



This Privacy Statement describes the privacy practices of GMSTEK, LLC and its affiliates (“GMSTEK”) responsible for collecting and maintaining certain Information (“Information”) collected about your Company and users within your Company of GMSTEK Services (“Services”).

1. WHEN THIS PRIVACY STATEMENT APPLIES.

If a Service you’re using links to this Privacy Statement, this Statement applies to you.

This Privacy Statement (“Statement”) applies to our sites, products, and services (collectively "Services") that link to this Statement. GMSTEK Inc. is the controller of all Information subject to this Statement for our Services.

2. WHAT WE DO WITH YOUR INFORMATION.

We want to be clear about what information we collect and how we use it to deliver our Services to you, operate our business, and help make our Services useful, more intelligent, and work better for you. We do not sell or share your Information with third parties for their own commercial uses without your consent.

- a) TYPES OF INFORMATION WE COLLECT. In connection with accessing our Services, we may collect information from you which can be used to identify your company, such as its name, shipping/billing address, email address(es), phone, user name(s) and password(s).

We collect information when you register or open an account, sign in, pay a bill, utilize a Service, call us for support, or give us feedback. We may also get information from other companies or third parties, such as when you sync a third-party account or service with your Services, or when we use service providers to supplement the Information you give us (e.g., validate your mailing address(es) to help us maintain the accuracy of your data and provide you with better service. Finally, we also collect content or other information that you may provide or create when you interact with our Services.

We may also automatically collect certain usage information when you access our Services ("Usage Data"), such as Internet Protocol (“IP”) addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with our Services, and other usage information collected from cookies and other tracking technologies in Section 3(c) below. For example, we collect IP addresses to track and aggregate non-personal information, such as using IP addresses to monitor the regions from which users navigate to our Services. We also collect IP addresses from users when they log into the Services as part of our log-in and security features. We may

also, when you enable location-based Services, collect Global Positioning System (GPS) location data and/or motion data.

Our Services may change over time and we may introduce new features that may collect new or different types of information.

- b) **HOW WE USE YOUR INFORMATION.** We may use your information, including your Company Information, for the following purposes:

ACCOUNT REGISTRATION. We may use your Company name, address, phone number, and email address(es) to register your account for the Services we provide and to communicate important information to you. We may obtain additional Company Information such as address change information, from commercially available sources, to keep our records current. If you set up an administrator account, the administrator may be given the authority to change or delete Company user accounts and other permissions.

TO PROVIDE OUR SERVICES AND OPERATE OUR BUSINESS. We may use your information to operate our business, including providing Services you requested, provide you with support related to our Services, and to help us protect our Services, including to combat fraud and protect your information.

CUSTOMER SERVICE AND TECHNICAL SUPPORT. We may use your name, address, phone number, email address, how you interact with our Services, and information about your computer configuration to resolve questions you may have about our Services and to follow up with you about your experience. We may also offer various Internet chat services, for example, to speak with a GMSTEK support representative. Internet Chat transmissions are encrypted but you should not supply more Information, than is required to address your specific issue. A transcript of the session may be retained to resolve questions or issues related to our Services.

COMMUNICATE WITH YOU AND TELL YOU ABOUT OTHER SERVICES. We may use your information to communicate with you about our Services and to give you offers for third party products and services that we think may be of use to you. Please see below under "What You Can Do to Manage Your Privacy" in Section 3 for the choices you have regarding these communications.

TO IMPROVE SERVICES AND DEVELOP NEW SERVICES. We will use your information to personalize or customize your experience and the Services, develop new features or services, and to improve the overall quality of our Services.

FEEDBACK. We may use any information you volunteer in surveys you answer for us and combine them with answers from other customers in order to better understand our Services and how we may improve them. Answering any survey is optional.

RESEARCH, INCLUDING PUBLISHING OR SHARING COMBINED INFORMATION FROM MANY USERS. Data and information can be shared but only in a way that would not allow your company or any individual user within your company to be identified. We may prepare and share information about our customers with third parties, such as advertisers or partners, for research, academic, marketing and/or promotional purposes. For example, we may share market data that describes the percentage of our

industry who use a particular aircraft type or product. We or our third-party partners may publicly report the aggregated findings of the research or analysis, but only in a way that would not allow Your Company or a Company User to be identified.

- c) **HOW WE SHARE YOUR COMPANY INFORMATION.** From time to time, we may need to share your Company Information with others.

THIRD PARTY SERVICE PROVIDERS. We may share your information, including Usage Data, with third party service providers who perform various functions to enable us to provide our Services and help us operate our business, such as website design, sending email communications, fraud detection and prevention, customer care, or performing analytics. Our contracts with these third parties require them to maintain the confidentiality of the Company Information we provide to them, only act on our behalf and under our instructions, and not use Information for purposes other than the product or service they're providing to us or on our behalf.

