

Data Protection & Privacy Policy

WHO WE ARE

The GEM (“The GEM,” “our,” “us,” or “we”) gathers and processes your personal information in accordance with this privacy notice. This notice provides you with the necessary information regarding your rights and obligations, and explains how, why, and when we collect, process, and use your personal information.

This Privacy Policy is part of our Terms of Service and applies to your use of The GEM and Hospitality Excellence, Inc websites (e.g. <https://www.gemjournaltoday.com>), mobile or tablet apps, (collectively, “the Sites”), subscription, comments, books, or other products, goods, or services from us (collectively, the “Services”).

Please note that this Privacy Policy does not govern the practices of third parties, including our partners, third party service providers, marketing providers, and/or advertisers, even when those services are branded as or provided on behalf of The GEM.

By using our services and/or making the choices you made when registering with us, you acknowledge that you have read and accepted the terms of this Privacy Policy and our Terms of Service, and you are consenting to our collection, protection, use, retention, and disclosure, subject to the terms and conditions set-forth below in this Policy, of your personal information. If you elect to not provide the information we require, we may not be able to provide all of our services to you.

If you do not agree to the terms of this Privacy Policy, please do not use our Sites or our other Services. We may make changes to this Privacy Policy from time to time. Your continued use of our Sites and other Services following the posting of any changes to this Privacy Policy will indicate your acceptance to these changes. We will post any Privacy Policy changes on this page. Please check back frequently to see any changes.

INFORMATION THAT WE COLLECT

We collect your information in several ways, including: Information we collect from you; Information we collect from when you use our Services; and Information we collect from third parties. When you use our Services (e.g., purchase a subscription or other products, browse our sites, use our apps, complete a survey, etc.), we may request and you may provide your personal information to The GEM.

The GEM collects, uses and processes your personal information to provide our Sites and Services to you, and to meet our legal, statutory and contractual obligations. The specific information we collect depends upon your use of the Sites and our other Services, as described below.

“Personal information” is information that identifies you as an individual or relates to or is reasonably capable of being associated with an identifiable individual, and includes the data sets referred to below.

The personal information that we may collect includes:

- Your name;
- Your Email (only applicable to account registration, for our newsletter service, subscription or if you submit an inquiry through our sites);
- Your billing and contact information, such as your name, address, telephone number (only applicable to subscription of certain paid services);
- Your user account information (including email address and access information);
- Your telephone number and voicemail if you call our hotline;
- Your IP address and unique user/device identifiers;
- Your geo-location;
- Your demographic information, such as your age and gender;
- Your payment card or other online payment information;
- Your purchasing history and subscription information;
- Browser type and browsing history;
- Device type and other device information;

- Operating system;
- Cookies and tags;
- Your user generated content (such as your comments to our Sites, chat information, and other content that you generate and provide to us);
- Information on user activity/behaviors, interests, and preferences on our Sites and apps; and
- Information from third parties and other databases.

How We Collect Your Information

The personal information is collected in several different ways, including: registration forms to sign up for our online and offline Services, billing, user generated content (e.g., comments), survey, contacting our service center, different cookies and tracking technologies, and other sources.

- **Information You Provide to Us.** This includes the information that you provide to The GEM directly — for instance, when you purchase a subscription or create an account, contact us with a question, apply for a job through our Sites, post comments or other user-generated content to our Sites, or otherwise directly interact with us. Please note that the information you choose to provide through comments or other user-generated content to our Sites may be publicly accessible and viewable to other visitors to the Sites.
- **Information Gathered During the Use of Our Services.** This includes, among other information, automatically gathered through your use of our Sites, such as through cookies.
- **Information Collected after Consent.** In some contexts, we may ask for your consent before collecting certain types of information.
- **Data from other sources.** We also obtain data from other partners or third parties that help us provide our services to you.

COOKIES AND AD-TARGETING TECHNOLOGIES

We and our third-party partners (including service providers and advertising partners) may use cookies, web beacons (“pixels”), mobile ad identifiers, and other similar technologies to facilitate our relevant services to you, and to provide you with a customized online experience. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to analyze and improve our Service. We use third-party partners to help manage and optimize our services’ performance and online advertising.

Please be advised that if you choose to reject all cookies, then certain areas of the Site might not function properly.

