

Privacy Policy

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INTRODUCTION

This GB Privacy Policy ("GB Privacy Policy" or "Privacy Policy") describes how we collect, use and disclose personally identifiable information that we may obtain about you ("You") ("Personal Information") through the GB Advisors SSI app .

SCOPE

All users of the GB Advisors SSI app Service.

DEFINITIONS

- (i) **Customer Data:** personal data that we collect, process and manage on behalf of our business customers ("**Customers**"), submitted to the GB Advisors SSI app Service, including our platforms, products, applications, and any ancillary or supplementary GB products and services including Upgrades, offered online and via a mobile application.
- (ii) **User Data:** personal data concerning our customers' internal focal persons who directly engage with GB concerning their GB account (e.g. billing contacts and authorized signatories), Customers' Account Admins, and authorized users of the Platform (collectively, "**Users**");
- (iii) **Prospect Data:** data relating to visitors of our websites (including but not limited to GB Advisors SSI app Service), participants at events, and any other prospective customer, user or partner (collectively, "**Prospects**") who visit or otherwise interact with our programs, marketing and social activities and our GB Advisors SSI app Service, digital ads and content, emails, integrations or communications under our control ("**Sites**").

If you are a Customer, User, Prospect or Technology Partner, please read this Privacy Policy carefully and make sure that you fully understand it.

You are not legally required to provide us with any of your personal data, and may do so (or avoid doing so) at your own free will. If you do not wish to provide us with your personal data, or to have it processed by us or any of our services providers, please simply do not visit or interact with our Sites, nor use our Services.

COMMITMENT TO PRIVACY

Your privacy is important to us. This website, GB Advisors SSI app (the "Site" – "App"), is owned and operated by GB Advisors ("GB"). This GB Privacy Policy ("GB Privacy Policy" or "Privacy Policy") describes how we collect, use and disclose personally identifiable information that we may obtain about you ("You") ("Personal Information") through the GB Advisors SSI app . When You provide Personal Information to us via our GB Advisors SSI app , we protect it according to this Privacy Policy. By using this GB Advisors SSI app , you acknowledge that You have reviewed and agree to, the terms of this Privacy Policy. If You do not agree to this Privacy Policy, do not use this Site.

GB adheres to the Safe Harbor Privacy Principles published by the U.S. Department of Commerce ("Safe Harbor") with respect to certain Personal information that it receives in the United States about European Union ("EU") and Swiss residents. Information about GB's participation in Safe Harbor can be found in the section set out below entitled "Safe Harbor Participation."

GB operates in the business-to-business (B2B) software industry. Unlike many companies and websites, we do not focus on consumer users or the collection of consumer data. To the extent we collect information online, our purpose is to better serve our business customers.

INFORMATION WE COLLECT

We may collect the following types of information when You browse this GB Advisors SSI app , any other GB website, mobile app, or any site of a GB affiliate ("GB Website" – "APP"):

Personal Information You provide directly when You register on a GB GB Advisors SSI app , make an online order, join an online community or other group, inquire about GB products, or request GB support or services at any GB interactive message board or via any e-mail messages You send GB, including Your name, contact information (phone, fax and pager numbers, address, and email address), ordering information, and payment data.

Personal Information You provide directly, including information You submit through a GB GB Advisors SSI app as part of the online application process or in the process of registering for a GB-sponsored training, event, user group, or conference.

Passively collected information, including through the use of "cookies" as described below, such as IP addresses, web browser and operating system information, date and time of visits, and the web pages Your Internet browser visits when browsing any GB GB Advisors SSI app ; click-through information related to GB emails and related marketing activities; and aggregate, non-Personal Information, such as the number of hits per week or per web page.

COOKIES

GB Software uses cookies to distinguish you from other users of a GB GB Advisors SSI app . This helps us to provide you with a good experience when you browse our GB Advisors SSI app and also allows us to improve our sites. By using this GB Advisors SSI app , or any other GB GB Advisors SSI app , you accept the use of cookies. If you do not accept the use of cookies, please disable them by changing your browser settings so that cookies cannot be placed on your computer or mobile device.

