

Privacy Statement

Last Updated: August 18, 2024

In Brief

At A.P. Gilfoyle Management we believe in setting the example, not following it. As such, we have created this Privacy Statement which we believe is both legally compliant and easy to understand. This Privacy Statement applies to www.apgilfoyle.com, which is the official website of A.P. Gilfoyle Global Management, and any other websites which link to this Statement (either in a footer, such as in our website, or other means). Collectively, we refer to these websites as “**Site**” in this document.

Information Collected

There are two types of information that we obtain from you online and then store and use:

- non-personal information that’s collected automatically from each visitor, such as the type of browser you are using or your device operating system; and
- personal information that is collected automatically or that you voluntarily provide to us through the “contact us” functionality or similar fields or forms or by emailing us.

Your Privacy Choices

As a privacy focused organization, we have made our Site as usable as possible without providing us with any personal information. Not providing certain personal information may limit your ability to take full advantage of the website but it will not affect your ability to

Uses of Information

We use voluntarily provided personal information for internal business purposes such as to process your requests and to communicate directly with you. We share personal information when needed to fulfill our legal obligations and when our vendors need it to perform under the contracts we have with them.

We do not sell, rent, or trade your personal information to or with third party data vendors or marketing companies. As you might expect, we disclose your information when required by law.

We use non-personal information to administer our website and to inform its content and user experience.

Your Privacy Rights

Certain of our business activities in California implicate obligations under the California Consumer Privacy Act (“**CCPA**”). We comply with those obligations by, among other things, providing information about the rights California residents have under the CCPA. Which we outline at apgilfoyle.com/ca-privacy

access certain information available to the general public on the website. You can access and amend the personal information we have collected about you and you may also delete the personal information we have collected about you under certain circumstances subject to our internal data retention procedures. To make a request to access, amend or delete your personal information, contact us using the contact information listed in this privacy statement.

Additionally, certain of our business activities in the European Union and United Kingdom implicate obligations under the General Data Protection Regulation, known commonly as the “GDPR”, or similar data protection laws. We comply with our duties thereunder by providing information about the rights certain individuals have under the GDPR and ensuring the use of appropriate safeguards for processing personal information governed by such data protection laws, which you can learn more about later in this document.

Contact Us

Address:

A.P. Gilfoyle Global Management
45 Rockefeller Plaza, Floor 20
New York, NY 10111.

Email: privacy@world.apgilfoyle.com

Phone: 1-212-529-4550

Our Privacy Statement

Thank you for visiting A.P. Gilfoyle Global Management’s website and viewing this privacy statement. We use this statement to tell you about the types of information we collect from you when you visit or use our website. More specifically, this statement tells you:

- the types of information we collect and how we collect it;
- the ways in which we use, share, and protect that information;
- the choices you have in controlling the collection of your information; and
- your ability to access and update your information.

By using our website, you are signifying to us that you agree with this privacy statement and that we may use and disclose your information as described herein. Although our website may contain links to other sites controlled by third parties, you should be aware that we are not responsible for the privacy practices of those, or any other, sites. If you have questions about how those sites collect and use data, you should carefully read their privacy policies.

This privacy statement is a legal document, so clarity is important. We will use this section to let you know about some words that have special meanings whenever you see them in this statement. Let’s start with the word “statement” itself: when we reference “**this statement**”, “**this privacy statement**”, and “**our statement**”, we mean A.P. Gilfoyle Global Management Online

Privacy Statement you are reading now. Wherever we say “**we**”, “**us**”, “**our**”, or the “**company**”, we mean A.P. Gilfoyle Global Management and its wholly owned subsidiaries. We use the words “**you**” and “**your**” to mean you, the reader, and other visitors to our website who are, in all cases, over the age of 18. This age requirement is discussed in more detail later in this statement. Whenever we say “**including**”, we mean “**including but not limited to**” or “**including without limitation**”.

By accessing or using the Site, you consent to our activities and practices regarding your information as described in this Privacy Statement. Please carefully review this Privacy Statement, and if you do not agree with any part of this Privacy Statement, your sole and exclusive remedy is to discontinue your use of the Site.

We may amend, modify, update, supplement or remove portions of this Privacy Statement in our sole discretion, and will provide notice of any changes using the last updated date above. Your use of the Site following any such changes constitutes your acceptance and agreement to the updated terms.

Information We Collect

“**Personal information**” is information that can personally identify you, such as your name, email address, telephone number. Personal information also includes any other identifier that permits the identification of a specific individual. The data we collect depends on the context of your interactions with us, the choices you make, and the features you use. The following describes the types of personal information we may collect:

1. **Contact Information:** We may collect and store any contact information you provide in connection with any forms on the Site. For example, if you submit an inquiry form, we collect your first name, last name and email address information.
2. **Browsers and devices:** We may collect certain information about the browsers and devices you use to access the Site, including unique identifiers. Unique identifiers are cookie files used to uniquely identify a browser or device. Please see the section below on “**Cookies**” for more information.
3. **IP address:** We may collect your Internet Protocol (IP) address whenever you access the Site, which is a number automatically assigned to your computer or device when you browse the internet. These numbers are usually assigned based on geography, so an IP address can often be used to identify the general geographic area of where a device is connecting to the internet. We may use your IP address to administer and address technical issues with the Site. You may be able to disallow certain location data through your device or browser settings.
4. **Use Statistics:** We may collect information about how your browsers and devices interact with the Site, including crash reports, system activity, and the date, time and referrer URL (the webpage you came from if you clicked a link to access the Site). We may also collect

statistical information about visitor activity on the Site, including web traffic, and the date, time, duration and number of visits.

