Privacy Policy

Because protecting your privacy is very important to VLAN Asia, we operate our web site under the following guidelines to safeguard your personally identifiable information:

VLAN Asia policies and procedures for handling customer information have been created with the understanding that Internet technologies are still evolving and that Internet business methods are continuing to evolve to meet the needs and opportunities of the changing technologies. As a result, VLAN Asia policies and procedures are subject to change.

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**How does VLAN Asia collect information from you?**

VLAN Asia collects information from you when you send it to VLAN Asia directly by filling out forms on VLAN Asia’s Website (including any application you may make for Services or the Software), corresponding with VLAN Asia by e-mail, writing to VLAN Asia by post, or speaking to VLAN Asia by telephone. VLAN Asia also collects information from you when you browse the Website and use the Software, as set out in detail below. Some of the methods VLAN Asia uses to collect data are automated and will take effect automatically as you navigate the Website and/or use the Software.

**What information does VLAN Asia collect?**

Personal Information.

Personal information means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (“Personal Information”).

VLAN Asia may collect the following Personal Information from you: name, address, date of birth, telephone number, postal address, e-mail address, IP address, information about the type of browser you use, your operating system, the screen resolution of your browser, your
ISP, which pages you view on the Website and the time and duration of your visits to the Website, credit card number (in the case of direct customers) and, if applicable, company name, postal address, telephone number, e-mail address, national identification number, passport number, credit card number or tax ID number as well as similar information concerning technical contacts, marketing contacts, and executive contacts within your company or organisation.

User Communications.

If you communicate with VLAN Asia, VLAN Asia may collect information relating to that communication whether it takes the form of e-mail, letter, forum posting, testimonials or any other form of communication between you and VLAN Asia or submitted by you to the Website (collectively, “User Communications”).

Server Information.

If you use one of VLAN Asia’s services such as VLAN Asia’s Web Hosting, Dedicated Server, VPS, Domain Name or SSL, VLAN Asia may collect certain information concerning such services and concerning the server upon which the services operates. This information includes without limitation: (a) the licensed or unlicensed status of the software used under the services; (b) the source from which the license for the software was obtained (i.e., VLAN Asia or an VLAN Asia affiliate); or (c) information about the server upon which the software is installed including (i) the public IP address, (ii) the operating system and (iii) the use of any virtualization technologies on such server ((a) through (c) collectively, “Server Information”). Additionally, “Server Information” may also include information collected by VLAN Asia from time to time concerning which features of the software are most often used in order to improve and make adjustments to the software; and information collected from you by VLAN Asia in the event that you request technical support services including without limitation, IP addresses, usernames and passwords necessary to login to SSH, the directory of the server upon which you installed the software and any affected accounts including email accounts and other accounts.

Non-Personal Information.

VLAN Asia also collects data in a form that does not, on its own, permit direct association with any specific individual. VLAN Asia may collect, use, transfer, and disclose non-personal information for any purpose.

What information does VLAN Asia collect if you’re under the age of 13?

By Default, VLAN Asia does not knowingly collect Personal Information about children under the age of 13. If VLAN Asia becomes aware that it has inadvertently collected Personal Information about children under the age of 13, it will take steps to delete the information as soon as possible, except where VLAN Asia is required by applicable law to keep it.

Where VLAN Asia knows a child is above the age of 13, but considered a minor under applicable law, VLAN Asia will obtain parental/guardian consent prior to using that child’s Personal Information.
How does VLAN Asia use and store the information it collects?

As a general matter, VLAN Asia may use the Personal Information you disclose to VLAN Asia to improve and provide the Website, the Services and VLAN Asia’s other products and services, and for the specific purpose that you gave VLAN Asia your Personal Information. More specific details on how VLAN Asia uses your information follows below.

VLAN Asia may use Personal Information to create and authenticate your account, to process transactions you request such as domain name registration in order to perform any contract you have entered into with VLAN Asia, to provide you with customer and technical support and to communicate with you about your account and VLAN Asia’s products and services.

