

Privacy Policy

MyArch, Inc. is committed to safeguarding your privacy. Contact us at privacy@myarch.com if you have any questions or problems regarding the use of your Personal Data and we will gladly assist you.

By using this site or/and our services, you consent to the Processing of your Personal Data as described in this Privacy Policy.

Definitions

Personal Data – any information relating to an identified or identifiable natural person.

Processing – any operation or set of operations which is performed on Personal Data or on sets of Personal Data.

Data subject – a natural person whose Personal Data is being Processed.

Child/children – a natural person or people under 16 years of age.

We/us (either capitalized or not) – MyArch, Inc.

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 withdraw any given consent for Processing of your Personal Data.

Data we gather

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. We collect information from you when you register on our site, subscribe to a newsletter, respond to a survey, fill out a form, use live chat, open a support ticket or enter information on our site. We also collect information when you provide us with feedback on our products or services.

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 about children

Our website and other assets not intended for or targeted at children under 16, and we do not knowingly or intentionally collect information about children under 16.

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.

Publicly available information

We might gather information about you that is publicly available.

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.
- Fulfil 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.
- To quickly process your transactions.
- To allow us to better service you in responding to your customer service requests.
- To ask for ratings and reviews of services or products.

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

- To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- 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.
- To improve our website in order to better serve you.
- To administer a contest, promotion, survey, or other site feature.

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).
- To follow up with you after correspondence (live chat, email or phone inquiries).
- For other purposes we have asked your consent for.

We Process your Personal Data in order to fulfill obligation arising 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.

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.
- 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 sell, trade, or otherwise transfer to outside parties your Personal Data 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 only work with Processing partners who are able to ensure adequate level of protection to your Personal Data.

We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety. We might disclose your Personal Data to third parties if you have consented to it or if there are other legal grounds for it.

However, non-Personal Data may be provided to other parties for marketing, advertising, or other uses.

We do not include or offer third-party products or services on our website.

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 anonymization and pseudonymization where suitable.

We monitor our systems for possible vulnerabilities and attacks.

We do not use vulnerability scanning and/or scanning to PCI standards.

An external PCI compliant payment gateway handles all CC transactions.

We do not use 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 enters, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

Even though we try our best, we cannot 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.

Cookies and other technologies we use

We use cookies and/or similar technologies to analyze customer behavior, administer the website, track users' movements, and to collect information about users. This is done in order to personalize and enhance your experience with us.

A cookie is a tiny text file stored on your computer. Cookies store information that is used to help make sites work. Only we can access the cookies created by our website. You can control your cookies at the browser level. Choosing to disable cookies may hinder your use of certain functions. We use cookies for the following purposes:

- Necessary cookies – these cookies are required for you to be able to use some important features on our website, such as logging in. These cookies don't collect any personal information.
- Functionality cookies – these cookies provide functionality that makes using our service more convenient and makes providing more personalized features possible. For example, they might remember your name and e-mail in comment forms so you don't have to re-enter this information next time when commenting.
- Analytics cookies – these cookies are used to track the use and performance of our website and services.
- Advertising cookies – these cookies are used to deliver advertisements that are relevant to you and to your interests. In addition, they are used to limit the number of times you see an advertisement. They are usually placed to the website by advertising networks with the website operator's permission. These cookies remember that you have visited a website and this information is shared with other organizations such as advertisers. Often, targeting or advertising cookies will be linked to site functionality provided by the other organization.

You can remove cookies stored in your computer via your browser settings. If you turn cookies off, some of the features that make your site experience more efficient may not function properly. Alternatively, you can control some 3rd party cookies by using a privacy enhancement platform such as optout.aboutads.info or youronlinechoices.com. For more information about cookies, visit allaboutcookies.org.

We use Google Analytics to measure traffic on our website. Google has their own Privacy Policy which you can review [here](#). If you'd like to opt out of tracking by Google Analytics, visit the [Google Analytics opt-out page](#).

Google Advertising

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>

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 the following:

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](#).

California Online Privacy Protection Act

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personal Data from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared.

See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

According to CalOPPA, 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 or as a minimum, on the first significant page after entering our website.
- Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above.
- You will be notified of any Privacy Policy changes on our Privacy Policy Page.

You can change your personal information:

- By emailing us
- By logging in to your account
- By chatting with us or by sending us a support ticket

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 do not 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 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
- 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:

- Follow the instructions at the bottom of each email.

We will then promptly remove you from **ALL** correspondence.

Contact Information

Data Protection Officer

If you have any questions regarding Processing your Personal Data, your rights regarding your Personal Data or this Privacy Policy, contact our Data Protection Officer:

Polina Ponomareva at privacy@myarch.com

myarch.com

5102 Woodford Dr

Centreville, VA 20120

United States

privacy@myarch.com

703.375.9302

Representative Contact in the EU

N/A

Supervisory Authority in the EU

Email: info@dataprotection.ie

Phone: +353 57 868 4800