### **Data Privacy Policy**

Global Code USA, Inc. is committed to safeguarding your privacy. Contact us at if you have any questions or problems regarding the use of your Personal Data and we will gladly assist you. By using this site or/and our services, you consent to the Processing of your Personal Data as described in this Data Privacy Policy.

#### **Definitions**

Personal Data – any information relating to an identified or identifiable natural person.

**Processing** – any operation or set of operations which is performed on Personal Data or on sets of Personal Data.

Data subject - a natural person whose Personal Data is being Processed.

**Child** – a natural person under 16 years of age.

We/us (either capitalized or not) Global Code USA, Inc.

# **Data Protection Principles**

We promise to follow the following data protection principles:

- Processing is lawful, fair, transparent. Our Processing activities have lawful grounds. We always consider your rights before Processing Personal Data. We will provide you information regarding Processing upon request.
- Processing is limited to the purpose. Our Processing activities fit the purpose for which Personal Data was gathered.
- Processing is done with minimal data. We only gather and Process the minimal amount of Personal Data required for any purpose.
- Processing is limited with a time period. We will not store your personal data for longer than needed.
- We will do our best to ensure the accuracy of data.
- We will do our best to ensure the integrity and confidentiality of data.

### Data Subject's rights

The Data Subject has the following rights:

- 1. Right to information meaning you have to right to know whether your Personal Data is being processed; what data is gathered, from where it is obtained and why and by whom it is processed.
- 2. Right to access meaning you have the right to access the data collected from/about you. This includes your right to request and obtain a copy of your Personal Data gathered.
- 3. Right to rectification meaning you have the right to request rectification or erasure of your Personal Data that is inaccurate or incomplete.
- 4. Right to erasure meaning in certain circumstances you can request for your Personal Data to be erased from our records.

- 5. Right to restrict processing meaning where certain conditions apply, you have the right to restrict the Processing of your Personal Data.
- 6. Right to object to processing meaning in certain cases you have the right to object to Processing of your Personal Data, for example in the case of direct marketing.
- 7. Right to object to automated Processing meaning you have the right to object to automated Processing, including profiling; and not to be subject to a decision based solely on automated Processing. This right you can exercise whenever there is an outcome of the profiling that produces legal effects concerning or significantly affecting you.
- 8. Right to data portability you have the right to obtain your Personal Data in a machine-readable format or if it is feasible, as a direct transfer from one Processor to another.
- 9. Right to lodge a complaint in the event that we refuse your request under the Rights of Access, we will provide you with a reason as to why. If you are not satisfied with the way your request has been handled please contact us.
- 10. Right for the help of supervisory authority meaning you have the right for the help of a supervisory authority and the right for other legal remedies such as claiming damages.
- 11. Right to withdraw consent you have the right withdraw any given consent for Processing of your Personal Data.

# Data we gather

### Information you have provided us with

Global Code USA, Inc. may obtain the following types of information from you or concerning your computer or device ("Information"), which may include information that can be used to identify you as specified below ("Personally Identifiable Information"):

- Name
- Email Address
- Mailing Address
- Telephone Number(s)
- Blog or Website URL
- Demographic Information (e.g., age, gender, interests, and preferences)
- Professional Title
- Company
- Industry
- Activities or Content Viewed on I'm Kind of a Big Deal
- Information Collected Automatically
- Information Received from Third Parties

In certain cases, we may request that you provide some of the Information identified above in order to obtain specific products or services (such as asking for samples of our products). If you choose not to provide the Information we request, you may still use kinglyslate.com, but you may be unable to access certain features or services. When you register to receive any products or services from Global Code USA, Inc. or provide information to Global Code USA, Inc. in any other manner, you agree to provide only true, accurate, current and complete information. Information automatically collected about you

Global Code USA, Inc. may automatically receive and log certain types of information when you visit or interact with our websites, services or other products, including:

- Browser Information
- Operating System Information
- Mobile Device Information (e.g., device identifier, mobile operating system, etc.)
- IP Address
- Internet Service Provider
- Content Viewed
- Geographic Location
- Connection Speed
- Time of Visit
- Referring Site, Application, or Service
- Registration Time

### Information collected if you provide your website and expressly consent

- Keywords your site ranks for
- Click volume
- Search volume
- Click volume from mobile versus desktop traffic

# Information from our partners

If you choose to use any third party website or service that is integrated with Global Code USA, Inc., including a third party social networking or blogging site, such as Facebook, LinkedIn, Instagram or Wix ("Global Code USA, Inc. Website") – or if you use any Global Code USA, Inc. application provided through any Third Party Website – we may receive Information, including Personally Identifying Information, from such Third Party Websites, including, but not limited to:

- Name
- Nickname or Username
- Photo or Graphic Avatar
- Unique Third Party Website Identifier (e.g., Facebook User ID)
- Biographical or Demographic Information (e.g. professional title, gender, college attended, etc.)
- Likes and Interests
- Contacts/Friends/Associations
- Any Information That Is Publicly Available on Third Party Websites

### Publicly available information

We might gather information about you that is publicly available.