The Personal Information you provide to VLAN Asia allows VLAN Asia to provide you with the newsletters and mailing lists that you have signed up for with VLAN Asia. If you do not want to be on VLAN Asia’s mailing list, you can opt out at any time by changing your settings in your ‘My Details’ page within the client area.

VLAN Asia may also use Personal Information to offer, market or advertise to you VLAN Asia products and services. While such VLAN Asia products and services may reference, incorporate or include third-party products and services, VLAN Asia will not use your Personal Information to independently offer, market or advertise third-party products and services unless VLAN Asia first obtains your consent to do so.

From time to time, VLAN Asia may use your Personal Information to send important notices, such as important product updates and communications about purchases as well as changes to VLAN Asia’s terms, conditions, and policies. Because this information is important for your interaction with VLAN Asia you may not opt out of receiving these communications.

VLAN Asia may also use your Personal Information for any other legal purpose stated in this Privacy Policy, and any other purpose for which you have given VLAN Asia express consent.

Where you consent to VLAN Asia doing so, VLAN Asia may use your Personal Information to send you direct marketing communications. Should you ever choose to ‘opt out’ of receiving such communications, VLAN Asia may retain your Personal Information on file to ensure that VLAN Asia does not continue to target you with communications of the type that you have asked VLAN Asia to cease sending to you.

VLAN Asia limits the use of Personal Information to the purposes identified in this Privacy Policy and for which you have provided explicit consent. In accordance with established policies and procedures, VLAN Asia retains Personal Information only for as long as necessary to fulfil the stated purposes, unless it is required by law for a different period or VLAN Asia has the consent of the individual.

In accordance with established policies and procedures, VLAN Asia will periodically destroy or erase any Personal Information that is no longer needed.

VLAN Asia may use User Communications in the same way as VLAN Asia uses Personal Information. If you communicate with VLAN Asia for a particular purpose, VLAN Asia may
use your User Communications for that purpose. For example, if you contact VLAN Asia for technical support, VLAN Asia may use your communications to provide technical support to you.

VLAN Asia may use Server Information to provide you with technical support services and to maintain, evaluate, improve and provide VLAN Asia products and services. VLAN Asia may also use such information to investigate unlicensed (and therefore unauthorised) uses of VLAN Asia’ software.

**Where is your Personal Information stored?**

VLAN Asia is a Malaysian company and your personal data may be transferred to and stored at our Malaysia office and associated datacenters globally and by accepting our terms of service, you are explicitly consenting to this transfer and storage taking place. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy policy.

**How does VLAN Asia protect your Data Security?**

VLAN Asia will protect the confidentiality of your personal information, account information and personal communications to the fullest extent possible and consistent with the law and the legitimate interests of VLAN Asia, its partners, its employees and other customers of VLAN Asia services. To protect the loss, misuse, and alteration of information that is collected from customers, VLAN Asia has appropriate physical, electronic, and managerial procedures in place.

**How can I modify my personal information?**

You may modify your personal information by logging a Help Desk ticket to make the request via helpdesk@vlan.asia.

If you have registered a domain name with VLAN Asia and wish to change the Technical Contact from VLAN Asia to another company or change any other registration information, you should be able to do so by sending an email to helpdesk@vlan.asia. VLAN Asia provides you with full access to your domain account by sending you your own username and password. It is important to note that your domain name registration information is made publicly available in the registry of domain names. In the event you lose your domain password, you can log a Help Desk ticket and we will re-send the password to the email address on the domain registration record. In the event you lose your password and the email address on record with Domain Registrar is no longer valid, a direct request to Domain Registrar is required, therefore it is important to keep your Domain Registrar email address current as well as your email address with VLAN Asia.

