

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

## **How we secure your data**

We do our best to keep your Personal Data safe. We use safe protocols for communication and transferring data (such as HTTPS). We use anonymizing and pseudonymising where suitable. We monitor our systems for possible vulnerabilities and attacks.

Even though we try our best we can not guarantee the security of information. However, we promise to notify suitable authorities of data breaches. We will also notify you if there is a threat to your rights or interests. We will do everything we reasonably can to prevent security breaches and to assist authorities should any breaches occur.

If you have an account with us, note that you have to keep your username and password secret.

### **COPPA (Children Online Privacy Protection Act)**

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under the age of 13 years old.

## **To comply with privacy policies, we agree to the following:**

Users can visit our site anonymously.

Once this privacy policy is created, we will add a link to it on our home page and on every page published on our website.

Our Privacy Policy link includes the word 'Privacy' and can easily be found.

You will be notified of any Privacy Policy changes on our [Privacy Policy Page](#).

You can change your personal information:

- By emailing us at support @ icebergwebdesign.com
- By calling us at 763-350-8762
- By chatting with us or by sending us a support ticket through our website

### **How does our site handle Do Not Track signals?**

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

### **Does our site allow third-party behavioral tracking?**

It's also important to note that we allow third-party behavioral tracking

### **Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

### **In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:**

We will notify you via email within 7 business days. We may also notify the users via in-site notification within 7 business days.

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

## **CAN SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

### **We collect your email address in order to:**

- Send information, respond to inquiries, and/or other requests or questions
- Process orders and to send information and updates pertaining to orders.
- Send you additional information related to your product and/or service
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

### **To be in accordance with CANSPAM, we agree to the following:**

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

### **If at any time you would like to unsubscribe from receiving future emails, you can email us at**

- Follow the instructions at the bottom of each email.
- and we will promptly remove you from **ALL** correspondence.

## **Contacting Us**

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

Needed Basics Digital Services

314-722-8090

*Last Edited on 2018-05-02*