

Privacy Policy

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Privacy policy for Equus Global Expansion, LLC

The following describes Equus Global Expansion, LLC, ("Global Expansion, LLC" "we," or "us") privacy policy and how Global Expansion, LLC handles information that it receives or collects specifically from individuals visiting this website that may constitute personal information. For clarity, the use of any Global Expansion, LLC products licensed by any Global Expansion, LLC customer and any related subscriptions to Global Expansion, LLC's services (each a "Customer") is subject to a separate agreement between Global Expansion, LLC and such Customer (each a "Customer Agreement"). The terms of such Customer Agreement govern any personal information that may be processed by Global Expansion, LLC. This Privacy Policy does not apply to employees of Global Expansion, LLC's Customers or your use of any products or services of Global Expansion, LLC. Individual employees of Global Expansion, LLC's Customers who seek access to their data or who seek to correct, amend, or delete inaccurate data should direct their requests to their employers who are Global Expansion, LLC's Customers.

Global Expansion, LLC complies with the EU-U.S. Data Privacy Framework ("EU-U.S. DPF") and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework ("Swiss-U.S. DPF") and the Rights of EU and UK individuals and Swiss individuals, as set forth by the U.S. Department of Commerce. Global Expansion, LLC 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, and to the rights of the EU and UK individuals. Global Expansion, LLC 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") and to the rights of the Swiss individuals 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 privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, and/or the rights of EU and UK individuals and Swiss individuals, the Principles and/or the individuals' rights shall govern. To learn more about the Data Privacy Framework ("DPF") program, and to view our certification, please click the following link to the respective site <https://www.dataprivacyframework.gov/>.

Global Expansion, LLC intends to comply with all applicable legal and regulatory requirements of those jurisdictions in which it does business, including, as applicable, compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF and the rights of EU and UK individuals and Swiss individuals.

Collection Of Personal Information

Global Expansion, LLC may collect certain information from you directly, such as when you send a direct mail inquiry or online registration, participate in seminars or webinars or contact us through the website. Information that we may collect includes individual names, telephone numbers, email addresses, company name, job title, and other personally identifiable information.

Global Expansion, LLC also automatically collects certain information from visitors to the website, including the IP address, time visited, pages viewed, and related information.

Legal Basis For Processing Personal Information

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.

However, we will normally collect personal information from you only where we have your consent to do so or where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to process personal information about you, or may need to process personal information in order to exercise, establish, or defend legal claims.

Use Of Personal Information

Global Expansion, LLC may use information we obtain about you for purposes including, without limitation:

- Requesting a demonstration;
- Send you information or materials you request;
- Respond to your questions and comments;
- Communicate with you about our products, services, offers, and promotions;
- Operate, evaluate, and improve our business and the products and services we offer;
- Analyze trends and statistics regarding use of the Website;
- Protect against and prevent fraud, unauthorized transactions, claims, and other liabilities, and manage risk exposure, including by identifying potential hackers and other unauthorized users;
- Enforce Global Expansion, LLC's Customer Agreements with you;
- Comply with applicable legal requirements and industry standards.

We may combine the information we collect with publicly available information and information we receive from our affiliates, business partners, and other third parties. We may use that combined information to enhance and personalize your experience with us, to communicate with you about products, services, and events that may be

of interest to you, for promotional purposes, and for other purposes described in this Privacy Policy.

We also may use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

Disclosure Of Personal Information

We may disclose aggregated information about our users, and information that does not identify any individual user, without restriction. We may disclose personal information about you:

- To service providers as set forth in the section “Use of Information by Third Parties that are Agents of Global Expansion, LLC,” below;
- To enforce or apply our Customer Agreements;
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Global Expansion, LLC, users of the Website, or others; and
- With your consent.

We may also be required to disclose and may disclose, personal information in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements. To the extent permitted, Global Expansion, LLC will inform its relevant customer or prospective customer before making such disclosure and provide it with a reasonable opportunity to object to such disclosure.

We also reserve the right to transfer your personal information to a buyer or other transferee in the event of a merger, divestiture, restructuring, reorganization, dissolution, sale, or other transfer of some or all of our assets. Should such a sale, merger, or transfer occur, we will use reasonable efforts to direct the transferee to use your personal information in a manner that is consistent with our Privacy Policy.

