

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) and the UK Extension to the 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) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to 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 organization is committed to complying with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF. This commitment ensures that personal data transfers from the European Union, the European Economic Area, and the United Kingdom to the United States are conducted in compliance with EU and UK data protection laws

We uphold the rights of EU and UK individuals by adhering to the principles outlined in these frameworks, which include providing clear notice, offering choices regarding data use, ensuring data integrity and security, and enabling access to personal data

Our dedication to these principles reflects our ongoing commitment to protecting personal data and maintaining transparency in our data handling practices.

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.

Our organization is committed to adhering to the principles and obligations of the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. This includes ensuring the protection of personal data transferred from the EU and the UK to the United States, and providing robust safeguards to address the privacy concerns of EU and UK individuals

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.

Our organization processes personal data received in reliance on the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF to provide and enhance our services, ensure compliance with legal obligations, and improve user experience. We are committed to upholding the privacy rights of individuals in the EU and the UK.

- Rights of EU and UK Individuals:

Right to Access:

Individuals have the right to access their personal data held by an organization. This includes the right to obtain confirmation as to whether or not personal data concerning them is being processed, and, if so, access to the personal data and information about the processing.

- Right to Rectification:

Individuals can request the correction of inaccurate personal data and the completion of incomplete data. This ensures that their information is accurate and up-to-date.

- Right to Erasure (Right to be Forgotten):

Individuals have the right to request the deletion of their personal data in certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected or when they withdraw their consent.

- Right to Restriction of Processing:

Individuals can request the restriction of processing of their personal data under specific conditions, such as when they contest the accuracy of the data or object to the processing.

- Right to Data Portability:

Individuals have the right to receive their personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller without hindrance.

- Right to Object:

Individuals can object to the processing of their personal data on grounds relating to their particular situation. This includes the right to object to processing for direct marketing purposes.

- Right to Withdraw Consent:

If the processing of personal data is based on consent, individuals have the right to withdraw their consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal¹.

- Right to Lodge a Complaint:

Individuals have the right to lodge a complaint with a supervisory authority if they believe that their rights under the EU-U.S. DPF or the UK Extension to the EU-U.S. DPF have been violated.

- Right to Redress:

Individuals have access to various redress mechanisms, including independent dispute resolution bodies and the Data Protection Review Court (DPRC), to address any violations of their privacy rights.

Our organization is committed to upholding these rights and ensuring that individuals can exercise them effectively.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, **GMS Management Solutions USA INC** commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and UK individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF should first contact **GMS Management Solutions USA INC** at privacy@managementsolutions.com

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, **GMS Management Solutions USA INC** commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF.

1. Disclosure to Third Parties: We may share your personal information with the following types of third parties for the purposes described below:

- **Service Providers:** To help us provide and improve our services, such as payment processors, data analytics providers, and customer support services.
- **Business Partners:** For joint marketing activities or to offer you certain products or services.
- **Legal Authorities:** To comply with legal obligations or respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.

2. Right to Access Personal Data: You have the right to access the personal data we hold about you. You can request to review, correct, amend, or delete your information by contacting our Data Protection Officer at privacy@managementsolutions.com.

3. Choice: If personal data covered by this Privacy Policy is to be used for a new purpose that is materially different from that for which the personal data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party in a manner not specified in this Policy, **GMS Management Solutions USA Inc** will provide you with an opportunity to choose whether to have your personal data so used or disclosed. Request on to opt out of such uses or disclosure of personal data should be sent at privacy@managementsolutions.com.

Certain personal data, such as information about medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, is considered "Sensitive Information". **GMS Management Solutions USA INC** will not use Sensitive Information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual unless **GMS Management Solutions USA INC** has received your explicit consent.

4. FTC Investigatory Powers: Our organization is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

5. Binding Arbitration: Under certain conditions, you may invoke binding arbitration to resolve disputes. To initiate arbitration, please deliver notice to our organization and follow the procedures outlined in Annex I of the DPF Principles.

6. Lawful Requests by Public Authorities: We may disclose your personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

7. Liability: GMS Management Solutions USA Inc remains responsible and liable under the EU-U.S. DPF Principles, the UK Extension to the EU-US DPF, if third parties agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles unless GMS Management Solutions USA Inc proves that it is not responsible for the event giving rise to the damage.