5. **Submissions:** We may store any messages, content, feedback and other submissions you provide through the Site or to us, whether directly or by using a third party service (collectively, “**Submissions**”). If you provide any Submissions, you are solely responsible for its contents and any personal information you may disclose therein. Providing any Submissions is at your own risk. We do not knowingly collect or monitor Submissions for personal information, and may use Submissions in any manner without any obligation, notice or liability to you. Do not provide information about others unless you are authorized to do so and consent to have all information used, disclosed, and transferred in accordance with this Privacy Statement. By submitting the information about others, you represent and warrant that you are authorized to do so and that you have received authorization from the person about whom you are providing the information and that person has consented to have all information used, disclosed, and transferred in accordance with this Privacy Statement.

Cookies

“**Cookies**” are small pieces of data (text files) that are stored in the web browser on your device in order to remember information about you. Cookies are used to compile anonymous, aggregate statistics based information collected through the Site. We may use cookies to administer and operate the Site, including site configuration and IT security. If you prefer, you can usually set your browser to disable cookies, or to alert you when cookies are being sent. The help function on most browsers contains instructions on how to set your browser to notify you before accepting cookies or to disable cookies entirely. However, note that this Site may not function properly if you disable all cookies.

How Your Information is Used

We may use information about you for various purposes, including:

1. to communicate with you;
2. to provide you with information regarding us or other parties that may be of interest to you;
3. to enhance your experience with this Site, including to save your preferences and login information;
4. to analyze web site usage and analyze use of the Site;
5. to protect the interests, rights, safety, or property of the Company or others and to monitor compliance with and enforce any terms of any agreement with the Company; or

6. to operate our systems properly.

We may share information about you as follows or as otherwise described in this Privacy Statement:

1. **Service Providers:** We may use third party providers to provide or support some of the services that are available through the Site, including without limitation, communications and hosting services, network security, technical and user support, tracking and reporting, quality assurance testing, and other functions. We may share your information with these third party providers so that they can perform their services or complete your requests. These third party providers may share information with the Company that they obtain from or about you in connection with providing their services or completing your requests. Third party providers may also share this information with their subsidiaries, joint ventures, or other companies under common control.
2. **Affiliates:** We may share your information with our affiliated entities, partners or agents, in which case we will require them to honor this Privacy Statement. If another Company acquires the Company or all or substantially all of its assets (e.g. merger, acquisition or sale), that Company will possess the same information, and will assume the rights and obligations with respect to that information as described in this Privacy Statement.
3. **Investigations:** We may investigate and disclose your personal information if we have a good faith belief that such disclosure (a) is reasonably necessary to comply with legal process and law enforcement instructions and orders, such as a search warrant, subpoena, statute, judicial proceeding, or other legal process served on the Company; (b) is helpful to prevent, investigate, or identify possible fraud wrongdoing in connection with the Site; (c) is necessary to act under exigent circumstances to protect the safety of the public or users of the Site, or (d) is reasonably necessary to protect the Company's rights, reputation, property, or that of its users, affiliates, partners or the public.
4. **Links:** The Site may contain links to unaffiliated third party services. If you visit any websites through those links, the collection and use of your information will be subject to such third party's terms and privacy Statement. Unless there is a separate basis for sharing your information as expressly set forth in this Privacy Statement, We will not share your personal information with these third parties and are not responsible for their privacy practices.

Non-U.S. Users

Information collected from the Site will be stored and processed in the United States. If you are located outside of the United States and choose to visit or use the Site, or provide your personal information to us, your personal information may be transferred to, processed and maintained on

servers or databases located in the United States. If you do not want your personal information transferred to or processed or maintained in the United States, you should not use the Site.

Security

We are committed to protecting the security of your information and follows generally accepted industry standards to protect the personal information it receives. However, no method of transmission over the internet, devices, or cloud or electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

Do Not Track Signals

The Site is currently not configured to respond to “Do Not Track” signals or other mechanisms that provide users the ability to exercise choice regarding the collection of personal information about a user's online activities over time and across third party websites or online services.

Personal Information of Children

This Site is intended for a general audience, and we do not knowingly collect personal information from children under 16. If you become aware that a child has provided the Company with personal information without parental consent, please contact us at privacy@gilfco.com. If we become aware that a child under 16 has provided personal information without parental consent, we will take steps to delete such data as soon as possible without notice.

European Union (EU) Residents: Your Privacy Rights under the General Data Protection Regulation (GDPR)

If you are located in the EU, we will collect personal information only if we have one or more legal bases for doing so under the General Data Protection Regulation (GDPR). The legal bases depend on your interaction with the Site. We will only collect personal information from you where: (i) you have given your consent for one or more specific purposes; (ii) it is necessary to perform a contract we are about to enter into or have entered into with you; (iii) it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; (iv) it is necessary to protect the vital interests of you or another natural person; or (v) it is necessary to comply with a legal obligation.

Data Subject Rights

You can submit a request regarding your personal information to us at privacy@world.apgilfoyle.com. In the request, you must provide certain information such as your first name, last name and email address, your relationship to the Company, and details about your request. We will only use the information you provide to evaluate, process, fulfill or contact you regarding your request (e.g., to follow up or ask for additional details about your request). We will

use commercially reasonable efforts to respond to your request as soon as possible. If the GDPR applies to your personal information, We will provide an initial response within one (1) month of your submission date. Please note that if you provide incorrect or insufficient information, we will not be able to fulfill your request.