**Privacy Policy**

**gbaSI™ - Privacy Policy**

**Effective Date: October 1, 2020**

**Updated Date: March 25, 2022**

**Introduction**

This is the Privacy Policy (“**Privacy Policy**”) for GBA System Integrators, LLC, d/b/a gbaSI™. We refer to ourselves in the Privacy Policy as “**gbaSI™**” “**we**”, “**us**”, “**our**” or words of similar import.

We care deeply about the privacy of all visitors to our website (the “**Site**”) and are fully committed to protecting their Personal Data and using it properly in compliance with applicable data privacy laws. Visitors to the Site are referred to in this Privacy Policy as “**users**”, “**you**”, “**your**” or words of similar import.

The purpose of this Privacy Policy is to provide you with a clear explanation of when, why and how we collect and use information about you and your practices on the Site. We refer to that information in this Privacy Policy as Personal Data and Non-Personal Data, and we define those terms in the***INFORMATION WE COLLECT*** section of this Privacy Policy. This Privacy Policy is not intended to override the terms of any contract you have with us, or any rights you might have under applicable data privacy laws.

​**We strongly urge you to read this Privacy Policy and make sure you fully understand our practices in relation to information about you and your practices on the Site before you access the Site and submit any information to us. By accessing the Site and submitting information about yourself to us through the Site, you acknowledge that you have read this Privacy Policy and you consent to the collection, use and transfer of your Personal Data for processing in the United States as described in this Privacy Policy. If you do not agree with any part of this Privacy Policy, you must not access or continue to use the Site or otherwise submit any Personal Data to us.**

**Third-Party Links**. The Site may provide links to third-party websites or applications. We are not responsible for the content or privacy compliance of third-party websites or applications. You should check those websites or applications for their privacy statements and the terms that apply to them.

**Privacy Policy Changes**. This Privacy Policy may change from time to time. (See **CHANGES TO OUR PRIVACY POLICY** section of this Privacy Policy). Your continued use of the Site after we make changes to it is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

**Users Outside the United States**. If you are located outside of the United States, please be aware that information we collect (including cookies and device data) will be processed and stored in the United States, a jurisdiction in which the data protection and privacy laws and principles, including your data subject rights, may not offer the same level of protection as those in the country/region where you reside or are a citizen. By accessing the Site and providing information to us, you consent to the transfer to and processing of that information in the United States and, unless otherwise stated in this Privacy Policy, we use this consent as the legal basis for that data transfer. Further country/region specific information for Users from outside the United States is outlined in the *COUNTRY/REGION-SPECIFIC DISCLOSURES* section of this Privacy Policy.

**Children under 13**. The Site is not intended to be used by children under 13 years of age. No one under age 13 may provide any Personal Data to or on the Site. If you are under 13, do not use or provide any information on the Site or on or through any of its features, use any of the interactive or public comment features of the Site or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information.

**Information We Collect**

The amount and type of information we gather depends upon your use of the Site and, in some cases, what type of information you choose to disclose. Generally, we collect two types of information about you:

**Non-Personal Data**. We automatically collect un-identified and non-identifiable information about you when you visit the Site. We refer to this type of information in this Privacy Policy as “**Non-Personal Data**”. The Non-Personal Data we collect mainly consists of details of your visits to the Site, including traffic data, location data, and your search inquiries. It also includes non-identifiable information about your device, operating system, internet browser, screen resolution, language and keyboard settings, internet service provider, and other information of that type.

**Personal Data**. In limited circumstances we collect “**individually identifiable information**”, namely information that identifies an individual (as opposed to an entity like a corporation or limited liability company) or may with reasonable effort cause the identification of an individual. We refer to this type of information in this Privacy Policy as “**Personal Data**”. Personal Data includes information such as your full name, email address, phone number, and details regarding a browsing or usage session (IP address, Geo-location and/or device unique identifier).

**Anonymized Data**. We may create de-identified or anonymous data from Personal Data by excluding data components (such as your name, email address, or linkable tracking ID) that makes the data personally identifiable to you, through obfuscation, or through other means. Our use of anonymized and de-identified data is not subject to this Privacy Policy.

**How We Collect Information About You**

There are basically two ways we collect information about you when you visit the Site. We collect information about you directly from you when you voluntarily provide it to us, and we collect information about you automatically as you navigate through the Site.

