

Privacy Notice

Last Updated February 1, 2025, v. 5.0

Introduction

GIA Alumni Association, LLC (hereinafter, “**GIA Alumni Association**,” “**we**,” “**us**,” or “**our**”) which offers the following: 1. GIA Alumni Collective®, 2. Continuing Education by GIA Alumni Collective®, 3. GIA Training Studio™, 4. GIA NextGem™, and so much more. We value the privacy of your personal data. This Privacy Notice (“**Notice**”) describes our policies and practices regarding the handling of your personal data in connection with your relationship with us as an alum or in relation to our corporate and on-demand training programs.

Privacy Office

If you have any questions or concerns about this Notice or our use of your personal data, please contact us at:

Privacy Office
GIA Alumni Association, LLC
The Robert Mouawad Campus
5345 Armada Drive
Carlsbad, California 92008 USA
alumniprivacy@gia.edu

Alumni who have successfully completed a GIA on-campus program or GIA Distance Education course (this does not include lab classes), will automatically become a member of the GIA Alumni Association, receive GIA alumni-related communications and be connected with the global alumni network. Local GIA alumni chapters may be operated by third parties who have their own privacy policies, for which GIA is not responsible. Subscribers will have the opportunity to opt out of receiving communications from the GIA Alumni Association.

Personal Data Collection and Handling

In connection with your relationship or interactions with GIA Alumni Association, we collect personal data about you (whether online, in-person, or through other means) from the following sources: directly from you; from our affiliated entities; from alumni chapters; and automatically as you visit our websites and mobile applications.

We use your personal data for the purposes described in further detail below, including to facilitate your experience with GIA Alumni Association and to provide you with products and services. We share your personal data with GIA-affiliated entities and others as described in this Notice.

Types of Personal Data We Collect

In connection with your relationship or interactions with GIA Alumni Association, we collect the following categories of personal data, as permitted by applicable law:

- **General contact information:** title, first name, last name, suffix, home address, mailing address, phone number(s), email address
- **Registration and Logins:** In order to sign up for an account on the site (where that option is available) you are required to provide your personal data, including, for example, your general contact information as identified above, ID number, and other relevant information. Once you are registered (where that

option is available), when you login to your account, we collect your login username, password, and email address (if applicable). Registering an account also allows you to edit and build out a profile. You may provide us a profile photo, updated or alternate general contact information, and other biographical information such as the company you work for and your role at such company, or information relevant to your time as a student or in relation to our training programs.

- **Business information:** business name, doing business as (“DBA”) name, address, phone number(s), business email address, company website (Note: business information is only considered personal data to the extent it identifies an individual, unless otherwise stipulated by applicable law)
- **Government identifiers:** driver’s license, passport, government-issued identification with photograph, tax identification number, business license number, business license document, GSTIN number with code (India only), voter registration card, permanent resident alien card, national identity card, vehicle license plate number (if entering GIA campus)
- **Financial information:** billing information, payment information, bank account number, banking institution, payment card information, third-party payer information
- **Education/Training:** details about your enrollments such as fields of study, dates of enrollment, degrees, diplomas, and certificates awarded, dates conferred, academic honors and awards received
- **Social Network Form Fill:** GIA Alumni Association may process your personal data when you authorize your social network to prefill a form on a GIA Alumni Association website (e.g., by signing into your social media account(s) through a button that appears on a GIA Alumni Association website). In that case, GIA Alumni Association will receive personal data about you from the social network pursuant to the policies of that social network. Examples of the personal data that we may receive includes your display name, first name, last name, profile URL, profile photo URL, social reach (number of followers), gender, email, date of birth, job title, and company. Your personal data will be processed by us in accordance with this Privacy Notice.
- **Social Media Interactions:** We may allow you to connect to and share information with social media platforms and we may be required to implement cookies, plug-ins, and APIs provided by those social media platforms to facilitate those communications and features. We may share information that you provide us or that we may collect about your use of the GIA websites or mobile applications with those platforms and that information will be subject to their privacy policies. We encourage you to review the privacy policy of any social media platform that you use in connection with the Site. In addition, by choosing to use any third-party social media platform or choosing to share content or communications with any social media platform, you allow us to share information with the designated social media platform. We cannot control any policies or terms of such third-party platforms. As a result, we cannot be responsible for any use or disclosure of your information or content by third party platforms, which you use at your own risk.
- **Images and recordings:** call recording, electronic video and audio monitoring and surveillance, film, photographs
- Other information we may collect from or about you as needed, such as date of birth or residency

Purposes for Which We Use Personal Data

We may use your personal data for the following purposes:

- Assist with quality assurance, training, respond to inquiries and provide customer service
- Register and administer your account
- Communicate with you about your account
- Review and process your submissions
- Provide you with information, products, and services
- Deliver publications and subscriptions
- Combine your personal data with other information that we obtain from third parties
- Assist us in advertising our services, including on non–GIA Alumni Association websites or through other channels
- Comply with applicable laws, including sharing your data with law enforcement and service providers
- Monitor compliance with our existing policies and procedures
- Investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, or violations of the [GIA Alumni Association, LLC Terms of Use](#), or this Notice, where we believe it is appropriate
- Respond to formal or informal government or regulatory body requests
- Provide for the integrity and security of our premises and processes
- Help us understand your needs and interests
- Improve our products and services
- Direct marketing as permitted by applicable law, for example, to send you news and newsletters, special offers and promotions, or to contact you about products or information we think may interest you. We may send these communications through postal mail, email, SMS (available in some markets only), or other available channels.
- Help us determine what advertisements to direct to you, to place on websites, and where to advertise our services

You will not be subject to decisions based on automated information processing without your prior consent, unless described as such in this Notice.

