

Digital Services Inc. d/b/a DVS, its affiliates and its properties ("Company" or "we," "our," or "us") respects the privacy of our users. This Privacy Policy will tell you how and what information we may receive about you, and how we may use your information when providing you our tools, products and services. Please read this Privacy Policy carefully. Please consult our [Terms of Use Agreement](#) for additional terms and conditions that apply to your use of and access to the Site.

## **1. How this Privacy Policy Applies**

This Privacy Policy applies to Web sites owned and operated by the Company and the mobile optimized versions of these sites. This Privacy Policy also applies to any other property and application owned or operated by Company ("App") which links to or references this Privacy Policy. Except where expressly noted, statements in this Privacy Policy with respect to our Web sites also apply to our Apps and such other properties.

Our Web sites may contain links to other sites. Please be aware when you visit another Web site (whether through an advertisement, service, link or otherwise), Company is not responsible for the privacy practices of these other sites, nor do we endorse, warrant, recommend or guarantee the services offered through such other sites. You should review the privacy statements of those other Web sites.

In connection with the tools, products and services provided through our Web sites, some of the information you provide may constitute Personal Information. "Personal Information" means non-public information that can identify you individually on a personal basis. Also, some information we receive through such tools, products and services may be non-Personal Information. You are responsible for ensuring the accuracy of information you provide to the Company. Inaccurate information may affect the information you receive when using such tools, products and services.

## **2. Non-Personal Information**

We may receive non-Personal Information about you as follows:

### Cookies and Web Beacons

We may receive information through the use of cookies, web beacons, and similar technology. Cookies are pieces of data that a Web site transfers to a user's hard drive for record-keeping purposes. Web beacons are transparent pixel images that are used in collecting information about Web site usage, e-mail response and tracking.

A designated service provider, or third-party advertisers or their advertising servers may also place or recognize unique cookies on your device or use similar electronic tools in order to display advertisements that you see on our Web site. Information about your visits to, and activity on, our Web site, an IP address, as well as the number of times you have viewed an advertisement, are used to display on your device screen customized advertisements that may be of particular interest to you. We do not have access to, or control the information collected by, these cookies or similar electronic tools used by these third-party advertisers or their advertising servers. The use and collection of your information by these third-party advertisers and advertising servers is not covered by this Privacy Policy. For information about advertising networks and how to "opt out" of cookies placed by the Network Advertising Initiative's member advertising networks, please contact the third party companies.

Company's designated service provider may assist Company with advertisement display functions for our Web sites. For more information about such provider's handling of non-Personal Information and use practices, including the use of cookies, as well as its instructions on how to "opt out" of having your Web site usage information collected or used by such provider, please contact us. When you opt out via this method, you officially opt out of such provider's advertisement display programs for your device's particular Web browser. You need to opt out for each browser, on each device you use to surf the Web. Thus, if you use multiple browsers (e.g., AOL, Netscape, Internet Explorer, Firefox, etc.), you should repeat this procedure with each one. Similarly, if you connect to the Web from multiple devices (e.g., work and home), you need to explicitly opt out from each browser on each device.

Most browsers are set to accept cookies by default. If you prefer, you can usually set your browser to disable cookies, or to alert you when cookies are being sent. The help function on most browsers contains instructions on how to set your browser to notify you before accepting cookies or to disable cookies entirely. However, it is possible that some parts of this Web site, such as the polls, surveys, contests, product sales, and game areas, will not function properly if you disable cookies.

Our Web sites may also use web analytics services provided by service providers (e.g., Google). Such providers may use cookies to help the Website analyze how users use the Web site. The information generated by the cookie about your use of our Web site (including your IP address) may be transmitted to and stored by such providers. Such providers may use this information for the purpose of evaluating your use of the Web site, compiling reports on Web site activity for Web site operators and providing other services relating to Web site activity and internet usage. Such providers may also transfer this information to third parties where required to do so by law, or where such third parties process the information on such provider's behalf. You may refuse the use of cookies by selecting the appropriate settings on your browser as described above, however please note that if you do this you may not be able to use the full functionality of our Web site.

### Third Party Advertisers

As mentioned above, sponsors or advertisers on Company's Web sites may use their own cookies, web beacons or other online tracking technologies in the advertisements served on our Web Sites, Apps and in emails, special promotions, newsletters or communication we send you. Some advertisers use companies other than Company to serve their advertisement and to monitor users' responses to advertisement, and these companies ("Ad Servers") may also receive non-Personal Information through the use of cookies or web beacons. In certain situations, information collection may be facilitated by momentarily directing your browser to the Web site of an Ad Server or other third party acting on behalf of the sponsor or advertiser before re-directing your browser to its selected destination. This re-direction process may not be apparent to you.

