

PRIVACY STATEMENT

Your privacy is important. Gates Defense Systems, LLC d/b/a GDX Development (“GDX,” “we,” “us,” or “our”) has created this statement to demonstrate our firm commitment to your privacy. This notice explains how we gather, use, and safeguard your information when you visit our website.

By using this website or accessing our website or any application or program offered by GDX in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information in this Privacy Statement.

1. AT A GLANCE

If you don’t have time for the detailed Privacy Statement below, here is what you need to know:

- This Privacy Statement relates to our main website, www.gdxdevelopment.com.
- Our goal is to limit the information we collect to what we need to support our clients and business missions.
- We are committed to using your personal information only for the purposes for which it was collected.
- **We never sell your personal information** and when we share it outside of GDX, it is only to enable operations and services on GDX’s behalf, meet legal obligations, or protect the safety, property, or rights of GDX.
- We strive to give you choices about the personal information collected on our website.
- If you have any questions or concerns about your privacy on the GDX website, you can contact us at legal@gdxdevelopment.com.

2. INFORMATION WE COLLECT

We may collect the following types of information:

Type of Data	Description
Personal Information You Provide	Name, email address, phone number and other contact details provided by you.
Identity Information	Government identification and governmental identifiers, such as tax identifiers, social security or national insurance numbers, and passport or driver’s license numbers.
Aggregate Usage Data	Information about how you use our website, including Internet protocol (IP) address of computer, browser type, referring web page, date, time & duration of visit.
Location Information	Precise device location (GPS and similar technologies) while using GDX’s applications or products including, but not limited to the Vector mobile application. Historical routes, tracks and location history associated with client accounts.

Type of Data	Description
Account and Identifiers	Client account usernames, passwords (stored in encrypted form), settings, preferences, purchase history, and other internal account identifiers. Organization or group identifiers for client accounts.
In-App Communications	Text chat content and associated metadata (sender, recipients, timestamps, etc.) Push-to-talk (PTT) audio content where recorded or logged by a client's configuration.
Media and User-Generated Content	Photos and videos clients upload or capture within GDX's applications or products. Any annotations, labels, or mission-related content clients attach to locations or media.
Contacts and Operational Directory Information	Operational contacts and team lists provided by clients or created within GDX's applications or productions (for example, display name, role, and association to units or channels). GDX does not access personal contacts stored in client's native address book.
App/Product Information and Performance	Diagnostic and performance information such as crash logs, error reports, and technical metrics (e.g., latency, resource usage) to help maintain and improve reliability.
Device and Technical Information	Basic device and application information (such as device model, operating system version, app version, and a device or app-specific identifier) used to secure access, route data, and support the mapping services we use.
Payment Information	Bank account information, including type of account, account number, routing number, the owner's first and last name, credit card number, debit card number, or any other financial information provided by you.
Demographic Information	Age, date of birth, marriage status, gender, physical characteristics, military status, political, religious or philosophical beliefs, sexual orientation, racial or ethnic origin, and union membership.
Biometric Data	Fingerprints, scans of face geometry, and other data generated by automatic measurements of an individual's physiological, biological, or behavioral characteristics.
Inferences from Personal Information	Profiles reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
Career, Education and Organization Information	Affiliated organizations, such as employer, industry associations, or licensing bodies, and status, position, and title, information about colleagues and contacts, career and education history, professional certifications and licenses, employee identification number, employee record, including performance and compensation information, and job application information.

Type of Data	Description
Health, Benefits and Insurance Information	Enrollment and participation in insurance or benefits programs; personal information of beneficiaries, family members, emergency contacts, or dependents; medical records; and disability information.
Legal Information	Legal status, citizenship or immigration status, legal court cases and proceedings, governmental records, personal property or real estate records, liens and judgments, death records, public filings, driving records, licenses and registrations, and criminal information - such as arrests, charges, convictions, and incarceration records.

3. HOW WE USE YOUR INFORMATION

We use your information described above for the following business purposes:

A. Providing, Customizing And Improving GDX's Website

- Providing you with the products, website or information you request.
- Meeting or fulfilling the reason you provided the information to us.
- Providing support and assistance for the website.
- Improving GDX's website, including testing, research, internal analytics and product development.
- Personalizing GDX's website, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your personal data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act, which is available below.

B. Corresponding With You

- Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about GDX or our website.
- Sending emails and other communications according to your preferences or that display content that we think will interest you.

C. Meeting legal requirements and enforcing legal terms

- Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
- Protecting the rights, property or safety of you, GDX or another party.
- Enforcing any agreements with you.

- Responding to claims that any posting or other content violates third-party rights.
- Resolving disputes.

D. Provide Core Functionality To GDX's Applications And Products

- Deliver navigation, mapping, situational awareness, route tracking, in-app chat, PTT, and media features, to associate your activity with your account and organization.

E. Account Setup And Access Control To GDX's Applications And Products

- Create and manage user accounts, authenticate users, enforce organization-level access controls, and maintain secure communications environments.

F. Operational Collaboration For GDX's Applications And Products

- Display team locations, routes, messages, and shared media to authorized users within the same organization or mission space, in accordance with customer configuration.

G. Security, Fraud Prevention And Compliance

- Protect GDX's applications, programs, backend infrastructure, investigate potential misuse, and support customer security and audit requirements.

H. Reliability And Performance Of GDX's Applications And Products

- Monitor and improve GDX's application and product stability and performance using diagnostics and crash information, without building marketing or advertising profiles.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated or incompatible purposes without providing you notice. **GDX does not use your information for advertising, retargeting, or sale to third parties.**

4. DATA COLLECTION AND USE LIMITATIONS

While using this website, you may choose to submit personal information through email or online forms. You may refuse to submit personal information. We limit the collection and use of the personal information to the minimum that is reasonably necessary for the purposes outlined in this Privacy Statement.

Some of our webpages require the use of cookies (bits of data passed by your browser to our website). If you prefer not to receive cookies, you can turn them off in your browser or set your browser to ask before accepting new cookies.

5. DATA SECURITY

We have put in place appropriate physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access, to assist in maintaining data security, and to assist in correctly using the information we collect online. Data is encrypted in transit and at rest using industry-standard encryption technologies. Access to systems that store or process data is restricted to authorized personnel with a business need.

We do not intentionally release personal information gleaned from these programs to others, except as required by law. No system can be guaranteed to be 100% secure. However, we work continuously to protect the data that we process.

6. INTERNATIONAL DATA TRANSFERS

GDX's programs and applications may be deployed on infrastructure selected by your organization. Where data is processed or accessed from outside the country where it was collected, we rely on appropriate safeguards as required by applicable law and our contracts with customers to protect your information.

7. ALTERNATE WAYS TO SUBMIT INFORMATION

You may refuse to provide personal information online. This may impact the functionality of using certain web pages or prevent you from receiving information electronically. For other options, contact the site manager and learn how you can provide information by phone, mail, fax or in person.

8. LEGAL BASES AND CUSTOMER CONTROL

Some of GDX's applications and programs are deployed for organizational customers under a separate contract. In most cases, GDX processes data as a service provider or processor acting on behalf of that customer, which is responsible for defining the lawful basis and retention periods that apply to its users. Where applicable law requires, our legal bases for processing data may include performance of a contract (providing the program or application), our legitimate interests in securing and maintaining the service, and compliance with legal obligations.

9. HOW WE SHARE INFORMATION

GDX does not sell or rent your information and we do not share your data with third parties for their independent marketing or advertising purposes. We may share your information in the following limited circumstances:

A. With Your Organization And Its Authorized Users

- Operational data such as locations, routes, chat, PTT, and media is shared with other users and administrators within your organization as configured by your organization.

B. Service Providers And Infrastructure Partners

- We use trusted third-party providers to host and operate GDX's programs, applications and related services. These providers may process data on our behalf only to deliver services to us and are bound by contractual confidentiality and security obligations.
- **We do not share your information with third parties for their independent purposes, marketing, advertising, or profiling.**

C. Map And Location Service Provider

- GDX uses Mapbox to deliver maps and related capabilities to users of its programs, applications and related services. Depending on your organization's configuration, GDX's programs, applications and related services may connect to:
 - Mapbox may receive certain technical and usage data (such as IP address, or application identifiers, and limited interaction data) as described in Mapbox's privacy documentation, for the purposes of operating and improving its mapping platform. This data is not used by Mapbox to deliver advertisements within any GDX program or application.
 - Organizations that prefer not to share information with Mapbox's public cloud may deploy GDX's programs or applications with a private, self-hosted Mapbox server. In these configurations, map data and usage information remains entirely within your organization's infrastructure and is not transmitted to Mapbox or any third party.
- Your organization controls which mapping configuration is used for your deployment.

D. Legal And Safety Requirements

- We may disclose information if required to do so by law or in the good-faith belief that such action is necessary to comply with legal obligations, respond to lawful requests, protect the rights or safety of users, your organization, GDX, or others, or detect and prevent fraud or security issues.

10. DATA RETENTION

Data retention is primarily determined by our contractual agreements with each customer.