Examples of cookies we use:

- **First Party Cookies.** We use first party cookies, including session cookies and preference cookies, to remember your selections, choices, and preferences for when you interact with our Sites. Session cookies are temporary and are automatically deleted once you close your Internet browser. Preference cookies are first party cookies that remain on your device until you delete them or they are otherwise removed upon expiration.
- **Third Party Cookies.** We permit certain third-party Service Providers, advertisers, and other companies to use cookies or other similar technologies on our Website. These companies may collect your information, track your behavior on our Website, and gather information about your use of our Websites and other online services over time and across different services. Additionally, some companies may use information collected to deliver targeted ads on behalf of us or other companies, including on other websites or online services. We are not responsible for the functioning of cookies and other technologies used and placed by third parties on your device. The third-party partners we

use who may utilize cookies or other tracking technologies include, but not limited to:

- **Google:** to provide Google Analytics (as Analytics Cookies) to analyze behavior of your use of our Sites, apps, and other Services, in order to improve our Services and provide you and other users with a better experience;
- **Facebook, Twitter, and other Social Media Partners** (Social Media Cookies): to enable the sharing of content through social media sites and otherwise allow you to interact or connect with such sites while using our platforms;
- **Advertising partners:** Google (Google Ad Manager): to collect information about your activities on our Sites and apps, and serve you personalized advertising.
- **Interest-Based Advertising & Analytics:** We utilize third parties to collect information about your activities on our Sites and apps, and serve you interest-based advertising and analyze the activity on our Sites and apps.

- **Other Technologies:** We collect many different types of information from other technologies to improve the quality of our Site and the services we provide. For example, we may collect usage data and other information about the device you use to access our Site, your operating system and/or mobile device type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. We may record the IP address of the device you use to connect to the Internet.

- **These technologies include web beacons and scripts:** Web beacons are pieces of code embedded in a website or e-mail to monitor your activity on the website or your opening of the e-mail, and which can pass along information such as the IP address of the computer or device you use to view the website or open the e-mail,

the URL page on which the web beacon is located, the type of web browser that was used to access the website, and previously set cookie values. Web beacons are sometimes used to collect advertising data, such as counting page views, promotion views or advertising responses. Disabling your computer's, device's or web browser's cookies may prevent some web beacons from tracking or recording certain information about your activities. Please be advised that if you disable all such cookies, then certain areas of the Site might not function properly. Scripts are pieces of code embedded in a website to define how the website behaves in response to certain key or click requests sent by the user. Scripts are sometimes used to collect information about the user's interactions with the website, such as the links the user clicks on. Scripts are often temporarily downloaded to the user's computer or device from the website server, active only while the user is connected to the Site and deactivated or deleted when the user disconnects from the website. Please be advised that if you disable any scripts through your web browser or other means, then certain areas of the Site might not function properly. This Privacy Policy applies to any personal information collected through our used Cookies and similar technologies. Personal information collected through the third-party partners' Cookies and similar technologies is subject to the privacy policy of the third-party partners respectively, and not to our privacy policy.

- **Software Development Kits (“SDKs”):** We may use SDKs on our mobile app to collect analytics regarding the use and functionality of our mobile app. Additionally, we may collect mobile ad identifiers on our mobile app for interest-based or cross-application advertising and analytics. To opt-out of the collection of mobile data for cross-application advertising, please contact us utilizing the information in the “Other Questions” Section below. Additionally, if you access our mobile app utilizing an iPhone, you may turn off cross-application tracking in the Privacy section of your phone settings.

Your Cookie Choices

When it comes to how you want to use or allow cookies to be used on your devices, you are in control. Most internet browsers are initially set to accept cookies. You can set your browser to block or otherwise control what cookies your browser or mobile device accepts via your browser or mobile device settings. Additionally, you can choose to modify your settings and delete cookies that are otherwise stored on your device. Please consult the instructions provided by your browser or your mobile device's manufacturer to determine how you can limit the placement of and/or remove cookies or other technologies. Please note, however, that limiting or disabling essential cookies and other technologies may impact or adversely affect some portion or functions of our Sites.