We do not control third party's use of cookies or web beacons, or how they manage the non-Personal Information they receive. You should not provide Personal Information to such sponsors, advertisers and Ad Servers without your consent. Certain Ad Servers allow you to prevent such third party's from collecting data through the use of cookies. In order to do so, you must opt out of such data collection with each individual site. Currently, you can opt-out of cookies for several Ad Servers by visiting the Network Advertising Initiative gateway opt-out site.

Some of the information gathered from the use of cookies, web beacons and similar technology is described below.

### Information from Video and Interactions with Web site and Properties

We may receive non-Personal Information about your interactions with video content (if any) on this Web site, such as the type of content viewed and information about your interactions with email messages (e.g., links clicked on and whether the messages were opened or forwarded). We may also receive non-Personal Information through your interactions with the Web site and our other properties.

### Information on Web pages and Links

We may receive non-Personal Information on Web pages and advertisements you view from the Web site and links within the Web site.

### URL, Browser Type, Operating Systems and IP Address

Like many other Web sites, we may receive non-Personal Information about our users' utilization, activity and navigation of our Web site, Web sites of selected sponsors and advertisers, your browser type, IP protocol and operating system.

### Apps

When you download and install our Apps onto your device, we may assign a number to your App installation. This number cannot be used to identify you personally, and we cannot identify you personally unless you choose to become a registered user of the App. We use this number in a manner similar to our use of cookies as described above. Unlike cookies, the number is assigned to your installation of the App itself and not a browser because the App does not work through your browser. Therefore the random number cannot be removed through settings. If you do not want us to use the random number for the purposes for which we use cookies, please do not use the App.

### Third Party Sources

We may receive non-Personal Information from other sources, such as through vendors and service providers with authorized rights to such information, and from publicly available sources.

### Use of Non-Personal Information

The paragraphs described above outline some of our uses of non-Personal Information. We may also use non-Personal Information to help us monitor how many people are using our Web site and selected sponsors' and advertisers' sites, to provide enhanced functionality on the Web site (e.g., user ID and password prompts, navigation aids, and session timers), to help us generate and deliver advertising, marketing and content on Web pages or any of our other properties, to monitor certain other Web site activity (e.g., user-agent, last URL requested by the user, client-side and server-side clickstream, age restrictions), to monitor how many people open our emails, and for functions related to the foregoing.

We may also use and share non-Personal Information in the same manner as our use of Personal Information described below and in connection with our business (e.g., our third party contractors, agents and representatives may help us utilize cookies and web beacons, and store/handle non-Personal Information).

## **3. Personal Information**

We may receive Personal Information which you provide to us including, as follows:

### Registration Information

You may share Personal Information with us through registration, subscription or other sign up on newsletters, trade shows, offers, features, conferences, products, tools or other services provided by us (and as part of the foregoing). The information you share with us may be changed by you by notifying us or by following the instructions provided to you by Company at registration.

### Community Areas, Chats, Postings, Bulletin Boards, Blogs and other User Forums

We may provide an opportunity for users to communicate in community areas, postings, wikis, bulletin boards, chat rooms, blogs and other public and interactive forums on or through our Web Sites ("User Forums"). Our User Forums are open to the public and should not be considered private.

Any information you share in any User Forum (including Personal Information) is by design open to the public and is not private. We are not responsible for any information that you share in any User Forum. You should be aware of the risks to you which can arise from sharing Personal Information in any User Forum. If you mistakenly post information on any User Forum and would like it removed, please contact us to request its removal. We will try our best to accommodate such removal request - however, not all information may be removable.

Please be aware that what you share in User Forums can be seen, disclosed to, collected and used by parties in ways we cannot control or predict, including to contact you for any purpose. As with any public forum on any site, the information you share may also show up in third-party search engines like Google, Yahoo, MSN, Bing, etc.

We may use third party administrators, agents or representatives to assist us in managing such User Forums. You may be given the option to register or create an account for such administrator. You are responsible for the information you share with such administrator as part of such registration or account creation process. Your information may be subject to additional privacy policies disclosed to you by such administrator.

### Interactive Tools

We may offer you interactive content, tools, products and services. In connection with such items, we may receive information, including Personal Information, which you voluntarily share with us. Some of the tools (like certain quizzes) do not retain your Personal Information, while others (like tools offered through Apps) may store your Personal Information.