- Location history, routes, operational logs, messages, and media are retained for as long as your organization's contract and configuration specify, and then deleted or anonymized in accordance with that organization's instructions.
- Account information is retained while your account remains active and for a reasonable period thereafter (for example, to support logs and audits), unless your organization instructs us to delete it sooner.
- Diagnostic and performance data is retained only as long as necessary to ensure the stability and security of GDX's programs and applications.

We take steps to permanently destroy any biometric data we maintain within the applicable timeframe specified by law or when it is no longer necessary to achieve the purpose for which it was collected or obtained, whichever occurs first. Initial purposes for collection may end, for example, when:

- The individual's identification has been verified.
- The individual's employment is terminated.
- The individual last interacts with or cancels their account for the service that uses biometric data.
- The contract that permitted the collection and use expires or is terminated.
- The consent that permitted the collection and use is withdrawn.

Where permitted, we may retain certain limited information if necessary to comply with legal obligations, resolve disputes, or enforce our agreements.

11. WHAT RIGHTS DO I HAVE OVER MY PERSONAL INFORMATION?

Your local privacy laws may grant you rights with respect to your personal information, and we will not knowingly discriminate against you because you have exercised any of your privacy rights. These rights differ based on the local laws that apply to you but could include one or more of the following:

- Right to withdraw consent - when we process your personal data based on your consent - without affecting the lawfulness of processing based on consent before its withdrawal.
- Right to confirm we process your personal information and, if so, to access - including, where possible, in a portable format - correct, complete, and delete your personal information.
- Right to restrict or object to the processing of certain personal information, including, where relevant, the right to opt out of our processing of your sensitive personal information and opt out of automated decision making or profiling that produces a legal or similarly significant effect.
- Right to view and update certain account information.

- Right to export account data and operational data associated with your environment.
- Right to request deletion of your account and associated data by contacting us or your organization's administrator. We will process deletion requests in coordination with your organization and in line with our contractual and legal obligations.

To exercise these options, contact your organizational administrator or email us at legal@gdxdevelopment.com. We may need to verify your identity and confirm your relationship with a customer before processing a request.

Important: These rights are **not** absolutely guaranteed and there are several exceptions where we may not have an obligation to fulfill your request. We are only required to honor these rights to the extent we act as a controller of that data, and the requested rights have been granted and apply to you under applicable data protection laws. Please consult your local data protection laws to determine what rights may be available to you and when access to these rights is limited.

12. CHILDREN'S PRIVACY

GDX's services are not intended for children under thirteen (13) years of age and we do not knowingly collect, maintain, or use personal information from children under thirteen (13) years of age. We will take reasonable steps to delete personal information (as defined by the United States Children's Online Privacy Protection Act – 15 U.S.C. § 6501, et seq.) as soon as reasonably possible if we learn that we have inadvertently collected it from children under the age of thirteen (13) without parental consent.

If you learn that your child has provided us with personal information without your consent, you may alert us at legal@gdxdevelopment.com. If we learn that we have collected any personal information from children under thirteen (13), we will promptly take steps to delete such information.

13. BREACH NOTIFICATION

In the event of a data breach, we will notify affected individuals and relevant authorities as required by law.

14. CALIFORNIA CONSUMER PRIVACY ACT AND CALIFORNIA PRIVACY RIGHTS ACT

Please be aware of GDX's CCPA & CPRA Privacy Notice To California Residents ("California Privacy Notice") that supplements this Privacy Statement. The California Privacy Notice applies generally to the provision of personal information by individuals residing within the State of California. The California Privacy Notice explains how we meet our obligations under the California Consumer Privacy Act and California Privacy Rights Act with respect to such information. The California Privacy Notice can be found below.

15. PERSONAL INFORMATION PROTECTION LAW

Please be aware of GDX's PIPL Privacy Notice that supplements this Privacy Statement. The PIPL Privacy Notice applies generally to the provision of personal information by natural individuals who are physically present in the People's Republic of China, excluding Hong Kong, Macau and Taiwan. The PIPL Privacy Notice explains how we meet our obligations under the People's Republic of China's PIPL law with respect to such information. The PIPL Privacy Notice can be found below.

16. CHANGES TO THIS PRIVACY POLICY

GDX may make changes to this Notice. Notification of changes will be posted on this page. You should review this Notice periodically to keep up to date on our most current policies and practices.

Date of last update: March 18, 2026.

17. QUESTIONS AND CONTACT INFORMATION

If you have questions regarding this Notice, please contact [GDX](mailto:legal@gdxdevelopment.com) at legal@gdxdevelopment.com.

CCPA & CPRA PRIVACY NOTICE TO CALIFORNIA RESIDENTS

1. PURPOSE

Gates Defense Systems, LLC d/b/a GDX Development (“GDX,” “we,” “us,” or “our”) is committed to respecting and protecting the privacy rights of natural persons within the borders of the State of California pursuant to the California Consumer Privacy Act (“CCPA”) and California Privacy Rights Act (“CPRA”). This CCPA & CPRA Privacy Notice supplements the information contained in our Privacy Statement, and describes GDX’s commitment to the principles of openness and transparency and is the explicit, truthful, accurate and full notification pursuant to the CCPA and CPRA. Any terms defined in the CCPA and CPRA have the same meaning when used in this notice.

2. DOES THIS CCPA & CPRA PRIVACY NOTICE APPLY TO ME?

This CCPA & CPRA Privacy Notice to California Residents applies to you if you are a visitor, user, and/or individual who resides in the State of California.

3. GDX’S ROLE

GDX may collect and use consumer Personal Information for its commercial and business purposes and related operational purposes. With respect to these activities, GDX may have direct responsibilities as a business subject to the CCPA. For example, for certain activities related to direct interaction with consumers who have a direct relationship with GDX, interacting with prospective/current clients, marketing, website and web application use, engaging vendors, and interacting with visitors/users of our website. In these cases, this CCPA & CPRA Privacy Notice is applicable.

4. WHAT PERSONAL INFORMATION DOES GDX PROCESS?

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“Personal Information”). In particular, we have collected the following categories of personal information on consumers as defined under the CCPA and CPRA within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers	Name, alias, postal address, unique personal identifier, online identifier, internet protocol address (IP Address), email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	Yes

Category	Examples	Collected
B. Personal Information categories described in California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.	Yes
C. Protected classification characteristics under California or federal law	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.	Yes
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	Yes
F. Internet/network activity	Browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.	Yes
G. Geolocation data	Physical location or movements.	Yes
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes
I. Professional or employment-related information	Current or past job history or performance evaluations.	Yes
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student financial information.	Yes
K. Inferences drawn from other personal information.	Inferences drawn to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	Yes

Category	Examples	Collected
L. Sensitive personal information	Social security, driver's license, state identification card, or passport number; user name, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin; religious or philosophical beliefs; union membership; genetic data; contents of consumer's mail, email, and text messages unless GDX is the intended recipient of the communication; processing of biometric information for the purpose of uniquely identifying a consumer; personal information collected and analyzed concerning a consumer's sexual orientation; or citizenship and immigration status.	Yes

Personal Information does not include:

- Publicly available information that is lawfully made available from government records, that a consumer has otherwise made available to the public.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's or CPRA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and the Driver's Privacy Protection Act of 1994.

5. SOURCES OF PERSONAL INFORMATION WE COLLECT

We obtain the categories of Personal Information listed above from the following categories of sources:

- Information directly from you, the consumer, that you choose to provide, when you interact with us, for example, when you communicate with us by phone, email, or otherwise, or inquire about or purchase a product or service.
- Information we automatically collect when you interact with our website, content or emails such as your IP address and the pages you visited, and when you use our services, we may collect information on how you use those services.
- Information provided by our clients in order for us to provide specific services as a service provider, or information from third parties, acquired at the direction of our clients in order to provide the services.

- Information from other sources, including service providers or publicly available sources.

6. USE OF PERSONAL INFORMATION

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name, contact information, and resume to be considered for a job posting, we will use that personal information in evaluating your qualifications for that position.
- To provide you with support and respond to your inquiries, including to investigate your concerns and monitor and improve our responses.
- To provide the products or perform services for clients pursuant to a written agreement, including contacting you in the course of our ordinary commercial relationship, maintaining and servicing client accounts, verifying client information, processing payments, or similar activities as needed to provide services for or on behalf of our clients.
- To respond to law enforcement requests and as required by applicable law, court order, or government regulations.
- To comply with our legal, risk, or compliance obligations in operating our business, for example conducting due diligence checks on clients, vendors, third parties, or business partners.
- For marketing purposes. For example, we may use your information to further discuss your interest in GDX's services and to send you information regarding GDX such as information about products or services. You may opt-out of receiving marketing communications and updates at any time.
- To improve GDX's communications with you. Emails sent to you by GDX may include standard tracking, including open and click activities. GDX may collect information about your activity as you interact with our email messages and related content in order to verify or maintain the quality of our communications, or improve, upgrade, or enhance the services we provide.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA and CPRA.
- For operating and improving GDX's website and web applications and your customer experience, including debugging to identify repair errors that impair existing intended functionality or to verify or maintain the quality of our website. For example, we may collect and analyze data on your use of our website and process it for the purpose of improving our online experience.
- For security and integrity purposes, including securing GDX's network, detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity.
- We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

7. SELLING/SHARING PERSONAL DATA

In the preceding twelve (12) months, we have not sold or shared any Personal Information.