**Will VLAN Asia Ever Send Me Direct Mailings?**

From time to time, VLAN Asia may send you information about various products and services that may be of interest. We will not send you information of this type without specifically allowing you to “opt out” of such mailings. You can opt out by sending an e-mail to VLANMarketingDivision@vlan.asia, however by doing so, you may miss important communication regarding your service.
In addition, if you are an VLAN Asia reseller, VLAN Asia and/or its partners and advertisers may from time to time send you newsletters, promotional material, and other mailings. You can opt out by sending an e-mail to VLANMarketingDivision@vlan.asia.

**How Do I Protect My Personal Information In Public Forums?**

VLAN Asia may offer interactive forums, such as message boards and chat. You should be aware that when you voluntarily disclose Personal Information to other users or to third parties on the VLAN Asia system, through e-mail, or outside of the VLAN Asia system, that information can be collected and used by others and may result in unsolicited messages from other members or third parties. While VLAN Asia strives to protect your Personal Information, VLAN Asia cannot guarantee the security of any information that you transmit to VLAN Asia, and you are solely responsible for maintaining the secrecy of any passwords or other account information.

**Information and access to your Personal Information**

Based on what you have told VLAN Asia, VLAN Asia tries to ensure that your contact information and preferences are accurate, complete, and up to date. You have the right to request access to and rectification or erasure of Personal Information or restriction of processing concerning your Personal Information or to object to processing as well as the right to data portability. VLAN Asia will comply with erasure requests as long as VLAN Asia is not required to retain the Personal Information by law and does not need to retain it for its legitimate business purposes. VLAN Asia may decline to process requests that are frivolous/vexatious, jeopardise the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. Access, correction, or deletion requests can be made by emailing VLANMarketingDivision@vlan.asia.

**Your Rights**

As a Data Subject you have a number of rights in relation to your Personal Information. These include your rights:

To ask VLAN Asia to confirm what (if any) Personal Information VLAN Asia holds relating to you and how that data is processed and used by VLAN Asia (often referred to as a ‘Subject Access Request’);

To have VLAN Asia rectify Personal Information which VLAN Asia holds about you that is inaccurate;

To have VLAN Asia erase Personal Information which relates to you if it is no longer necessary for VLAN Asia to continue to process it, or if VLAN Asia has no lawful basis to store, process or retain it (though VLAN Asia does have rights to refuse these requests in certain situations);
To object to VLAN Asia processing your Personal Information;

To be informed about the existence of any automated decision making and profiling of your Personal Information, and where appropriate, be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing that affects you;

To have VLAN Asia provide you with a copy of your Personal Information for transfer to an alternative provider of similar services.

Should you ever wish to exercise one or more of these rights you should contact VLAN Asia at VLANMarketingDivision@vlan.asia.

Third party websites

VLAN Asia Website may, from time to time, contain links to and from the websites of VLAN Asia partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that VLAN Asia does not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Information to these websites.

**Does VLAN Asia use cookies and web beacons?**

Cookies

Yes, VLAN Asia uses cookies to distinguish you from other users of the Website and to improve your overall experience. When you use the Website, certain information may be stored locally on your device using ‘cookies’ or similar technologies such as objects stored in the device’s local storage. A cookie is a small text file used to store limited information about the user of the device. They help VLAN Asia to identify how VLAN Asia’ users use the Website, and so that VLAN Asia can continue to develop and improve it.

Cookies do this by storing information about your preferences on your device, including the device model, manufacturer, screen resolution, device capabilities, service provider, country and city location data. VLAN Asia uses the following types of cookies:

Strictly necessary: These cookies enable VLAN Asia’ Website to function correctly and deliver the services and products you have requested.

Performance & Functionality: These cookies are used to enhance the performance and functionality of VLAN Asia’ Website but are non-essential to their use (for example, VLAN Asia uses cookies to remember your preferences on the Website). However, without these cookies, certain functionality may become unavailable.

Analytical: These cookies collect information that is used either in aggregate form to help VLAN Asia understand how the Website is being used or to help VLAN Asia customise the Website for you. In particular VLAN Asia uses the Google analytics cookies. For more
information about Google’s privacy policy, please visit http://www.google.com/intl/en/policies/. If you do not wish to allow the use of Google Analytics cookies at all, Google provides an opt-out plug-in for most common website browsers http://tools.google.com/dlpage/gaoptout. By using the Service, you accept the use of cookies in accordance with this Privacy Policy.

