

Privacy Policy (External Website)

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“GRS” is the national brand under which Gabriel, Roeder, Smith & Company Holdings Inc. and its subsidiaries operate and provide professional services. While each company within the GRS group is a separate legal entity, “GRS” is often used to refer either to the individual companies within the group or to several or all of them collectively. However, each company within the GRS group has its own legal status and is responsible for its own services and work product and not those of any other GRS group company.

1. Introduction

GRS ("Company," "We," or "Us") respects your privacy and is committed to protecting it through compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website www.grsconsulting.com ("Website") and our practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies to information we collect:

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

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party.
- Any third party, including through any application or content that may link to or be accessible from or on the Website.

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, 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

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at www.grsconsulting.com/contact-us.

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

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name and e-mail address ("personal information").
- About your internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons, and other tracking technologies.

4. Information You Provide to Us

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website. We may also ask you for information when you fill out a survey, when you enter a promotion sponsored by us and when you report a problem with our Website.
- Records and copies of your correspondence (including e-mail addresses), if you contact us.
- Your search queries on the Website.

5. Usage Details, IP Addresses And Cookies/, Cookies and Other Technologies

As you navigate through and interact with our Website, we may automatically collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Website, including traffic data, location data, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system and browser type.

The information we collect automatically is statistical data, and does not identify any individual. It helps us to improve our Website and to deliver a better and more personalized service by enabling us to:

- Estimate our audience size and usage patterns.
- Recognize you when you return to our Website.
- Understand which parts of the Website to optimize based on user traffic.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** 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 are used for browser cookies.
- **Web Beacons.** Pages of our the Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

6. How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- 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 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.
- 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 www.grsconsulting.com/contact-us

7. Disclosure of Your Information

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 you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers and other 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.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law or legal process, including responding to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of GRS, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

8. Choices About How We Use and Disclose Your Information

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 e-mail address used by the Company to promote our own or third parties' products or services, you may opt out by selecting the unsubscribe feature in any promotional communication.

9. Accessing and Correcting Your Information

You may send us a notification through www.grsconsulting.com/contact-us to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information

except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

10. California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please notify us through www.grsconsulting.com/contact-us. We do not respond to Do Not Track browser signals.

11. Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

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.

12. Changes to our Privacy Policy

We may update this Privacy Statement at any time by publishing an updated version at www.grsconsulting.com. You can access the most current version of this Privacy Statement at any time on this Site.

13. Contact Us

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at:
Gabriel, Roeder, Smith & Company Holdings Inc.
One Towne Square, Suite 800
Southfield, Michigan 48076
(248) 799-9000 or (800) 521-0498
www.grsconsulting.com/contact-us