8. DISCLOSING PERSONAL INFORMATION

GDX may disclose your Personal Information to a contractor or service provider for a business purpose. In the preceding twelve (12) months, GDX has disclosed the following categories (corresponding with the table above in Section 4) of Personal Information for a business purpose: Category: Identifiers, Personal Information categories described in California Customer Records statute (Cal. Civ. Code § 1798.80(e)), Protected classification characteristics under California or federal law, Commercial information, Biometric Information, Internet/network activity, Geolocation data, Sensory Data, Professional or employment-related information, Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99), Inferences drawn from other personal information., Sensitive personal information

We disclose your Personal Information with the following categories of third parties:

- Our affiliates, as needed to operate our business and provide services.
- Our service providers or contractors, such as vendors, consultants and other service providers who perform certain services on behalf of GDX, in which case we enter into a contract that describes the purpose of processing and requires the recipient to not use it for any purpose except performing the contract.
- Third parties to whom you or your agents request or authorize us to disclose your Personal Information in connection with products or services we provide to you.

9. DATA RETENTION

GDX will retain Personal Information for a reasonable period of time, taking into account legitimate business needs to capture and retain such information. Information will also be retained for a period necessary to comply with state, local, and federal regulations. GDX keeps your Personal Information for the shortest period necessary to realize the purpose of the Personal Information handling.

10. YOUR RIGHTS AND CHOICES

The CCPA and CPRA provide California residents with specific rights regarding their personal information. This section describes your CCPA and CRPA rights and explains how to exercise those rights.

A. Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal and sensitive information unless responding to the request is impossible or

involves disproportionate effort. Once we receive and confirm your verifiable request, we will disclose to you:

- The categories of Personal Information and sensitive information we collected about you.
- The categories of sources for the personal and sensitive information we collected about you.
- Our business or commercial purpose for collecting, using and/or disclosing that information.
- The categories of third parties, contractors and service providers with whom we share, sell or disclose that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request).
- If we disclosed your Personal Information for a business purpose, a list of those disclosures, identifying the Personal Information categories that each category of recipient obtained.
- Whether your information is sold or shared.
- The retention period or criteria used for retention.

B. Deletion and Correction Request Rights

You have the right to request that we correct or delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, we will correct and/or delete (and direct our service providers to correct and/or delete) your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Help to ensure security and integrity to the extent the use of the consumer's Personal Information is reasonably necessary and proportionate for those purposes.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligations.

C. Exercising Access, Data Portability, Correction and Deletion Rights

To exercise the access, data portability, and deletion rights described above and as described in more detail in the Privacy Statement, please download and complete a request form and send it to GDX via email at legal@gdxdevelopment.com. Please include the information listed on the form to confirm your identity. As an alternative, you can call our Chief Technology Officer at (631) 752-8667. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable request related to your Personal Information. You may also make a verifiable request on behalf of your minor child.

You may only make a verifiable request for access or data portability twice within a twelve (12) month period. The verifiable request must:

- Provide enough information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. We will only use Personal Information provided in a verifiable request to confirm the requestor's identity or authority to make the request.

D. Response Timing and Format

We endeavor to respond to a verifiable request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the twelve (12) month period preceding the verifiable request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

E. Personal Information Sales Opt-Out and Opt-In Rights

GDX does not sell your Personal Information.

F. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA or CPRA rights. Unless permitted by the CCPA or CPRA, we will not:

- Deny you services.
- Provide you a different level of service.
- Discriminate in making employment decisions.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits employees 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 send us an electronic message via legal@gdxdevelopment.com.

11. CHANGES TO NOTICE

GDX may make changes to this Notice. Notification of changes will be posted on this page. You should review this Notice periodically to keep up to date on our most current policies and practices.

Date of last update: March 18, 2026.

12. QUESTIONS AND CONTACT INFORMATION

If you have questions regarding this Notice, please contact GDX at legal@gdxdevelopment.com.

GDPR PRIVACY NOTICE

1. PURPOSE

Gates Defense Systems, LLC d/b/a GDX Development (“GDX,” “we,” “us,” or “our”) is committed to respecting and protecting the privacy rights of persons in the European Economic Area (“EEA”), comprised of the European Union (“EU”) and the countries of Iceland, Norway, and Lichtenstein, pursuant to the EU General Data Protection Regulation (“GDPR”). This GDPR Privacy Notice describes GDX’s commitment to the privacy of persons in the EEA, and supplements GDX’s Privacy Statement for certain persons in the EEA.

2. DOES THIS GDPR PRIVACY NOTICE APPLY TO ME?

This GDPR Privacy Notice applies to you if:

- You are a “Person” or “Data Subject” - meaning a natural person, not a corporation, partnership or other legal entity - who is physically present in the EEA;
- It is with respect to your “Personal Information” - meaning any information relating to an identified or identifiable person - that is provided while you are physically present in the EEA;
- Such Personal Information is not earlier or later provided to GDX while you are outside the EEA;
- Such Personal Information is provided to GDX:
 - During the course of GDX offering you goods or services;
 - While you are using or otherwise operating any of systems or applications offered by GDX; or
 - While you are associated with any of GDX’s programs;

3. WHAT PERSONAL INFORMATION DOES GDX PROCESS?

We process your Personal Information, meaning we collect, record, organize, structure, store, adapt, alter, retrieve, consult, use, disclose by transmission, disseminate, make available, align, combine, restrict, erase, or destroy your Personal Information.

A. General Categories

Depending on the specific purpose for processing Personal Information, GDX may process the following general categories of Personal Information:

- Names
- Addresses
- Telephone numbers
- Email addresses

- Identification numbers including but not limited to social security numbers and driver's license numbers
- Unique GDX identification numbers
- Personal identification numbers
- Usernames
- Passwords
- Demographic information, including residential information
- Education history
- Background check information, including criminal records
- Personal references
- Emergency contact information
- Financial information and family financial information including credit and debit-card numbers, tax information, financial aid information, and insurance and benefits information
- Transaction history
- Business information
- Passport and visa information
- Work history
- Insurance information
- Military service
- IP addresses
- Location information
- Device information
- Metadata
- Medical history and treatment information
- Family medical history information
- Disability information
- Biometric and genetic information
- Photographs
- Purchasing activity to secure food, lodging, and other services for you

B. Special Categories

In order to fulfill certain of the purposes identified in the table below, GDX may need to request special categories of Personal Information - information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; genetic data; biometric data for the purpose of uniquely identifying a natural person; data concerning health or treatment; or data concerning a natural person's sex life or sexual orientation.

Among the various categories of personal information we may collect as described in the "What Personal Information Does GDX Process?" section of this Privacy Notice, the following may be considered as special category Personal Information:

- Account information including purchase history;
- Pictures, audio, and video recordings
- Identity information;

- Financial information;
- Legal information.

We will process your special category Personal Information for the specific purposes as described in this Privacy Statement, and in a way that has the least impact on your personal rights and interests. **By interacting with us, you will be deemed as having consented to our collection and processing of your special category Personal Information in accordance with this Privacy Notice.**

Before GDX processes your special category Personal Information or your criminal conviction Personal Information, if any, GDX will inform you of the necessity for processing your special category Personal Information and ask for your separate affirmative consent.

C. Legal Basis And Purposes For The Processing Of Personal Information

We may, where applicable under the applicable EU laws, rely on some or all of the following applicable legal bases for the processing of your personal information:

- Your consent (“Individual Consent”);
- The necessity to conclude or perform a contract to which you are a party (“Contract Basis”);
- The necessity to perform a statutory duty or legal obligation (“Legal Obligation Basis”);
- The necessity to safeguard your life safety, health and property safety in emergency situations (“Emergency Basis”);
- Personal information has been made public by you or has otherwise been lawfully made public, and our processing is done pursuant to the GDPR and the extent of the processing is reasonable (“Public Information Basis”); and
- Other circumstances as stipulated in EU laws.

The below table includes the relevant purposes for the personal information processing and the corresponding legal basis. This table is for indicative purposes only, and in practice, there may be some variations based on the circumstances.

4. WHY GDX PROCESSES YOUR PERSONAL INFORMATION

GDX requires Personal Information only when necessary. The table below describes the purposes for which GDX processes your personal data and the legal basis for the processing.

