

GMS Privacy Policy

General Marketing Solutions (GMS) recognizes the importance of maintaining your privacy. We value your privacy and appreciate your trust in us. This Privacy Policy applies to current and former visitors to our site. By visiting and/or using our site, you agree to this Privacy Policy. This Privacy Policy explains the information practices that apply to personally identifiable information and sensitive data that we collect about you when you visit and/or use our site. Any information that we collect about you while you are visiting or using our site will be handled in accordance with this Privacy Policy and will not be shared except in accordance with this Privacy Policy. GMS is a member of the Network Advertising Initiative (“NAI”). GMS complies with all federal, state, and local laws, including, where applicable the General Data Protection Regulation (GDPR) (EU) 2016/679.

1. Definitions:

As used in this policy, the following terms have the meaning set forth below (and in the NAI Code of Conduct)

a. Sensitive Data

Sensitive Data includes:

- Social Security Numbers or other government-issued identifiers;
- Insurance plan numbers;
- Financial account numbers;
- Information about any past, present, or potential future health or medical conditions or treatments, including genetic, genomic, and family medical history, based on, obtained or derived from pharmaceutical prescriptions or medical records, or similar health or medical sources that provide actual knowledge of a condition or treatment (the source is sensitive);
- Information, including inferences, about sensitive health or medical conditions or treatments, including, but not limited to, all types of cancer, mental health-related conditions, and sexually transmitted diseases (the condition or treatment is sensitive regardless of the source); and
- Sexual orientation.

b. Personal Directory Data

Personal Directory Data is calendar, address book, phone/text log, or photo/video data (including any associated meta data), or similar data created by a user that is stored on or accessed through a device.

c. Personalized Advertising

Personalized Advertising is a collective term for Interest-Based Advertising, Cross-App Advertising, and Retargeting, as well as any combination of these practices.

d. Personally-Identifiable Information (PII)

Personally-Identifiable Information (PII) is any information used, or intended to be used, to identify a particular individual, including name, address, telephone number, email address, financial account number, and government-issued identifier.

e. Precise Location Data

Precise Location Data is information that describes the precise geographic location of a device derived through any technology that is capable of determining with reasonable specificity the actual physical location of an individual or device, such as GPS-latitude-longitude coordinates or location-based radio frequency signal triangulation.

2. Collecting and Maintaining Personal Data

We do not collect personally identifiable information or sensitive data about you when you visit our site unless you choose to provide that information to us. This personal identifiable information, if provided by you, may be collected via a secure online contact form or other secure document available on our website. If you provide information to us we may add your information to our internal database to use for marketing purposes. If you prefer not to receive marketing communication from us or wish to unsubscribe, please send an email to connect@2gms.com with your request. We maintain a high level of security, both physical and electronic, for all client data and material we handle. All material created or received on behalf of our customers is inventoried and stored in our secure warehouse until it is delivered, returned to the customer, or destroyed. We offer secure transfer methods for all customer data and encourage the use of secure file transfer. We request to receive personal information only as it relates to specific client job requirements. We restrict customer data access to appropriate employees, determined by our management staff. We store data on a secure network with access to the network limited by an access-controlled environment.

3. How Information is Used

GMS may collect and use your information for the following purposes:

- *To run and operate our Site*
 - We may need certain information to display content on the Site correctly.
- *To provide services to you and to improve customer service*
 - Information you provide to us, including Personally Identifiable Information and Sensitive Data may be used to provide Services to you as a GMS customer. To carry out certain business functions, GMS sometimes hires other companies to perform services on its behalf. GMS may disclose user data that it collects to these companies to enable them to perform these services, but they are required to safeguard the data and are not authorized to use it for any other purpose than completing their contractual requirements to GMS.
 - Information you provide helps us respond to your customer service requests and support needs more efficiently. We may also use the information to verify your account with us and maintain the safety and security of your account information and our products.
- *To personalize user experience*
 - We may use your IP address combined with other de-identified data (such as a hashed, non-readable email or postal address) in the aggregate to understand how our site users as a group use the services and resources provided on our Site. We may also use aggregate non-personal identification information to measure the effectiveness and distribution of ads and services, and how people interact with our website, apps, and services, as described more fully below.
- *To improve our Site*
 - We may use feedback you provide to us to improve our products and services.
- *To send periodic emails*
 - We may use the email address you provide to respond to their inquiries, questions, and/or other requests. If requested by you, we may also use your email address and/or contact information to send you electronic newsletters and information about products. You have the option to opt-out of newsletters and other information from us, as detailed below.

GMS will not sell or provide any user data for purposes of solicitation or profit. To describe our services to advertisers, vendors, and other reputable third parties and for other lawful purposes, GMS may disclose aggregate statistics about our site visitors, customers, and sales. But these statistics include no personal data. GMS may disclose user data in circumstances as required or permitted by law. For example, GMS reserves the right to disclose personally identifiable information, including account information, when we believe such disclosure is appropriate to cooperate with an investigation of activities claimed to be unlawful, to enforce our Terms of Use, or to protect the rights or property of GMS or others. GMS may disclose your personal data in the event of any sale or transfer of its business or its assets. Sensitive Data and Personal Directory Data is not used for Personalized Advertising Purposes.

4. Security

GMS takes precautions to protect your information, particularly personally identifiable and sensitive data. When you submit personally identifiable information and/or sensitive data via the website, your information is protected both online and offline. Wherever GMS collects this information (such as credit card data), that information is encrypted and transmitted to GMS in a secure way. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of the Web page.

5. 3rd Party Disclosure

This website may contain links to other sites. GMS is not responsible for the privacy practices of these sites and we recommend that users read the privacy statements of each website. We may work with a data provider to target advertising to you personally, through online and offline methods including email, display media, video media and direct mail. These providers may use personal information that we have collected or that you have provided to locate you online, such as when you visit or log in to websites or mobile applications.

6. Personalized Advertising

When you log in to or visit our website, your IP address may be combined with other de-identified data (such as a hashed, non-readable email or postal address) to send ads and materials to you based on your preferences, interests and attributes.

GMS uses tools such as “Google Analytics” to collect information about use of this site. Google Analytics and similar tools collect information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. GMS uses the information we get from Google Analytics and similar sources only to improve this site. Google Analytics and similar programs collect only the IP address assigned to you on the date you visit this site, rather than your name or other identifying information. GMS does not combine the information collected through the use of Google Analytics or similar programs with personally identifiable information.

GMS may use website cookies to optimize its website user experience. You have the ability in most web browsers to disable cookies, if you wish. GMS uses various types of marketing software to track clients, leads, and other information. To opt out of this and other interest-based advertising, please visit the industry opt-out pages operated by the NAI at <http://networkadvertising.org>.

7. Access to and Control Over Your Information

You may opt out of any future contact from us at any time. You can do the following at any time by contacting us via the email address or phone number given below and on our site:

- See what data we have about you, if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

GMS retains data used for Personalized Advertising and/or Ad delivery for ____ months after receipt of such data.

If you have any questions or complaints regarding this policy, please contact:

General Marketing Solutions, 7500 Golden Triangle Drive, Eden Prairie, MN 55344, Phone: 952-838-3500, Web: www.2gms.com, Email: connect@2gms.com

8. General Provisions and Updates

This Privacy Policy is governed by Minnesota law, without reference to its conflicts of law provisions. If any provision of this policy is found to be invalid under any applicable law, such provisions shall be deleted without affecting the remaining provisions in this Privacy Policy.

We update our privacy policy from time to time. When a change occurs to our privacy policy, we will post the updated policy on our website.