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Web: http://www.ggnet.net

## **GGNet, Inc. Privacy Policy**

GGNet, Inc. (hereafter referred to as GGNet, we, us or our) believes in protecting the privacy of our clients and their customers. When we collect personal information from our clients, we follow the privacy principles of and comply with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from the European Union. GGNet has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, data security, data integrity, access and enforcement. To learn more about the Safe Harbor program, please visit <a href="http://www.export.gov/safeharbor/">http://www.export.gov/safeharbor/</a>. These are our promises to our clients:

- 1. **Notice.** When we collect personal information from our clients, we will give our clients timely and appropriate notice describing what personal information we're collecting and how we'll use it. GGNet does not share personal information with third parties for marketing purposes or otherwise. We hold our client's data private.
- 2. **Choice.** We will give our clients choices about the ways we use personal information and we will respect the choices our clients make.
- 3. **Relevance.** We will collect only as much personal information as we need for specific, identified purposes and we will not use it for other purposes without obtaining our client's consent.
- 4. **Retention.** We will keep personal information only as long as we need for the purposes for which we collected it, or as permitted by law.
- 5. **Data Security.** We will take appropriate physical, technical and organized measures to protect personal information from loss, misuse, unauthorized access of disclosure, alteration and destruction.
- 6. **Data Integrity.** We only process personal information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, GGNet shall take reasonable steps to ensure that personal information is accurate, complete, current and reliable for its intended use.
- 7. **Access.** We will allow an individual access to his or her personal information and allow the individual to correct, amend or delete inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question where the rights of persons other than the individual would be violated.
- 8. **Enforcement.** We will regularly review how we are meeting these privacy promises and we will provide an independent way to resolve complaints about our privacy practices.

#### What Information Do We Gather?

The personal information given to us depends on the type of service, support, or sale inquiry and may include names, addresses, telephone numbers, fax numbers and email addresses, dates of service provided, types of services provided, payment histories, manners of payment, amounts of payments, dates of payments, domain names, credit card or other payment information. The financial information that will be transferred will only be used to bill for the products and services purchased. If a purchase was made by credit card, this information may be forwarded to the credit card provider. All sensitive information is collected on a secure server and data is transferred. When transferring personal information a security icon will appear in your browser.

Our GGNet website uses IP addresses to analyze trends, administer our site and servers, track access and gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

#### **How Do We Use the Information We Gather?**

The information we collect is used for billing and to provide service and support to our clients. We may also study this information to determine our client's needs and provide support for our clients. One service we may provide to our clients is the use of Amazon cloud technology for secure archiving and backup. All reasonable precautions are taken to prevent unauthorized access to a client's billing, service and support information. This safeguard may require clients or their customers to provide additional forms of identity should an individual wish to obtain information about account details.

### **Changes to this Policy**

This privacy policy may be amended from time to time consistent with the requirements of the Safe Harbor. We will post any revised policy on this website. We will make individuals aware of what information we collect, how we use it and under what circumstances, if any, we disclose it.

We reserve the right to modify this policy at any time, so please review it frequently. If we make material changes to this policy, we will make notification here, by email or by means of prominent notice on our home page.

### **Enforcement and Dispute Resolution**

GGNet has established internal mechanisms to verify its ongoing adherence to its privacy policy, including the Safe Harbor Principles. GGNet also encourages individuals covered by this privacy policy to raise any concerns about our processing of personal information by contacting us at:

GGNet Technologies 890 Sidewalk Road, Suite 200 Chesterton, IN 46304 T: +1.219.926.6800 x203

GGNet will seek to resolve any concerns. GGNet has also agreed to participate in the dispute resolution program provided by the European Data Protection Authorities.

## **Accessing and Updating Personal Information**

At GGNet, we make good faith efforts to provide individuals with access to their personal information and either to correct this data if it is inaccurate or to delete such data upon request if it is not otherwise required to be retained by law or for legitimate business purposes. We may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical, or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. Individuals can correct any changes or factual errors by emailing us at <a href="mailto:inquiries@ggnet.net">inquiries@ggnet.net</a>.

# **Contacting Us**

If you have any questions about our Privacy Policy, please email us at <u>inquiries@ggnet.net</u>.