

## GT Independence

### Privacy Policy

Last Updated: September 9, 2020

Welcome to the GT Independence website (“Site”) located at <https://gtindependence.com/>. Please know that we value your privacy and are serious about safeguarding it. This privacy policy (“Privacy Policy”) describes how GT Independence and its affiliates and subsidiaries (collectively, “GT Independence,” “our,” “we,” and “us”) collect, obtain, use, and disclose personal information provided to us by users of the Site, prospective customers, existing customers that enroll in and engage our services (collectively “Services”), and from third parties with whom we do business.

By using or accessing this Site or any of our Services, you consent to the terms of this Privacy Policy and acknowledge that this Privacy Policy is part of GT Independence’s Terms of Use (“Terms”). By accessing or using the Site, you agree to be bound by both this Privacy Policy and the Terms. If you do not agree to abide by both this Privacy Policy and the Terms, please do not use this Site.

**Your California Privacy Rights.** If you are a California resident, please visit our [California Privacy Policy](#) for more information about your rights under the California Consumer Privacy Act.

### PRIVACY VALUES

In an effort to protect your privacy, GT Independence seeks to achieve the following goals:

- to collect only as much personal information about you as is necessary for our business purposes;
- to only use your personal information for the business purposes stated in this Privacy Policy, or as otherwise disclosed to you; and,
- to only share your personal information with third parties that we identify in this Privacy Policy.

### INTENDED AUDIENCE

Please note that the Site and our Services are intended for audiences and consumers at least 18 years old. We do not knowingly collect or disclose any personal information from anyone under the age of 18. GT Independence reserves the right to delete from its records any such information provided to us.

### COLLECTION OF YOUR INFORMATION

When you apply for or use our Services, we may collect information that either you or third parties provide to us, including:

- contact information such as name, email address, mailing address, and phone number;
- other information you voluntarily choose to provide to us; and/or
- other information that we request and you provide.

We may obtain information about you from third parties and may combine this information with other personal information we maintain about you. If we do so, this Privacy Policy governs any combined information that we maintain in personally-identifiable format.

## **USE OF YOUR INFORMATION**

We may use your information to provide Services and information that you request, and for our legitimate business purposes, such as improving, operating, and enhancing the Site and our Services. Specifically, we may use your information to:

- process employer and employee paperwork;
- send you information about availability and your use of Services;
- respond to your customer services requests;
- otherwise administer your account;
- enable you to obtain or become a caregiver; and,
- consider an individual for employment.

## **INFORMATION SHARING**

**Please note that we do not sell your information to third parties.**

Except as described in this Privacy Policy, we will not disclose personal information that you provide to us to third parties. Please note that we may disclose information to third parties, for example, (i) if they are our business partners or service providers, (ii) in the event of a business transfer, (iii) to protect our interests, or (iv) to comply with the law.

We may disclose your information to our third-party service providers (*e.g.*, payment processing services, identity verification services, etc.) that assist us in our work. We only provide the information that is reasonably necessary for the specific service provider to perform their functions. For example, all personal information collected from you is used solely to handle all required employer and employee paperwork and other functions in our performance as a fiscal intermediary. This information is not used by GT Independence for marketing and/or promotional purposes.

In order to improve our business, we may buy or sell a company, or we may merge with or be acquired by another company. Information about our users may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of company assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third

parties as one of our business assets. In the event we transfer any of your information in connection with such a sale, we will notify you of the purchaser as required by law.

We may disclose personal information if we believe that doing so is in our interest (i) to protect our property or legal rights (including, but not limited to, enforcement of our agreements) or the rights or property of others, (ii) to help protect the safety or security of our Services and other users of our Services, or (iii) to investigate fraud. We will disclose personal information as required by law, such as to comply with a subpoena or other legal process, or to respond to a government request.

We may also disclose your information if we have obtained your prior consent to do so.

## **COOKIES AND TRACKING TECHNOLOGIES**

As is true of most websites, our Site gathers certain information automatically through the use of “cookies” and stores it in log files. Technologies such as cookies, beacons, tags and scripts may be used by GT Independence and our service providers. This information may include internet protocol (“IP”) addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp, and/or clickstream data. We use this information to administer, operate, and improve the Site and our Services, to improve the effectiveness of advertising of our Services, and to provide advertisements and other content that is tailored to you. These technologies are also used to analyze trends, track users’ movements around the Site, and to gather demographic information about our Site user base as a whole. We may receive reports based on the use of these technologies by these service providers on an individual as well as aggregated basis. We may combine this automatically collected log information with other information we collect about you.