Purpose of Processing	Legal Basis
• To fulfill our contractual obligations, including registering your account and providing our Services. • Communicate with you about our Services and process related transactions. • For any purpose, with your consent or to follow your instructions.	• Contractual Basis • Individual Consent

Purpose of Processing	Legal Basis
• To operate, improve, or personalize our services, corporate networks and devices, offices, events, and related infrastructure. • To annotate, tag, and add metadata to our content, including naming or tagging individuals in our news content • Develop new products, services, content, and other offerings . • Monitor the usage of our services, corporate networks and devices, offices, events, and related infrastructure. • Audit usage of our services, corporate networks and devices, offices, events, and related infrastructure, including consumer interactions. • Ensure the security of our services, corporate networks and devices, offices, events, and related infrastructure • Detect fraud and abuse, including for our services, corporate networks and devices, offices, events, and related infrastructure. • Manage our internal operations, such as account administration, corporate asset deployment, billing, troubleshooting, and repair.	• Contractual Basis • Individual Consent
• Provide our services to third parties where our services and content include your personal information. • Send you personalized and interest-based advertising and marketing • Improve and develop new marketing campaigns, segments, and materials • To enable you to partake in a prize draw or competition or complete a survey	• Contract Basis • Individual Consent • Public Information Basis • Individual Consent
• Manage the applicant relationship, such as for the application process or background checks • Communicate with you regarding recruiting purposes	• Contract Basis • Individual Consent
• Exercise our rights and protect our or others' rights or property • Effectuate the sale, merger, acquisition, or other disposition of our business • Advance our other commercial and economic interests as permitted by law • For other purposes as required by or permitted by law	• Legal Obligation Basis • Emergency Basis • Individual Consent
• Information made public about you.	• Individual Consent • Public Information Basis
• Judicial proceedings	• Legal Obligation Basis
• Public interest such as for taxation; reporting crimes; and as required by law or for legal reporting requirements	• Legal Obligation Basis

5. HOW DOES GDX PROTECT YOUR PERSONAL INFORMATION?

GDX adopts necessary measures to safeguard the security of the personal information it handles, for more information please see our Data Protection Policy below. GDX ensures compliance with all applicable federal, state, and local laws, regulations and statutes and ensures the protection of Information Assets, Information Systems, and IT Resources. GDX regularly engages in audits personal information handling compliance with laws and regulations.

6. HOW DOES GDX RECEIVE YOUR PERSONAL INFORMATION?

A. From You, The Data Subject

GDX may receive your Personal Information when you visit GDX's websites, during the course of GDX offering you goods or services; while you are using or otherwise operating any of systems or applications offered by GDX; while you are associated with any of GDX's programs; or otherwise interact with GDX in the EEA.

B. From Third Parties

GDX may also receive your Personal Information from third parties. Examples include from law enforcement, and from other cybersecurity companies, as well as from those who process the information provided on behalf of these entities.

7. WHO PROCESSES YOUR PERSONAL INFORMATION?

A. GDX Personnel

Your Personal Information may be processed by GDX's owners, managers, and employees, including human resources professionals, as well as law-enforcement officers, and others, as may be necessary to carry out the purposes for processing the information and GDX's activities.

B. GDX Related Organizations

GDX may share your Personal Information with GDX's related organizations.

C. Third Parties

GDX may share your Personal Information with third parties, such as: U.S. and foreign government entities to fulfill regulatory obligations and to facilitate access to funding sources; and vendors to provide services related to your affiliation with GDX.

GDX may disclose your Personal Information to legal or governmental regulatory authorities as required by applicable law. We may also disclose your Personal Information to third parties as required by applicable law in connection with claims, disputes, or litigation, when otherwise required by applicable law, if we determine disclosure is necessary to protect the health and safety

of you or us, to enforce our legal rights, or to enforce contractual commitments that you have made.

GDX may share your Personal Information with third parties who complete transactions or perform services on our behalf or for your benefit, including functions related to payment and operation, legal processes, benefits assistance, and for quality control purposes.

By interacting with us, you will be deemed as having consented to our collection and processing of your Personal Information in accordance with this Privacy Notice.

Please note that GDX may provide anonymized data developed from Personal Information to third parties, such as government entities, and that such anonymized data is outside the scope of this GDPR Privacy Notice.

8. HOW LONG DOES GDX KEEP YOUR PERSONAL INFORMATION?

GDX keeps your Personal Information as required by law or our policies to perform our legitimate interests, contracts, and substantial public interests. GDX keeps your Personal Information for the shortest period necessary to realize the purpose of the Personal Information handling.

9. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

As a Data Subject pursuant to the GDPR, you have certain rights. This GDPR Privacy Notice summarizes what these rights under the GDPR involve and how you can exercise these rights. More detail about each right, including exceptions and limitations, can be found in Articles 15-21 and 77 of [the GDPR](#).

Please note: Nothing in this GDPR Privacy Notice is intended by GDX to waive sovereign immunity or any other defenses or immunities afforded by any or all U.S. federal law, Utah state law, other applicable state law in the United States, and EU law.

A. The Right Of Access

You have the right to request that GDX confirm whether it is processing your Personal Information. If GDX is processing your Personal Information, you have the right to access that Personal Information, and GDX will provide you with a copy of that Personal Information unless prevented by applicable law.

B. The Right Of Correction

You have the right to request that GDX correct any inaccurate Personal Information that it maintains about you. You also have the right to request that GDX complete any incomplete Personal Information that it maintains about you, which could be accomplished by incorporating a supplementary statement that you submit. If GDX concurs that the Personal Information is incorrect or incomplete, GDX will promptly correct or complete it.

C. The Right To Erasure

You have the right to request the erasure of Personal Information that GDX maintains about you in certain circumstances. These circumstances are identified in Article 17 of the GDPR and include that the Personal Information is no longer necessary in relation to the purpose(s) for which it was collected.

Subject to applicable U.S., state, and EU law, GDX policies, including but not limited to its Privacy Statement, and provided that there are no overriding legitimate grounds for GDX to retain the Personal Information, GDX will comply with the request and will take reasonable steps to inform any third parties with whom the Personal Information was shared.

D. The Right to Restrict Processing of Personal Information

You have the right to request that GDX restrict the processing of your Personal Information where one of the reasons identified in Article 18 of the GDPR apply. These reasons include that the Personal Information is inaccurate, the processing is unlawful, or GDX no longer needs the Personal Information.

If GDX grants your request to restrict processing, GDX will only process that Personal Information with your consent, for the protection of the rights of another natural or legal person, for reasons of important public interest, for the establishment, exercise or defense of legal claims, or as otherwise required by applicable U.S., state, or EU law.

E. The Right to Data Portability

Where the basis for processing is either consent or performance of a contract between you and GDX, and where the processing is carried out by automated means, you have the right to receive your Personal Information that you have provided to GDX. GDX will provide the Personal Information in a structured, commonly used, and machine-readable format. Where technically feasible and upon your request, GDX will transmit the Personal Information directly to another entity.

F. The Right to Withdraw Consent

If the basis for processing your Personal Information is consent, you may revoke your consent at any time. Upon receipt of your notice withdrawing consent, and if there are no other legal grounds for the processing, GDX will stop processing the Personal Information unless the processing is necessary for the establishment, exercise, or defense of legal claims. Revoking consent does not affect the lawfulness of processing that occurred before the revocation.

G. The Right to Object to Processing

In certain situations, you may have the right to object to processing of your Personal Information:

- *Public Interest or Legitimate Interests.* If the basis for processing your Personal Information is public interest or legitimate interests, you have the right to object to processing the Personal Information. GDX will cease processing unless it demonstrates overriding legitimate grounds for processing or the processing is necessary for the establishment, exercise, or defense of legal claims.
- *Direct Marketing.* If GDX is using your Personal Information for direct marketing purposes, you have the right to object at any time, and GDX will stop using your Personal Information for that purpose.

H. The Right to File a Complaint

You have the right to submit a complaint with an EU supervisory authority, in particular the one in the EU Member State of your habitual residence, place of work, or place of the alleged violation, if you believe that GDX's processing of your Personal Information violates the GDPR.

For more information on the process for submitting a complaint, consult the relevant EU supervisory authority: <https://ec.europa.eu/newsroom/article29/items>.

10. HOW TO EXERCISE YOUR RIGHTS

In order to exercise any of these rights, except the right to file a complaint with an EU supervisory authority, you should submit your request to GDX Development

Email: legal@gdxdevelopment.com

Address: Chief Technology Information Officer
GDX Development
450 8th Ave SE
St. Petersburg, FL 33701

At that time, you will be asked to:

- Identify yourself
- Provide information to support that the GDPR applies to you
- Identify the specific information or data that you are concerned about
- State what right(s) you wish to exercise

To expedite processing your request, please identify the data-collection location (e.g., the website where your Personal Information was collected), if known.

11. HOW DOES GDX RESPOND TO REQUESTS FOR PERSONAL INFORMATION?

In addition to the rights provided by the GDPR, you may also have rights with respect to your Personal Information pursuant to U.S. federal law, state law, or GDX policy. When you submit a

request to GDX to exercise your rights, it will respond in accordance with existing GDX policies and procedures that implement the relevant privacy law(s).