Data Security

Global Expansion, LLC will use reasonable methods to secure all personal information by a variety of methods, including restricting access to such information only to those people who have a legitimate need to know in order to discharge their job responsibilities on behalf of Global Expansion, LLC, securing access to the facility where the information is stored, and the use of technology and physical controls to secure the information. Global Expansion, LLC is required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Data Retention

We will retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting 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), we will securely store your personal information and isolate it from any further processing until deletion is possible.

Use of information by third parties that are agents of Global Expansion, LLC

Global Expansion, LLC will require that all third parties that are acting on behalf of Global Expansion, LLC, and to which personal or sensitive information is provided, give Global Expansion, LLC adequate assurances that they will safeguard all such information in a manner consistent with this Privacy Policy, the EU-U.S. and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPFs, and the rights of EU and UK individuals and Swiss individuals. Global Expansion, LLC's accountability for personal data that it receives under the DPFs and subsequently transfers to a third party is described in the Principles. In particular, Global Expansion, LLC remains responsible and liable under the Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless Global Expansion, LLC proves that it is not responsible for the event giving rise to the damage.

Your Rights Regarding Your Personal Information

Review, correct, and delete your personal information: If you would at any time like to review, correct or delete the personal information that we hold about you, you can contact us using the contact information provided. Upon your request to terminate your account or delete your personal information, we will delete your personal information from our active databases.

Please note that some personal information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Customer Agreements with you and/or comply with legal requirements.

- **Cookies and similar technologies:** Global Expansion, LLC uses cookies on its website. A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser.
- **Opt-Out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service related emails that are necessary your use of our services. To otherwise opt-out, you may contact us using the contact information provided below.
- **Revoke consent:** Where we process your personal information on the basis that you have consented to such processing, you have the right to withdraw your consent at any time by unsubscribing or contacting us.
- **Object to processing:** You can object to the processing of your personal information, ask us to restrict processing of your personal information, or

request portability of your personal information. You can exercise these rights by contacting us using the contact information provided

Additional rights: In addition to the above, you may also ask us to stop or restrict processing of the personal information we have about you. You may also ask us to transfer your personal information to a third party in certain circumstances. If you would like any other information on these aspects of your rights, please contact us.

Do Not Track Features

Your web browser may let you choose your preference as to whether you want to allow the collection of information about your online activities over time and across different websites or online services. At this time, Global Expansion, LLC's services do not respond to the preferences you may have set in your web browser regarding such collection of your information, and Global Expansion, LLC may continue to collect information in the manner described in this Privacy Policy.

Resource, Enforcements and Liability - Data Privacy Framework

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Global Expansion, LLC commits to resolve DPF Principles-related complaints about our collection and use of your Personal Information. European Union and UK individuals and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact Global Expansion, LLC.

The Federal Trade Commission (FTC) has investigatory and enforcement powers over Global Expansion, LLC including Global Expansion, LLC's compliance with the Data Privacy Framework.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Global Expansion, LLC commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF, and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF in the context of employment relationship.

In compliance with the EU-U.S. DPF and the Swiss-U.S. DPF, Global Expansion, LLC commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning

our handling of personal data received in reliance on the EU-U.S. DPF and the Swiss-U.S. DPF.

If your Data Privacy Framework complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not otherwise resolved by other redress mechanisms. For more information about binding arbitration, visit <https://www.dataprivacyframework.gov/s/article/G-Arbitration-Procedures-dpf?tabset-35584=2> [dataprivacyframework.gov].

Enforcement And Compliance

Global Expansion, LLC will conduct regular audits to monitor compliance with this Privacy Policy and will provide annual certifications to the U.S. Department of Commerce that it has done so. Violations of this Privacy Policy will subject the violator to disciplinary action, up to and including termination.

Children's Information

Global Expansion, LLC's services are not directed to, and Global Expansion, LLC does not knowingly solicit personal information from, minors under the age of 16. If you believe we might have any information from or about a child under the age of 16.

Changes

Global Expansion, LLC may amend or modify this policy from time to time by posting the amended or modified version on its website at <http://www.globalexpansion.com/>

Amendments and modifications will be made in a manner so as to remain consistent with the Principles. This Privacy Policy may also be changed, or limited, to comply with legal or regulatory requirements, or as otherwise allowed or required by law. If we make a change to our Privacy Policy that materially changes our use, collection, or disclosure of your personal information, we will provide notice to you (by email and/or posting on our website) that our privacy practices have changed and will provide a link to the new policy. In the event we make a material change to how we use your personal information, we will provide you with an opportunity to opt out of such new or different use.