

This policy applies as between you, the user of this web site, and KVLR Capital LLC, the owner and provider of www.kvlrcapital.com. This policy applies to our use of any and all data collected by us in relation to your use of the web site and any services or systems therein.

1. Definitions and Interpretation

In this policy, the following terms shall have the following meanings:

"Account"	means collectively the personal information, Payment Information and credentials used by Users to access Material and / or any communications System on the Web Site;
"Content"	means any text, graphics, images, audio, video, software, data compilations and any other form of information capable of being stored in a computer that appears on or forms part of this Web Site;
"Cookie"	means a small text file placed on your computer by KVLR Capital when you visit certain parts of this Web site. This allows us to identify recurring visitors and analyze their browsing habits within the web site. Where e-commerce facilities are provided, cookies may be used to store your details. Further details are contained in Clause 10 of this policy:
"Data"	means collectively all information that you submit to the Web Site. This includes, but is not limited to, Account details and information submitted using any of our Services or Systems;

"Service"	means collectively any online facilities, tools, services or information that KVLRCapital makes available through the Web Site either now or in the future;
"System"	means any online communications infrastructure that KVLRCapital makes available through the Web site either now or in the future. This includes, but is not limited to, web-based email, message boards, live chat facilities and email links;
"User" / "Users"	means any third party that accesses the Web Site and is not employed by KVLRCapital and acting in the course of their employment; and
"Web Site"	means the website that you are currently using (www.kvlrcapital.com) and any sub-domains unless expressly excluded by their own terms and conditions.

2. Data Collected

Without limitation, any of the following data may be collected:

2.1	Name, date of birth, gender, job title, profession;
2.2	contact information such as email addresses and telephone numbers;
2.3	demographic information such as post code, preferences and interests;
2.4	IP address (automatically collected);
2.5	web browser type and version (automatically collected);

2.6	operating system (automatically collected);
2.7	a list of URLs starting with a referring site, your activity on this Web Site, and the site you exit to (automatically collected); and
2.8	Cookie information (see Clause 10 below).

3. Our Use of Data

3.1	Any personal data you submit will be retained by KVL R Capital for as long as you use the services and systems provided on the web site. Data that you may submit through any communications system that we may provide may be retained for a longer period of up to 6 months.
3.2	Unless we are obliged or permitted by law to do so, and subject to Clause 4, your data will not be disclosed to third parties. This does not include our affiliates and / or other companies within our group.
3.3	For further details on our security procedures, see Clause 9 below.

3.4

Any or all of the above data may be required by us from time to time in order to provide you with the best possible service and experience when using our Web site. Specifically, data may be used by us for the following reasons:

3.4.1	internal record keeping;
3.4.2	improvement of our services and recognition of your preferences;
3.4.3	transmission by email of promotional materials that may be of interest to you;
3.4.4	contact for market research or survey purposes, which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Web site.
3.4.5	KVLR Capital operates an affiliate marketing network, which allows website publishers to display advertisements for online retailers. The advertisements that are displayed contain a link to the retailers' websites. This enables visitors to click on the advertisement and be directed to the website of the online retailer via one of our web servers. Publishers earn commission on the basis of the sales generated by the advertisements they display. KVLR Capital then calculates the commission that is earned by recording which website publishers have generated sales for which online retailers. To achieve this we make use of cookies to record when a visitor to a publisher website clicks on a link to an online retailer.

3.4.6 We will only keep your data for as long as it remains necessary in line with the reason that we collected it from you and to meet any legal requirements. You may request to have data removed or updated by using the contact details provided in clause 12.

4. Third-party Web Sites and Services

KVLR Capital may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment handling, delivery of purchased items, search engine facilities, advertising and marketing. The providers of such services do not have access to certain personal Data provided by users of this Web Site. Any data used by such parties is used only to the extent required by them to perform the services that KVLR Capital requests. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties must be processed within the terms of this Policy.

KVLR Capital's website may contain links to and from the websites of our (without limitation) partner networks, advertisers, affiliates, etc. If you click on a link to the websites of any of these parties you are advised that these websites have their own privacy policies and terms of use. KVLR Capital do not accept liability for these policies or for any personal information that they may collect upon your visit. You are advised to satisfy yourself with their policies before submitting any personal information.

5. Changes of Business Ownership and Control

5.1	KVLR Capital may, from time to time, expand or reduce its business and this may involve the sale of certain divisions or the transfer of control of certain divisions to other parties. Data provided by Users will, where it is relevant to any division so transferred, be transferred along with that division and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was supplied by you.
5.2	In the event that any data submitted by Users will be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted, you will be given the choice to have your data deleted or withheld from the new owner or controller.

