



# PRIVACY POLICY

**Last revised:** August 31, 2023.

## INTRODUCTION

The Global Data Systems (GDS) Privacy Policy sets out the basis on which we will collect, use, protect, and process your personal data through your use of the GDS website <https://www.getgds.com>. By providing us with your data, you warrant to us that you are over 13 years of age. GDS is committed to protecting and respecting your privacy and if GDS becomes aware that a child has provided us with information without parental consent, or a parent or guardian of a child contacts GDS through the contact information provided below, GDS will use reasonable efforts to delete the child's information from our databases.

## TYPES OF DATA WE COLLECT ABOUT YOU AND OUR LEGAL BASIS AND BUSINESS PURPOSE TO COLLECT

We may collect the below data about you and process the data for the following reasons:

- **Communication Data:**

This includes any communication that you send us through avenues such as contact forms, emails, text, chat box, social media messages, surveys, or posts. GDS processes this data for the purpose to communicate with you, maintain records, and establish, pursue, or defend legal claims.

Our legal basis for this processing is our legitimate interest, which includes responding to communications sent to us, maintaining records, and establishing, pursuing, or defending legal claims.

- **Customer Data:**

This encompasses data related to purchase of products and/or services, including your name, title, billing address, shipping address, email address, phone number, contact details, purchase details, and card details. We process this data to fulfill the products or services you have purchased and maintain transaction records.

Our legal basis for this processing is the performance of a contract between you and GDS or taking steps at your request to enter such a contract. For example, if you wish to utilize our products or services, we will need to process your personal data in order to negotiate and enter into the relevant agreement with you. We may also process your personal data on this basis to open, maintain, administer, manage, and service individual customer's user profiles.

- **Website User Data:**

This includes data on your usage of our website, online services, and any data you publish on our website or other online platforms. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain backups of our website and/or databases, and to enable publication and administration of our website, other online services, and business.

Our legal basis for this processing is our legitimate interests, to properly administer our website and organization.

- **Technical Data:**

This comprises data about your use of our website and other online services, such as your IP address, login data, browser details, page visits, navigation paths, device information, usage frequency, click actions, location data, call data, advertisement behavior, and social media behavior. This data is sourced from our analytics tracking system and marketing automation platform. We process this data to analyze our website usage, safeguard our organization and website, deliver tailored content and advertisements, and evaluate the effectiveness of our marketing efforts.

Our legal basis for this processing is our legitimate interests to properly administer our website and our organization and to expand our business.

- **Marketing Data:**

This covers data about your communication preferences and your preferences regarding receiving marketing from us and our third parties. We process this data to enable you to partake in our promotions, to deliver relevant website content and advertisements to you, and to measure the effectiveness of this advertising. We may use this data you (including LinkedIn or Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you.

Our legal basis for this processing is our legitimate interests to analyze how customers utilize our products and services, which ultimately helps us to develop and enhance them through product development. Furthermore, we aim to expand our business and shape our marketing strategy based on valuable insights obtained from this data.

## **HOW WE COLLECT YOUR PERSONAL DATA**

We gather information about you through various means, including when you voluntarily provide it to us by filling out forms on our website or sending us emails.

- **IP Addresses:**

When you visit our website, we may automatically collect information about your computer and/or mobile device, including, where available, your Internet Protocol (IP) address, operating system, and browser type, for system administration and to help us improve the services on our website for your use. This is statistical data about our users' browsing actions and patterns and does not identify any individual. However, to the extent that IP addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information.

- **Cookies:**

For the same reasons, we may automatically obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer and/or mobile device or through other technologies such as web beacons, widgets, and server log files. The use of such technologies helps us to improve our website interface and to deliver a better and more personalized service. They enable us to estimate our user numbers and usage pattern; to store information about your preferences; and to recognize you when you return to our site. systems performance and personalization systems analytics, advertising (including affiliate marketing), content management, eCommerce, search, and social media integration. This information may be analyzed by third parties on our behalf consistent with section V of this policy.

