

**GSD&M Idea City LLC, a Delaware limited liability company  
On-Line Privacy Policy**

**General**

Part of the operation of the **GSD&M Idea City LLC, a Delaware limited liability company** (along with its affiliates and related companies, “GSD&M”) Web Sites, found at <http://www.gsdm.com>, <http://www.ideacity.com>, <https://vendors.gsdm.com>, <https://ideacity.gsdm.com>, <http://www.itsnotwhatyousell.com> and other web sites as may be modified from time to time (collectively, the “Sites”) includes the gathering of certain types of information about GSD&M users and their companies. Because we understand that your privacy is important to you, we would like to explain the types of information we gather and the way in which we use it. This on-line privacy policy (“Privacy Policy”) applies to the Sites operated by GSD&M and any affiliated or related companies of GSD&M that it has at any time, all of which are included in references to “GSD&M” in this document. It does not necessarily apply to information collected by GSD&M by means other than through the Sites.

This Privacy Policy covers two types of information gathered at GSD&M, **personal information** and **aggregated data**. “**Personal information**” refers to data you voluntarily provide in connection with use of the Sites that identifies you and/or the company on whose behalf you are accessing and using the Sites. Personal information includes such identifying information as your name, physical address, e-mail address, phone number, company affiliation, business or taxpayer identification number, and social security number. For example, you might provide personal information when you submit an application for employment or resume, or when you submit information to our Vendor-Partner database. “**Aggregated data**” refers to general information regarding visitors and users of the Sites that relates to use of the Sites, e.g., traffic patterns, number of visits to certain sections or pages, visits from other Web Sites or to third-party Web Sites linked to GSD&M’s Sites, use of particular services and information or features of GSD&M or other parties made available through or found at the Sites.

You may have entered into a separate agreement with GSD&M governing your access to and use of certain functions and features of particular Sites. If so, this Privacy Policy will still apply, but that separate agreement will control in the event of any inconsistencies with any provisions of this Privacy Policy.

**Use of Personal Information**

GSD&M is committed to protecting the privacy of all of its users. We understand that your **personal information** and, if applicable, the non-public information about the company you represent is sensitive and private data. GSD&M may collect and use personal data that you submit at the Sites in any manner that is consistent with uses stated in this Privacy Policy or disclosed elsewhere on the Sites at the point you submit such personal information. Except as expressly stated in this Privacy Policy, GSD&M will never willfully disclose or make personal information about you available to any third party without first having provided you notice in this Privacy Policy or receiving your permission at the time you submit the personal information. GSD&M may share personal information with third parties, in connection with its business, in order to facilitate proper and beneficial use of the features and services offered at this Sites. GSD&M may also use personal information to contact you to keep you informed of current and future products, services and other opportunities GSD&M provides.

Personal information that GSD&M may use may be collected at the Sites, among other ways (1) in the event registration and/or user login is ever required; (2) if you choose to submit personal information when making an e-mail inquiry at the Sites; (3) through submission of a resume or application for employment; or (4) through the GSD&M Vendor-Partner database.

**Permission for Use**

At the time you submit personal information or make a request, the intended use of the information you submit will be apparent in the context in which you submit it and/or because GSD&M states the intended purpose. By submitting personal information at the Sites, you are giving your consent and permission for any use that is consistent with uses stated in this Privacy Policy or disclosed elsewhere at the Sites at the point you submit such

personal information, and such consent will be presumed by GSD&M, unless you state otherwise at the time you submit the personal information.

PLEASE DO NOT REQUEST ANY SUCH COMMUNICATIONS ON BEHALF OF AN INDIVIDUAL OR COMPANY IF YOU ARE NOT AUTHORIZED TO MAKE THE REQUEST AND THE RECIPIENT OF THE COMMUNICATIONS DOES NOT WANT YOU TO DISCLOSE THE REQUESTED INFORMATION.

