

## Privacy Policy (GRS Advantage™)

Last Modified: July 2018

### 1. Introduction

GRS (“Company, “we”, “our” or “us”) respects your privacy and is committed to protecting it through compliance with the Privacy Policy (“the Policy”). The Policy should be read in conjunction with our Terms of Use, into which this Policy is incorporated by reference.

In compiling this Policy, we have taken steps to ensure that we have incorporated the standards and principles outlines in data collection and privacy frameworks. This Policy describes:

- the types of information we may collect from you or that you may provide when you visit the website <https://advantage.gabrielroeder.com/> (the “Website”), and
- our practices for collecting, using, maintaining, protecting and disclosing that information

This policy applies to information we collected:

- On this Website.
- In mail, text and other electronic messages between you and this Website.

This Policy does not apply to any information

This Policy does not apply to any information we collect offline or through any other means. This Policy does not apply to websites or other domains that are maintained or operated by third parties or our affiliates. The Website may link to third party websites and services, but these links are not endorsements of these sites and this Policy does not extend to them. Because this Policy is not enforced on these third party websites, we encourage you to read any posted privacy policy of the third party website before using the service or site and providing any Personal Information. Personal Information is any information that can be used to individually identify you from a larger group, and can include details such as your name, email address, age, and address.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, then your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

### 2. Children Under the Age of 13

The Website is not directed for use by children who have not reached thirteen (13) years of age without adult supervision and consent, or the express written authorization of a parent or legal guardian that will warrant and represent a child’s use complies with applicable law and these Terms of Service. Otherwise, children under the age of 13 must not use the Website or services offered on it without adult supervision, and are not permitted to submit any personally identifiable information. If you submit any personally identifiable information of a child under the age of thirteen (13), you warrant and represent that you have the legal authority, or have obtained all necessary authorizations, to consent to the submission of any personal identifiable information as provided for in any applicable laws governing your jurisdiction. If we learn that we have collected or received personal information from a child under the age of 13 without verification of the appropriate consent, we will endeavor to delete that information. If you believe we might have any information from or about a child under 13, please notify us through <https://www.grsconsulting.com/contact-us/> .

### 3. Information We Collect About You and How We Collect It

To insure we provide you with the best possible experience, we will store, use, and share information about you in accordance with this Policy. For example, when you request information, register yourself with the Website, or make an inquiry about our products and services, we will ask you to provide Personal Information to complete these transactions. We collect information through two different means: information you provide to us, and information we collect automatically.

#### *Information You Provide to Us*

As you navigate our Website, you will be presented with forms that you may complete. This includes forms provided to you at the time you register to use our Website. The Personal Information you may provide to us through these forms includes your name, email address, phone number, date of birth, and social security number. We will also collect and store your search queries on the Website. We may ask you for a username and password that should only be known to you. In some cases, we may also ask you for employment information, such as your date of hire and pay level.

In some cases, we may ask for information relating to your health and wellness. Use of your Personal Information is in no way governed by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), and any information you provide to us is not considered protected health information as that term is defined under HIPAA.

#### *Automatic Information Collection*

In addition to the information that you provide us through registration, questionnaires, or elsewhere, we may also collect information about you during your visit to our Website. The information we collect automatically is statistical data. This information helps us to improve our Website and to deliver a better and more personalized service.

We collect this information using automated tools that are detailed below. These tools may collect information about your behavior and your computer system: information like your internet address (IP address), your internet connection, the pages you have viewed, the type of browser you used, and the actions you have taken while on our Website. This helps us understand the usage of the website and allows us to produce aggregate statistics on usage. Some of the tools we use to automatically collect information about you include:

- (a) Cookies: A “cookie” is a small data file transmitted from a website to your computer’s hard drive. Cookies are usually defined in one of two ways, and we may use both of them: (1) session cookies, which do not stay on your computer after you close your browser, and (2) persistent cookies, which remain on your computer until you delete them or they expire. We may use cookies on our Website to store information about your preferences, allowing us to customize our Website based on your particular interests. Most browsers automatically accept cookies by default, but you can usually refuse cookies or selectively accept cookies by adjusting the preferences in your browser. Please be aware that a number of features on our Website may require cookies to operate correctly. Turning off cookies may affect your experience on our Website. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as browser cookies.
- (b) Do Not Track Disclosure: We do not track website visitors over time and across third party websites to provide targeted advertising. Therefore, our Website does not operate any differently when it receives Do Not Track (DNT) signals. The information we collect automatically is statistical data and does not include personal data.

#### 4. **How We Use Your Information**

The information we gather and you provide is collected and used to complete the services you have requested. We use information that we collect about you or that you provide to us, including any Personal Information, for the following purposes:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account/subscription, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- To prevent malicious activity and provide you with a secure experience.
- For any other purpose with your consent.

We may also use your information to contact you about our own goods and services that may be of interest to you. If you do not want us to use your information in this way, you may opt out by sending a notification through <https://www.grsconsulting.com/contact-us/>. You can also unsubscribe from receiving any such marketing emails via the unsubscribe option in any such marketing email you receive from us.

#### 5. **How We Share Your Information**

We do not sell or lease your information to any third party. We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. We may disclose Personal Information that we collect or that you provide, as described in this Policy, including:

- To our subsidiaries and affiliates.
- To contractors, service providers and other trusted third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of GRS's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by GRS about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- To comply with any court order, law or legal process, including responding to any government or regulatory request.
- To enforce or apply our terms of use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- With your consent.

## 6. Your Choices and Selecting Your Privacy Preferences

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

- Tracking Technologies and Advertising. 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. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- Promotional Offers from the Company. If you do not wish to have your email address used by the Company to promote our own products or services, you may select the unsubscribe feature in any promotion communication.

The communication that you receive from us will be in accordance with your preferences and this Policy. Some of the communications you receive could include automatic information collection tools.

## 7. Accessing and Correcting Your Information

We strive to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant frameworks and take steps to monitor its accuracy. We employ technologies designed to help us maintain information accuracy on input and processing.

Where we enable you access to your Personal Information, we will always ask you for a username and password to help protect your privacy and security. We recommend that you keep your password safe, that you change it periodically, and that you do not disclose it to any other person or allow any other person to use it.

To view and change the Personal Information that you have directly provided to us, visit your account profile page.

## 8. Safeguarding the Data We Collect

We take reasonable technical, administrative, and physical precautions to keep both your Personal Information and non-Personal Information secure against accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers. When we collect or transmit information over the internet, we protect it through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## 9. **For Website Visitors in the European Union (“EU”)**

We do not conduct business in the European Union or intentionally collect personal data relating to any data subjects in the European Union. Therefore, we do not warrant that our Website complies with the General Data Protection Regulation. Please be aware that any information you provide to us is stored and processed within the United States, which does not have the same protections as the European Union. Website visitors in the European Union are discouraged from sharing their personal data with us, and any personal data from website visitors in the European Union will be deleted.

## 10. **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our Privacy Policy on this page with a notice that the Privacy Policy has been updated on the Website home page. If we make material changes to how we treat our users' Personal Information, we will notify you by email to the email address specified in your account or through a notice on the Website home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date, active and deliverable email address for you, and for periodically visiting our Website and this Privacy Policy to check for any changes.

## 11. **How to Contact Us**

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at:

GRS  
One Towne Square, Suite 800  
Southfield, Michigan 48076  
(248) 799-9000 or (800) 521-0498  
<https://www.grsconsulting.com/contact-us/>