WEB BEACONS

GB may use "web beacon" technology to gather metrics from anonymous web users and email recipients for the purpose of operating and improving GB GB Advisors SSI app and email communications. A web beacon is an electronic image that is imbedded in a GB Advisors SSI app or email which allows GB to track web page views/hits or the opening of an email containing a beacon. GB may use web beacon in conjunction with cookies to track web site activity on the GB Advisors SSI app , and other GB GB Advisors SSI app . Web beacon tracking by GB does not identify the name or email address of the web user or mail recipient.

THE WAY WE USE PERSONAL INFORMATION

GB uses Personal Information You have provided directly or information we collect indirectly online about You for marketing purposes in the following ways:

For Personal Information You provide directly online, or through email messages, relating to inquiries about products, ordering products, requests for support or services, or downloading products, we use the information to engage in and process transactions with You, to respond to Your inquiries and requests, to provide information on GB products and services, to provide information on GB's partners offering GB's services and products, and to provide customer support activities. Before we use Your Personal Information, we will give You the opportunity to choose whether or not You allow GB to use Your Personal Information in such ways described in this Privacy Policy. You may at any time choose to stop receiving GB's emails relating to our marketing materials by following the unsubscribing instructions contained in the emails we send to Your attention. You can also unsubscribe by sending an email legal@gb-advisors.com – support@gb-advisors.com and requesting the removal of Your name from GB marketing lists.

Some of GB products and services may be advertised by third parties. In the U.S. and other jurisdictions with similar laws, we will only share Your Personal Information if You have not expressed Your preference by opting out of having Your information shared. In countries that are members of the European Union and all other jurisdictions with similar laws, we will only share Your Personal Information if You have agreed to allow us to share Your information with third parties. You have the opportunity to choose to not receive such marketing materials from third parties by updating Your subscription preferences here.

GB informs You that when You agree for Your information to be shared and used by third parties, then these third parties are responsible for handling Your information. Personal Information You provide online on others' sites may be provided to third parties working on GB's behalf, such as GB partners, data processors, and advertisers. Therefore, we recommend that You familiarize yourself with their online privacy policies so you understand how GB partners will use, collect, and handle your information.

For Personal Information You provide online, including cookies, actions, or clicks from hyperlinks and subscriptions, we may use such information to customize future communications and GB web pages in accordance with communication preferences You have established with GB.

For some registration, email and data You provide, we may direct You to particular web pages, customize the web pages You see, or otherwise increase the relevance of the information You receive. GB may use Analytic Cookies as described in our Cookie Notice accordingly to collect Your Personal Information about web pages visited, page hits per week, and the like, and GB will use this information internally to improve the design of our web pages.

For Personal Information submitted using the online job application process, we may use and disseminate this information internally and among our affiliates as necessary to consider Your application and to contact You regarding our decision.

For Personal Information submitted online for scheduling training or registering to attend a GB-sponsored conference or event, we may use and disseminate this information internally and among our affiliates to communicate with You and to facilitate Your registration and participation.

WHEN WE SHARE YOUR PERSONAL INFORMATION

As a global company, GB shares information for business and marketing purposes only on a need-to-know basis and only with: (a) its own employees, contingent workers, and worldwide offices (b) the customer from which GB received the information; (c) GB distributors, resellers, third parties software vendors, subcontractors, consultants, and third-party service-provider companies, that have agreed to safeguard such information in a like manner to the way that GB safeguards such information and that have agreed to confidentiality terms with GB or that have entered into arrangements with us to provide the services described in this privacy policy; and (d) other entities authorized to have access to such information under applicable law or regulation.

GB may disclose Your Personal Information to protect our rights or property, to enforce our terms of use and legal notices, as required or permitted by law, or at the request of government regulators or other law enforcement officials and the courts (including the issuance of a valid subpoena). We shall have no duty to notify You of such compliance with local law where applicable.

GB will not use or share Your Personal Information in ways unrelated to those described above without first notifying You and offering You a choice as to whether or not we may use Your Personal Information in a different manner.