Controlling Cookies and Opt Out Choices

You can visit the following sites for comprehensive information on how to manage cookies and how to opt out of cookies used for advertising and marketing purposes:

For individuals in the United States:

- The Digital Advertising Alliance's Consumer Choice tool at <https://www.aboutads.info/choices>
- The Digital Advertising Alliance's AppChoices program at <https://www.aboutads.info/appchoices>
- The Network Advertising Initiative's opt-out program at <https://www.optout.networkadvertising.org/>

For EU/EEA-based individuals:

- The EDAA opt-out program at <https://www.youonlinechoices.eu>

We partner with third-party sponsors, affiliates, vendors, and other companies who might have links, content, or applications on the Sites. These third parties might also use tracking tools on our Sites or other Sites to collect information about you when you use the Sites. They may collect information about your online activities over time and across different Sites and other online services. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about such a link, content, or application, you should contact the third entity directly. We are not responsible for the content or privacy practices on any websites, applications, tracking tools, or other technology that are not operated by The GEM, even though our Sites might link to them or they might link to our Sites.

HOW WE USE YOUR PERSONAL INFORMATION

The GEM takes your privacy very seriously. The purposes and reasons for collecting, processing, and using your personal information are detailed below:

- To provide you with the subscriptions, news, content, other information, and other Services that you seek from us;
- To improve the contents of the Sites and apps to serve you, and make them more suitable to your needs and increase their usability;
- To analyze how you and other users interact with our Sites;
- To provide customer support;
- To communicate with you about your account, your subscription or other transactions;
- To make your navigation more pleasant and personalized, with our products (such as contents) and services personalized to you;
- To facilitate your experience and social sharing;
- To analyze and develop our new products and services for the interest of users;
- To send you newsletters, offers or other communications about our products and services, such as special or promotional events, including services, products, or events, or other materials;
- To detect, investigate, and prevent activities that may violate our Terms of Service or other policies, or which may be fraudulent or illegal;

- In specific cases we will be contractually obligated to share your data with one of our third-party partners explained above.

In these instances, we will make it clear that the third-party partners, which the data you share will be transferred to, follow applicable privacy and data protection regulations.

SHARING YOUR PERSONAL INFORMATION

We may share or disclose your personal information to help provide our Services to you. For instance, we may share your information with our affiliated companies and service providers to respond to your requests or process your subscriptions. We may also provide your Personal Information to third party service providers who assist us in providing certain services. For example, we may share the information we collect from you with our cloud hosting service providers.

We may also disclose or share your information for the following purposes:

- To facilitate and improve the quality of our Services.
- To protect our users and network against fraud and security threats.
- To comply with a legal obligation.
- To protect and defend our rights or property.
- To prevent or investigate possible wrongdoing in connection with the Services.
- To protect the personal safety of individuals or the public.
- To protect against legal liability.
- When there is a good faith belief that such action is necessary to investigate or protect against harmful activities to our guests, visitors,

associates, or property (including the Websites), or to others. This may include disclosures to law enforcement to investigate potential criminal activity or other civil violations.

We may share your information with the following types of entities and third parties:

- Our affiliated companies within The GEM family;
- Our third-party service providers, such as Google, to analyze how users use our websites and apps, track user interests, trends and patterns in order to serve you personalized content which is relevant to your interests;

The GEM uses third-party service providers and business partners to provide certain services and business functions as detailed throughout this Privacy Policy. In those instances, the applicable third-party partners collect and process your data governed by their privacy policy.

When you use our website and enter your email address on our website (either to log in, or sign up for a newsletter, or similar), we may share with solution providers and its group companies information that we collect from you, such as your email (in hashed, pseudonymous form), IP address, or information about your browser or operating system, with any of the following, acting as “joint controllers” (as applicable and defined in the GDPR).

This Site is affiliated with Adapex INC for the purposes of placing advertising on the Site, and Adapex INC will collect and use certain data for advertising purposes. Learn more about Adapex’s data usage [here](#).

In certain situations, we will only share your information with your consent, as noted below.

We may from time to time be required to provide information to law enforcement or other governmental authorities pursuant to a warrant, court order, or other lawful process.

SHARING YOUR PERSONAL INFORMATION WITH OUR ADVERTISING AND MARKETING PARTNERS

Some of the above sharing and use of your information is only done where we have obtained your consent to do so. For example, we may ask your consent to provide your personal information, including IP address information, interest data, unique IDs and other information to certain third parties that help us advertise and market our services. In those instances where we ask your consent, we will only share your information with those third parties where you have given us permission to do so. You can withdraw your consent at any time by contacting us at using the contact information listed in the “Exercising your Privacy Rights” section below.

