

# Privacy

## **INTRODUCTION**

Gupton Marrs International, Inc. (GMI) is committed to protecting stakeholder data and privacy. Unless otherwise stated or governed by law, the commitments described below apply to all individuals who have a relationship with GMI, including our customers, employees, partners, vendors, contractors, and website visitors. This Privacy Policy should be read in conjunction with our related Data Security Policy.

## **DEFINITION**

“Personal Information” is defined as any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural, or social identity.

In general, and regardless of how Personal Information is collected, GMI obtains only the minimum data required to provide any agreed upon products and services, securely stores that data, and does not share it without your consent. GMI’s services and products are not intended for use by minors. As such, GMI does not knowingly collect personal information from minors.

You may contact us at any time to inquire about the Personal Information we collect about you. Your rights to the information we collect are protected by the applicable information protection legislation in your state, country, or region.

## **REQUIREMENTS**

- A. Automatic Information Collection** – When you visit our website, use our WorkItem.com<sup>®</sup> software platform, or email our staff members, we may

automatically collect information sent to us by your computer device, some of which may be considered Personal Information. This information may include but is not limited to unique IDs, IP addresses, device IDs, device type, geo-location information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, and standard web log information. We may also collect anonymous information using cookies. The purpose for collecting this data is to provide or enhance the user experience, assess GMI offerings, detect and prevent security threats, and/or adhere to a contract or similar arrangement to which you are a party.

**B. Manual Information Collection** – As a customer, vendor, or employee/contractor of GMI, we may manually request Personal Information, such as your name, title, address, phone number, email address, payment information, SSN/EIN, and bank account information. These requests may come through interactions with our Finance, Human Resources, Technical Support, and other similar teams. This data is collected with your consent for billing/payment purposes, managing our customer or employee relationship commitments, and/or legal requirements.

**C. Third-Party Information Collection** – GMI may also collect Personal Information from third parties. To date, information has only been collected from third-party background check service providers for the purposes of employment or contracting.

Personal Information may be collected by GMI's customers using our WorkItem.com<sup>®</sup> platform. In such cases, it is the responsibility of our customers, in collaboration with GMI via contractual means, to ensure that Personal Information is appropriately secured. GMI is not responsible for and has no control over the privacy and data security practices of our customers, which may differ from those explained in this policy.

Information may also be collected by social media platforms such as Facebook<sup>®</sup>, Twitter<sup>®</sup>, and LinkedIn<sup>®</sup> when you interact with GMI on these platforms. Each platform has its own privacy notices that specifically govern its use of social media features and collected data.

**D. Information Sharing** – GMI is contractually required to maintain the confidentiality of your Personal Information and prohibited from using that information for any

purpose not defined in contracts. However, we may share your information (a) with your consent, (b) when we believe in good faith that disclosure is necessary to protect our rights or property, (c) when necessary to protect the vital interests of any person, (d) to investigate fraud or respond to a government, judicial or other legal request, (e) to comply with the law, or (f) in connection with a corporate change, such as an acquisition or merger.

**Information Storage & Protection** – GMI has implemented appropriate administrative, technical, and physical controls to prevent unauthorized access, use, or disclosure. Personal Information you provide is stored on computer servers with limited access located in controlled facilities. Personal Information is retained for as long as we have a justifiable business need to do so, or unless a longer retention period is required by law.