12. TRANSFER OF PERSONAL INFORMATION OUTSIDE THE EEA

GDX is based in the U.S. and is subject to U.S. and Florida law. Personal Information that you provide to GDX will generally be hosted on U.S. servers. To the extent that GDX needs to transfer your information either (a) from the EEA to the U.S. or another country or (b) from the U.S. to another country, GDX will do so on the basis of either (i) an “adequacy decision” by the European Commission; (ii) EU-sanctioned “appropriate safeguards” for transfer such as model clauses, a copy of which you may request, if applicable, by contacting GDX as set forth in Section 9; (iii) your explicit and informed consent; or (iv) it being necessary for the performance of a contract or the implementation of pre-contractual measures with GDX, in which case GDX will inform you of the intent to transfer the Personal Information. Please note that the U.S. is not currently considered a safe harbor country under the GDPR.

13. HOW DO I CONTACT GDX, THE DATA CONTROLLER?

GDX is the data controller. If you have any questions about anything contained in this GDPR Privacy Notice, please contact:

Email: legal@gdxdevelopment.com

Address: Chief Technology Information Officer
GDX Development
450 8th Ave SE
St. Petersburg, FL 33701

14. GDPR

If you are interested in reviewing an English version of the GDPR please see [GDPR Regulations](#).

15. UPDATES TO GDPR PRIVACY NOTICE

GDX may update this GDPR Privacy Notice from time to time. Any changes will become effective upon posting of the revised GDPR Privacy Notice.

Date of last update: March 18, 2026.

PIPL PRIVACY NOTICE

1. PURPOSE

Gates Defense Systems, LLC d/b/a GDX Development (“GDX,” “we,” “us,” or “our”) is committed to respecting and protecting the privacy rights of natural persons within the borders of the People’s Republic of China, pursuant to the Personal Information Protection Law of the People’s Republic of China (the “PIPL”). This PIPL Privacy Notice describes GDX’s commitment to the principles of openness and transparency and is the explicit, truthful, accurate and full notification pursuant to the PIPL.

2. DOES THIS PIPL PRIVACY NOTICE APPLY TO ME?

This PIPL Privacy Notice applies to you if:

- You are a natural person - meaning you are an individual, not a corporation - who is physically present in the People’s Republic of China, and does not include Hong Kong, Macau or Taiwan;
- It is with respect to your “Personal Information” - meaning all kinds of information, recorded by electronic or other means, related to identified natural persons and provided or collected while you are in the People’s Republic of China; and
- Such Personal Information is provided to GDX:
 - During the course of GDX offering you goods or services;
 - While you are using or otherwise operating any of systems or applications offered by GDX; or
 - While you are associated with any of GDX’s programs;

3. WHAT PERSONAL INFORMATION DOES GDX PROCESS?

We process your Personal Information, meaning we collect, record, organize, structure, store, adapt, alter, retrieve, consult, use, disclose by transmission, disseminate, make available, align, combine, restrict, erase, or destroy your Personal Information.

A. General Categories

Depending on the specific purpose for processing Personal Information, GDX may process the following general categories of Personal Information:

- Names
- Addresses
- Telephone numbers
- Email addresses
- Identification numbers including but not limited to social security numbers and driver’s license numbers

- Unique GDX identification numbers
- Personal identification numbers
- Usernames
- Passwords
- Demographic information, including residential information
- Education history
- Background check information, including criminal records
- Personal references
- Emergency contact information
- Financial information and family financial information including credit and debit-card numbers, tax information, financial aid information, and insurance and benefits information
- Transaction history
- Business information
- Passport and visa information
- Work history
- Insurance information
- Military service
- IP addresses
- Location information
- Device information
- Metadata
- Medical history and treatment information
- Family medical history information
- Disability information
- Biometric and genetic information
- Photographs
- Purchasing activity to secure food, lodging, and other services for you

B. Processing Of Sensitive Personal Information

“Sensitive Personal Information” is defined in the PIPL as personal information, that, if leaked or if used illegally, is likely to cause harm to a natural person’s personal dignity or endanger his or her personal safety or the safety of his or her property, including information concerning biometrics, religious beliefs, particular capacity, medical treatments, health, financial accounts, tracking, as well as personal information of minors under the age of 14. Among the various categories of personal information we may collect as described in the “What Personal Information Does GDX Process?” section of this Privacy Notice, the following may be considered as Sensitive Personal Information:

- Account information including purchase history;
- Pictures, audio, and video recordings
- Identity information;
- Financial information;
- Legal information.

We will process your Sensitive Personal Information for the specific purposes as described in this Privacy Statement, and in a way that has the least impact on your personal rights and interests. **By interacting with us, you will be deemed as having consented to our collection and processing of your Sensitive Personal Information in accordance with this Privacy Notice.**

Before GDX processes your Sensitive Personal Information or your criminal conviction Personal Information, if any, GDX will inform you of the necessity for processing your Sensitive Personal Information and ask for your separate affirmative consent.

C. Legal Basis And Purposes For The Processing Of Personal Information

We may, where applicable under the applicable Chinese laws, rely on some or all of the following applicable legal bases for the processing of your personal information:

- Your consent (“Individual Consent”);
- The necessity to conclude or perform a contract to which you are a party (“Contract Basis”);
- The necessity to perform a statutory duty or legal obligation (“Legal Obligation Basis”);
- The necessity to safeguard your life safety, health and property safety in emergency situations (“Emergency Basis”);
- Personal information has been made public by you or has otherwise been lawfully made public, and our processing is done pursuant to the PIPL and the extent of the processing is reasonable (“Public Information Basis”); and
- Other circumstances as stipulated in Chinese laws.

The below table includes the relevant purposes for the personal information processing and the corresponding legal basis. This table is for indicative purposes only, and in practice, there may be some variations based on the circumstances.

4. WHY GDX PROCESSES YOUR PERSONAL INFORMATION

GDX requires Personal Information only when necessary. The table below describes the purposes for which GDX processes your personal data and the legal basis for the processing.

Purpose of Processing	Legal Basis
• To fulfill our contractual obligations, including registering your account and providing our Services • Communicate with you about our Services and process related transactions • For any purpose, with your consent or to follow your instructions	• Contractual Basis • Individual Consent

Purpose of Processing	Legal Basis
• To operate, improve, or personalize our services, corporate networks and devices, offices, events, and related infrastructure • To annotate, tag, and add metadata to our content, including naming or tagging individuals in our news content • Develop new products, services, content, and other offerings • Monitor the usage of our services, corporate networks and devices, offices, events, and related infrastructure • Audit usage of our services, corporate networks and devices, offices, events, and related infrastructure, including consumer interactions • Ensure the security of our services, corporate networks and devices, offices, events, and related infrastructure • Detect fraud and abuse, including for our services, corporate networks and devices, offices, events, and related infrastructure • Manage our internal operations, such as account administration, corporate asset deployment, billing, troubleshooting, and repair	• Contractual Basis • Individual Consent
• Provide our services to third parties where our services and content include your personal information. • Send you personalized and interest-based advertising and marketing • Improve and develop new marketing campaigns, segments, and materials • To enable you to partake in a prize draw or competition or complete a survey	• Contract Basis • Individual Consent • Public Information Basis • Individual Consent
• Manage the applicant relationship, such as for the application process or background checks • Communicate with you regarding recruiting purposes	• Contract Basis • Individual Consent
• Exercise our rights and protect our or others' rights or property • Effectuate the sale, merger, acquisition, or other disposition of our business • Advance our other commercial and economic interests as permitted by law • For other purposes as required by or permitted by law	• Legal Obligation Basis • Emergency Basis • Individual Consent
• Information made public about you.	• Individual Consent • Public Information Basis
• Judicial proceedings	• Legal Obligation Basis
• Public interest such as for taxation; reporting crimes; and as required by law or for legal reporting requirements	• Legal Obligation Basis

5. HOW DOES GDX PROTECT YOUR PERSONAL INFORMATION?

GDX adopts necessary measures to safeguard the security of the personal information it handles. GDX ensures compliance with all applicable federal, state, and local laws, regulations and statutes and ensures the protection of Information Assets, Information Systems, and IT Resources. GDX regularly engages in audits personal information handling compliance with laws and regulations.

6. HOW DOES GDX RECEIVE YOUR PERSONAL INFORMATION?

A. From You, The Data Subject

GDX may receive your Personal Information when you visit GDX's websites, during the course of GDX offering you goods or services; while you are using or otherwise operating any of systems or applications offered by GDX; or while you are associated with any of GDX's programs.

B. From Third Parties

GDX may also receive your Personal Information from third parties. Examples include from law enforcement, and from other cybersecurity companies, as well as from those who process the information provided on behalf of these entities.

7. WHO PROCESSES YOUR PERSONAL INFORMATION?

A. GDX Personnel

Your Personal Information may be processed by GDX's owners, managers, and employees, including human resources professionals, as well as law-enforcement officers, and others, as may be necessary to carry out the purposes for processing the information and GDX's activities.

B. GDX Related Organizations

GDX may share your Personal Information with GDX's related organizations.

