

Data Privacy Framework Privacy Notice

Effective on: November 14th, 2024

Introduction and Scope

GPSi, LLC (doing business as “**Guidepoint Systems**,” “we,” “us,” “our”) takes the protection of personal data very seriously. This Privacy Notice (the “**Notice**”) is directed at data subjects whose personal data we may receive from our customers or business partners as part of the services offered to them in relation to our mobile application ([My Guidepoint](#)) (“**Services**”), or any other application of ours that links to this Notice.

This Notice does not apply to personal data we collect by other means, such as personal data that we receive directly through Guidepoint Systems’ own publicly accessible websites.

EU-U.S. and Swiss-U.S. Data Privacy Frameworks

GPSi, LLC (doing business as Guidepoint Systems) complies with the EU-U.S. Data Privacy Framework (“**EU-U.S. DPF**”), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (“**Swiss-U.S. DPF**”) as set forth by the U.S. Department of Commerce. GPSi, LLC (doing business as Guidepoint Systems) has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (“**EU-U.S. DPF Principles**”) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. GPSi, LLC (doing business as Guidepoint Systems) has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (“**Swiss-U.S. DPF Principles**”) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Notice and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern.

To learn more about the Data Privacy Framework Program, and to view Guidepoint Systems’ certification, please visit <https://www.dataprivacyframework.gov/s/> and <https://www.dataprivacyframework.gov/s/participant-search>, respectively.

Dispute Resolution

Where a privacy complaint or dispute cannot be resolved through Guidepoint System’s internal processes, GPSi, LLC (doing business as Guidepoint Systems) has agreed to participate in the [VeraSafe Data Privacy Framework Procedure](#). Subject to the terms of the VeraSafe Data Privacy Framework Dispute Resolution Procedure, VeraSafe will provide appropriate recourse free of charge to you. To file a complaint with VeraSafe and participate in the VeraSafe Data Privacy Framework Dispute

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Resolution Procedure, please submit the required information here:

<https://www.verasafe.com/public-resources/dispute-resolution/submit-dispute/>

Categories of Personal Data

We may process the following categories of your Personal Data in relation to providing the Services to our customers:

- Contact information such as names, phone numbers, billing addresses etc.
- Payment data such as your payment instrument number.
- Application data such as geolocation information, mobile device access, mobile device data and push notifications.

Controllership

In the context of this Notice, Guidepoint Systems acts as a data processor for the Personal Data we process.

Purpose of Processing

We process personal data for the purposes of providing our Services to our customers as follows:

- To facilitate account creation and authentication and otherwise manage user accounts. We may process your personal data so you can create and log in to your account, as well as keep your account in working order.
- To deliver and facilitate delivery of services to the user. We may process your personal data to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may process your personal data to respond to your inquiries and solve any potential issues you might have with the requested service.
- To enable user-to-user communications. We may process your personal data if you choose to use any of our offerings that allow for communication with another user.
- To evaluate and improve our Services, products, marketing, and your experience. We may process your personal data when we believe it is necessary to identify usage trends, determine the effectiveness of our promotional campaigns, and to evaluate and improve our Services, products, marketing, and your experience.
- To comply with our legal obligations. We may process your personal data to comply with our legal obligations, respond to legal requests, and exercise, establish, or defend our legal rights.
- For other business purposes. We may use your personal data for other business purposes, such as data analysis, identifying usage trends, and to evaluate and improve our Services, products and your experience.

When the purposes of processing are satisfied, we will delete such personal data within six months.

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Data Subject Rights

GPSi, LLC (doing business as Guidepoint Systems) acknowledges the right of EU, UK and Swiss individuals to access their personal data pursuant to the Data Privacy Framework and will grant individuals reasonable access to personal data it received pursuant to the Data Privacy Framework Principles. In addition, GPSi, LLC (doing business as Guidepoint Systems) will take reasonable steps to permit individuals to correct, amend, or delete such information that is demonstrated to be inaccurate or processed in violation of the Principles. An individual may request to access their information, or otherwise correct, amend, or delete their information in line with the EU-U.S. (and its UK Extension) and Swiss-U.S. Data Privacy Framework Principles by contacting us at support@guidepointsystems.com

Sharing Personal Data with Third Parties

We share personal data with our service providers, who process personal data on behalf of Guidepoint Systems. Such third parties include those:

- Providing IT systems and infrastructure
- Managing our IT systems and infrastructure
- Providing customer support

Our service providers may be located outside of the United States; however, we will either obtain your explicit consent to transfer your Personal Data to such third parties, or we will require those third parties to maintain at least the same level of confidentiality that we maintain for such Personal Data ourselves. Guidepoint Systems remains liable for the protection of your Personal Data that we transfer to our service providers, except to the extent that we are not responsible for the event giving rise to any unauthorized or improper processing.

Other Disclosures of Your Personal Data

We may disclose your Personal Data (i) to the extent required by law or if we have a good-faith belief that such disclosure is necessary in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, or private parties, including but not limited to: in response to subpoenas, search warrants, or court orders, or (ii) if we sell or transfer all or a portion of our company's business interests, assets, or both, or in connection with a corporate merger, consolidation, restructuring, or other company change, or (iii) to our subsidiaries or affiliates only if necessary for business and operational purposes as described in the section above.

We reserve the right to use, transfer, sell, and share aggregated, anonymous data, which does not include any Personal Data, about our My Guidepoint application users as a group for any legal business purpose, such as analyzing usage trends and seeking compatible advertisers, sponsors, clients, and customers.

If we must disclose your Personal Data in order to comply with official investigations or legal proceedings initiated by governmental and/or law

enforcement officials, we may not be able to ensure that such recipients of your Personal Data will maintain the privacy or security of your personal data.

Access & Review

If you are a data subject about whom we store personal data, you may have a right to request access to, and the opportunity to update, correct, or delete, such personal data. To submit such requests or raise any other questions, please contact us via email at support@guidepointsystems.com or by post at:

GPSi, LLC
25231 Dequindre Road
Madison Heights, MI 48071

Choice

You may opt out of having your personal data shared with third parties by us, and you may revoke your consent that you have previously provided for us to share your personal data with third parties, except as required by law. You may also have the right to opt out if your personal data is used for any purpose that is materially different from the purpose(s) for which it was originally collected or which you originally authorized. To do this, you may send your request to us using the information in the “Contact Us” section below.

Changes to this Notice

If we make any material change to this Notice, we will post the revised Notice to this web page and update the “Effective” date above to reflect the date on which the new Notice became effective.

Contact Us

If you have any questions about this Notice or our processing of your personal data, please write to support@guidepointsystems.com or contact us by postal mail at:

GPSi, LLC
25231 Dequindre Road
Madison Heights, MI 48071
USA

Please allow up to four weeks for us to reply.

Binding Arbitration

If your dispute or complaint cannot be resolved by us, nor through the dispute resolution program established by VeraSafe, you may have the right to require that we enter into binding arbitration with you pursuant to the Data Privacy Framework’s Recourse, Enforcement and Liability Principle and Annex I of the Data Privacy Framework.

Regulatory Oversight

Guidepoint Systems is subject to the investigatory and enforcement powers of the United States Federal Trade Commission.