- **User Preferences:**

If you do not want to have cookies placed on your device, you can remove any existing cookies and block new cookies from being put on your device. To learn more about how to remove or block cookies in your web browser, visit [www.aboutcookies.org](http://www.aboutcookies.org), read the Help text in your web browser, or read the instructions for your mobile device. However, if you select this setting, you may be unable to access our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the GDS website. For further details, please refer to our cookie policy.

- **Third Party Sources:**

We may obtain information from third-party sources such as Google for analytics, Facebook or LinkedIn for advertising networks, Survey Monkey, Eventbrite, and Google for search information providers. We may also receive data from technical, payment, and delivery services providers, as well as data brokers or aggregators.

## HOW WE USE YOUR DATA

We may use information about your for any of the following reasons:

- **Service Offerings:**

- Process or fulfill orders and transactions;
- Maintain and service accounts;
- Debug to identify and repair errors that impair existing functionality;
- Improve the functionality of our websites and mobile applications;
- Process payments; and
- Customer service

- **Marketing:**

If you have made a purchase, inquired about our goods or services, or agreed to receive marketing communications and have not opted out of receiving such messages; If you are a limited company, we may send you marketing emails without your consent under these regulations. However, you can still opt-out of receiving marketing emails from us at any time; Before sharing your personal information with any third party for their own marketing purposes, we will obtain your express consent; You can request that we or third parties stop sending you marketing messages whenever you want by logging into the website and adjusting your marketing preferences, following opt-out links on marketing messages, or emailing us at [support@getgs.com](mailto:support@getgs.com); **Notice:** Opting out of marketing communications does not apply to personal data provided through other transactions, such as purchases or warranty registrations.

- **Research and Development:**

Maintain, improve, and analyze our websites, mobile applications, ads, and the products and services we offer; and Help to ensure security and integrity of our products and services, including to detect, prevent, or investigate suspicious activity or fraud.

- **Compliance with Applicable Laws:**

Maintain appropriate records for internal administrative purposes; and Comply with applicable legal and regulatory obligations, and respond to lawful governmental requests, as needed.

- **Subject to your Consent:**

To fulfill any other business or commercial purposes at your direction or with your consent.

## **WHO WE SHARE YOUR DATA WITH**

In order to provide you with access to the GDS website, we may sometimes, if necessary, share your personal information and traffic data with GDS' group companies and offices, and analytical and other approved third-party service providers and/or agents around the world. We do not sell your personal information.

We may disclose your personal information to: our representatives, advisers and others you have authorized to interact with us on your behalf; related entities within our corporate group, our employees and third parties including business partners, consultants, contractors, suppliers, service providers, professional advisers and agents who need the information to assist us with conducting our business activities; payment system operators and financial institutions; and government agencies or authorities, regulators, law enforcement agencies and other parties where authorized or required by law who ask us to disclose that information and to which we are legally required to disclose your personal information.

We will require these third parties to take appropriate organizational and technical measures to protect your personal information and traffic data. In relation to any third parties, we will only disclose your personal information and traffic data where you have given your consent or where it is reasonably necessary to: (a) satisfy any applicable law, regulation, legal process or enforceable governmental request; (b) enforce applicable Terms of Service, including investigation of potential violations thereof; (c) detect, prevent or otherwise address fraud, security or technical issues; or (d) protect against harm to the rights, property or safety of GDS users or the public as required or permitted by law. For more information about our group companies and offices, see our Contact page.

As GDS continues to develop its business, GDS might sell or buy group companies or business units. In such transactions as well as in the event GDS or substantially all of its assets are acquired by a third party, personal information, and traffic data of GDS end users will generally be one of the transferred business assets. We reserve the right to include your personal information and traffic data, collected as an asset, in any such transfer to a third party.

GDS may de-identify information about you so that the information can no longer be used to identify you. We may use and disclose de-identified personal information in the course of our business (including in any promotional or marketing material).