C. Third Parties

GDX may share your Personal Information with third parties, such as: U.S. and foreign government entities to fulfill regulatory obligations and to facilitate access to funding sources; and vendors to provide services related to your affiliation with GDX.

GDX may disclose your Personal Information to legal or governmental regulatory authorities as required by applicable law. We may also disclose your Personal Information to third parties as required by applicable law in connection with claims, disputes, or litigation, when otherwise required by applicable law, if we determine disclosure is necessary to protect the health and safety of you or us, to enforce our legal rights, or to enforce contractual commitments that you have made.

GDX may share your Personal Information with third parties who complete transactions or perform services on our behalf or for your benefit, including functions related to payment and operation, legal processes, benefits assistance, and for quality control purposes.

By interacting with us, you will be deemed as having consented to our collection and processing of your Personal Information in accordance with this Privacy Notice.

Please note that GDX may provide anonymized data developed from Personal Information to third parties, such as government entities, and that such anonymized data is outside the scope of this PIPL Privacy Notice.

8. HOW LONG DOES GDX KEEP YOUR PERSONAL INFORMATION?

GDX keeps your Personal Information as required by law or our policies to perform our legitimate interests, contracts, and substantial public interests. GDX keeps your Personal Information for the shortest period necessary to realize the purpose of the Personal Information handling.

9. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

As a Data Subject, you have certain rights. This PIPL Privacy Notice summarizes what these rights under the PIPL and how you can exercise these rights. More detail about each right, including exceptions and limitations, can be found in Articles 15-17, 24, and 44-47 of the PIPL.

Please note: Nothing in this PIPL Privacy Notice is intended by GDX to waive sovereign immunity or any other defenses or immunities afforded by any or all U.S. federal law, Utah state law, other applicable state law in the United States, and Chinese law.

A. The Right to Withdraw Consent

If the basis for processing your Personal Information is consent, you may revoke your consent at any time. Upon receipt of your notice withdrawing consent, and if there are no other legal grounds for the processing, GDX will stop processing the Personal Information unless the processing is necessary for the establishment, exercise, or defense of legal claims. Revoking consent does not affect the lawfulness of processing that occurred before the revocation.

B. The Right to Non-Discrimination

GDX will not discriminate against you for exercising your right to withdraw consent. Unless the GDX needs your Personal Information to perform a contract or provide a service, GDX will not withhold services from you because you do not consent to use of your Personal Information.

C. The Right to Be Informed

Before GDX processes your Personal Information, you have the right to know:

- The name and contact method of the individual at GDX handling your Personal Information.
- The purpose of GDX handling and collecting your Personal Information.
- How long GDX will retain your data.
- How you can exercise your data privacy rights.
- How you can contact GDX's Personal Information Handler.

This is the purpose of this PIPL Privacy Notice.

D. The Right to Refuse Automatic Decision Making

You have the right to opt out of automated decision making based on your personal data.

E. The Right to Amend

You have the right to request that GDX correct any inaccurate Personal Information that it maintains about you. You also have the right to request that GDX complete any incomplete Personal Information that it maintains about you, which could be accomplished by incorporating a supplementary statement that you submit. If GDX concurs that the Personal Information is incorrect or incomplete, GDX will promptly correct or complete it.

F. The Right to Request Deletion

You have the right to request the deletion of Personal Information that GDX maintains about you in certain circumstances. These circumstances are identified in Article 47 of the PIPL and include that the Personal Information is no longer necessary in relation to the purpose(s) for which it was collected.

Subject to applicable U.S., state, and Chinese law, and GDX policies, including but not limited to its Privacy Statement, and provided that there are no overriding legitimate grounds for GDX to retain the Personal Information, GDX will comply with the request and will take reasonable steps to inform any third parties with whom the Personal Information was shared.

G. The Right to Make Decisions Regarding Personal Information

You have the right to have control over your personal data. You can decide who accesses and/or handles your data.

H. The Right to Data Portability

You have the right to receive a copy of your Personal Information. GDX will provide the Personal Information in a portable format, such as by email or PDF. GDX will provide your Personal Information in a timely manner.

I. The Right To Transfer

You have the right to request us to transfer your Personal Information that we hold about you to another controller to the extent the conditions stipulated by the applicable law are fulfilled.

Important: These rights are not absolutely guaranteed and there are several exceptions where we may not have an obligation to fulfill your request. We are only required to honor these rights to the extent that they have been granted to you and apply to you under PIPL.

10. HOW TO EXERCISE YOUR RIGHTS

In order to exercise any of these rights, except the right to file a complaint with a department under the State Council, you should submit your request to GDX

Email: legal@gdxdevelopment.com

Address: Chief Technology Information Officer
GDX Development
450 8th Ave SE
St. Petersburg, FL 33701

At that time, you will be asked to:

- Identify yourself
- Provide information to support that the PIPL applies to you
- Identify the specific information or data that you are concerned about
- State what right(s) you wish to exercise

To expedite processing your request, please identify the data-collection location (e.g., the website where your Personal Information was collected), if known.

11. HOW DOES GDX RESPOND TO REQUESTS FOR PERSONAL INFORMATION?

In addition to the rights provided by the PIPL, you may also have rights with respect to your Personal Information pursuant to U.S. federal law, state law, or GDX policy. When you submit a request to GDX to exercise your rights, it will respond in accordance with existing GDX policies and procedures that implement the relevant privacy law(s).

12. TRANSFER OF PERSONAL INFORMATION OUTSIDE THE PEOPLE'S REPUBLIC OF CHINA

GDX is based in the U.S. and is subject to U.S. Federal and Florida State law. Personal Information that you provide to GDX will generally be hosted on U.S. servers. To the extent that GDX needs to transfer your information either (a) from the People's Republic of China to the U.S. or another

country or (b) from the U.S. to another country, GDX will do so only on a lawful basis and upon receipt of the Data Subject's separate, informed consent to the transfer.

Before any data is transferred overseas, GDX will ensure that: There is sufficient security measures in place to protect the data before, during, and after the transfer, including by passing a security assessment organized by the State cybersecurity and informatization department; GDX will keep a clear record of any overseas data transfers that are made; and GDX will conduct an impact assessment before the transfer.

13. HOW DO I CONTACT GDX, THE PERSONAL INFORMATION HANDLER?

GDX is the Personal Information Handler. If you have any questions about anything contained in this PIPL Privacy Notice, please contact GDX

Email: legal@gdxdevelopment.com

Address: Chief Technology Information Officer
GDX Development
450 8th Ave SE
St. Petersburg, FL 33701

14. PIPL

If you are interested in reviewing an English version of the PIPL please see [PIPL - Effective Nov. 1, 2021](#).

15. UPDATES TO PIPL PRIVACY NOTICE

GDX may update this PIPL Privacy Notice from time to time. Any changes will become effective upon posting of the revised PIPL Privacy Notice.

Date of last update: March 18, 2026.

DATA PROTECTION POLICY

Gates Defense Systems, LLC d/b/a GDX Development (“GDX,” “we,” “us,” or “our”) is committed to safeguarding the privacy of all personal data provided by our employees, current and prospective clients, as well as contractors (collectively referred to as “Data Subjects”). GDX processes Personal Data belonging to our employees, contingent employees, partners, suppliers, and clients in our role as a Data Controller or Data Processor, and Personal Data belonging to our clients and their end users in our role as a Data Controller or Data Processor. Where GDX processes Personal Data, we do so in compliance with our legal, contractual, and ethical obligations and with full transparency.

1. PURPOSE

This policy sets forth the requirements and elements of our global data privacy program to ensure we comply with relevant legal and contractual obligations as well as certification and audit requirements. This policy applies globally to all Personal Data Processing performed directly by GDX and indirectly by third parties Processing Personal Data on our behalf.

2. DEFINITIONS

“Data Controller” means the entity that determines the purpose and means of processing Personal Data and has the same meaning ascribed to “Personally Identifiable Information Controller” under ISO 27701.

“Data Processor” means the entity that processes Personal Data on behalf of the Data Controller and has the same meaning ascribed to “Personally Identifiable Information Processor” under ISO 27701.

“Data Protection Impact Assessment” refers to a documented analysis by a Data Controller or Data Processor assessing privacy risks where Processing is likely to result in a high risk to the rights and freedoms of the Data Subject.

“Data Protection Laws” refers to all Personal Data protection and privacy laws and regulations applicable to GDX, including, but not limited to, the [EU General Data Protection Regulation](#) (“GDPR”), [United Kingdom General Data Protection Regulation](#) (“UK GDPR”), United Kingdom’s Data Protection Act (“UK DPA”), [Switzerland’s Federal Act on Data Protection](#) (as implemented on September 1, 2023), [Canada’s Personal Information Protection and Electronic Documents Act](#) (PIPEDA), [Japan’s Act on Protection of Personal Information](#) (“APPI”), [China’s Personal Information Protection Law](#) (“PIPL”), and US state privacy laws, in each case as may be amended, superseded, or replaced.

“Data Subject” means the identified or identifiable person or household to whom Personal Data relates and has the same meaning ascribed to “Personally Identifiable Information Principal” under ISO 27701.