### Market Research

We may offer you an opportunity to respond to market research studies, questionnaires or surveys. In connection with such items, we may receive information, including Personal Information, which you voluntarily share with us. For general market research surveys, studies or questionnaires we will not knowingly accept responses from or conduct interviews with any person under the age of 13.

Some market research surveys, studies and questionnaires may provide remuneration (payment of some kind) to participants such as a gift card for your time. We will notify you upon participation in a survey if it is paid. We are responsible for the surveys which we may introduce to you through our properties. We are not responsible for unauthorized surveys that are conducted on third party sites. You may be directed by link, banner ad or otherwise from our Web Site to visit an advertiser's Web site that may introduce you to surveys or questionnaires. We are not affiliated with, nor do we endorse, warrant, recommend or guarantee any part of, any services or offerings on such Web Sites directed from our Web Site. These surveys are not subject to our policies and are not related to Company.

### Use of Personal Information

Except as described in this Privacy Policy, we will not use or disclose any Personal Information we receive without your consent or authorization. This limitation, however, does not apply to information that you voluntarily share publicly (e.g., User Forums) or information that is otherwise publicly available.

We may disclose and use Personal Information to comply with valid legal requirements such as a law, regulation, search warrant, subpoena or court order; or in special cases, such as in response to, to prevent or stop a physical threat, harm, threats to safety, liability, risks, criminality or tortious conduct onto you, us, our users, their property, or defend or assert legal rights. In addition, we may use Personal Information to provide you the tools, products and services requested or agreed by you (e.g., newsletters, reports, apps, games, mailings, alerts, notifications requested or agreed by you); communicate with you on the tools, products and services requested or agreed by you (or their terms) and respond to questions you have about the tools, products and services we provide you; help us design, improve, promote, and administer our Web site, Apps, tools, business, products, operations and services; help us diagnose problems with our tools, products and services, and to maintain and administer our Web site, Apps and properties properly; enable you to participate in features and offers, such as market research surveys, studies, tournaments, games, contests, questionnaires, polls, sweepstakes, and User Forums; enforce our policies and procedures, or enforce any other agreement we have with you; help with billing and collection (if applicable) on services and products requested by you; comply with your instructions, authorization or request; address emergencies or acts of God; as part of a substantial corporate transaction, such as a sale, a merger, consolidation, or asset sale; and for any other purpose disclosed to you at the time we receive your information or pursuant to your consent. We may combine your information with other information. We may communicate with you through any contact information you provide with us, including any cellular/mobile telephone number/device, and you are solely responsible for any charges, including SMS/text charges, incurred related thereto.

We may also use Personal Information to develop and provide you advertising, marketing and promotions, or information on services, offerings or products that may be of interest to you. You may opt-out from having Personal Information used for this type of communication by contacting us at any time. Please allow sufficient time after your election for the opt-out to take effect.

Personal Information may be provided in connection with the foregoing uses to our affiliates, successors, assigns and their representatives, and to personnel, agents, service providers and contractors who perform functions on our behalf or otherwise in connection with the foregoing uses. Personal Information may also be provided to certain strategic partners, alliance partners, and other parties who referred you to us (for example, if you were referred to us from a credit union association whom we have established a relationship, we will share information with such association so that they can assess business impact resulting from our relationship).

#### Correspondence You Send

This Privacy Policy does not apply to content, business information, ideas, concepts or inventions that you send to us in any correspondence (including by email or mail). We retain all information in your correspondence. Information from your correspondence will not be subject to these privacy terms. If you want to keep content or business information, ideas, concepts or inventions private or proprietary, do not send them in an email or mail to us.

#### **4. De-Identified Data**

We may receive information about you or others on your behalf under this policy and create de-identified data to help us in our business and operations and for purposes permitted under law. De-identified data will never contain Personal Information protected by law. De-identified data may be transferred, disclosed, assigned, leased, licensed, sold and otherwise shared with and by our partners, service providers, advertisers and/or other third parties for purposes permitted under law.

#### **5. Children**

We are committed to protecting the privacy of children. Neither Company nor any of its services are designed or intended to attract children under the age of 13. We do not collect Personal Information from any person we actually know is under the age of 13. Although not recommended, a parent or guardian, however, may use our Web Sites for the benefit of a minor. The parent or guardian is solely responsible for providing supervision and care of the use for the benefit of such minor. The parent or guardian assumes full responsibility for ensuring that any information shared is kept secure and that the information submitted is accurate. The parent or guardian also assumes full responsibility for the interpretation and use of any information or tools provided through us. Any parent or guardian may review and delete such information by contacting us at the information below.