All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties for their own marketing purposes.

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

The GEM is headquartered in the United States, and its Services are designed and intended for audiences within the United States. If you reside outside of the United States and access our Services, you acknowledge that your information will be collected and transmitted to the United States. Please do not use our Services if you do not agree to this transfer. Many of our third-party service providers such as Google, Facebook, and X are U.S. companies. Data transmitted to those service providers are done in accordance with their respective privacy policies.

SECURITY MEASURES

The GEM takes your privacy seriously and we take reasonable measures and precautions to protect and secure your personal information. This includes implementing physical, technical, administrative, and other safeguards to protect you and your information from unauthorized access, alteration, disclosure or destruction.

Encryption is our security strategy to ensure the stored personal information can be accessed only by the authorized roles and services with audited access to the encryption keys.

Personal information is encrypted and stored in a private and isolated environment for extended security.

CONSEQUENCES OF NOT PROVIDING YOUR DATA

You are not obligated to provide your personal information to The GEM. However, there may be times when your information is required for us to provide you with our Services, deliver requested products, or provide you with the content, feedback, or other materials that you request from us. In certain situations, we will not be able to offer some or all of our products or Services to you without requesting or collecting your personal information.

HOW LONG WE KEEP YOUR DATA

The GEM retains your personal information for as long as necessary for the purpose for which it is collected, to provide you with our Services, such as our Sites and apps.

CHILDREN'S INFORMATION

The GEM and its Sites and Services provide news and related services for general audiences, and are intended for adults over 18 years of age. The GEM does not intentionally or knowingly collect, use, or process the personal information from children under the age of 16, and such children are not permitted to use our Site or Services. If you are under 18, do not attempt to register for or use any of our Services, including our Sites, and do not provide us any Personal Information about yourself. By signing up for an account or subscription with us or otherwise using our Services, you acknowledge you are an adult over 18 years of age and are permitted to use our services in accordance with our Privacy Policy and Terms of Service. If you are a parent or guardian and you are aware that your child has violated this Privacy Policy and provided us with Personal Information, please contact us and we will take measures to remove that information from our Services.

OUR POLICY ON “DO NOT TRACK” SIGNALS

We do not support “Do Not Track.” Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable “Do Not Track” by visiting the “Preferences” or “Settings” page of your web browser.

We may track users across time and over different websites or platforms.

YOUR PRIVACY RIGHTS

Individuals may have certain rights over their personal information under particular laws. Please see the following sections regarding the rights you may have over your information:

1. Your Rights under the EU General Data Protection Regulation (“GDPR”) and United Kingdom General Data Protection Regulation (“UK GPDR”)

For residents from the United Kingdom (UK), or the European Economic Area (EEA) and Switzerland, this section allows you to exercise your rights under the European Union's (EU) General Data Protection Regulation (GDPR) and the UK's version of the GDPR (UK GDPR), as applicable. Although applicable data protection legislation in relevant jurisdictions may afford similar rights, there may be circumstances where some of these rights do not apply under or are modified by, local law. GEM takes reasonable steps to allow you to correct, amend, delete or limit the use of your personal information, and exercise other rights available under applicable law. GEM therefore informs you that, where applicable under relevant law, you are entitled to the following:

- Right to Access / Disclosure: The right to have access to your personal data upon simple request – that is, you may receive a copy of such data upon receipt of a verifiable request, along with other information related to the processing.
- Right to Correction/Rectification: The right to correct your personal data if you find it is inaccurate, incomplete or obsolete.
- Right to Erasure / “Right to be Forgotten”: The right to obtain the deletion of your personal data in the situations set forth by applicable data protection law.
- Withdrawal of Consent to Processing: The right to withdraw your consent to the data processing without affecting the lawfulness of processing, where your personal data has been collected and processed based on your consent and not any other basis.
- Right to Object: The right to object to the processing of your personal data under certain circumstances, in which case we may ask you to justify your request by explaining to us your particular situation.
- Right to Restrict Processing: The right to request limits to the processing of your data, when allowed by and in circumstances set forth under applicable law, as well as to object to any direct marketing from us.
- Right to Restrict Automated Individual Decision-Making (Profiling): The right to not be subject to a decision based solely on automated

processing, including profiling, that produces legal effects concerning you.