Your cookie choices

You have the right to choose whether to accept or refuse cookies and similar technologies. You can exercise this choice by not accepting the Terms of Service and this Privacy Policy, however, please note that if you choose to do so, you will not be able to use the Service.

What About Privacy On Sites That VLAN Asia Links To?

VLAN Asia may provide links to its partners and other Internet sites. These sites have separate data and privacy practices independent of VLAN Asia, and VLAN Asia disclaims any responsibility or liability for their policies or actions.

How does VLAN Asia disclose the Personal Information it collects?

VLAN Asia will not otherwise disclose its customers’ personal and account information unless VLAN Asia has reason to believe that disclosing such information is necessary to identify, make contact with, or bring legal action against someone who may be causing harm or interfering with the rights or property of VLAN Asia, VLAN Asia customers, or others, or where VLAN Asia has a good faith belief that the law requires such disclosure.

VLAN Asia cannot be responsible for protecting your Personal Information if you share such information in publicly available sections of the Website such as the user forums or testimonials section. You should use your own judgment in disclosing this information on the Website.

VLAN Asia also will not, except for reasons stated below, disclose to third parties the contents of any electronic mail or other electronic communications that VLAN Asia stores or transmits for its customers. The circumstances under which VLAN Asia will disclose such electronic customer communications are when:

- it is necessary in order to provide service to the customer;
- it is necessary to protect the legitimate interests of VLAN Asia and its customers;
- it is required to cooperate with interception orders, warrants, or other legal process that VLAN Asia determines in its sole discretion to be valid and enforceable; and
- it is necessary to provide to a law enforcement agency when the contents are inadvertently obtained by VLAN Asia and appear to pertain to the commission of a crime.

VLAN Asia disclaims any intention to censor, edit or engage in ongoing review or surveillance of communications stored on or transmitted through its facilities by customers or others. VLAN Asia will, however, review, delete or block access to communications that may harm VLAN Asia, its customers or third parties. The grounds on which VLAN Asia may
take such action include, but are not limited to, actual or potential violations of VLAN Asia policies.

In the event that VLAN Asia is purchased by another company, merges with another company or has a substantial portion of its assets purchased by another company, VLAN Asia may share your Personal Information with that company. In such an event, VLAN Asia will notify you in accordance with the notice provisions of the Terms of Use.

VLAN Asia may disclose your Personal Information to affiliated third parties that assist VLAN Asia in providing maintaining, evaluating, improving and providing the Website, the Services and any other VLAN Asia products and services. VLAN Asia may disclose your Personal Information to affiliated third parties for the purposes of offering, marketing or advertising VLAN Asia products and services to you (such VLAN Asia products and services may reference, incorporate or include third-party products and services). In such an event, VLAN Asia will take reasonable measures to prevent such affiliated third parties from using your Personal Information for other purposes.

What if you have questions, comments or complaints about this Privacy Policy?

Please feel free to direct any questions, comments or complaints regarding this Privacy Policy using the contact information listed in the Notices section of the VLAN Asia Terms of Use. It is VLAN Asia policy to investigate and attempt to resolve all formal written complaints VLAN Asia receives concerning this Privacy Policy. VLAN Asia will cooperate with appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between VLAN Asia and an individual.

With effect from 25 May 2018, the General Data Protection Regulation (GDPR) enters force. Your rights under that new regulation are explained at https://ico.org.uk/for-organisations/data-protection-reform/overview-of-the-gdpr/. Details of how you can exercise those rights are set out in ‘Your Rights’. VLAN Asia have largely factored GDPR into this Privacy Policy but if you think VLAN Asia has failed to do so in any way, please notify VLAN Asia at VLANMarketingDivision@vlan.asia.