

## **Great Lakes International LTD**

### **Privacy Policy**

Great Lakes International Ltd. as well as its various subsidiary and affiliated companies (collectively, "Great Lakes International") respects the privacy of our customers and visitors to our website, [www.glinternational.com](http://www.glinternational.com) (the "Site"), and we are committed to protecting your privacy through our compliance with this Privacy Policy ("Privacy Policy"). Please review the following Privacy Policy to understand what information is being collected and how it will be used. We do not and will not make personal information collected available to any outside third parties except as set forth in this Privacy Policy. All information gathered will be obtained only through your knowledge and consent.

While offering our Site users the advantages and convenience of web-based technologies, we also strive to employ practices that ensure information collected about customers and visitors is used conscientiously and appropriately. This Privacy Policy sets out how Great Lakes International uses and protects any information that you give us when you use the Site. When we talk about "Great Lakes International," "we," "our," or "us" in this Privacy Policy, we are referring to Great Lakes International Ltd., which is the company which provides the access to the Great Lakes International Site. This Privacy Policy outlines the use of personally identifiable information collected on the Site. This Privacy Policy does not encompass any other websites referenced by us in print, online, in e-mail or any other medium.

Great Lakes International is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this Site, you can be assured that it will only be used in accordance with this Privacy Policy.

Great Lakes International may change this policy from time to time by updating this page. This policy is effective from 25<sup>th</sup> of May 2018. Whenever we change our policy, we will give reasonable notice by posting a notice on our homepage. Since this policy change notices last only for a limited time, however, you should check this Privacy Policy regularly to see if there have been any changes.

By accessing our Site or by otherwise giving us your information, you accept and agree to this Privacy Policy. If you do not agree to this Privacy Policy, do not access the Site or give us any of your information.

### **Collecting information**

#### **Great Lakes International Site**

For purposes of any applicable data protection legislation, Great Lakes International is a "Controller" of the personal data you provide to us. We only collect basic personal data about you. You are the sole source of your information provided to us on our Site. Our Site may collect any or all of the following:

- Name (First, Last, Middle)
- Contact information, including email address and phone number
- Job Title
- Company name and address (if applicable)
- Other information relevant to customer surveys and/or offers

- Information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters;
- Information from your browser or device, including, but not limited to, your IP address, location, cookie information, and hardware & software attributes; and
- Any other information that you choose to provide

### **Third Party Services**

We may obtain information about you from third-party sources, such as lead generation services, public databases, joint marketing partners, and social media platforms. Use of these services helps us in our outreach to you, and in tailoring a more-personalized web experience as you visit our Site.

### **Log file information**

Log file information is automatically reported by your browser each time you make a request to access a web page or app. It can also be provided when the content of the webpage or app is downloaded to your browser or device. When you access the Site or use our services, our servers may automatically record certain log file information, including your web request, Internet Protocol (“IP”) address, browser type, referring/exit pages and URLs, number of clicks and how you interact with links on the Site, domain names, landing pages, pages viewed, and other such information. Similar information may also be collected from emails sent to our users which helps track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Site.

### **Links to other websites**

Our Site may contain links to other websites. However, once you click or engage those other websites, you will be directed away from our Site and thus will leave our Site at that time. We have no control over other websites or links to other websites. To this end, we are not responsible for the protection and privacy of any information which you provide these other websites.

We collect your information for internal marketing purposes, to evaluate the effectiveness of our communications with you, and to improve the relevance of our message to meet your needs.

### **We use your information to provide you with:**

- Information about our products and services
- Responses to your questions about our company and requests for product demonstrations

We will retain your information so long as it serves the purposes discussed above, unless and until you direct us to delete it.

### **What we do with your information**

Personal data submitted on this Site will be used for the purposes specified in this privacy policy or in relevant parts of the Site.