- **Right to Data Portability:** The right to have your personal data directly transferred by us to a third-party processor of your choice (where technically feasible; may be limited to situations when processing is based on your consent).

To exercise any of these rights, please contact us at the contact information listed in the “Exercising your Privacy Rights” section below. Note that we may ask you to verify your identity before responding to such requests.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

Please bear in mind that if you exercise such rights, this may affect our ability to provide our products and services.

2. Your Rights Under Australia’s Privacy Act of 1988

We intend to allow Australian residents to exercise their rights under the Privacy Act 1988 and associated Australian Privacy Principles. Although applicable data protection legislation in relevant jurisdictions may afford similar rights, there may be circumstances where some of these rights do not apply under or are modified by, local law. GEM takes reasonable steps to allow you to correct and amend your personal information, and exercise other rights available under applicable law. We therefore inform you that, where applicable under relevant law, you are entitled to the following:

- **Right to Access / Disclosure:** The right to have access to your personal data upon simple request – that is, you may receive a copy of such data upon receipt of a verifiable request, along with other information related to the processing.
- **Right to Correction/Rectification:** The right to correct your personal data if you find it is inaccurate, incomplete or obsolete.
- To exercise any of these rights, please contact us at the contact information listed in the “Exercising your Privacy Rights” section below.

Note that we may ask you to verify your identity before responding to such requests.

3. Your Rights Under Canada's Personal Information Protection and Electronic Documents Act

We intend to allow Canadian residents to exercise their rights under the Personal Information Protection and Electronic Documents Act ("PIPEDA"), Alberta's Personal Information Protection Act (Alberta PIPA), British Columbia's Personal Information Protection Act (BC PIPA), and Québec's Act respecting personal information in the private sector (Quebec Act) as applicable. Although applicable data protection legislation in relevant jurisdictions may afford similar rights, there may be circumstances where some of these rights do not apply under or are modified by, local law. GEM takes reasonable steps to allow you to correct, amend, and delete your personal information, and exercise other rights available under applicable law. We therefore inform you that, where applicable under relevant law, you may be entitled to the following:

- **Right to Access / Disclosure:** The right to have access to your personal data upon simple request – that is, you may receive a copy of such data upon receipt of a verifiable request, along with other information related to the processing.
- **Right to Correction/Rectification:** The right to correct your personal data if you find it is inaccurate, incomplete or obsolete.
- **Right to Deletion:** The right to obtain the deletion of your personal data in the situations set forth by applicable data protection law.

4. California Consumer Privacy Act and California Privacy Rights Act

This Agreement is between Client (as defined below) and Hospitality Excellence, Inc. ("HEI"), publisher of The Gem. Under the California Consumer Privacy Act and the California Privacy Rights Act of 2023 (collectively, the "CPRA"), certain organizations that do business in California and collect personal information about California residents are subject to privacy disclosure, access, and deletion requirements.

To the extent any California data privacy law applies to the collection of your personal information, this supplemental section of our Privacy Policy outlines the rights that California residents may have, and how they can exercise those rights. This notice applies solely to California residents.

California law allows California residents once a year to request information regarding our disclosure of your personal information, if any, to third parties for those third parties' direct marketing purposes during the preceding calendar year. This information includes:

- The categories of information we disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year;
- The names and addresses of third parties that received the information; and
- If the nature of the third party's business cannot be determined from their name, to obtain examples of the products or services marketed.

California residents may have separate rights under the CPRA, including the following:

- **Right to Know and Access Specific Information.** You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm a verifiable consumer request from you, we will disclose to you, to the extent permitted by law:

- The categories of personal information we collected about you, and whether we sell or share your information to third parties.
- The specific pieces of personal information we hold about you.
- The categories of personal information sold within the last 12 (twelve) months.
- The categories of sources from which personal information about you is collected.

- Our business or commercial purpose for collecting, selling, or sharing your personal information.
- The categories of third parties with whom your personal information is sold, shared, or disclosed for a business purpose.

You have the right to request that the personal information described above be provided to you in a portable and readily useable format, to the extent technically feasible (“data portability”).