**Voluntarily Provided Information**. We ask for Personal Data from you in only a few areas of the Site. One of those areas is our online store. When you go to our [**online store**](https://dev.tbelldesign.co/baamtech/store/) to purchase products from us, you must first set up an account with us before you can purchase any products. To do so, you will be required to provide us you name, address, email address and phone number, all of which are Personal Data. Subscribing to our email newsletter also requires you to provide us your email address, which is Personal Data.

**Automatically Provided Information**. As you navigate through and interact with the Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including details of your visits to the Site. The technologies we use for this automatic data collection may include:

* ***Cookies (or browser cookies)***. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of the Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Site.
* ***Flash Cookies***. Certain features of the Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on the Site. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see [**Privacy Policy**](https://dev.tbelldesign.co/baamtech/privacy-policy/).
* ***Web Beacons***. Pages of the Site may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

**Third-Party Use of Cookies and Other Tracking Technologies**. Some content or applications on the Site are served by third parties. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you visit the Site. The information they collect may be associated with your Personal Data or they may collect information, including Personal Data, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about any targeted content, you should contact the responsible provider directly.

**How We Use Your Information**

We use information that we gather about you for the following purposes:

* ***To Verify You***. We use cookies to help verify your account and provide you the option of not having to reenter your login information each time you use the Site.
* ***To Analyze User Trends***. We use cookies for analytics and performance — that is, to gather information that helps us understand how users engage with the Site to enable us and third-party service providers that we work with, like Google Analytics, to make the Site more interesting and to improve the Site’s design and performance.
* ***To Provide Services to You***. We use Personal Data that you voluntarily give us by registering for a service like our newsletter to enable us to provide you that service. You have the right to unregister for our newsletter at any time by contacting us at [**www.gbasi.com**](http://www.gbasi.com).

**When We Disclose Your Information**

We may disclose Non-Personal Data without restriction. We do not disclose Personal Data to anyone except as follows:

* ***For any disclosed purpose***. We may disclose Personal Data for any purpose disclosed by us when you provide the information.
* ***Consent***. We may disclose Personal Data with your consent.
* ***To successors to our business or assets***. We may disclose Personal Data to a buyer or other successor to our business in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about visitors to the Site is among the assets transferred.
* ***To enforce or apply our terms of use***. We may disclose Personal Data to enforce or apply our [**Site Terms of Use**](https://dev.tbelldesign.co/baamtech/terms-of-use/) and other agreements we have with you.
* ***To comply with legal process and prevent harm***. We may disclose Personal Data to respond to subpoenas, court orders, and other legal processes. In rare circumstances, we may disclose Personal Data when we believe it is necessary to prevent illegal, fraudulent, or injurious actions that may cause harm to property or individuals.

**Our Legal Basis For Collecting Information**

* ***Consent***. We can collect and process your information with your consent.
* ***Contractual Obligations***. We need your Personal Data to comply with our contractual obligations. For example, where you have provided us with your email address to receive our newsletter, we will use this information in order to deliver communications.
* ***Legitimate interest***. We may require your information to pursue our legitimate interests in a way that might reasonably be expected as part of running our business and that does not materially impact your rights, freedom or interests. For example, it is in our legitimate interests to ensure that content from the Site is presented in the most effective manner for you and your computer and we provide you with the information, products and services that you request from us.

**How Long We Keep Your Information**

We retain Personal Data for as long as necessary to fulfill any legal obligations we may have as well as for purposes of processing your information (for example, if you continue to subscribe to one of our services, we will need your information to deliver the service to you). We may also retain Non-Personal Data beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from Non-Personal Data retained or used for these purposes. We keep the Personal Data that we obtain from our users while they are subscribed to our services or until our users request that we delete the information from our records by contacting us at [**www.gbasi.com**](http://www.gbasi.com).

**Where We Store Personal Data**

The Personal Data we process, and all associated services and systems are housed on servers in the United States. If you are located outside of the United States, please be aware that Personal Data we collect about you will be processed and stored in the United States and that the data protection and privacy laws in the United States may offer a lower level of protections than in your country/region. By accessing the Site and submitting any Personal Data, you agree to the transfer, storage, and/or processing of your Personal Data in the United States. Where and as required, we will seek your explicit consent as outlined in this Privacy Policy.