RESPONSE TO SUBPOENAS AND OTHER LEGAL REQUESTS. We may share your information with courts, law enforcement agencies, or other government bodies when we have a good faith belief we're required or permitted to do so by law, including to meet national security or law enforcement requirements, to protect our company, or to respond to a court order, subpoena, search warrant, or other law enforcement request.

PROTECTION OF GMSTEK AND OTHERS. We may share Information and Usage Data when we believe it is appropriate to enforce or apply our products' Terms of Service and other agreements; or protect the rights, property, or safety of GMSTEK, our Services, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. This does not include selling, renting, sharing, or otherwise disclosing Information of our customers for commercial purposes in violation of the commitments set forth in this Privacy Statement.

REPORTING TO CREDIT BUREAUS. We may share your information with credit bureaus and card associations. Late payments, missed payments, or other defaults on your account may be reflected in your credit report. We may also share your information with other companies, lawyers, credit bureaus, agents, government agencies, and card associations in connection with issues related to fraud, credit, or debt collection.

INFORMATION SHARING BETWEEN GMSTEK ENTITIES. We share your Information, with and among our affiliates and subsidiaries, except where prohibited by law. Affiliates and subsidiaries means companies related by common ownership or control. The reasons why we share your information include for our everyday business purposes, such as to: process your transactions, maintain your account(s), operate our business etc. We will also share your Information in order for us to be able to offer our products and services to you. We may also share information about your creditworthiness, your transactions and experience so that we can operate our business effectively, detect and prevent fraud, and improve our Services.

SALE OF OUR BUSINESS. If we sell, merge, or transfer any part of our business, we may be required to share your Information. If so, you will be asked if you'd like to stop receiving promotional information following any change of control.

WITH YOUR CONSENT. Other than as set out above, we will provide you with notice and the opportunity to choose when your Information may be shared with other third parties.

- d) **SYNCING, LINKING, CONNECTING YOUR BANK ACCOUNT OR OTHER THIRD PARTY SERVICES WITH YOUR SERVICES.** You may choose to sync certain Services with information from other financial accounts. To sync your financial account information, we may access your online account with your financial institution. Depending on your banking or credit services we may request your user name, password, and any other login data that you have set up with your financial or credit institution to enable access. We use this information to update and maintain the account information and enable various financial services within our platforms, and to enhance the Services we may provide in the future.

We work with other companies or developers to offer you products and services and you may choose to sync, link or connect other third party services with your Services. Sometimes GMSTEK may let you know about the service or product, or another company may let you know about an GMSTEK service or product. It will be clear who is referring the service or product, and who is providing the service or product. If you choose to accept these services, providing your consent to either the third party or to us, we may exchange your information, including your Information, as well as information about how you interact with each company's service or product. This exchange of information is necessary to maintain business operations and to provide the ongoing service you've requested. By requesting or accepting these products or services, you are permitting us to provide your Information, to the other party.

3. WHAT YOU CAN DO TO MANAGE YOUR PRIVACY.

You can view and edit information that identifies you online through your Services. How you can access and control information that identifies you will depend on which Services you use. You have a choice about the use of information that identifies you, marketing communications you receive from us, and our use of cookies and other tracking technologies.

- a) **UPDATING YOUR INFORMATION.** In connection with your right to manage your Information, you may access, update, change, correct or request deletion of your information either through the Services or through our Customer Support. You can reach our customer support by using the contact information provided in the "How to Contact Us" (Section 7) section of this statement.

- b) **MANAGING MARKETING COMMUNICATIONS FROM US.** We will honor your choices when it comes to receiving marketing communications from us.

You have the following choices if you have been receiving marketing communications from us that you no longer wish to receive:

- Click the "unsubscribe" link in the email or newsletter you received.

- For SMS messages, reply "STOP" or follow the instructions in the message or settings to discontinue the Service.

Remember that even if you choose not to receive marketing communications from us, we will continue to send you mandatory service or transactional communications.

- c) **COOKIES AND OTHER TRACKING TECHNOLOGIES.** In accordance with applicable law, GMSTEK and our service providers may use commonly-used tools to recognize your visit and track your interactions with our Services such as cookies, web beacons, pixels, local shared objects, and similar technologies (collectively, "Cookies"). Sometimes this tracking is necessary in order for us to provide you the Services you requested. Other times, we combine Usage Data collected from Cookies with that of other customers to improve your and other customers' experience. You have control over some of the Usage Data we collect from Cookies and how we use it. Information on changing your browser settings to opt out of Cookies can be found in your browser settings.