GDS may aggregate information on the use of our products and services (including our website) in such a way that the information can no longer be related to the identifiable individuals. We may use and disclose aggregated information in the course of our business (including in any promotional or marketing material).

## HOW WE PROTECT YOUR DATA

We take appropriate administrative, technical, and physical security measures to protect against unauthorized access to or unauthorized disclosure or destruction of data transmitted through the GDS website. These include up-to-date data storage, processing, transmission, and security techniques, including encryption, password protection, network firewalls, intrusion detection and site monitoring, to protect your information from unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss.

All our employees and any third parties we engage to process your personal information are obliged to respect the confidentiality and protect the security of your personal information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee that your personal information will never be disclosed in a manner inconsistent with this Privacy Policy (for example, as the result of unauthorized acts by third parties that violate the law or this Privacy Policy).

## HOW LONG WE RETAIN YOUR DATA

We will not keep your personal data longer than necessary to fulfill the reasons we collected it as documented in this Privacy Policy and in order to satisfy any legal, accounting, or reporting requirements.

We consider the amount, nature, and sensitivity of the data, as well as the potential risk of harm from unauthorized use or disclosure, the processing purposes, and if the same results can be achieved through other means and legal requirements.

Additionally, we are obliged to keep basic customer information, such as Contact, Identity, Financial, and Transaction Data, for six years after they stop being customers for tax purposes.

In some cases, we may anonymize your data for research or statistical purposes, giving us the ability to use it indefinitely without any further notice to you.

## ACCESS TO AND UPDATING YOUR DATA

You have a right to:

- Request a copy of your personal information;
- Ask us to restrict the use of your personal information 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 will be able to correct any of your personal information associated with the GDS Website if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes.

You can exercise the foregoing rights at any time by contacting us at [support@getgds.com](mailto:support@getgds.com). We may ask you to verify your identity before providing you with or correcting such information.

We may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others, are extremely impractical (such as requests concerning information residing on backup tapes), or for which access is prohibited by local law.

Some browsers include a "Do Not Track" setting that can send a signal to the websites you visit indicating you do not wish to be tracked. Our websites do not respond to browser "Do Not Track" signals. Instead, you may use the range of other tools to control data collection and use, including the cookie controls discussed herein.

In the European Union and the United Kingdom, you have the right to object to, or obtain a restriction of, the processing of your personal information under certain circumstances; and where the processing is based on your consent, you have a right to withdraw that consent at any time for future processing.

## **STATE-SPECIFIC PRIVACY RIGHTS**

If you are a resident of **California, Colorado, Connecticut, Utah, or Virginia**, you may be afforded additional rights regarding your personal information as provided in our supplemental privacy notice.

## **YOUR FEEDBACK ON OUR SERVICES**

We may from time to time ask you to provide information on your experience with the GDS website which will be used to measure and improve quality. You are at no time under any obligation to provide any of such data. Any and all information which is voluntarily submitted in feedback forms on a GDS Website or any survey that you accept to take part in is used for the purposes of reviewing this feedback and improving the GDS Website.

## **THIRD-PARTY WEBSITES AND SERVICES**

The GDS Website may also contain links or otherwise enable you to access third party websites and services. Linked and other third-party websites are not under our control and will have a different privacy policy. We do not accept any responsibility or liability for third party privacy policies, endorse third party site, any products or services described on the site, or any other material contained in a that site. Please check the third party privacy policy before you submit any personal information to a third-party website.

## **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to change the Privacy Policy from time to time. We will inform you of these changes by publishing the revised Privacy Policy and prominently posting a notice of the change at <https://www.getgds.com/legal-terms-conditions>. By continuing to use our products and services after Privacy Policy changes go into effect, you agree to be bound by the revised policy.

## **QUESTIONS ABOUT OUR PRIVACY POLICY**

If you have any questions in relation to this Privacy Policy, please contact us at:

ATTN: Privacy Policy, Global Data Systems, Inc. 310 Laser Lane, Lafayette, LA 70507  
Telephone: 888-435-7986  
Email: [support@getgds.com](mailto:support@getgds.com)