**How We Secure Personal Data**

gbaSI™ and the third-party vendors we use to store your Personal Data, employ security measures (such as SSL encryption and HTTPS protocol) to protect against the loss, misuse, and alteration of the information under our control. However, no system can be completely secure. Therefore, although we take steps to secure your information, we cannot promise, and you should not expect, that your Personal Data or other communications will always remain secure.

**Managing Our Use of Your Personal Data**

We strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with the following control over your Personal Data:

* ***Tracking Technologies***. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe’s website.
* ***Unregister from our software application***. You can unregister from use of our software by contacting us at **www.gbasi.com**.

**Accessing and Correcting Your Information**

You may contact us at any time to request access to, correct or delete any Personal Data about you that you have provided to us. Deletion of your Personal Data may result in the termination of the related service we were providing to you. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

WITHDRAWING CONSENT

Where the processing of your Personal Data by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us at [**www.gbasi.com**](http://www.gbasi.com).

**Country/Region-Specific Disclosures**

**Residents of the United States.**Under California’s “Shine the Light” law, California residents who provide Personal Data to the Site may request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. If you are a California resident and would like a copy of this notice, please contact us at [**www.gbasi.com**](http://www.gbasi.com) or write to us at gbaSI™, 15501 W 100th Terrace, Lenexa, Kansas 66219.

Residents of the European Economic Area.

* ***The Data Controller***. For the purposes of European Economic Area data protection law, (the “Data Protection Law”), the data controller is: gbaSI™, 15501 W 100th Terrace, Lenexa, Kansas 66219.
* ***Use of Cookies***. Below you will find the types of cookies that we set when you visit the Site and their purpose. To help you better understand why we are setting them, we have used the categories and definitions established by the International Chamber of Commerce.
	1. Strictly Necessary: cookies that enable the services that you have specifically asked or paid for;
	2. Performance: cookies that collect information on how visitors use our site including the pages visited and most frequented as well as the sources of our traffic. They are used to help us improve how the site works; and
	3. Functionality: cookies that help us remember the choices you have made so we can provide you with a more personalized experience.

If you have any questions about the cookies we set, please contact our Data Protection Officer at [**www.gbasi.com**](http://www.gbasi.com).

* **Data Storage**. The information that we collect from you is transferred to, and may be stored at, a destination outside the European Economic Area (“**EEA**”) that is not subject to equivalent Data Protection Law. For our purposes, the information we collect is processed and stored in the U.S. We may transfer your Personal Data outside the EEA:
1. To store it.
2. To enable us to provide goods or services to you and fulfill our contract with you. This includes order fulfillment, processing of payment details, and the provision of support services.
3. Where we are legally required to do so.
4. To facilitate the operation of our business, where it is in our legitimate interests, and we have concluded these are not overridden by your rights.

Where your information is transferred outside the EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognized legal adequacy mechanism, and that it is treated securely and in accordance with this Privacy Policy.

* **European Site users have certain rights under certain circumstances:**
1. to be provided with a copy of your Personal Data held by us;
2. to request the rectification or erasure of your Personal Data held by us;
3. to request that we restrict the processing of your Personal Data (while we verify or investigate your concerns with this information, for example);
4. to object to the further processing of your Personal Data, including the right to object to marketing;
5. to request that your provided Personal Data be moved to a third party.
* **Your right to withdraw consent**. Where the processing of your Personal data by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us at [**www.gbasi.com**](http://www.gbasi.com).

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority (see[**http://ec.europa.eu/justice/data-protection/bodies/authorities/index\_en.html**](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html)).

**Changes to Our Privacy Policy**

Each time you use the Site, the then-current version of this Privacy Policy will apply. Although most changes are likely to be minor, we reserve the right to modify this Privacy Policy by posting such modification on this page; however, if changes are significant, we may provide a more prominent notice or email you. Unless we receive your express consent, any revised Privacy Policy will apply only to information collected after the effective date of such revised Privacy Policy, and not to information collected under any earlier version.

**Contact Us**

To ask questions or comment about this Privacy Policy or our privacy practices, contact us at [**www.gbasi.com**](http://www.gbasi.com), or by mail:

gbaSI™
15501 W 100th Terrace
Lenexa, Kansas 66219

Attn: Data Controller