

# Privacy Notice

GlobTek is committed to protecting your privacy. This notice describes how we collect and use personal information about you.

This notice applies to personal information that we collect in connection with our websites , personal meetings, business requests, and our various social media accounts.

This notice also applies to personal information that is collected from you by our employees.

The data controller of your personal information collected through the company is GlobTek, Inc., 186 Veterans Drive, Northvale NJ 07647.

Please read this notice carefully to understand how and why we are using your personal information.

The kind of information we may hold about you

We may collect, store, and use the following categories of your personal information:

- Personal contact details such as name, title, address, email address and telephone number.
- Country and language.
- Bank account and payment information.
- Details of purchases and transactions carried out with you and fulfilled by us.
- Information submitted as part of a survey operated through the Websites.
- Records of correspondence with you whether by telephone, email, social media or otherwise.
- Telephone call information, including call recordings, phone number and length of call.
- Social media profile information, including profile name and picture.
- Details of your visits to the Websites, and information about how your device has interacted with our Websites, including search and browsing history, the pages accessed and links clicked.
- Information collected automatically from your device, including IP address, device type, operating system, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information.

## How is your personal information collected?

We collect information that you provide voluntarily. Certain parts of our Websites may ask you to provide personal information voluntarily, to register an account with us, to place an order with us, to subscribe to a service from us, to subscribe to marketing communications from us, and/or to submit

enquiries to us. We also collect information that you provide voluntarily to our Sales or Customer Services team, whether in personal contact, writing or by telephone or email.

The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information

We also collect some information automatically when you visit the Websites. Collecting this information enables us to better understand the visitors who come to our Websites, where they come from, and what content on our Websites is of interest to them.

Some of this information may be collected using cookies and similar tracking technology. We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you, including to serve internet-based advertising. What we use cookies for on this site:

- Google analytics
- Cross site Request Forgery Protection
- Keeping track of session data

## **Why do we collect your personal information?**

The situations in which we will process your personal information are listed below:

- To create an account for you to help us provide a more personalized service suited to meet your preferences.
- To ensure that the Websites are presented in the most effective manner for you and your device.
- To send you newsletters or publications or provide you with information, products or services that you request from us, or which we feel may interest you.
- To carry out our obligations arising from any contracts entered into between you and us
- To interact with you and handle and respond to communications with you.
- To allow you to participate in interactive features of our Websites and service, when you choose to do so.
- To notify you about changes to our service.
- To contact you and to update you in respect of any partially complete or incomplete transactions you have made.
- To obtain and analyze your feedback as part of customer surveys.
- To analyze customer behavior and purchases within the Websites and improve the quality and relevance of our Websites to our visitors.
- To facilitate the improvement and optimization of our services to you.
- To store information about your preferences to allow us to customize our site and newsletters according to your individual interests.

- To detect and/or prevent illegal or undesirable activities within the Websites.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it, such as: (i) for the purpose of performing a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, (iii) where we have your consent to do so, or (iv) where we have a legal obligation to collect personal information from you.

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be for our legitimate commercial interest, to operate the Websites and make these available to you as necessary to provide our products and services to you, for interacting with you, responding to your queries and maintaining good customer relations, for monitoring our communications with you, analyzing customer behavior and purchases, undertaking and optimizing marketing and contacting you in respect of incomplete orders, obtaining customer feedback, handling disputes, staff development and for the purposes of detecting or preventing illegal or undesirable activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us

## **What if we want to use your information for a different purpose?**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

## **How secure is your information?**

We have put in place appropriate technical and organizational measures to prevent your personal information from being accidentally lost, used, accessed, altered or disclosed. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information and include:

- Site access controls – only authorized personnel are able to gain access to premises, buildings

and rooms where your information is being processed.

- IT access controls – only authorized personnel are able to gain access to your information stored electronically within our IT systems.
- IT security controls – use of appropriate technology and security measures to ensure secure storage of your information.
- Policies & procedures – comprehensive data protection and IT security policies and procedures setting out the way in which your information must be handled by staff.
- Training – delivery of ongoing data protection and IT security training to all staff handling your information.

## Who might we share your information with?

We may share your personal information in the situations detailed below:

- Service providers We share your personal information with third parties who provide services to us. The following activities all involve the processing of personal information and are carried out by third party service providers: website hosting, website optimization and analytics, edge caching services, payment processing, delivery, monitoring and optimization of checkout reminder emails and marketing materials, customer survey services, hosting and maintenance of customer services case management platform, maintenance of call recording system, hosting and maintenance of social media platforms, document and information collaboration and sharing, IT services. Further details in respect of our third-party service providers are available on request. Please contact us for further information. All service providers are required to take appropriate security measures to protect your personal information. We do not allow third party service providers to use your information for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.
- Sale or restructure We may share your personal information in the context of the possible sale or restructuring of the business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this notice.
- Law, legal rights and vital interests We may also need to share your information with a law enforcement body, regulator, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any person.
- Consent We may share your personal information where you have specifically consented to such disclosure.

## Do you transfer my information outside of the European

## Union?

We may transfer your personal information outside the European Economic Area (EEA). For example, our Webservices are hosted on servers within Europe and the United States of America, and our third-party service providers might operate around the world. We will only transfer your personal information outside the EEA if adequate protection measures are in place. To ensure that your personal information does receive an adequate level of protection outside the EEA we use the following protection measures:

- Transferring to countries approved by the European Commission
- Using model contractual clauses approved by the European Commission
- Requiring companies, we transfer information to in the United States to be signed up to the EU/US Privacy Shield Framework

Further details in respect of protective measures used outside of the EEA are available on request. Please contact us for further information.

## How long do we keep hold of your information?

We only retain your information for as long as necessary for the purposes described above, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which it has been processed, and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## What are your rights in connection with your personal information?

Under certain circumstances, by law you have the right to:

- Request access to a copy of the personal information we hold about you
- Request correction of any incomplete or inaccurate information we hold about you
- Request erasure of information where there is no good reason for continued processing
- Object to processing of your information where we are relying on a legitimate interest to process your information.
- Where we are processing your information for a particular purpose based on your consent, you have the right to withdraw your consent at any time.
- Request restriction to suspend our processing of your personal information.
- Request transfer of your personal information to another party which you have provided to us.
- opt out of marketing communications which we send you at any time.

If you want to exercise any of these rights, please contact us.

You will not have to pay a fee to exercise any of your rights, however we may charge a reasonable fee if your request is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Please note that we may need to request information from you to confirm your identity and establish your entitlement to these rights.

If you are not satisfied with our processing of your personal information, you also have the right to make a complaint to the relevant supervisory authority. Please see here for the relevant contact details.

## **What we ask of you?**

It is important that the personal information we hold about you is accurate and current. Please contact us immediately and inform us of any changes to the personal information which we hold about you.

If you provide us with information about another person, you confirm that you have informed them of our identity, the purposes for which their personal data will be processed, and that you have obtained their permission to such processing by us.

## **Change to this privacy notice**

We may update this notice from time to time. When we update this notice, we will take appropriate measures to inform you, consistent with the significance of the changes. We will obtain your consent to any material changes if and where this is required by law.

You can see when this notice was last updated by checking the date displayed at the top of this

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notice.

## Contact us

This notice is overseen by the Data Protection Manager GlobTek Inc.. If you have any questions, complaints or requests please make contact with our Data Protection Manager by email at: [dataprivacy@globtek.us](mailto:dataprivacy@globtek.us)