“Data Transfer Impact Assessment” refers to a documented analysis by a Data Controller or Data Processor of the impact and security implications of a transfer of Personal Data from inside the European Economic Area (“EEA”) or UK to a country outside the EEA/UK that does not have an adequacy finding by the European Commission or Information Commissioner’s Office.

“Legitimate Interest Impact Assessment” refers to a documented analysis by a Data Controller or Data Processor as to whether legitimate interest can be used as the legal basis for Processing Personal Data. The assessment includes a three-prong test analyzing whether the Personal Data Processing is in pursuit of a legitimate interest, whether it is necessary for that pursuit, and whether the Data Subject’s interests override the legitimate interest.

“Personal Data” has the meaning ascribed to “personally identifiable information,” “personal information,” or equivalent terms as such terms are defined under Data Protection Laws.

“Personal Data Incident” has the meaning ascribed to “security incident,” “security breach” or “personal data breach” or equivalent terms as such terms are defined under Data Protection Laws and includes any situation in which GDX becomes aware that Personal Data has been or is likely to have been accessed, disclosed, altered, lost, destroyed, or used by unauthorized persons, in an unauthorized manner.

“Processing” means any operation or set of operations that is performed on Personal Data, whether by automatic means, such as collection, recording, organization structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction. Processing also includes transferring or disclosing Personal Data to third parties.

“Sensitive Personal Data” is a subset of Personal Data and refers to information about a Data Subject that if lost, compromised, accessed, or improperly disclosed could result in harm, embarrassment, inconvenience, or unfairness to the data subject and is therefore subject to heightened protection.

“Special Category Data” is a subset of Personal Data and refers to information about an individual’s race or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or treatment or data concerning a natural person’s sex life or sexual orientation.

3. PERSONAL DATA PROCESSING CORE PRINCIPLES

GDX adheres to the following core principles when Processing Personal Data as a Data Controller:

- Lawfulness and Adequacy: We ensure Personal Data is collected for a lawful purpose and relevant and necessary for that purpose.

- Accuracy and Retention: We keep our systems up to date, provide mechanisms to update or delete inaccurate Personal Data and do not retain Personal Data longer than necessary to fulfill the lawful purpose for Processing.
- Confidentiality and Integrity: We ensure Personal Data remains secure and protected during Processing but respond swiftly and appropriately to Personal Data Incidents if they do occur, including providing timely notifications as required.
- Transparency: We adequately inform Data Subjects when we Process their Personal Data. We are clear about why we need it, how we will use it and how it will be handled and protected. We provide mechanisms for data subjects to exercise rights they have with respect to their Personal Data under applicable law.

All GDX employees are responsible for appropriately Processing and safeguarding Personal Data and understand that failure to do so has the potential not only to undermine client confidence in GDX, but to result in significant fines and penalties for GDX.

4. RECORDS OF PROCESSING

To ensure compliance with applicable Data Protection Laws and to uphold our commitment to transparency and accountability, GDX maintains a Record of Processing Activities (RoPA) in accordance with Article 30 of the GDPR and other relevant privacy regulations. The RoPA includes all Processing activities involving Personal Data as classified in accordance with GDX's Data Classification & Handling Standard.

5. LAWFULNESS AND ADEQUACY

A. Legal Bases For Processing Personal Data.

When acting as a Data Controller, GDX only processes Personal Data as legally permitted and with appropriate notice to the data subject. GDX principally relies on the following legal bases for Processing:

- Performance of a contract;
- Compliance with legal obligations, including but not limited to, lawful requests from law enforcement;
- Legitimate interest, except where such interest is overridden by the interests or fundamental rights and freedoms of the data subject; and
- Consent.

Where consent is the legal basis for Processing, GDX ensures that consent is freely given, specific, informed and an unambiguous indication of the Data Subject's wishes. The Data Subject has the right to withdraw consent at any time for any reason.

B. Privacy Assessments

i. Privacy By Design Assessment

GDX evaluates Personal Data Processing against the core principles described in Section 3 above as part of its design and development of new or substantially modified product offerings and when onboarding vendor solutions where Personal Data will be processed, including licensed in third party software applications. This “Privacy by Design” assessment is embedded in GDX’s development and vendor onboarding processes. Completion of the assessment requires review and approval by GDX’s. Development may not move forward without approval.

ii. Data Protection Impact Assessment (“DPIA”)

When contemplated Personal Data Processing poses a high risk to an individual’s rights and freedoms, GDX completes a DPIA to document and assess the purpose for the Processing, how GDX will comply with relevant Data Protection Laws and how GDX will mitigate potential risks to the Data Subject. Where a DPIA relates to Processing where GDX is the Data Controller, it is reviewed by GDX who must approve the proposed Processing before it commences. DPIAs shall be reviewed and updated at least annually, or more frequently as necessary, to ensure continued compliance with applicable laws and regulations.

iii. Data Transfer Impact Assessment (“DTIA”)

Where GDX intends to transfer Personal Data from inside the EEA or United Kingdom (“UK”) to a country outside of the EEA or UK that does not benefit from an adequacy finding by the European Commission or UK Information Commissioner’s Office, GDX completes a formal DTIA to analyze the impact and security implications of the transfer, particularly where the laws of the receiving country could allow its government access to the Personal Data being transferred. GDX will only proceed with the transfer where it concludes the risk posed by the transfer is acceptable. DTIAs shall be reviewed and updated at least annually, or more frequently as necessary, to ensure continued compliance with applicable laws and regulations.

iv. Legitimate Interest Impact Assessment (“LIIA”)

Where GDX acts as a Data Controller and relies on legitimate interest as the legal basis for Processing Personal Data, GDX completes a formal LIIA to document and assess the legitimate interest, determine whether the Processing is necessary, and evaluating whether the Data Subject’s interests, rights and freedoms outweigh or override the legitimate interest. GDX will only proceed with the Processing on the basis of legitimate interest where the LIIA concludes that the legitimate interest is not so overridden.

v. Standards For Handling Sensitive And Special Category Data

In its role as a Data Controller, GDX processes Sensitive Personal Data relating to employees across various business systems and some limited Special Category Data on a voluntary basis and as permitted by local law. Appropriate controls are in place and outlined in applicable DPIAs, the

Access Control Standard for Sensitive and Special Category Data, and enhanced privacy training mandated for employees handling this Sensitive and Special Category Data.

vi. Bulk Data Rule

Sensitive Personal Data, including human ‘omic data, biometric identifiers, precise geolocation data, personal health data, personal financial data and certain personal identifiers of U.S. citizens, as well as U.S. government data including precise geolocation data for any area specifically designated as posing a heightened risk of exploitation (such as military installations, national security, defense or intelligence facilities, or worksites of federal national intelligence personnel) is subject to restrictions on export, transfer and access. Such data cannot be provided to any individual or entity located in or controlled by or acting at the direction of an individual or entity located in, a “country of concern”. Currently, “countries of concern” are China (including Hong Kong and Macau), Cuba, Iran, North Korea, Russia and Venezuela.

While such transfer or access can be provided under certain circumstances, GDX has determined that it will not engage in any transactions with countries of concern that involve sensitive U.S. Personal Data or U.S. government data. No such data should ever be transferred to a country of concern or a person or entity located in a country of concern, either by GDX or anyone acting on GDX’s behalf.

C. Contractual Protections

i. Intra-Group Data Transfer Agreement (“IGDTA”)

GDX and its subsidiaries enter into an Intra-Group Data Transfer Agreement to ensure that where Personal Data is shared within the GDX group, this is covered by appropriate data sharing clauses (including controller – processor clauses as required by GDPR). The IGDTA also ensures there are appropriate safeguards in place (i.e. standard contractual clauses) for when the sharing of Personal Data within the GDX group involves the transfer of Personal Data from inside the EEA/UK to a country outside of the EEA/UK that does not benefit from an adequacy finding by the European Commission or Information Commissioner’s Office.

ii. Data Processing Agreement (“DPA”)

Companies outside of the GDX group who process Personal Data for or on behalf of GDX are required to have appropriate technical and organizational measures in place to comply with relevant Data Protection Laws. GDX makes equivalent commitments to its clients where it acts as a Data Processor through a standard client DPA.

iii. General Privacy Provisions

Contractual language around privacy is also built into standard agreements with customers, suppliers, and partners as well as in GDX’s standard Non-Disclosure Agreement (NDA). Contracts with vendors and suppliers also include obligations to comply with the Bulk Data Rule.

6. ACCURACY AND RETENTION

A. Records Management

GDX's global records management program ensures that a retention period is formally defined for Processing Personal Data to ensure it is kept only for as long as it is needed, and that Personal Data is erased, destroyed, or anonymized at the end of the assigned retention period. The Global Records Management Policy sets forth handling requirements for all records, not just those containing Personal Data, and the accompanying Records Retention Schedule defines the retention period for each type of record maintained by GDX.