### **Disclosure of Personal Information to Third Parties**

GSD&M may share your personal information in any of the following circumstances:

- If you request a bid for services at the Sites, GSD&M may disclose such personal information to any third-party service provider GSD&M uses or may use to fulfill any services in connection with such project on which a bid is given.
- GSD&M may share your personal information to third-party suppliers in connection with services such third parties provide under an agreement with GSD&M, e.g., for handling communications such as e-mail newsletters or other communications. In this case, such third party will be restricted to using your personal information only as directed by GSD&M and only in connection with the business of GSD&M.
- Governmental accounts served by the GSD&M Vendor Partner database may access all Vendor data fields within such database for the purposes of conducting an audit.
- In connection with any other feature, service or submission you make at the Sites. If you are participating in a feature on the Sites and submitting personal information that GSD&M may disclose to third parties and this Privacy Policy has not already advised you of such disclosure, then we will let you know at that time. GSD&M will also give you the opportunity at that time to elect to not have your personal information shared with such third parties. If you do not elect to prevent the sharing of your personal information with third parties at that time, GSD&M may use it as permitted in this Privacy Policy. However, use of personal information is limited to the purposes disclosed when you submit the information.

### **Use of Aggregated Data**

GSD&M is interested in improving the Sites and may develop and offer new features and services. We monitor aggregated data regarding use of the Sites for marketing purposes and to study, improve and promote use of the Sites. In connection with such purposes, GSD&M may share aggregated data with third parties collectively and in an anonymous way. Disclosure of aggregated data does not reveal personal information about individual Site users in any way that identifies who they are or how to contact them. However, disclosure of aggregated data may include the identity of the company or business to which it relates. GSD&M will not disclose or otherwise share data which GSD&M knows to be confidential or to be specific competitive, proprietary data regarding the business of a Sites user or the company whose personal information the user has submitted, without the express permission of the user, except to third-party suppliers of GSD&M who need such information and have an agreement with GSD&M that restricts use of such data to those purposes authorized by GSD&M in connection with its business. However, GSD&M may disclose such specific business data, so long as GSD&M does not identify the individual or company to whom it pertains and does not reveal the identity of the person, in the case of personal information.

### **Exceptions to the Privacy Policy**

In addition to the disclosures discussed above, GSD&M may disclose information in other situations:

- (1) GSD&M may monitor and, when we believe in good faith that disclosure is required, disclose information to protect the security, property, assets and/or rights of GSD&M from unauthorized use, or misuse, of the Sites or anything found at the Sites, such as information that GSD&M in good faith believes must be disclosed to correct

false or misleading information or to address activities that GSD&M believes to be manipulative, deceptive or otherwise in violation of law.

(2) GSD&M may disclose information when required by law; however, only to the extent necessary and in a manner that seeks to maintain the privacy of the individual.

(3) GSD&M may disclose and transfer information to a third party who acquires all or a substantial portion of our business, whether such acquisition is by way of merger, consolidation or purchase of all or a substantial portion of our assets. In addition, in the event we become the subject of a bankruptcy proceeding, whether voluntary or involuntary, GSD&M or our trustee in bankruptcy may sell, license or otherwise dispose of such information in a transaction approved by the bankruptcy court. You will be notified of sale of all or a substantial portion of GSD&M's business to a third party via email or through a prominent notice posted on the Sites.

### **Use Of Cookies**

To enable features at the Sites, GSD&M may assign one or more "cookies" to your Internet browser. Cookies, among other things, speed navigation through our Sites, keep track of information so that you do not have to re-enter it each time you visit our Sites, and may provide you with customized content. A "cookie" is an Internet mechanism composed of a small text file containing a unique identification number that permits a Web server to send small pieces of information or text by means of your browser and place them on your computer's hard drive for storage. This text lets the Web server know if you have previously visited the Web page. This information may be used to help us dynamically generate personalized advertising and content specifically tailored for you and also allows us to statistically monitor user traffic on our Sites and the concentration of such traffic in certain areas of our Sites.

The cookies used with our Sites can only be read by the server that placed them. In other words, servers of Web Sites that are not affiliated with our servers cannot retrieve the information contained in the cookies placed by our computers on your computer. Since cookies are only text files, they cannot "run" on your computer and have no ability to search your computer for other information, or transmit information contained on your computer's hard drive to anyone. Most browsers are initially set to accept cookies. However, most browsers also permit you to refuse cookies and can alert you when cookies are being sent and/or allow you to delete these files. Set your browser's guidelines or features accordingly, if you wish to prevent cookies. However, please be aware that if you choose to refuse cookies when you are on this Sites, it is possible that some features of the Sites may not function properly.

