

# **PRIVACY POLICY**

## **WHEN YOU VISIT WIPGA.ORG, YOU'RE TRUSTING US WITH YOUR INFORMATION. WE WORK HARD TO PROTECT IT!**

The Wisconsin Propane Gas Association (“WPGA”, “us”, “we”, or “our”) operates the wipga.org website (the “Services”). This Privacy Policy is intended to help you understand what information we collect, why we collect it, how we handle your information, and how you can manage your information.

We offer a range of Services to help you and others explore, interact and learn about the world of propane in new ways. By using our Services, you agree to the collection and use of information in accordance with this Privacy Policy.

You can use our Services in a variety of ways to manage your privacy. For example, you can create an account if you want to download, purchase and manage content like safety, training or consumer education materials. You can delete the accounts you create. You can choose whether or not to provide certain information.

To help explain things as clearly as possible, and if you have any questions about this Privacy Policy, you can contact us at [info@wipga.org](mailto:info@wipga.org).

## **INFORMATION WPGA COLLECTS**

### **WE WANT YOU TO UNDERSTAND THE TYPES OF INFORMATION WE COLLECT AS YOU USE OUR SERVICES**

We collect information to provide better Services to all users. The information WPGA collects, and how we use that information, depends on how you use our Services and how you manage your privacy.

When you're not signed in to your WPGA Account, or do not create a WPGA Account, we store the information we collect with unique identifiers tied to the browser, application, or device you're using.

When you're signed in to your WPGA Account, we also collect information that we store with your WPGA Account, which we treat as personal information.

## **INFORMATION YOU PROVIDE TO US**

When you create a WPGA Account, you provide us with personal information that includes your name and a password. You can also choose to add addresses, company or organization, phone number or other information to your account. Even if you do not create or are not signed in to your WPGA account, you might choose to provide us with information — like an email address to receive updates about our Services or information or products you may find useful, or a zip code to receive region-specific information.

## **INFORMATION WE COLLECT AS YOU USE OUR SERVICES**

### **YOUR BROWSERS AND DEVICES**

We collect information about the browsers, and devices you use to access WPGA Services, which helps us provide features.

The information we collect includes unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. We also collect information about the interaction of your browsers and devices with our Services, including IP address, and the date, time.

### **YOUR ACTIVITY**

We collect information about your activity in our Services, which we use to do things like recommend a video or publication you might like. The activity information we collect may include:

- Terms you search for.
- Videos you watch.
- Views and interactions with content.
- Purchase activity.
- People with whom you communicate or share content.

### **YOUR LOCATION INFORMATION**

We collect information about your location when you use our Services, which helps us offer features like identifying products or services that may interest you that are nearby.

Your location can be determined with varying degrees of accuracy by:

- GPS
- IP address

In some circumstances, WPGA also collects information about you from publicly accessible sources. For example, if your name appears in your local newspaper, WPGA may index that

article and display it to other people if they search for your name. We may also collect information about you from trusted partners, including partners who provide us with information about potential customers of our Services, and security partners who provide us with information to protect against abuse.

We use various technologies to collect and store information, including cookies, pixel tags, local storage, such as browser web storage or application data caches, databases, and server logs.

## **WE COLLECT AND USE DATA TO BUILD BETTER SERVICES**

We use the information we collect from all our Services for the following purposes:

### **PROVIDE OUR SERVICES**

We use your information to deliver our Services, like processing the terms you search for in order to return results, developing more items of particular interest, fulfilling your purchases, or helping you share content with others.

### **MAINTAIN & IMPROVE OUR SERVICES**

We also use your information to make improvements to our Services — for example, understanding which search terms are most frequently used helps us determine which content to feature.

### **PROVIDE PERSONALIZED SERVICES, INCLUDING CONTENT AND ADS**

We use the information we collect to customize our Services for you, including providing recommendations, personalized content, and customized search results.

Depending on your settings, we may also show you personalized ads based on your interests. For example, if you search for “furnaces,” you may see an ad for or information about water heaters or other equipment when you’re browsing a site that shows ads served by WPGA.

