



## **PRIVACY POLICY**

GBIA is committed to protecting your privacy. This privacy policy tells you about our collection and use of personal information. By using GBIA's products and services, you understand and agree to the terms of this policy. This Privacy Policy applies to information that GBIA collects from applications submitted by both U.S. Mail, E-Mail, Telephonically and through our website. This site may be accessed in the United States and abroad. Information collected may be retained, and may be stored, processed, accessed, and used in jurisdictions whose privacy laws may be different and less protective than those of your home jurisdiction.

### **Collection and Use of Your Personal Information**

GBIA is committed to protecting the personal information you provide to us. You will be required to provide certain personal information, such as your name, maiden name (if applicable), mailing address, e-mail address, phone number, birth date, and such other information that is required by GBIA for the purpose of conducting our business and complying with US law. GBIA is the sole owner of the information that is collected. The purpose of collecting this information from you is to provide you with an efficient and pleasant experience while using our services and to maintain accurate and up to date records. Additional personal information (e.g., your bank account information and billing address) is collected to process transactions or to provide you with products and services.

### **Use of Your Personal Information**

GBIA collects and uses your personal information to open accounts, process your transactions, to provide customer service, to perform research and analysis aimed at improving our products, services and technologies.

We also use your personal information to communicate with you. We may send transaction-related communications such as welcome letters, billing reminders, and purchase confirmations. We may also send you surveys or marketing communications to inform you of new products or services or other information that may be of interest.

Personal information collected by GBIA may be stored and processed in the United States or any other country in which GBIA or its affiliates, subsidiaries, contractors or agents maintain facilities, and by using our Site or services, you consent to any such transfer of information outside of your country. GBIA abides by the safe harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union. If you would like to exercise any of your data protection rights (including the right to have your personal information deleted), please contact us directly.

### **Sharing of Your Personal Information**

Except as disclosed in this privacy policy, GBIA does not share your personal information with any outside parties. We may share your personal information within our corporate group, including with our subsidiaries and divisions, all of whom may use your information for the purposes disclosed herein.

We may share your personal information with service providers who perform services on our behalf. For example, we may hire other companies to handle the processing of payments, to provide data storage, to fulfill orders and shipments, to assist in direct marketing, to conduct audits, etc. Those companies will be permitted to obtain only the personal information they need to provide the service. They are required to maintain the confidentiality of the information and are prohibited from using it for any other purpose.

Information about our customers, including personal information, may be disclosed as part of any merger, acquisition, or sale of the company and/or its assets, as well as in the unlikely event of insolvency,



bankruptcy, or receivership, in which personal information would be transferred as one of the business assets of the company. We will notify you of such an occurrence as described in the “Changes to This Privacy Policy” section below.

We reserve the right to disclose your personal information if required to do so by law, or in the good-faith belief that such action is reasonably necessary to comply with legal process, respond to claims, or protect the rights, property or safety of our company, employees, customers, or the public.

### **Use of Cookies and Other Technologies**

GBIA uses “cookies” to enable you to log onto our site and help personalize your online experience. A cookie is a small text file that is placed on your hard drive. Cookies contain information, including personal information that can later be read by a web server in the domain that issued the cookie to you. The information that cookies collect includes the date and time of your visit, your registration information, and your navigational and purchase history.

Cookies offer you many conveniences such as saving you time by eliminating the need to repeatedly enter the same information.

Certain publicly available pages within this Site may use GIF files (also known as action tags, web beacons, tracking pixels or transparent GIF files) to help manage online marketing and advertising. These files are provided to us by our third party ad service provider, installed by us on this Site and allow the ad service provider to recognize its unique cookies that may be located on your computer. Depending on your system settings, these cookies are placed on your computer as you travel around the Internet. No personally identifiable information is sent by these files on this Site. Aggregate and anonymous user activity information is reported by our ad service provider back to GBIA. We use this information to understand the effectiveness of our online marketing and advertising (such as to better understand which advertisements bring users to this Site).

You have the ability to accept or decline cookies. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you choose to decline cookies, you may not be able to sign in or use other interactive features of our sites and services that depend on cookies.

### **Security of Your Personal Information**

The security of your personal information is important to us. We follow generally accepted industry standards to protect your personal information. For instance, when you provide us with sensitive information on our registration or order forms, we encrypt that information on our technology platform. We also limit access to your personal information to those employees who need to know in order to conduct our business, service your account, and help you accomplish your objectives. Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so. We maintain physical, electronic and procedural safeguards to protect your personal information. We do not rent or sell your name or personal information to anyone.

### **Changes to This Privacy Policy**

GBIA may update this policy from time to time as our information practices are modified or changed. If we make any material changes to this policy, we will notify you in a manner to be designated by GBIA such as, by U.S. Mail, email (sent to the primary e-mail address specified in your account) or by means of a notice on the Site for a period of not less than thirty (30) days prior to the change. We encourage you to periodically review the Privacy Policy for the latest information on our privacy practices.