You may occasionally receive cookies from unaffiliated companies or organizations, to the extent they place advertising on our Sites or are linked to the GSD&M Sites. If so, these third-party cookies may collect information about you when you "click" on their advertising or content or link. This practice is standard in the Internet industry. Because of the way in which the Internet operates, we cannot control collection of this information by these third parties, and these cookies are not subject to GSD&M's privacy policies. As the user of these Sites, you should contact these third-party content and information providers who place information on GSD&M's Sites or Web site owners who maintain links with our Sites directly, if you have any questions about their use of the information they may potentially collect.

### **Children's Privacy And Parental Consent**

Please be aware that GSD&M has not designed the Sites for, and does not intend for it to be used by, anyone under age 13. Accordingly, the Sites should not be used by anyone under age 13. Should GSD&M inadvertently acquire personal information or other data from users under the age of 13, GSD&M will not knowingly provide this data to any third party for any purpose whatsoever, and any subsequent disclosure would be due to the fact the user under age 13 used the Sites and submitted personal information without solicitation by or permission from GSD&M.

### **General Information Regarding Online Privacy and Information You Provide**

At GSD&M we strive to protect your privacy and will attempt to comply with every aspect of this Privacy Policy. **Unfortunately, it is not possible to ensure the security of the information you send us over the Internet 100% of the time.** For example, GSD&M does not generally use encryption and cannot protect against all unauthorized access. Consequently, **GSD&M makes no guarantee or warranty with respect to this Privacy Policy, including**

**without limitation, protecting your privacy, the privacy of any company for whom you may be using the Sites, or the confidentiality of information about either of you.** Therefore, when you supply information to GSD&M, you and any company on whose behalf you supply such information do so at your own risk and you both assume full responsibility for the security, confidentiality and use of such information.

### **Links Provided To Other Sites**

It is important to note that GSD&M may provide links to a number of other Web sites that we believe might offer you useful information and services. However, those sites may not follow the same privacy policies as GSD&M. Therefore, we are not responsible for the privacy policies or the actions of any third parties, including without limitation, any Web site owners whose sites may be reached through the Sites, nor can we control the activities of those Web sites. These links may include links to third parties such as advertisers, content providers and business partners and other suppliers who may (a) use the GSD&M logo and or style as a result of a co-branding agreement, (b) be linked to GSD&M, and/or (c) participate in providing one of the services or features offered through GSD&M. We suggest that you contact the relevant parties controlling these Sites or accessing their on-line policies for the relevant information about their data collection practices.

### **Your Consent To This Privacy Policy**

**USE OF THE SITES SIGNIFIES YOUR CONSENT, AS WELL AS THE CONSENT OF THE COMPANY OR BUSINESS FOR WHOM YOU USE THE SITES AND WHOSE INFORMATION YOU SUBMIT (IF ANY), TO THIS ON-LINE PRIVACY POLICY, INCLUDING THE COLLECTION AND USE OF INFORMATION BY GSD&M, AS DESCRIBED IN THIS PRIVACY POLICY, AND ALSO SIGNIFIES AGREEMENT BY BOTH YOU AND YOUR COMPANY TO THE TERMS AND CONDITIONS (also available on this site) FOR THE GSD&M WEB SITES CONTINUED ACCESS AND USE OF THE SITES WITHOUT ACCEPTANCE OF THE TERMS OF THIS PRIVACY POLICY RELIEVES GSD&M FROM ANY RESPONSIBILITY TO THE USER.**

### **Changes to Privacy Policy**

Because the Internet is a rapidly evolving medium and because our business may change, GSD&M reserves the right to change this Privacy Policy from time to time. You should occasionally return to the posted Privacy Policy see if any changes have been made and to advise GSD&M as soon as possible if you want GSD&M to cease using any personal information you have submitted. The effective date of the most recent revision is located at the end of this Privacy Policy. If we decide to materially change our Privacy Policy, we will post those changes through a prominent notice on the Sites so that you will always know what information we gather, how we might use that information, and to whom we will disclose it.

If at any time, you have questions or concerns about this Privacy Policy or believe that we have not adhered to this Privacy Policy, please feel free to email us at [webinfo@gsdm.com](mailto:webinfo@gsdm.com).

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