

## **PRIVACY POLICY - EU-U.S. Data Privacy Framework**

**GMS Management Solutions USA INC.** complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) as set forth by the U.S. Department of Commerce.

**GMS Management Solutions USA INC.** has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) regarding the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Our Data Privacy Framework certifications cover:

1. personal information regarding clients and their personnel and customers in connection with the client relationship, such as the delivery of professional services and the administration of the client relationship; and
2. personal information regarding third parties (such as service providers and contractors) and their personnel in connection with the management and administration of the business relationships with such third parties.

Our certifications do not cover any disclosure of an individual's personal information to a third party who processes personal information for its own purposes when the disclosure is made at the request of the individual. We disclose personal information to third party service providers in connection with the operation of our business, including our provision of services to clients and our Personnel and business relationships. We ascertain that these third-party service providers provide at least the same level of privacy protection as is required by the Data Privacy Framework Principles. We may be liable if both third parties fail to meet these obligations and we are responsible for the event giving rise to the damage.

**GMS Management Solutions USA INC** is subject to the investigatory and enforcement powers of the United States Federal Trade Commission. **GMS Management Solutions USA INC** may be required to disclose personal information to law enforcement, regulatory or other government agencies, or to other third parties, in each case to comply with legal, regulatory, or national security obligations or requests.

Any questions or complaints concerning our Data Privacy Framework compliance, or requests to access, correct, amend, delete, or limit the use or disclosure of personal information (opt out) may be directed to [privacy@managementsolutions.com](mailto:privacy@managementsolutions.com). If we have not been able to satisfactorily resolve the issue, then you may raise it with (1) your data protection authority, if it relates to Personnel data, and (2) the International Centre for Dispute Resolution/American Arbitration Association ("ICDR/AAA"), which can be contacted [here](#), if it relates to any other personal information covered by our certification. Under certain conditions, individuals may have the possibility to engage in binding arbitration through the Data Privacy Framework Panel.

**GMS Management Solutions USA INC** commits to cooperate with EU data protection authorities (DPAs) and to comply with the advice given by such authorities where needed to comply with the Data Privacy Framework Principles regarding human resources data transferred from the EU in the context of the employment relationship.