Great Lakes International may access and use your personal data, as reasonably necessary and in accordance with your consent to:

- ✓ administer the Site
- ✓ improve the content on the Site
- ✓ improve your browsing experience by personalizing the Site
- ✓ send to you downloads you request via the Site
- ✓ send you general marketing and non-marketing commercial communications
- ✓ send you email notifications which you have specifically requested
- ✓ send to you our newsletter and other marketing communications (relating to our business which we think may be of interest to you) by email or similar technology
- ✓ deal with enquiries made by you relating to the Site or our products and services

We will not sell, distribute or provide your personal information to third parties unless required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

### **Disclosures to others**

Great Lakes International may share or disclose your personal information and other information as follows:

- ❖ If you register for webinars or live events, which are co-sponsored by a third-party partner, your contact information may be available to that third-party partner.
- ❖ *During changes to our business structure.* If we engage in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of Great Lakes International's assets, financing, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence).
- ❖ *To comply with applicable laws.* To comply with any and all legal or regulatory requirements and to respond to lawful requests, court orders and legal process.
- ❖ *To enforce our rights, prevent fraud and for safety.* To protect and defend the rights, property, or safety of us or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud.
- ❖ We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- ❖ We may disclose or use aggregate or de-identified information for any purpose. For example, we may share aggregated or de-identified information with our partners or others for business or research purposes. Similarly, we may remove parts of data that can identify you and share anonymized data with other parties, and we may also combine your information with other information in a way that it is no longer associated with you and share that aggregated information.

### **Responding to Legal Requests and Preventing Harm**

As noted above, we may access, preserve and share your information in response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that the law requires us to do so. This may include responding to legal requests from jurisdictions within or outside of the United States of America where

we have a good faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and/or is consistent with internationally recognized standards. Also, we may also access, preserve and share information when we have a good faith belief that it is necessary to: (a) detect, prevent and address fraud and other illegal activity; (b) protect ourselves, you and others, including as part of any investigations; and (c) prevent death or imminent bodily harm. As a result, information we receive about you may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

### **Cookies and Similar Technologies**

A “cookie” is a small file placed on your computer's hard drive. The cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use several types of cookies:

- **Essential Cookies.** These cookies are essential to provide you with services available through our Site. For example, when you sign in, we may send cookies to your device so that we can identify you as a user.
- **Functionality Cookies.** These cookies are used to remember choices you make when you use our Site, such as your country. The purpose of these cookies is to provide you with a more personal experience on our Site.
- **Analytics and Performance Cookies.** These cookies are used to collect information about traffic to our Site and how users use the Site. The information is aggregated and anonymous and does not identify any individual visitor. It includes the number of visitors to our Site, the pages they visited, and other similar information. We use this information to help operate, maintain, and improve our Site.
- **Social Media Cookies.** These cookies are used when you share information using a social media sharing button on the Site or engage with our content on or through a social network such as Facebook or Twitter, LinkedIn. The social network will record that you have done this.
- **Web Beacons.** Pages on our Services and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs). Web beacons differ from cookies in that the information is not stored on your hard drive, but invisibly embedded on web pages or in email. Web beacons permit us to track online movements of web users for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). This enables us to provide a Site experience more tailored to your preferences and interests.

You can typically remove and reject cookies from our Site within your own browser settings. By limiting calls to these websites, the browser will limit the information these third-party sites can collect about you. Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. For step-by-step instructions, please check your browser's help section.

## **Security**

We maintain technical, physical, and administrative security measures designed to provide customary and reasonable protection for your personal information against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data, and information access authorization controls. While we are dedicated to securing our systems and services, you are responsible for verifying that the personal information we maintain about you is accurate and current.

We seek to use technical and administrative measures to protect personal information within our company. Unfortunately, no data transmission or storage system can be guaranteed. If you have reason to believe that your interaction with us is no longer safe (for example, if you feel that the security of your account with us might have been compromised), please immediately notify us of the problem by contacting us at the address, email and/or telephone noted in this Privacy Policy.