### How we use your Personal Data

We use your Personal Data in order to:

- Provide Global Code USA, Inc. products and services
- Fulfill your requests
- Improve our products and services

- Personalize and tailor your experience on I'm Kind of a Big Deal
- Operate our business
- Understand how users are engaging with Global Code USA, Inc. We use your Personal Data on legitimate grounds and with your Consent.

On the grounds of entering into a contract or fulfilling contractual obligations, we process your Personal Data for the following purposes:

- To identify you for communication purposes
- To provide you a service or to send/offer you a product
- To communicate either for sales or invoicing

On the ground of legitimate interest, we Process your Personal Data for the following purposes:

- To send you personalized offers (from us and/or our carefully selected partners);
- To administer and analyze our client base (purchasing behavior and history) in order to improve the quality, variety, and availability of products/ services offered/provided;
- To conduct questionnaires concerning client satisfaction; as long as you have not informed us otherwise, we consider offering you products/services that are similar or same to your purchasing history/browsing behavior to be our legitimate interest.

With your consent we process your Personal Data for the following purposes:

- To send you newsletters and campaign offers (from us and/or our carefully selected partners);
- To build a database of relevant search information to improve the quality, variety, and availability of our products and services;
- For other purposes we have asked your consent for:

We Process your Personal Data in order to fulfill obligation rising from law and/or use your Personal Data for options provided by law. We reserve the right to anonymize Personal Data gathered and to use any such data. We will use data outside the scope of this Policy only when it is anonymized. We save your billing information and other information gathered about you for as long as needed for accounting purposes or other obligations deriving from law.

We might process your Personal Data for additional purposes that are not mentioned here, but are compatible with the original purpose for which the data was gathered. To do this, we will ensure that;

- The link between purposes, context and nature of Personal Data is suitable for further Processing;
- The further Processing would not harm your interests and
- There would be appropriate safeguard for Processing.

We will inform you of any further Processing and purposes.

### Who else can access your Personal Data

We do not share your Personal Data with strangers. Personal Data about you is in some cases provided to our trusted partners in order to either make providing the service to you possible or to enhance your customer experience. We share your data with:

Our business partners

#### Connected third parties:

- Google Analytics
- Google Optimizer
- Google API
- Instagram
- Facebook
- LinkedIn
- Wix

We only work with Processing partners who are able to ensure an adequate level of protection to your Personal Data. We disclose your Personal Data to third parties or public officials when we are legally obliged to do so. We might disclose your Personal Data to third parties if you have consented to it or if there are other legal grounds for it.

#### How we secure your data

We do our best to keep your Personal Data safe. We use safe protocols for communication and transferring data (such as HTTPS). We use anonymizing and pseudonymizing where suitable. We monitor our systems for possible vulnerabilities and attacks. Stored data is encrypted when possible.

Even though, we try our best, we cannot guarantee the security of information. However, we promise to notify suitable authorities of data breaches. We will also notify you if there is a threat to your rights or interests. We will do everything we reasonably can to prevent security breaches and to assist authorities should any breaches occur.

### Children

We do not intend to collect or knowingly collect information from children. We do not target children with our services.

# Cookies and other technologies we use

We use cookies and/or similar technologies to analyze customer behavior, administer the website, track users' movements, and to collect information about users. This is done in order to personalize and enhance your experience with us.

A cookie is a tiny text file stored on your computer. Cookies store information that is used to help make sites work. Only we can access the cookies created by our website. You can control your cookies at the browser level. Choosing to disable cookies may hinder your use of certain functions.

### We use cookies for the following purposes:

- Necessary cookies these cookies are required for you to be able to use some important features on our website, such as logging in. These cookies don't collect any personal information.
- Functionality cookies these cookies provide functionality that makes using our service more convenient and makes providing more personalized features possible. For example, they might remember your name and e-mail in comment forms so you don't have to reenter this information next time when commenting.
- Analytics cookies these cookies are used to track the use and performance of our website and services
- Advertising cookies these cookies are used to deliver advertisements that are relevant to
  you and to your interests. In addition, they are used to limit the number of times you see an
  advertisement. They are usually placed to the website by advertising networks with the
  website operator's permission. These cookies remember that you have visited a website and
  this information is shared with other organizations such as advertisers. Often targeting or
  advertising cookies will be linked to site functionality provided by the other organization.

#### Here are the cookies we use:

• Cookie policy – persistent cookie – 1-year duration – we set this cookie to limit showing the cookie policy on every page view/visits.

#### **Contact Information**

sales@kinglyslate.com 8620 Rolling Road, Manassas, VA 20110

### Changes to this Privacy Policy

We reserve the right to make change to this Privacy Policy. Last modification was made 2019-August-6.