

# Privacy Policy

Your privacy is important to Grant Professional Strategies, LLC (“GPS”). So we’ve developed a Privacy Policy that covers how we collect, use, disclose, transfer, and store your information. Please take a moment to familiarize yourself with our privacy practices and let us know if you have any questions.

## Collection and Use of Personal Information

Personal information is data that can be used to identify or contact a single person.

You may be asked to provide your personal information anytime you are in contact with GPS or a GPS affiliated company. GPS and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, content, and advertising. You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

Here are some examples of the types of personal information GPS may collect and how we may use it:

### What personal information we collect

When you create an GPS ID, register your products, purchase a product, download a software update, register for a class at an GPS venue, contact us or participate in an online survey, we may collect a variety of information, including your name, mailing address, phone number, email address, contact preferences, and credit card information.

When you share your content with family and friends using GPS products, send gift certificates and products, or invite others to join you on GPS forums, GPS may collect the information you provide about those people such as name, mailing address, email address, and phone number.

In the U.S., we may ask for your Social Security number (SSN) or professional license, but only in limited circumstances such as when setting up an and activating your account or when determining whether to extend commercial credit.

### How we use your personal information

The personal information we collect allows us to keep you posted on GPS’s latest product announcements, software updates, and upcoming events. If you don’t want to be on our mailing list, you can opt out anytime by updating your preferences.

We also use personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti-fraud purposes.

From time to time, we may use your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with GPS, you may not opt out of receiving these communications.

We may also use personal information for internal purposes such as auditing, data analysis, and research to improve GPS’s products, services, and customer communications.

If you enter into a sweepstake, contest, or similar promotion we may use the information you provide to administer those programs.

## Collection and Use of Non-Personal Information

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

We may collect information such as occupation, language, zip code, area code, unique device identifier, location, and the time zone where an GPS product is used so that we can better understand customer behavior and improve our products, services, and advertising.

We may collect information regarding customer activities on our website and from our other products and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

### **Cookies and Other Technologies**

GPS's website, online services, interactive applications, email messages, and advertisements may use "cookies" and other technologies such as pixel tags and web beacons. These technologies help us better understand user behavior, tell us which parts of our website people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

GPS and its partners use cookies and other technologies in mobile advertising services to control the number of times you see a given ad, deliver ads that relate to your interests, and measure the effectiveness of ad campaigns. If you do not want to receive ads with this level of relevance on your mobile device, you can opt out by contacting Customer Service. Alternatively, if you are using mobile devices, you may opt out by configuring your device according to the manufacturers instructions for Limit Ad Tracking. If you opt out, you will continue to receive the same number of mobile ads, but they may be less relevant because they will not be based on your interests. You may still see ads related to the content on a web page or in an application or based on other non-personal information. Opting out applies only to GPS advertising services and does not affect interest-based advertising from other advertising networks. However, if you select Limit Ad Tracking on your mobile device, third party apps are not permitted by contract to use the Advertising Identifier, a non-personal device identifier to serve you targeted ads.

GPS and our partners also use cookies and other technologies to remember personal information when you use our website, online services, and applications. Our goal in these cases is to make your experience with GPS more convenient and personal. For example, knowing your first name may let us welcome you the next time you visit the GPS Online Store. Knowing your city and state helps us provide a customized and more useful shopping experience. Knowing someone using your computer or device has shopped for a certain product or used a particular service helps us make our advertising and email communications more relevant to your interests. And knowing your contact information, product information helps us support your products and provide you with better customer service.

If you want to disable cookies, check with your provider to find out how to disable cookies browser preferences. Please note that certain features of the GPS website will not be available once cookies are disabled.

As is true of most websites, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit pages, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyze trends, to administer the site, to learn about user behavior on the site, and to gather demographic information about our user base as a whole. GPS may use this information in our marketing and advertising services.

In some of our email messages, we use a “click-through URL” linked to content on the GPS website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email messages.