In accordance with the [Digital Advertising Alliance Principles](#) GMSTEK may use advertising networks and other third parties to display advertising on our website or to manage our advertising on other sites. Our third-party partners may place Cookies on our Services and unaffiliated websites in order to serve advertisements that may be relevant to you based on your browsing activities and interests, and to determine the effectiveness of such advertisements. If you wish to opt out of interest-based advertising, click [here](#) or if located in the European Union, click [here](#). You also have the following additional choices to opt-out of certain tracking through Cookies for such purposes:

- Visit the [Digital Advertising Alliance's](#) or [Network Advertising Initiative's](#) opt-out page.
- [Clicking here](#) to opt out of targeted ads on Facebook.
- [Clicking here](#) to opt out of Google Analytics for display advertising or to [customize Google Display Network ads](#).
- To manage Flash cookies, please click [here](#)
- For mobile apps, please refer to your mobile device's settings.
- Please note that even if you opt-out of such Cookies or otherwise opt-out of interest based advertising, you may still receive advertisements. They just won't be tailored to your interests. Also, if you opt-out and later delete your Cookies, use a different browser, or buy a new computer, you may need to renew your opt-out choices.

- d) **DO NOT TRACK.** Like most other companies, our Services are not currently configured to respond to browsers' "Do Not Track" signals because at this time no formal "Do Not Track" standard has been adopted. Click [here](#) for more information on "Do Not Track."
- e) **SOCIAL MEDIA FEATURES.** Our Services may use or incorporate social media features, such as Facebook sharing ("Social Media Features"). These features may collect your IP address and which page you are visiting within our Service, and may

set a cookie to enable the feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy statement of the company providing the relevant Social Media Features.

4. DATA RETENTION AND YOUR ACCESS RIGHTS.

- a) DATA RETENTION. In accordance with and as permitted by applicable law and regulations, we will retain your Information as long as necessary to serve you, to maintain your account for as long as your account is active, or as otherwise needed to operate our business. When you close your account, we may continue to communicate with you about our Services, give you important business updates that may affect you, and let you know about products and services that may interest you, unless you have opted out of receiving marketing communications. We may also continue to use some of your information for business purposes and to improve our offerings or in some cases to develop new ones. We will retain and use your information as required by applicable regulations and GMSTEK's records and information management policies to comply with our legal and reporting obligations, resolve disputes, enforce our agreements, complete any outstanding transactions and for the detection and prevention of fraud.
- b) YOUR ACCESS RIGHTS. As required by applicable law, you may contact us to confirm whether we maintain, or process on behalf of a third party, any of your Information and to review it in order to verify its accuracy and the lawfulness of our processing of such Information. Where you have determined that the Information we collected about you is inaccurate or processed in violation of applicable law, you may also request that your Information be corrected, amended, or deleted. Requests for access to your Information and to have it corrected, amended, or deleted should be sent to privacy@GMSTEK.com or to the mailing address provided under "How to Contact Us," (Section 7).

5. SECURITY OF YOUR INFORMATION.

We provide reasonable and appropriate security measures in connection with securing information we collect. For example, we:

- Constantly work to update our security practices to implement accepted best methods to protect your Information, and review our security procedures carefully.
- Comply with applicable laws and security standards.
- Securely transmit your sensitive Information.
- Train our staff and require them to safeguard your data.
- Transmit, store, protect, and access all cardholder information in compliance with the Payment Card Industry's Data Security Standards.

6. INTERNATIONAL DATA TRANSFERS.

In accordance with and as permitted by applicable law and regulations, we reserve the right to transfer your information, process and store it outside your country of residence to wherever we or our third-party service providers operate.

7. HOW TO CONTACT US.

If you have questions or comments about this Privacy Statement, please contact us. We want your feedback and comments.

a) VIA EMAIL: If you have questions or complaints regarding our Privacy Statement or practices, please contact us by email at privacy@GMSTEK.com.

b) VIA UNITED STATES POSTAL SERVICE: GMSTEK Inc., Attention: Privacy, 75 Valencia Avenue, Suite 200, Coral Gables, FL 33134.

8. CHANGES TO OUR PRIVACY STATEMENTS.

From time to time we may change or update our Privacy Statements. We reserve the right to make changes or updates at any time. More information about how we will notify you is below.

If we make material changes to the way we process your Information, we will provide you notice via our Services or by other communication channels, such as by email or community post.

Please review any changes carefully. All changes are effective immediately upon posting and your use of our Service after a notice of material change or posting of an updated Privacy Statement shall constitute your consent to all changes.

9. COLLECTION AND USE OF CHILDREN'S PERSONAL INFORMATION.

We do not knowingly collect information from minors. GMSTEK Services are intended for and directed to adults. Our Services are not directed to minors, and we do not knowingly collect Information from minors.

10. YOUR CALIFORNIA PRIVACY RIGHTS.

We do not share your Information with third parties for their marketing purposes without your consent.