HOW LONG DO WE KEEP YOUR INFORMATION

We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

OUR COMMITMENT TO DATA INTEGRITY AND SECURITY

GB is committed to protecting Your privacy. GB processes Your Personal Information only in ways compatible with the purpose for which it was collected. To the extent necessary for such purposes, we take reasonable steps to make sure that the information is accurate, complete, current and otherwise reliable with regard to its intended use. However, GB expects that You will update your Personal Information with GB as necessary as described in the section above "How You Can Access or Correct Your Personal Information".

GB takes reasonable and appropriate measures to maintain the confidentiality and integrity, and prevent the unauthorized use or disclosure, of information. This includes maintaining a system of appropriate administrative, physical and technical safeguards to secure such information.

HOW DO WE KEEP YOUR INFORMATION SAFE

GB aim to protect your personal information through a system of organizational and technical security measures.

GB have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

LINKS TO UNAFFILIATED THIRD-PARTY WEBSITES

This GB Advisors SSI app may contain links to unaffiliated third-party websites. If You link to or otherwise visit any other websites managed by third parties, GB encourages You to review the privacy policies available on such websites. You understand that GB has no control over those websites and is not responsible or liable for the policies and practices followed by such third parties.

HOW YOU CAN ACCESS OR CORRECT YOUR PERSONAL INFORMATION

Online registration profiles You may have established at GB relating to sales, marketing, customer support, training, and event registrations can be updated by following the instructions provided within each profile/account.

You can also request access to Your Personal information that we collect online and maintain, and update or correct that information, through e-mailing legal@gb-advisors.com – support@gb-advisors.com with the subject line heading of "Privacy Policy Request." To protect Your privacy and security, GB will take reasonable steps to verify Your identity before granting access or making corrections.

We may keep information in an off-line form, for archival purposes or as otherwise required by law. Please note that if Your information is removed from our databases, You may no longer be able to access certain areas of a GB website requiring registration or a subscription.

Users may request to be removed from a GB e-mail list, by following the "unsubscribe" instructions on e-mails from GB or by sending a request to legal@gb-advisors.com – support@gb-advisors.com.

REVISIONS AND CONTACT INFORMATION

We periodically update the features of GB GB Advisors SSI app to better serve You and all our customers. We reserve the right to change this Privacy Policy without advance notice and any modifications are effective when they are posted here. The date of the newest version will be posted below. Please check back frequently, especially before You submit any Personal information at this GB Advisors SSI app, to see if the Privacy Policy has changed. By using any GB GB Advisors SSI app, You indicate Your understanding and acceptance of the terms of the Privacy Policy posted at the time of Your use. If You have any questions, please contact us by sending an e-mail message to legal@gb-advisors.com – support@gb-advisors.com with the subject line heading of "Privacy Policy Request."

SAFE HARBOR PARTICIPATION

GB complies with the U.S.-EU Safe Harbor Framework and the U.S.- Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, transfer and retention of personal information from European Union member countries and Switzerland, collectively referred to in this policy as "EU/Swiss Personal Information". GB adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view GB's certification, please visit www.export.gov/safeharbor

GB employees in the EU and Switzerland are provided with information regarding GB's employee data privacy practices and Safe Harbor via a separate policy.

COLLECTION, USE, AND DISCLOSURE OF EU/SWISS PERSONAL INFORMATION

GB collects, uses, and discloses EU/Swiss Personal Information in the ordinary course of its business. In particular, GB may obtain in the U.S. the following types of EU/Swiss Personal Information about individual contacts for customers, customer prospects, partners, suppliers, vendors, participants in GB sponsored events, conferences and training, and online job applicants ("EU/Swiss Data Subjects"), including: name; contact information (phone, fax and pager numbers, address, and email address); title; company name; sales, product and services purchase information; payment data; usernames and passwords; product skills;

certifications; resume and application data; and other data necessary to register for GB sponsored training, conferences and events.