- **Deletion Request Rights.** You have the right to request that we delete the personal information that we collected from you, subject to certain exceptions. To the extent that we can delete your personal information, once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Information, unless an exception applies.
- **Right to Correct Inaccurate Information.** To the extent that we may maintain inaccurate personal Information, you have the right to request that we correct such inaccurate personal information taking into account the nature of the personal information and the purposes of the processing of the personal Information. Once we receive and verify your verifiable consumer request, we will use commercially reasonable efforts to correct your personal information.
- **Sale and Sharing of Personal Information and the Right to Opt Out.** You have the right to opt out of the processing of your Information for the following purposes:

- Sale of your personal information.
- Sharing of your personal information for cross-context behavioral advertising.

The use of online tracking technologies may be considered a “sale” or “sharing” under California law. To the extent that these online tracking technologies are deemed to be a “sale” or “sharing” under California law, you may opt out of these online tracking technologies by submitting a

request by clicking the “Cookie Settings” button below or by broadcasting an opt-out preference signal, such as the Global Privacy Control (GPC). Cookies Settings

- **Right to Limit Use and Disclosure of Sensitive Personal Information.** You have the right to request that we limit the ways we use and disclose your sensitive personal information (as defined by the CCPA) to uses which are necessary for us to perform the Services, or deliver the goods reasonably expected by you, or and as authorized by law.
- **Right to Non-Discrimination.** You have a right to not be discriminated against in the Services or quality of Services you receive from us for exercising your rights. We may not, and will not, treat you differently because of your data subject request activity. As a result of your data subject request activity, we may not and will not deny goods or Services to you, charge different rates for goods or Services, provide a different level quality of goods or Services, or suggest that we would treat you differently because of your data subject request activity.

You may make an authenticated consumer request exercising your Right to Know and Access Specific Information including Right to Know what Personal Information is being Sold or Shared or under the CCPA twice within a twelve (12) month period.

Once The GEM receives and confirms a verifiable consumer request, we will work to promptly process such request. The need to verify an individual’s identity is critical to protecting your information, and ensuring that your information is not shared with anyone pretending to be you or someone who is not authorized to act as your agent on your behalf. To that end, we must be able to verify your information in order to process your request. You may fill out and submit a request [HERE](#).

We will ask you to provide information about yourself so that we can verify your identity as part of this process. This information may include your name, address, account information, and any other information deemed necessary by The GEM to reasonably verify your identity, to ensure that your information is not shared with anyone impersonating you. Once we have verified your identity, we will work to fulfill your request in a timely manner. Please note there may be some situations in which we are unable to fulfill your request, such as if we

cannot find any information about you within our systems. Additionally, we may not be able to honor a deletion request in some situations, such as if your information is necessary to fulfill the Services you requested or meet a legal obligation. We will inform you whether we can fulfill your rights request. We may ask for additional information if we have difficulty confirming your identity. You may use an authorized agent to submit verifiable consumer requests on your behalf provided that the authorized agent is a natural person or a business entity that you have authorized to act on your behalf. If you use an authorized agent, we will require: (1) proof of written permission for the authorized agent to make requests on your behalf, and identity verification from you; or (2) proof of power of attorney pursuant to California Probate Code sections 4000 to 4665.

We will not share your information or honor other requests in those situations in which we are unable to confirm a request for your information is a “verifiable request.”

To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

Financial Incentives

As an incentive for providing us with your information, you may receive a financial benefit in the form of an email coupon, discount, rebate, free sample, promotions, or other similar reward that will be sent to you. This discount may constitute a financial incentive under the CPRA (“Financial Incentive”). The categories of personal information required for us to provide the Financial Incentives include personal identifiers such as full name and contact information including email address as well as personal and demographic information you choose to provide.

To offer these discounts, we may track your personal information, such as purchase history and other demographic data. You have the right to withdraw from the Financial Incentive at any time by submitting a request [HERE](#). Please note that if you request deletion of part or all your personal information, that could affect your ability to qualify for the discount.

5. Colorado Privacy Act

NOTICE TO COLORADO RESIDENTS

To the extent any Colorado data privacy law applies to the collection of your Information, this supplemental section of our Privacy Policy outlines the individual rights guaranteed to Colorado residents and how to exercise those

rights and applies solely to Colorado residents. We provide the supplemental section below to comply with the Colorado Privacy Act (“CPA”) and any terms defined in the CPA have the same meaning when used below.