We don’t show you personalized ads based on sensitive categories, such as race, religion, sexual orientation, health or politics.

We don’t share information that personally identifies you with advertisers, such as your name or email, unless you ask us to. For example, if you see an ad for or information about a nearby propane marketer and select the “contact” button, we may share your personal information with the propane marketer so that they may contact you.

## MEASURE PERFORMANCE

We use Google Analytics to understand how our Services are used. For example, we analyze data about your visits to our sites to do things like optimize the site design.

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

## COMMUNICATE WITH YOU

We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, like an attempt to sign in to your WPGA Account from an unusual location. Or we may let you know about upcoming changes or improvements to our Services. And if you contact WPGA, we'll keep a record of your request in order to help solve any issues you might be facing.

## PROTECT WPGA, OUR USERS, AND THE PUBLIC

We use information to help us improve the safety and reliability of our Services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm WPGA, our users, or the public.

We use different technologies to process your information for these purposes. We use automated systems that analyze your content, such as your order history, to provide you with things like customized search results, personalized ads, or other features tailored to how you use our Services. And we analyze your content to help us detect abuse such as spam, malware, and illegal content. We also use algorithms to recognize patterns in data.

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

## **YOU HAVE CHOICES REGARDING THE INFORMATION WE COLLECT AND HOW IT'S USED**

This section describes key controls for managing your privacy across our Services.

## **MANAGING, REVIEWING, AND UPDATING YOUR INFORMATION**

### **WAYS TO REVIEW & UPDATE YOUR INFORMATION YOUR PERSONAL INFORMATION**

#### **DELETE YOUR ENTIRE WPGA ACCOUNT**

Deleting your WPGA Account will remove your order history, including the list of those items you purchased from WPGA, as well as your name and other personal information you provided when you created your WPGA account. Note however that as WPGA is the provider of those products, we will still retain, as a part of our files, a record of your transactions.

There are other ways to control the information WPGA collects whether or not you're signed in to a WPGA Account, including:

**Browser settings:** For example, you can configure your browser to indicate when WPGA has set a cookie in your browser. Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Services.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

**Device-level settings:** Your device may have controls that determine what information we collect. For example, you can modify location settings on your mobile device.

## **WHEN YOU SHARE YOUR INFORMATION**

Some of our Services let you share information with other people, and you have control over how you share. For example, you can share videos with others via email and social media platforms. Remember, when you share information, that content may be made accessible by the actions of others.

## **WHEN WPGA SHARES YOUR INFORMATION**

We do not share your personal information with companies, organizations, or individuals outside of WPGA except in the following cases:

### **WITH YOUR CONSENT**

We'll share personal information outside of WPGA when we have your consent. For example, if you use Find A Propane Retailer, we'll get your permission before we share your address with a retailer. We'll ask for your explicit consent to share any sensitive personal information.

### **WITH DOMAIN ADMINISTRATORS**

They may be able to:

- Access and retain information stored in your account, like your email.
- View statistics regarding your account, like what and how many purchases you make.
- Change your account password.
- Suspend or terminate your account access.
- Receive your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request.
- Restrict your ability to delete or edit your information or your privacy settings.

### **FOR EXTERNAL PROCESSING**

We provide personal information to our affiliates and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support, and to process orders and take payments for purchases.

### **FOR LEGAL REASONS**

We will share personal information outside of WPGA if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, legal process, or enforceable governmental request.
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.

- Protect against harm to the rights, property or safety of WPGA, our users, or the public as required or permitted by law.

We may share non-personally identifiable information publicly and with our partners – like publishers, grantees, developers, or rights holders. For example, we share information publicly to show trends about the general use of our Services.