#### **6. Accuracy and Security of Personal Information**

Any Personal Information you provide to us is kept on secure servers. We use commercially reasonable administrative, technical, personnel, and physical measures (a) to safeguard Personal Information against loss, theft, unauthorized use, disclosure, or modification; and (b) to ensure the integrity of the Personal Information. To help us protect your privacy, you should maintain the secrecy of any logon ID and password required from time to time (if any) which you may have set up in connection with your receipt of our tools, products or services. We are committed to adhering to all laws pertaining to privacy applicable to us.

We update and test our security technology on an ongoing basis. We restrict access to your Personal Information to our personnel who need to know that information to provide benefits or services to you. In addition, we train our personnel about the importance of confidentiality and maintaining the privacy and security of your Personal Information. We commit to taking appropriate disciplinary measures to enforce our privacy responsibilities, however we make no representation, warranty or guarantee on the reliability, sufficiency, suitability, quality, completeness, adequacy, or currency of any security practices. Transmission of information through mail, email, SMS or other means may not always be secure though we use commercially reasonable measures to secure delivery.

#### **7. Accessing and Updating Your Personal Information**

To access, review, rectify, or delete Personal Information collected about you, please contact us. All requests must include the following information: first name, last name, e-mail address, and known location of Personal Information controlled by us. While we try our best to accommodate your request, we reserve the right to impose certain restrictions and requirements on such access requests, if allowed or required by applicable laws, and not all information is removable.

## **8. Transfer of Personal Information To Other Countries**

Information under this Privacy Policy may be transferred to various countries around the world that may have varying legal protections than your country. By submitting your information to us, you consent to such transfers. By using and/or participating in our tools, products and services, or providing us with your information, you consent to the collection, transfer, storage, and processing of information to and in the United States.

## **9. Links To Third-Party Web Sites**

This Privacy Policy only addresses our use and disclosure of your information. We may provide links to third-party Web sites. We do not control third-party sites and are not responsible for any information you may provide while on such sites. We are not liable for their use or misuse of your information. You should read the privacy policies on those Web sites before providing any of your information on such sites.

## **10. Legal Notice and Disclaimer**

Our tools, products and services (to which this Privacy Policy may be linked or referenced) are provided by us for convenience to users. References herein to any product, process or service do not constitute or imply endorsement, warranty, guarantee or recommendation by us, nor does it constitute a formal offer, binding obligation or agreement to provide such product, process or service under any circumstances. While we make every effort to present accurate and reliable information on our Web site, Apps, and other tools, products and services, we do not approve or certify such information nor do we guarantee, warrant or represent the legality, accuracy, authenticity, reliability, sufficiency, truth, suitability, quality, validity, timeliness, completeness, adequacy, currency of any such information. Use of such information is voluntary and reliance on it should only be undertaken after an independent review of its legality, accuracy, authenticity, reliability, sufficiency, truth, suitability, quality, validity, timeliness, completeness, adequacy, currency with regard to a user's specific needs and uses. Company (including its employees and agents) is not responsible for, and expressly disclaims all liability for, damages of any kind arising out of use, reference to or reliance on the information available through its tools, products, and services which this Privacy Policy is linked or referenced. No approvals, recommendations, endorsements, guarantees or warranties, including, but not limited to, any express or implied warranties of merchantability or fitness for any particular use or purpose of tools, products or services provided by Company.

## **11. Conditions on Use**

By using Company's tools, products, and services which this Privacy Policy is linked or referenced, you agree to the terms and conditions contained in this Privacy Policy, Company's Terms of Use, and any other agreement that we might have with you concerning the use herein. If you do not agree to any of these terms and conditions, you should not use such tools, products or services. If you have entered into another agreement with us about the confidentiality of your information, that agreement will control if there is a conflict. You agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the laws of the State of Michigan. You also agree to arbitrate such disputes in Kent County, Michigan, and to abide by any limitation on damages contained in any agreement we may have with you (including the Company's Terms of Use).

## **12. Questions Regarding This Privacy Policy**

If you have questions regarding this Privacy Policy, please contact us at [info@dvs.com](mailto:info@dvs.com) or by mail at DVS 401 Hall ST SW Box 62, Grand Rapids, MI 49503.

## **13. Modifications To This Privacy Policy**

Company reserves the right to change this Privacy Policy for any reason at any time without notice to you other than by posting revisions accessible to you and on our Web site. Such changes will be effective upon posting and apply to all user information. You should check our Web site frequently to see the current Privacy Policy that is in effect and any changes that may have been made to it. The provisions contained herein supersede all previous notices or policies regarding our privacy practices and the terms and conditions that govern the use of this Web site.

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