B. Storage And Backup Of Personal Data

GDX stores and backs up Personal Data across multiple server locations directly and indirectly managed by GDX. IT and relevant vendors (for non-IT managed, cloud-hosted applications) are provided with standard guidance around the proper handling of Personal Data on these servers, including with respect to storage and backups.

GDX does not remove copies of Personal Data from its backup media and servers at the end of the retention period when doing so would be commercially impracticable; however, Personal Data retained by GDX in this manner is protected by the same security standards protecting the Personal Data while in use and the Personal Data remains subject to confidentiality and may not be accessed except as required by applicable law.

C. Erasure or Destruction of Personal Data

GDX's Global Records Management Policy and Data Classification and Handling Policy set forth the requirements for appropriately handling records of all types at the end of their prescribed retention period. In particular, the following principles apply with respect to records containing Personal Data:

- Personal Data should not be copied except as necessary to accomplish the specified purpose for Processing and any copies made should retain any original confidential or proprietary markings.
- Paper records must be shredded and disposed of securely when there is no longer a need to retain them and may not be disposed of in any other manner.
- Personal Data in electronic format should be deleted or anonymized once it is no longer needed.
- GDX's IT Department is responsible for destroying or erasing electronic equipment that contains Personal Data (e.g., laptops, desktops, company-owned mobile devices, and work data on Bring Your Own Device (BYOD) devices) in accordance with relevant Information Security policies and standards.

7. CONFIDENTIALITY AND INTEGRITY

A. Information Security

Where GDX processes Personal Data, we take appropriate measures to ensure the Personal Data remains secure and is protected against unauthorized or unlawful Processing, accidental loss, destruction, or damage. GDX does this by:

- Encrypting Personal Data at rest and in transit where required by law or contract and additionally as commercially practicable;
- Ensuring the ongoing confidentiality, integrity, availability and resilience of systems and services used to process Personal Data through formalized business recovery and disaster recovery plans that are routinely tested or exercised;
- Ensuring the restoration of access to Personal Data in a timely manner in the event of a physical or technical incident;
- Periodically testing, assessing, and evaluating the effectiveness of technical and organizational measures in place to secure Personal Data;
- Enforcing physical security standards are in place requiring that desks, cabinets and cupboards be kept locked if they hold Personal Data, individual monitors/screens not allow Personal Data to be visible to passers-by and electronic devices (e.g., computers, tablets) are locked or logged off GDX's systems when left unattended.

In assessing appropriate security controls, GDX considers the risks associated with the Processing, in particular the risk of accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to the Personal Data that is processed.

Where GDX engages third parties to process Personal Data on its behalf, such parties do so based on written instructions from GDX and subject to contractual provisions (e.g., via a DPA) to appropriately handle the Personal Data and implement appropriate technical and organizational measures that are at least equivalent to GDX's own security requirements. Personal Data is not shared outside of GDX without these mechanisms in place.

B. Testing

Personal Data may not be used in any GDX testing environment without a formal security exception approved in advance. All testing environments must adhere to the current standards and controls in place for production environments and all Personal Data approved for use in testing environments must be removed without delay once testing has been completed. Further details are outlined in the Secure Software Development Lifecycle.

C. Reporting A Personal Data Incident

A Personal Data incident can take many forms including, but not limited to:

- Loss of a mobile device or hard copy file containing Personal Data (e.g., accidentally leaving a device behind on public transportation);
- Theft of a mobile device or hard copy file containing Personal Data;
- Human error (e.g., an employee accidentally sending an email containing Personal Data to an unintended recipient, or accidentally altering or deleting Personal Data);
- Cyber-attack (e.g., opening an attachment to an email from an unknown third party that contains ransomware or other malware);
- Allowing unauthorized use/access (e.g., permitting an unauthorized third party to access secure areas of GDX offices or systems);
- Physical destruction and loss (e.g., fire or flood); or
- Information is obtained from GDX by a third party through deception (e.g., phishing or smishing attacks).

A Personal Data incident may have occurred if there is:

- Unusual log-in and/or excessive system activity with respect to active user accounts;
- Unusual remote access activity;
- The presence of spoof wireless (Wi-Fi) networks visible or accessible from GDX's working environment;
- Equipment failure; or
- Hardware or software key-loggers connected to or installed on GDX systems.

Employees who become aware of or have any reason to suspect that a Personal Data incident may have occurred or is about to occur must immediately contact GDX's Information Services team at info@gdxdevelopment.com.

D. Personal Data Incident Response

In the event of an actual or imminent Personal Data incident, GDX will implement its incident response and handling procedures maintained by GDX's Information Security to minimize the impact of the incident and notify regulators, data subjects and/or other parties as legally and/or contractually required. A response will typically involve the following:

- Investigating the incident to determine the nature, cause and extent of the damage or harm that has or may result;
- Implementing necessary steps to stop the incident from continuing or recurring, and limiting the harm to affected data subjects;
- Assessing whether there is an obligation to notify other parties (e.g., national data protection authorities, affected data subjects, contractual parties) and making those notifications in a timely manner; and
- Recording information about the Personal Data incident and steps taken in response, including documenting decisions to notify or not notify regulators or affected parties.

8. TRANSPARENCY

GDX provides transparency with respect to its global data privacy program through its Privacy Statement.

A. Privacy Notices

GDX provides notice to Data Subjects about the Processing of their Personal Data in its role as both a Data Controller and Data Processor. This information is available through GDX's various privacy notices for web users, job applicants and employees as well as through its individual product privacy notices. Such notices provide information about:

- The types of Personal Data GDX processes;
- The purpose and legal basis for the Processing;
- Third parties used for Processing, if applicable;
- Location and duration of Processing;
- Any cross-border transfers of Personal Data;
- Duration of Processing;
- Data subject rights; and
- Details of any artificial intelligence/automated decision-making processes

B. Training

GDX provides employees with mandatory, annual training about data protection responsibilities. The Data Privacy Training occurs at onboarding and annually thereafter. In addition to the Data

Privacy Training, GDX mandates annual completion of the Enhanced Data Privacy Training by employees who handle sensitive and special category data as well as the Privacy by Design Training by employees who play a role in the development and design of software product and service offerings. GDX continues to develop and deploy additional function-specific privacy trainings as needed.

C. Data Subject Rights

Where GDX processes Personal Data, Data Subjects have certain rights under Data Protection Laws. Although these rights vary by jurisdiction, Data Subjects generally have the right to:

- Request information about the Personal Data GDX holds about them, including a copy of such information;
- Have any inaccurate Personal Data about them corrected and incomplete Personal Data completed;
- Object to GDX's Processing their Personal Data where GDX is doing so in pursuit of its own legitimate interests. GDX can continue Processing the Personal Data notwithstanding an objection if GDX's legitimate interests outweigh those of the Data Subject, or if GDX needs to do so for legal reasons;
- Ask GDX to destroy Personal Data held with respect to the data subject. GDX can refuse this request if the Personal Data is still necessary for the purposes for which it is being processed and there is a legal basis for GDX to continue Processing; and
- Ask GDX to restrict the Processing of their Personal Data to storage under certain circumstances.

GDX will assess a Data Subject's rights under Data Protection Laws on a case-by-case basis and follow the Data Subject Request ("DSR") Procedure in determining how to fulfill a request. In general, GDX will use a Data Subject's rights under the GDPR as a baseline for fulfilling all requests and apply additional rights available under Data Protection Laws applicable to the Data Subject to the extent those are more favorable to the Data Subject. If a Data Subject exercises these rights and GDX has disclosed the Personal Data in question to a third party, GDX will do its best to ensure that the third party also complies with the wishes of the Data Subject.

Data Subjects who wish to request information about the Personal Data GDX holds about them should do so through submission of a formal DSR. If any GDX employee receives a request directly (whether verbally or in writing), the request should immediately be forwarded to legal@gdxdevelopment.com.

D. Supervisory Authorities

Contact information for relevant data supervisory authorities varies by location. The list of European Data Protection Board authorities can be found [here](#). The United Kingdom (UK)

Information Commissioner's Office (ICO) can be found [here](#). The Office of the Privacy Commissioner of Canada can be found [here](#). The European Data Protection Board for the EEA can be found [here](#). The Federal Council of Switzerland can be found [here](#). The Personal Information Protection Commission of Japan can be found [here](#). The Cyberspace Administration of China can be found [here](#).

E. Data Protection Officer

Please contact the Data Protection Officer via the following:

legal@gdxdevelopment.com
GDX Development
450 8th Ave SE
St. Petersburg, FL 33701

9. COMPLIANCE

All employees and contingent employees are expected to comply with this policy. Additionally, all GDX business units must ensure they have appropriate local standards and procedures in place to comply with this policy and applicable data privacy legislation in their jurisdiction. Breaches of this policy will be taken seriously and may result in disciplinary action, up to and including termination. This policy may be updated or amended at any time.

10. EXCEPTIONS

There are no exceptions to this policy.

11. CHANGES TO POLICY

GDX may make changes to this Policy. Notification of changes will be posted on this page. You should review this Policy periodically to keep up to date on our most current policies and practices.

Date of last update: April 14, 2026.