6. Controlling Access to your Data

6.1	<p>Wherever you are required to submit data, you will be given options to restrict our use of that data. This may include the following:</p> <table border="1"><tr><td data-bbox="289 1192 391 1346">6.1.1</td><td data-bbox="391 1192 1448 1346">use of Data for direct marketing purposes; and</td></tr><tr><td data-bbox="289 1346 391 1499">6.1.2</td><td data-bbox="391 1346 1448 1499">sharing data with third parties.</td></tr></table>	6.1.1	use of Data for direct marketing purposes; and	6.1.2	sharing data with third parties.
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6.1.2	sharing data with third parties.				

7. Your Right to Withhold Information

7.1	You may access certain areas of the web site without providing any Data at all. However, to use all services and systems available on the Web Site you may be required to submit account information or other Data.
7.2	You may restrict your internet browser's use of Cookies. For more information, see Clause 10 below.
7.3	You have the right to request for us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking rows on the forms we use to collect your data. You can also contact us directly by using the details provided in clause 12 below.

8. Accessing your own Data

8.1	You may access your Account at any time to view or amend the Data. You may need to modify or update your Data if your circumstances change. Additional Data as to your marketing preferences may also be stored and you may change this at any time.
8.2	You have the right to ask for a copy of your personal Data on payment of a small fee.

9. Security

Data security is of great importance to KVL R Capitaland to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected online.

10. Cookies

10.1	<p>KVLR Capital may set and access Cookies on your computer. First-party Cookies that may be placed on your computer are detailed in Schedule 1 and third-party Cookies that may be placed on your computer are detailed in Schedule 2. All Cookies used by the Web Site are used in accordance with the provisions of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011. KVLR Capital has carefully chosen these Cookies and uses them to facilitate certain functions and features of the Web Site. We also use Cookies for analytics purposes. These Cookies track your movements and activities on the Web Site and are designed to give us a better understanding of our users, thus enabling us to improve the Web Site and our services.</p>
10.2	<p>Prior to setting any cookies, you will be presented with a cookie prompt requesting your consent to set those Cookies. For avoidance of doubt the Cookies set by the Web Site do not jeopardise your privacy in any way and no personal data is collected. By providing your consent to the setting of our Cookies you are enabling us to provide the best possible experience and service to you through our Web Site. If you do not wish to consent to the placing of Cookies, certain features of the Web Site may not function fully or as intended.</p>
10.3	<p>Certain features of the Web Site depend upon Cookies to function and are deemed, within the law, to be strictly necessary. These Cookies are detailed in Schedule 1A. You will not be asked for your consent to place these Cookies however you may still disable cookies via your web browser's settings, as set out in sub-Clause 10.4.</p>

10.4	You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies, however this can be changed at any time. Further details can be obtained by viewing the help menu in your browser. Please note that disabling Cookies may prevent you from using the full range of Services available on the Web Site.
10.5	You may delete Cookies at any time however you may lose any information that enables you to access the Web Site more quickly.
10.6	The Web Site uses the third-party Cookies detailed in Schedule 2 for the purposes described therein. These Cookies are not integral to the services provided by the Web Site to you and may be blocked at your choosing via your internet browser's privacy settings or via your response to the request for consent detailed in sub-Clause 10.2.
10.7	It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your browser if you are unsure as to how to adjust your privacy settings.

11. Changes to this Policy

KVLR Capital reserves the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Web site, and you are deemed to have accepted the terms of the Policy on your first use of the Web site following the alterations.

12. Contact

If you require further information on this policy or have any questions, please direct them to info@kvlrcapital.com, and we will aim to respond within 2–5 business days.

Schedule 1: First-Party Cookies

Name of Cookie	Purpose
HTC_AFF	KVLR Capital affiliate tracking is used to determine the affiliate identifier.
HTC_REAF	KVLR Capital affiliate tracking is used to determine the resource identifier.
HT_VID	KVLR Capital affiliate tracking is used to determine the visitor identifier.
HTC_TID	KVLR Capital affiliate tracking is used to determine the last click source identifier.
HTC_CID	KVLR Capital affiliate tracking is used to determine the sub-campaign identifier.
HTC_GID	KVLR Capital affiliate tracking, used to determine group identifier.

Schedule 1A: Strictly Necessary Cookies

Name of Cookie	Purpose
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PHPSESSID	Used for essential website features.
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Schedule 2: Third-Party Cookies

Name of Cookie	Name of Provider	Purpose
__ar_v4	Adroll	AdRoll retargeting cookie. For more information, visit the Adroll Privacy page .
__lc.visitor_id	Live Chat	Tracks users on the website, allowing for better support. For more information, visit the Live Chat Privacy page .
_ga	Google	Used to collect information about how visitors interact with our website.