Some GT Independence business partners (e.g., advertisers or tracking utility companies) may use cookies on the Site. GT Independence does not have access or control over these cookies. For example, GT Independence utilizes Google Analytics to collect non-personally identifiable information utilizing cookies. For more information about Google Analytics, please refer to the website, “How Google uses data when you use our partners’ sites or apps” at <http://www.google.com/policies/privacy/partners/>.

Please note that you can block, delete, or choose not to accept cookies. However, if you choose not to accept cookies, you may not be able to use some features of the Site. If you delete cookies, any settings and preferences that were associated with those cookies will also be deleted.

GT Independence does not track you across third party websites and therefore we do not respond to Do Not Track (“DNT”) signals. However, some third party websites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. GT Independence may subscribe to these third party services in order to provide targeted advertising. If you are visiting such sites, your internet browser may allow you to set the DNT signal on your browser so that third parties (particularly advertisers) know you do not want to be tracked.

## **YOUR RIGHTS – USER ACCESS AND CHOICE**

If your contact or other information changes, you are responsible for correcting or updating your information by making the change on your member account information page or by emailing our customer service via our contact us form. We will endeavor to respond to your request within ten (10) days. If you would like to change or terminate your Services, you may contact the regional center and notify us at [customerservice@gtindependence.com](mailto:customerservice@gtindependence.com). We will endeavor to respond to your request within ten (10) days.

## **CAREER OPPORTUNITIES**

The Site or our Services may allow you to respond to a job posting on the Site. If you choose to use this service, we will collect the information that you provide to us in the course of completing our employment application.

## **THIRD-PARTY WEBSITES AND SOCIAL MEDIA WIDGETS**

Our Services may contain links to other websites, products, or services that we do not own or operate. If you choose to visit or use any third-party website or products or services, information you disclose while using those third-party website or any products or services available on or through such third-party website will be governed by that third-party websites privacy policy and not this Privacy Policy. We are not responsible for the privacy practices of these third-party website or any products or services on or through them.

The Site includes social media features, such as Facebook functionalities. These features may collect your IP address, which pages you visit within the Site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Site. GT Independence may maintain presences on social media platforms like Facebook and LinkedIn. Any information, communications, or materials you submit to GT Independence through any social media platform is done at your risk and without any expectation of privacy. Your interactions with these features are governed by the privacy policy of the company providing it.

## **LOCATION OF INFORMATION**

GT Independence has servers and/or offices located in the United States, so your information may be transferred to, stored, or processed in the United States. By using the Site, you understand and consent to the collection, storage, processing, and transfer of your information to GT Independence facilities in the United States, and those third parties with whom GT Independence shares it as described in this Privacy Policy. If you choose to use the Services from outside the United States, then you should know that you are consenting to transferring your personal information outside of your region and into the United States for storage and processing.

## **SECURITY AND RETENTION**

We use reasonable security measures that are designed to protect your information from accidental loss, disclosure, misuse, and destruction. Please be advised that no data security

measures can be guaranteed to be completely effective. Consequently, we cannot guarantee security of any information that you provide to us. You transmit information to us at your own risk. We recommend that you help us keep your data safe by taking reasonable steps such as keeping your passwords private and not disclosing sensitive personal data in places that can be accessed publicly.

By using our Site and Services, you agree that GT Independence is not responsible for any electronic communication and/or any of your personal data which may be lost, altered, intercepted, or stored without authorization during the transmission of any data whatsoever across networks not owned and/or operated by GT Independence. GT Independence will not have any liability to you for any such misuse or disclosure.

We will retain your information for as long as your account is active or as otherwise required to process payments for your subscription for the Services. We may also retain and use your information as we deem necessary to comply with our business purposes or legal obligations, to resolve disputes and enforce our agreements, or where we reasonably believe that we have a legitimate reason to do so.

## **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy is reviewed and updated as needed to accurately reflect our practices and procedures. When we do make changes to this Privacy Policy, we will revise the “last updated” date at the beginning of the Privacy Policy. We encourage you to periodically review this Policy to stay informed about how we collect, use, and disclose personal information. Your continued use of the Services after any changes to this Privacy Policy are in effect constitutes your acceptance of the revised Privacy Policy in connection with the new usage.

## **CONTACT US**

If you have any questions or comments about this Privacy Policy, please contact us:

GT Independence  
215 Broadus Street  
Sturgis, MI 49091  
Main Phone: 269-651-4500  
Toll Free Customer Service: 1-877-659-4500  
<https://gtindependence.com/contact-us/>

Effective as of September 9, 2020