Your Rights under CPA

Subject to certain exceptions you may be entitled to the following rights:

- **Right to Access & Data Portability.** You have the right to request that we disclose certain information to you about our collection and use of your Personal Information at any time. Once we receive and confirm an authenticated consumer request from you, we will, subject to certain exceptions:

- Disclose whether we are processing your Personal Information.
- Provide you with access to your Personal Information where we process it.

Where exercising your right to access, you have the right to request and obtain a copy of your Personal Information that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the Information to another data controller without hindrance (“data portability”).

- **Right to Correct Inaccurate Information.** To the extent that we may maintain inaccurate Personal Information, you have the right to request that we correct such inaccurate Personal Information taking into account the nature of the Personal Information and the purposes of the processing of the Personal Information. Once we receive and verify your authenticated consumer request, we will use commercially reasonable efforts to correct your Personal Information.
- **Right to Delete.** You have the right to request that we delete certain of your Personal Information provided by or obtained about you. To the extent that we can delete your Personal Information, once we receive and confirm your authenticated consumer request, we will delete your Personal Information, subject to certain exceptions.

- **Sale of Personal Information, Targeted Advertising, Profiling, and the Right to Opt Out.** You have the right to opt out of the processing of your Personal Information for the following purposes:

- Targeted advertising.
- Sale of your Information.
- Profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **Right to Appeal.** You have the right to appeal our denial of any request you make under this section. To exercise your right to appeal, please submit an appeals request via the information in the How To Contact Us[NA1] [T2] section below. Within forty-five (45) days of receipt of your appeal, we will inform you in writing of any action taken or not taken in response to your appeal, including a written explanation of the reasons for the decisions. If you have concerns regarding the results of your appeal, you may contact the Colorado Office of the Attorney General by:
 - Contacting Online: <https://complaints.coag.gov/s/contact-us>
 - Calling: (720) 508-6000

You may make an authenticated consumer request free of charge under the CPA once within a twelve (12) month period. We reserve the right to charge a reasonable fee for a second or subsequent request within the same twelve (12) month period. To exercise the rights described above, see the Exercising Your Rights section below.

Sensitive Data

We do not process sensitive data including sensitive data inferences. When we process sensitive data, we do so with your consent.

Authorized Agent

You may use an authorized agent to submit verifiable consumer requests on your behalf. An authorized agent is a natural person or a business entity that you have authorized to act on your behalf. If you use an authorized agent, we

will require: (1) proof of written permission for the authorized agent to make requests on your behalf, and identity verification from you; or (2) proof of power of attorney pursuant to Colo. Rev. Stat. § 15-14-705. We may deny a request from an authorized agent that does not submit proper verification proof.

Notice of Financial Incentive

As an incentive for providing us with your Personal Information, you may receive a financial benefit as part of our bona fide loyalty program in the form of an email coupon, discount, rebate, free sample, promotions, or other similar reward that will be sent to you. This discount may constitute a financial incentive under the Consumer Privacy Act (“Financial Incentive”). The categories of Personal Information required for us to provide the Financial Incentives include personal identifiers such as full name and contact information including email address as well as personal and demographic information you choose to provide.

To offer these discounts, we may track your Personal Information, such as purchase history and other demographic data. You have the right to withdraw from the Financial Incentive at any time by submitting a request [HERE](#).

Please note that if you request deletion of part or all your Personal Information, that could affect your ability to qualify for the discount.

LOGGING A COMPLAINT

The GEM only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however, you are a resident of the UK or the EEA and wish to raise a complaint regarding the processing of your personal information or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with your local supervisory authority.

If you would like to raise an issue or lodge a complaint directly with GEM, please contact us using the information below.

The GEM Address: 2401 E. Atlantic Blvd, Pompano Beach, FL 33062 Suite 314, USA. Online: Fill out a request form [HERE](#).

UPDATE TO OUR PRIVACY POLICY

The GEM may update this notice from time to time. All changes will be posted and updated here. We will notify you directly by email (if we hold one for you) or by other appropriate means if any significant changes occur. Any changes to the privacy policy will become effective when the updated policy is posted. We advise you to check back here frequently to review the most current version of this notice.

CONTACT US

If you have other questions, contact us [HERE](#).

Or, by writing to the following postal address: 2401 E. Atlantic Blvd, Pompano Beach , Fl 33062 Suite 314 USA.

This policy was last updated on May 5, 2025.