

## Great Lakes General Data Protection Regulation (GDPR) Update

To comply with the requirements of the GDPR, Great Lakes International Ltd. as well as its various subsidiary and affiliated companies (collectively, "Great Lakes International" or "Great Lakes" herein), has made changes and implemented a new Privacy Policy. This summary is intended to notify and direct our customers to review the updated Privacy Policy and Cookies Statement which is available on our website at [www.glinternational.com](http://www.glinternational.com). Capitalized terms that are not defined herein shall have the meaning ascribed to them in the Privacy Policy.

### Data Protection and Continued Use

Data Protection 2018: As further set forth in the Privacy Policy, we would like to continue sending you occasional marketing messages. If you no longer wish to receive our information or have information stored, please email [terrym@glinternational.com](mailto:terrym@glinternational.com)

### Data Collected

The Great Lakes website [www.glinternational.com](http://www.glinternational.com) (the "Site") collects details provided by you for the purpose of processing orders and service requests placed via the Great Lakes Site. Please note that all data collected is solely used in accordance with our Privacy Policy. For the purpose of fulfilling online orders, we collect information regarding transactions you undertake, including name, address and notes pertaining to the order (if applicable). Our payment gateway provider Stripe processes transactions on our behalf and stores this information on our behalf- we do not store this information.

Great Lakes also collects data when you purchase goods, collect items, seek information, participate in Products and Solutions function. The nature and extent of the data collected is variable, and often limited. Nonetheless, we consider all data protected.

### Data Processing

As further stated in the Privacy Policy, Great Lakes also collects data (name and email address) for monthly newsletters to keep you informed of upcoming news, events and products which may be of interest. This data is collected at the point of 'sign-up'. Those who have chosen to subscribe to this service can unsubscribe at any time.

We may also use your contact details to communicate with you. We may use your information to send you offers and news about our upcoming events, products and services which we think may be of interest. In an effort to improve customer experience and service, we monitor all traffic to the Great Lakes Site and Site usage.

Please note that there may be instances where it may be necessary for us to communicate with you for administrative purposes or to assist with order processing.

### The Categories of Personal Data Concerned

Great Lakes collects the following information in order for the purpose of processing:

- Name
- Address
- Email address
- Telephone number
- Billing & Payment information

Great Lakes gathers statistical and other analytical information collected on an aggregate basis of all visitors to our Site. This data comprises information that cannot be used to identify or contact user, such as demographic information regarding, for example,

- User IP addresses
- Browser types
- Anonymous statistical data involving the use of our Site

This information is solely used to gain a more informed understanding of how our Site is being used and to make our Sites more relevant to our users.

**Note** – Great Lakes' Site uses session cookies. Cookie consent is obtained either explicitly or implicitly requested via an opt-in or email message.

Great Lakes receive personal data through the following means:

- Credit card/Client form
- Through contractual negotiation and agreements
- Corresponding through email or phone

### The Recipients of the Data

The recipients of the data are the Great Lakes staff (permanent, fixed term, contracted or trainee staff) who process the data only in the ways that have been defined in purposes and legal basis of the processing. Great Lakes International may share personal information with any origination within the Great Lakes for the purposes defined in the Privacy Policy.

### Personal Data to a Third Party or International Organisation

Great Lakes International will not disclose Personal Data to third parties unless Great Lakes has consent to do so or unless the third party is required to fulfil a contracted task (e.g. for data entry, where in such circumstances, the third party will have a data processor agreement signed to adhere to GDPR). Great Lakes International will disclose Personal Data if it is believed in good faith that Great Lakes International are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory requirement.

### How long will the Personal Data be stored for?

Great Lakes International will retain personal data for the following reasons (the only exception to these reasons are if Great Lakes International is required or permitted by law to hold onto the information for a specific amount of time):

Data that is required in order to perform a contract, will be held on Great Lakes International system for the period necessary or until the completion of a contract.

For business interests (as defined in purposes and legal basis of the processing) data that is no longer deemed necessary will be deleted from our system.

When personal data is deemed no longer necessary, it will be removed and deleted in a correct manner.

## Data Subject's Rights

Those affected by our Privacy Policy have the following rights:

- Right to access: the right to request, access and copy of the personal information that Great Lakes International is holding. Great Lakes International can charge a reasonable fee for 2 or more personal data requests. One copy of personal data will be charged at no cost. Any access requests will need to be requested in writing or email (mailing & Email address provided in the Data Protection Officer Section above). Evidence of identification will be required as this makes sure that the personal information is not given to the wrong person. Information will be given within 30 days.
- Right to rectification: the right to have personal data rectified if it's incorrect, out of date or incomplete.
- Right to be forgotten: the right to withdraw consent given to process data and the right to request that Great Lakes International delete personal data from the Great Lakes system (the only exception to this is Great Lakes compliance with any legal obligations or if the data is required for any legal claims.)
- Right to object as to how Great Lakes International use the personal data received (e.g. marketing purposes).

**Note** – Withdrawal of consent will lead to Great Lakes International being unable to provide access to all or parts of the Services Great Lakes International provides to those who are affected by the Privacy Policy.

## Lodging a Complaint

Any complaints on how Great Lakes International use personal data can be sent to the Data Commissioner's office or as set forth in the Privacy Policy. More information can be provided on their website: [www.dataprotection.ie](http://www.dataprotection.ie)

## Other Web Sites

Our Site may contain links to other websites. Please note that these sites are outside of our control and not covered by our Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

## Cookies

"Cookies" are small pieces of information sent by a web server to a web browser, which enables the server to collect information from the browser. The Great Lakes International Site uses cookies to improve navigation and to enable traffic monitoring. Non-registered visitors of the Site may be sent anonymous cookies to keep track of their browsing patterns and build up a demographic profile.

Whilst you do not need to allow your browser to accept cookies in order to browse much of our Site or to access many of our Services, you must have cookies enabled if you wish to access any areas reserved for registered users.

## Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place professional physical, electronic and managerial procedures to safeguard and secure the information we collect online.

We advise that you review the Privacy Policy in detail and contact us with any questions or concerns. The effective date of the Privacy Policy is May 25, 2018. The Privacy Policy is written in English (US). To the extent any translated version of the Privacy Policy conflicts with the English version, the English version shall control.