Pixel tags enable us to send email messages in a format customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

### **Disclosure to Third Parties**

At times GPS may make certain personal information available to strategic partners that work with GPS to provide products and services, or that help GPS market to customers. Personal information will only be shared by GPS to provide or improve our products, services and advertising; it will not be shared with third parties for their marketing purposes.

### **Service Providers**

GPS shares personal information with companies who provide services such as information processing, extending credit, fulfilling customer orders, delivering products to you, managing and enhancing customer data, providing customer service, assessing your interest in our products and services, and conducting customer research or satisfaction surveys. These companies are obligated to protect your information and may be located wherever GPS operates.

### **Others**

It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for GPS to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

### **Protection of Personal Information**

GPS takes the security of your personal information very seriously. GPS online services such as the GPS Online Store protect your personal information during transit using encryption such as Transport Layer Security (TLS). When your personal data is stored by GPS, we use computer systems with limited access housed in facilities using physical security measures. Storage services data is stored in encrypted form when we utilize third party storage.

When you use some GPS products, services, or applications or post on an GPS forum, chat room, or social networking service, the personal information you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to submit in these instances. For example, if you list your name and email address in a forum posting, that information is public. Please take care when using these features.

### **Integrity and Retention of Personal Information**

GPS makes it easy for you to keep your personal information accurate, complete, and up to date. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

### **Access to Personal Information**

You can help ensure that your contact information and preferences are accurate, complete, and up to date by logging in to your account at [www.GrantGPS.com](http://www.GrantGPS.com). For other personal information we hold, we will provide you with access for any purpose including to request that we correct the data if it is inaccurate or delete the data if GPS is not required to retain it by law or for legitimate business purposes. We may decline to process requests that are frivolous/vexatious, jeopardize 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 through the regional Privacy Contact Form.

### **Children**

We do not knowingly set up accounts for Children under the age of 18. This is a professional services website and is restricted to professional users. If it is discovered that anyone under the age of 18 or anyone who is not connected to an authorized professional service has established an account with GPS, without first receiving verifiable consent, we will take steps to delete the information as soon as possible.

### **Location-Based Services**

To provide location-based services on GPS products, GPS and our partners and licensees may collect, use, and share precise location data, including the real-time geographic location of your GPS computer or device. GPS and our partners and licensees, in order to provide and improve location-based products and services, collect this location data anonymously in a form that does not personally identify you and is used. For example, we may share geographic location with application providers when you opt in to their location services.

Some location-based services offered by GPS require your personal information for the feature to work.

### **Third Party Sites and Services**

GPS websites, products, applications, and services may contain links to third-party websites, products, and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties, which may include such things as location data or

contact details, is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties.

### **International Users**

All the information you provide may be transferred or accessed by entities around the world as described in this Privacy Policy. GPS abides by the “safe harbor” frameworks set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information collected by organizations in the European Economic Area and Switzerland. Learn more about the U.S. Department of Commerce Safe Harbor Program.

GPS does not solicit nor service users outside of the United States.

### **Our Companywide Commitment to Your Privacy**

To make sure your personal information is secure, we communicate our privacy and security guidelines to GPS employees and strictly enforce privacy safeguards within the company.

### **Privacy Questions**

If you have any questions or concerns about GPS’s Privacy Policy or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please contact us.

All such communications are examined and replies issued where appropriate as soon as possible. If you are unsatisfied with the reply received, you may refer your complaint to the relevant regulator in your jurisdiction. If you ask us, we will endeavor to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

GPS may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.

### **California**

GPS does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser may allow you to set the DNT signal on your browser so that third parties (particularly advertisers) know you do not want to be tracked. If you would like to learn how to set your browser so that websites do not track you, please refer to your browsers support services.

Third parties that have content embedded on GPS’s websites such as a social feature or a visit ticker may set cookies on a user’s browser and/or obtain information about the fact that a web browser visited a specific GPS website from a certain IP address. Third parties cannot collect any other personally identifiable information from GPS’s websites unless you provide it to them directly.

The information contained in this web site is subject to change without notice.

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