## **WE BUILD SECURITY INTO OUR SERVICES TO PROTECT YOUR INFORMATION**

The security of your data is important to us but remember that **no method of transmission over the Internet, or method of electronic storage is 100% secure.** While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. Some of our security methods include:

- We use encryption to keep your data private while in transit.
- We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems.
- We restrict access to personal information to WPGA employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## **YOU CAN DELETE YOUR WPGA ACCOUNT AT ANY TIME**

To delete your WPGA Account, you can submit your request to [info@wipga.org](mailto:info@wipga.org).

In some cases, we retain data for when it needs to be kept for legitimate business or legal purposes. You can read about WPGA’s data retention periods, including how long it takes us to delete your information.

We try to ensure that our Services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

## **COMPLIANCE & COOPERATION WITH REGULATORS**

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

## **DATA TRANSFERS**

We utilize servers around the world and your information may be processed on servers located outside of the country where you live. Data protection laws differ around the world, with some countries providing more protection than others.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

## **WHEN THIS POLICY APPLIES**

This Privacy Policy applies to all Services offered by WPGA. This Privacy Policy does not apply to services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our Services.
- Services offered by other companies or individuals, including products or sites that may include WPGA Services, be displayed to you in search results, or be linked from our Services.

## **CHANGES TO THIS POLICY**

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published, and we offer access to archived versions for your review. If changes are significant, we'll provide a more prominent notice (including, for select Services, email notification of Privacy Policy changes).

## **RELATED PRIVACY PRACTICES**

### **ADVERTISING AND RESEARCH SERVICES ON THEIR BEHALF**

For example, advertisers may upload data from their loyalty programs so that they can better understand the performance of their ad campaigns. We only provide aggregated reports to advertisers that don't reveal information about individual people.

### **DELIVER OUR SERVICES**

Examples of how we use your information to deliver our Services include:

- We use the IP address assigned to your device to send you the data you requested, such as loading a video.
- We use unique identifiers stored in cookies on your device to help us authenticate you as the person who should have access to your WPGA Account.

Our service may contain links to other sites that are not operated by us. These sites may include, and are not limited to: Google, YouTube, Vimeo, HubSpot, WooCommerce, Stripe, and others. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## **ENSURE OUR SERVICES ARE WORKING AS INTENDED**

For example, we continuously monitor our systems to look for problems. If we find something wrong with a specific feature, reviewing activity information collected before the problem started allows us to fix things more quickly.

## **IMPROVE OUR SERVICES**

For example, we use cookies to analyze how people interact with our Services. And that analysis can help us build better products. For example, it may help us discover that it's taking people too long to complete a certain task or that they have trouble finishing steps at all. We can then redesign that feature and improve the product for everyone.

## **CUSTOMIZED SEARCH RESULTS**

For example, when you're signed in to your WPGA Account, you can get more relevant search results that are based on your previous searches and activity. You may also get customized search results even when you're signed out. If you don't want this level of search customization, you can search and browse privately.

## **MAY LINK INFORMATION**

Google Analytics relies on first-party cookies, which means the cookies are set by the WPGA Analytics customer. Using our systems, data generated through Google Analytics can be linked by the Google Analytics customer and by Google to third-party cookies that are related to visits to other websites. For example, an advertiser may want to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. Learn more

## **SAFETY AND RELIABILITY**

Some examples of how we use your information to help keep our Services safe and reliable include:

Collecting and analyzing IP addresses and cookie data to protect against automated abuse. This abuse takes many forms, such as sending spam account holders, or censoring content by launching a Distributed Denial of Service (DDoS) attack.

## **DETECT ABUSE**

When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers

## **CHILDREN'S PRIVACY**

Our Services do not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your children provided us with personal data, please contact us. If we become aware that we have collected personal data from children without verification of parental consent, we take steps to remove that information from our servers.

## **LEGAL PROCESS, OR ENFORCEABLE GOVERNMENTAL REQUEST**

Like other companies, WPGA may receive requests from governments and courts to disclose user data. Respect for the privacy and security of data you store with WPGA underpins our approach to complying with these legal requests. Our legal team will review a request, regardless of type, and we will push back when a request appears to be overly broad or doesn't follow the correct process.