

# IDS GROUP PRIVACY POLICY

Last revised: November 2019

## 1. INTRODUCTION

**Purpose.** Your privacy is important to us. The purpose of this Privacy Policy is to describe how IDS Group collects, uses and shares information about you through our on-line VaultDirect or [www.ids-delaware.com](http://www.ids-delaware.com) (collectively, “IDS”). Please read this notice carefully to understand what we do. If you do not understand any aspects of our Privacy Policy, please feel free to [Contact Us](#) or as described at the end of this Policy.

Our Privacy Policy explains:

[Information We Collect and Why We Collect It](#)  
[How We Use and Share Your Information](#)  
[Access to Your Information and Choices](#)  
[Security of Your Information](#)  
[Changes to Our Privacy Policy](#)  
[Questions and How Contact Us](#)

**Scope.** This Privacy Policy applies only to information we collect at and through IDS online and mobile applications. Our website and other affiliated sites, such as [www.fiztrade.com](http://www.fiztrade.com) and [vaultdirect.com](http://vaultdirect.com) are governed by this omnibus privacy policy which is set forth herein. Please be aware that we are not responsible for the privacy practices of such other third-party sites which you may integrate into your business processes and order flows. We encourage you to be aware when you leave IDS, to read the privacy statements of each and every website that collects personal information.

**Terms of Use.** Please note that your use of IDS is also subject to our [Terms of Use as set forth in the Storage Agreement](#).

## 2. INFORMATION WE COLLECT AND WHY WE COLLECT IT

**Information You Provide To Us.** We collect certain personal information when you provide it to us, such as when personally identifiable information is voluntarily provided when you use IDS, register for an account, and when you electronically communicate with us. This information may consist of the following: your name, address, telephone number, and your e-mail address. The information you voluntarily supply will be used by IDS to respond to your inquiries, supply you with requested information on IDS services, to issue reminders for or to track orders you have made with IDS. Your information is considered private and confidential and treated with the strictest confidence. We will not sell or divulge any of your private information to any 3rd parties. If you are not yet a customer, but have submitted personal information to IDS electronically and would like it removed or modified, please contact us at [INFO@IDS-DELAWARE.com](mailto:INFO@IDS-DELAWARE.com). We will gladly and expediently comply with your request. Please note that certain contact, banking and trading information related to orders placed with IDS that have been provided are part of a permanent trading record that must be kept in accordance with federal law.

**Information We Collect Automatically.** We collect certain information automatically as you use IDS, such as general non-personal information used to effectuate your inventory activity with IDS. This may include items such as: usage information, order history, drop ship information, device information such as the device you use to access IDS, IP addresses, including the hardware model, operating system and version, MAC address, and unique device identifier.

**Information Collected Through Google Analytics.** We use a tool called “Google Analytics” and may use other third party analytic tools to collect information about use of IDS. Google Analytics collects information such as how often users visit IDS and what pages they visit when they do so. We use the information we get from Google Analytics only to improve IDS. Google Analytics does not collect 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 device to identify you as a unique user the next time you visit IDS, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your usage of IDS is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#).

**Information Collected Through Cookies and Similar Technologies.** We and our service providers may also use cookies, web beacons, and other technologies to receive and store certain types of information whenever you interact with IDS. A cookie is a small file containing a string of characters that is sent to your device when you use IDS. Cookies may store unique identifiers, user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. We use cookies to improve the quality of our service, including for storing user preferences, tracking user trends, and providing relevant information to you.

### **3. HOW WE USE AND SHARE YOUR INFORMATION**

**To Provide Products, Services, and Information.** As described above, we collect information from you so that we can communicate with you, and provide and deliver the information and services you have requested. We use your personal information to contact you about your orders, shipping status, or to inform you about our other products and services available and new offerings from IDS. We may provide information to third party service providers that help us process orders, fulfillment services and deliver products and services that you request from us (i.e. shipping software and the like).

We may use third parties to help host IDS, send out email updates about IDS and IDS products, provide marketing and advertising services for us, remove repetitive information from our user lists, and process payments. These service providers will have access to your personal information in order to provide these services, but when this occurs we implement reasonable contractual and technical protections to limit their use of that information to helping us provide the service.

Except as set forth in this Privacy Policy, we do not share, rent, license, or sell your personal information to third parties.

**Surveys.** From time-to-time IDS may host surveys which may require the submission and collection of personal information. Participation in these surveys is completely voluntary, unless mandated by the Dealer Agreement, and you may choose whether or not to participate and

therefore disclose this information. Personal information requested may include contact information (such as name and shipping address), and demographic information (such as zip code, state of residence, and other business information). Survey information will be used for purposes of monitoring or improving the use and satisfaction of IDS services you receive from IDS.

**Your Consent.** In addition to the sharing described elsewhere in this Policy, we will share personal information with companies, organizations or individuals outside of the IDS when we have your consent to do so.

**Legal Proceedings.** We will share personal information with third party companies, organizations or individuals outside of IDS if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to: (a) meet any applicable law, regulation, subpoena, legal process or governmental request; (b) enforce applicable Terms, including investigation of potential violations; (c) detect, prevent, or otherwise address fraud, security or technical issues; or (d) protect against harm to the rights, property or safety of IDS, our users, clients, as required or permitted by law.

**Transfer in the Event of Sale or Change of Control.** If the ownership of all or substantially all of our business changes or we otherwise transfer assets relating to our business, IDS, or IDS to a third party, such as by merger, acquisition, bankruptcy proceeding or otherwise, we may transfer or sell your personal information to the new owner. In such a case, unless permitted otherwise by applicable law, your information would remain subject to the promises made in the applicable privacy policy unless you agree differently.

#### **4. ACCESS TO YOUR INFORMATION AND CHOICES**

You can access and update certain information we have relating to your IDS account by signing into your account and going to the profile section of IDS. If you have questions about personal information we have about you or need to update your information, or if you want to opt-out of receiving marketing and promotional e-mails from IDS, you can [Contact Us](#). You can also opt-out of receiving future marketing and promotional e-mails from IDS by using the opt-out or unsubscribe feature contained in the e-mails.

You can close your IDS account by contacting us as set forth above. If you close your account, we will no longer use your online account information or share it with third parties. We may, however, retain a copy of the information for archival purposes, and to avoid identity theft or fraud.

IDS may send push notifications or alerts to your device. You can deactivate these messages at any time by changing the notification settings on your device (iOS).

#### **5. SECURITY OF YOUR INFORMATION**

We use industry standard physical, technical and administrative security measures and safeguards to protect the confidentiality and security of your personal information. However, since the Internet is not a 100% secure environment, we cannot guarantee, ensure, or warrant the security of any information you transmit to us. There is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. It is your responsibility to protect the security of your login information. Please note

that e-mails and other communications you send to us through IDS are not encrypted, and we strongly advise you not to communicate any confidential information through these means.

## **6. CHANGES TO OUR PRIVACY POLICY**

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your consent in accordance with applicable law. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes).

## **7. QUESTIONS AND HOW CONTACT US**

You may contact IDS regarding these Terms, the Privacy Policy, or with respect to any other comments or questions at:

IDS Group  
406 West Basin Road,  
New Castle DE 19720  
302.322.6150  
info@ids-delaware.com