

LEGAL DOCUMENT

Privacy Policy

Globe-America Consulting, Inc. · globe-america.com

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1. Introduction

Globe-America Consulting, Inc. ("Globe-America," "we," "us," or "our") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard information when you visit globe-america.com, use our online tools, or engage our consulting services. By accessing our website or tools, you consent to the practices described in this policy. If you do not agree, please discontinue use of our website and services.

2. Information We Collect

2.1 Information You Provide Directly

- Name, email address, phone number, and company name submitted via contact or intake forms
- Information submitted through our compliance assessment tools (C3 Kit, SPRS Calculator, SSP Builder, etc.)
- Communications sent to us by email or through the website
- Consultation scheduling information submitted via our booking system
- Payment information processed through our third-party payment processor (Stripe)

2.2 Information Collected Automatically

- IP address, browser type, and operating system
- Pages visited, time spent on each page, and referring URLs
- Device identifiers and session data collected via cookies and analytics tools

2.3 Information About Our Clients

In the course of providing consulting services, we may receive business information about your organization, including contract details, system descriptions, and compliance documentation. We treat all client business information as confidential. We do not request, receive, or process Controlled Unclassified Information (CUI) in the delivery of our services. Our engagements are structured to maintain clear data boundaries consistent

with federal requirements.

3. How We Use Your Information

- To respond to inquiries, schedule consultations, and deliver contracted services
 - To process payments and send transactional communications
 - To provide access to our online compliance tools and resources
 - To improve our website, tools, and service offerings
 - To send educational content and updates about CMMC and federal compliance requirements (with your consent)
 - To comply with applicable laws, regulations, and legal obligations
 - To protect our rights, property, and the safety of our clients and the public
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4. Disclosure of Your Information

We do not sell, rent, or trade your personal information. We may share information only in the following circumstances:

- **Service Providers:** Third-party vendors who assist in website hosting, payment processing, scheduling, and email communications. These providers are contractually required to maintain confidentiality.
 - **Legal Requirements:** When required by law, court order, or governmental authority.
 - **Business Protection:** When necessary to protect the rights, property, or safety of Globe-America Consulting, Inc., our clients, or the public.
 - **Business Transfers:** In connection with a merger, acquisition, or sale of assets, with appropriate confidentiality protections.
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5. Cookies and Tracking Technologies

Our website uses cookies and similar technologies to enhance user experience and collect analytics data. You may control cookie preferences through your browser settings. Disabling cookies may limit certain website functionality. We do not use tracking technologies for advertising purposes, and we do not permit third-party advertisers to collect data through our website.

6. Data Retention

We retain personal information for as long as necessary to fulfill the purposes described in this policy, maintain business records, comply with legal obligations, and resolve disputes. Client engagement records are retained for a minimum of seven (7) years in accordance with standard business and legal requirements. You may request deletion of your personal information at any time, subject to our legal retention obligations.

7. Your Rights

- **Access:** Request a copy of the personal information we hold about you.
- **Correction:** Request correction of inaccurate or incomplete information.
- **Deletion:** Request deletion of your personal information, subject to legal obligations.
- **Opt-Out:** Opt out of marketing communications at any time via the unsubscribe link in any email.
- **Data Portability:** Request your information in a structured, machine-readable format.

To exercise any of these rights, contact us at info@globe-america.com.

8. Security

We implement reasonable administrative, technical, and physical safeguards to protect your information against unauthorized access, disclosure, and destruction. As a CMMC advisory firm, we apply security practices consistent with the frameworks we advise our clients to implement. However, no transmission or storage system is 100% secure, and we cannot guarantee absolute security.

9. Third-Party Links

Our website may contain links to third-party websites, including the CyberAB Marketplace, PIII/SPRS, and federal government resources. This Privacy Policy does not apply to those sites. We encourage you to review the privacy policies of any third-party sites you visit.

10. Children's Privacy

Our services are directed exclusively to business professionals and organizations. We do not knowingly collect personal information from individuals under the age of 18. If we become aware that we have collected such information, we will delete it promptly.

11. Changes to This Policy

We may update this Privacy Policy periodically to reflect changes in our practices or applicable law. Material changes will be posted on this page with an updated effective date. Continued use of our website or services following a posted update constitutes acceptance of the revised policy.

12. Contact Us

Questions or requests regarding this Privacy Policy may be directed to:

Globe-America Consulting, Inc.

702 Houston St., Fort Worth, TX 76102

info@globe-america.com

globe-america.com

This document was prepared for informational purposes and does not constitute legal advice. Globe-America Consulting, Inc. recommends consulting qualified legal counsel to ensure compliance with all applicable privacy laws including the California Consumer Privacy Act (CCPA), applicable state privacy statutes, and federal requirements.