## **What are your rights?**

You have choices when it comes to the privacy practices and communications described in this Privacy Policy. Many of your choices may be explained in the context of your use of the Site. You may be provided with instructions and prompts within the experiences as you navigate the services. You may choose to restrict the collection or use of your personal information.

### Choices Relating to the Personal Data We Collect

**Personal Information.** You may decline to provide Personal Data when it is requested by Great Lakes International, but certain services, such as personalisation of the Site, may be unavailable to you.

**Location and other device-level information.** The device you use to access the Site or services may collect information about you which Great Lakes may then collect and use. For information about your ability to restrict the collection and use of such information, please use the settings available in the applicable device.

## **Choices Relating to Your Personal Information**

You may request details of personal information which we hold about you. If you would like a copy of the information held on you, please write to Terry Murphy at Great Lakes International (see address below)

If at any point you believe the information we process on you is incorrect, you may request to see this information and even have it corrected or deleted. If you wish to raise a complaint about how we have handled your personal data, you can contact our Data Protection Officer who will investigate the matter.

Our Data Protection Officer is Terry Murphy and you can contact him at [terrym@glinternational.com](mailto:terrym@glinternational.com) or at

Great Lakes International  
Unit 14 Aerbridge House  
Dunshaughlin Business Park

Dunshaughlin  
Co Meath  
A85 XP48

### **Choices Relating to Cookies**

As noted above, you may have options available to manage your cookies preferences. For example, your browser or internet device may allow you delete, disable, or block certain cookies and other tracking technologies. You can learn more by visiting [AboutCookies.org](http://AboutCookies.org). You may choose to enable these options, but doing so may prevent you from using many of the core features and functions available on our Site or other websites.

Upon first entry, when registering at the Great Lakes International Site you will be presented with an option to refuse cookies. Making that selection will prevent the use of cookies, but doing so will prevent us from presenting information tailored to your specific interests.

### **Communications from Great Lakes International**

We may send you marketing content about our sites, services, products, and products through various communication channels, for example, email, pop-ups, push notifications, and messaging applications. You may opt out of these marketing communications by following the instructions in the communications you receive.

### **Transfers of Your Personal Information to Other Countries**

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers store and process your personal information in Europe (EU). We will protect your information as described in this Privacy Policy if your personal information is transferred to other countries. By using our Site and/or services, you consent to your personal information being transferred to other countries, including countries that have different data protection rules than your country. We do not represent that our Site is appropriate or available in any particular jurisdiction.

### **Children's information**

Great Lakes International does not knowingly collect or solicit any information from anyone under the age of 16 or knowingly allow such persons to register on or with the Site and/or for our services. The Site, our services and their content are not directed at or intended for children under the age of 16. In the event that we learn that we have collected personal information from a child under age 16 without parental or guardian consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 16, please contact our Data Protection Officer as noted above in this Privacy Policy.

### **Your California Privacy Rights**

California Civil Code Section 1798.83 permits users of the Site and/or our services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make

such a request, please our Data Protection Officer as noted above or write us at the address for Great Lakes International noted in this Privacy Policy.

### **Changes to this Privacy Policy**

We may modify or update this Privacy Policy from time to time, so please review it periodically. We may provide additional forms of notice of modifications or updates if any significant changes are made to the policy by sending a notice to the email address you provide when registering, though we reserve the right to change, modify or update the policy without prior notice. Your continued use of the Site and/or our services after any modification to this Privacy Policy will constitute your acceptance of such modification.

The effective date of this Privacy Policy is May 25, 2018. This Privacy Policy was written in English (US). To the extent any translated version of this Privacy Policy conflicts with the English version, the English version controls.

### **Contacting Great Lakes International**

Please also feel free to contact us if you have any questions about Great Lakes International's Privacy Policy or practices. You may contact us at [terrym@glinternational.com](mailto:terrym@glinternational.com) or at our mailing address below:

Great Lakes International Ltd  
Unit 14 Aerbridge House  
Dunshaughlin Business Park  
Dunshaughlin  
Co Meath  
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