GB may use such EU/Swiss Personal Information for the following purposes: communicating with customers, prospects, partners, and others; fulfillment and tracking of orders; providing services and support; tracking of payments and otherwise ensuring payment; assessing performance and making assessments about future purchases; performing direct marketing activities and otherwise communicating information regarding GB products or services (where permitted by law); providing registration for and participation in GB sponsored training, events and conferences; and for facilitating the online employment application process.

GB may disclose EU/Swiss Personal Information to its affiliates, subsidiaries, business partners, and service providers for the purposes listed above. In situations where GB discloses EU/Swiss Personal Information to any third parties acting as service providers or "agents" on behalf of GB, GB will require the recipient to protect the disclosed EU/Swiss Personal Information in accordance with the relevant Safe Harbor Principles, or otherwise take steps to ensure that EU/Swiss Personal Information is appropriately protected.

With respect to any sharing of EU/Swiss Personal Information for purposes of marketing GB products and services, GB obtains promises from its affiliates, subsidiaries and business partners that such entities will use and disclose such EU/Swiss Personal Information for purposes of marketing GB products and services only. In certain situations, EU/Swiss Data Subjects and others may seek to opt-out of disclosures of their Personal Information by following the opt-out instructions contained on marketing emails or by contacting GB at privacy@gb-advisors.com

DATA PROCESSOR ACTIVITIES

In certain situations, GB may obtain incidental access to information about its customers' employees and other end users in the EU and Switzerland in connection with supporting its products or services ("EU/Swiss Processor Information"). These customers act as the data controller for any EU/Swiss Processor Information collected in the EU or Switzerland and subsequently transferred to GB in the United States. GB acts as a data processor on behalf of its customers with respect to such EU Processor Information and accordingly carries out their instructions with regard to the collection, processing, and protection of EU Processor Information.

DATA SECURITY, INTEGRITY AND ACCESS

GB takes reasonable precautions to protect EU/Swiss Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. GB makes reasonable efforts to keep EU/Swiss Personal Information reliable for its intended use, accurate, current and complete. GB also provides EU/Swiss Data Subjects with the opportunity to access, review and correct their own EU/Swiss Personal Information, and otherwise provides such individuals access to EU/Swiss Personal Information in accordance with Safe Harbor.

Individuals may contact the GB Safe Harbor Privacy Contact identified below to review EU/Swiss Personal Information about them. However, such individuals may first wish to contact their own company with questions regarding EU/Swiss Personal Information shared with GB, as that might be the most efficient means of addressing such issues. GB reserves the right to take reasonable steps to authenticate the identity of any such individual seeking access to Personal Information.

OTHER DISCLOSURES

GB may disclose EU/Swiss Personal Information as necessary in connection with the sale or transfer of all or part of its business, where required or permitted by law, where GB believes that such disclosures are appropriate in connection with a law enforcement request or otherwise permitted by Safe Harbor, or in order to investigate, prevent or take action regarding illegal activities or suspected fraud, or to enforce or apply GB agreements.

COOPERATION WITH DATA PROTECTION AUTHORITIES AND DISPUTE RESOLUTION

GB agrees to cooperate and comply with EU and Switzerland data protection authorities in the investigation and resolution of complaints brought under the Safe Harbor framework. GB has chosen to use the EU Data Protection Authorities and Swiss Federal Data Protection and Information Commissioner to serve as independent recourse mechanisms for dispute resolution.

QUESTIONS

Questions regarding this Safe Harbor section of this Privacy Policy or requests for access to EU/Swiss Personal Information should be directed to the Safe Harbor Privacy email Contact legal@gb-advisors.com. Additional information may be obtained on the US Department of Commerce website at www.export.gov/safeharbor. In addition, if any individual located in the EU or Switzerland experiences an issue regarding their Personal Information that GB holds about him or her, the individual may contact the local data protection authority for further information.

INFORMATION FROM MINORS

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at support@gb-advisors.com

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

CONTACT US

If you have any concerns about GB or regarding the GB Advisors SSI app Services Privacy Policy or to receive further information regarding the use of the GB Advisors SSI app Services, please contact us at support@gb-advisors.com / legal@gb-advisors.com with a detailed description, and we will try to resolve it.