



**CCPA Privacy Policy for GMMI, Inc.**

This Privacy Policy for California residents supplements the information contained in GMMI’s current Privacy Policy. At GMMI, we want you to understand the personal information we collect, use, share, and protect, which identifies or is associated with you and your device(s).

**Scope.**

GMMI may have collected the following categories of CCPA Personal Information from consumers within the last 12 months:

Category	Examples
Identifiers	A real name, alias, postal address, IP address, email address, account name, and other similar identifiers.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, address or telephone number. Some personal information included in this category may overlap with other categories.
Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.

CCPA Personal Information doesn’t include:

1. Publicly available information from government records,
  2. Information excluded from the CCPA’s scope, such as:
- Protected Health Information under HIPAA, information subject to the California Confidentiality of Medical Information Act, or clinical trial data; or
  - “Business to business” information, which is information related to communications or transactions between a business collecting the information and a consumer who is acting on behalf of another business where the communications or transaction relate solely to an exchange of products or services between the two businesses.

**Collection of Your CCPA Personal Information.**

GMMI collect’s each of the categories of CCPA Personal Information listed above in one or more of the following ways:

- When you contact us (i.e. from forms you complete).
- Automatically when you use GMMI services
- From other sources, including the Internet and other publicly-available sources and databases, data aggregators, marketing companies, and other third parties.

**How We Use Your CCPA Personal Information.**

GMMI may use or disclose each of the categories of CCPA Personal Information described above for one or more of the following business purposes:

- **Information.** GMMI may use your CCPA Personal Information to verify your identity or provide you the information, products, and services that you request.
- **Experience.** GMMI may use your CCPA Personal Information to personalize and enhance your experience.
- **Business Transaction:** If GMMI is exploring or go through a business transition, such as a merger, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, securities offering, or sale of all or a portion of GMMI assets.



- **Legal Purposes:** GMMI will use your CCPA Personal Information when we think it is necessary to investigate or prevent actual or expected fraud, criminal activity, injury or damage to us or others; when otherwise required by law, regulation, subpoena, court order, warrant or similar legal process; or if necessary to assert or protect our rights or assets.

### **Sharing Your CCPA Personal Information.**

GMMI may share your CCPA Personal Information with the following categories of third parties for a business purpose:

- **Internally** (i.e. with our group companies and affiliates).
- **Vendors:** GMMI may share your CCPA Personal Information with our vendors (including third-party hosting providers) that provide services on our behalf, such as for email marketing, advertising, promotions, newsletters, notices and other communications, or that assist us in monitoring, improving, and hosting services.
- **Business Transaction:** If GMMI is exploring or go through a business transition, such as a merger, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, securities offering, or sale of all or a portion of GMMI assets.
- **Legal Purposes:** GMMI may disclose your CCPA Personal Information when it thinks it is necessary to investigate or prevent actual or expected fraud, criminal activity, injury or damage to us or others; when otherwise required by law, regulation, subpoena, court order, warrant or similar legal process; or if necessary to assert or protect our rights or assets.

### **Security Measures.**

GMMI restricts access to your personal information to employees who we have determined need it in order to provide products or services to you. Further, GMMI provides thorough training to its employees to safeguard customer personal information. We maintain strict physical, electronic and procedural safeguards to protect your personal information from unauthorized access by third parties.

### **Rights and Choices under the CCPA.**

- **Right to Know.** You have the right to request that GMMI disclose certain information to you about our collection and use of your CCPA Personal Information over the past 12 months.
- **Right to Deletion.**
  - You have the right to request that we delete any of your CCPA Personal Information that GMMI collected from you and retained, subject to certain exceptions. Any requests for deletion should be directed at [legal@gmmi.com](mailto:legal@gmmi.com).
  - GMMI may deny your deletion request for reasons permitted by the CCPA. (i.e. if the information is excluded from the CCPA or does not constitute CCPA Personal Information).
- **Response Timing and Format.** Once verified the request is from a California consumer, GMMI will try to respond within 45 days. If we need more time, we will tell you in writing why and how much longer we need, either by mail or electronically (based on your choice).
- **Non-Discrimination.** GMMI will not discriminate against you for choosing to exercise any of your CCPA rights, including with respect to any GMMI services.
- **Alternative Format.** To obtain this Privacy Policy in an alternative format please contact GMMI at 1-954-370-6404.





### **Changes and Updates to this Privacy Policy.**

GMMI may occasionally update this CCPA Privacy Policy. When we do, we will also revise the “Last Updated” section below. Your continued use of the Website constitutes Your agreement to this CCPA Privacy Policy and any updates. Updates will only apply after the effective date of the update.

### **Contacting Us.**

If you have any questions or comments about this Supplement, including how we collect and use your CCPA Personal Information or your choices and rights regarding such use, or if you wish to exercise your rights under California law, please contact us by either:

Email: [legal@gmmi.com](mailto:legal@gmmi.com)

Telephone: 1-954-370-6404

Address: 880 SW 145<sup>th</sup> Avenue, Suite 400 Pembroke Pines, Florida 33027

Attn: Legal Department

Last Updated March 11, 2020