As applicable based on your interaction with us, we use and may share your personal data as follows:

GIA Alumni Association

- To deliver the GIA Alumni Association information, products, and services you request and connect you with your global alumni network

- Administration of scholarships and awards through alumni and donor relationships

Security

- To provide for the integrity and security of physical premises and for the safety of our employees, clients, students, alumni, visitors, training participants, and others, and for emergency security purposes

Video and Audio Monitoring

- To provide for the integrity and security of our premises and processes, we use both video and audio monitoring in public and workspaces. Appropriate signs are displayed in all areas where video and audio monitoring are used.

User Generated Content

You are responsible for any data, information, images, messages, documents, and other content you (where the option is available) enter, submit, create, post, upload, transmit, or otherwise provide through or using the website, including, for example, by populating your user account or profile and uploading a profile image. All user-generated content is provided at your own risk. We cannot guarantee that user-generated content will not be viewed by unauthorized persons. You understand that, even after removal, copies of user-generated content may remain viewable in cached and archived pages and may have been copied or stored by Internet archives and other users. We will make user-generated content available, including publicly available, to other users and the public, as applicable and at our sole discretion, and will use and disclosure user-generated content for the purpose for which it was provided as indicated at the point of collection.

Links

For your convenience, we may provide links to certain non-affiliated websites or referrals to certain non-GIA products or services. If you choose to visit these websites or to use such products or services, please be aware that we are not responsible for the information practices of these third parties and the third party's privacy policy, and not this Notice, will govern your activities and any information you disclose while interacting with them.

Automatically Collected Data

Our websites collect certain information automatically and store it in log files. The information includes Internet Protocol ("IP") addresses, the region or general location where your computer or device is accessing the Internet, browser type, operating system, and other usage information about your use of our websites. We use this information to help us design our services to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our websites, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

Information About Our Use of Cookies

Our website uses cookies to distinguish you from other users of this site. This helps us provide you with a good experience when you visit our website and allows us to improve this site. Our [GIA Alumni Association, LLC Cookie Notice](#) ("Cookie Notice") provides you with information about the cookies and similar technologies we use, and our purpose for using them. We may combine this data with the personal data we have collected from you.

Cookies: Cookies allow a web server to transfer data to a computer for record keeping and other purposes. We and our service providers use “cookies” on our websites or mobile applications and similar devices designed for mobile applications, to, among other things, better serve you with tailored information and facilitate your ongoing access to and use of the Site. For further information and details about the cookies used on our websites and mobile applications, please see our [Cookie Notice](#). There are two types of cookies: session-based and persistent cookies.

- **Session Cookies.** Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged in to our websites or mobile applications. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our websites or mobile applications.
- **Persistent Cookies.** Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to track aggregate and statistical information about user activity, which may be combined with other user information.

Disabling Cookies. Most web browsers automatically accept cookies, but if you prefer you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our websites or mobile applications who disable their web browsers’ ability to accept cookies will be able to browse our websites or mobile applications; however, certain site features, such as the shopping cart or the ability to find the location of a lab, may not function if you disable cookies.

Information About Our Use of Other Technologies (web beacons, pixel tags, and other technologies): Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. Clear GIFs are small pieces of code embedded invisibly on web pages, not stored on your hard drive, which often work in conjunction with cookies. We may use clear GIFs in connection with our websites to, among other things, track the activities of users, help us manage content, and compile statistics about use of these sites. We and our service providers also use web beacons in HTML emails to you to help us track email response rates, measure the success of our marketing campaigns, identify when our emails are viewed, and track whether our emails are forwarded.

Analytics: We work with service providers (including Google Analytics) who conduct analytics to help us track and understand how visitors use our websites. Google Analytics is a web analytics service provided by Google that uses cookies to help us analyze how users use our websites. The information generated by the cookies about your use of the services will be transmitted to and stored by Google on servers in the United States. If you access our websites through different devices, Google may associate your devices with one another. For more information about how Google Analytics uses cookies to measure user interactions, visit <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>. Google has developed the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js). You can prevent Google’s collection and use of the data it collects as defined in its policy by downloading and installing this browser plug-in: <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. For more information about Google Analytics cookies, please see Google’s help pages (<https://support.google.com/analytics/answer/6004245>), FAQ on how they use the data (<https://policies.google.com/technologies/partner-sites>), and privacy policy (<https://www.google.com/intl/en/policies/privacy/>).

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Online Advertising: To display more relevant advertising, to manage our advertising on non-affiliate sites, mobile apps, and online services, and to measure and improve our ads and marketing efforts, we work with Google and other non-affiliated ad companies, ad exchanges, channel partners, measurement services and ad networks. Please see the “Information About Our Use of Cookies” section above or our [Cookie Notice](#) for more information. For more information and to exercise your choices please see Google/DoubleClick’s [privacy policy](#), [ad settings](#), and [ads help](#) page.

You can also learn more about online advertising [here](#) and opt out of interest-based advertising from many participating ad companies at the ad industry websites, including:

- EU: www.youronlinechoices.eu
- U.S.: www.aboutads.info

Similarly, you can learn about your options to opt out of mobile app tracking by certain advertising networks through your device settings. For more information about how to change these settings for Apple, Android or Windows devices, see:

- Apple: <http://support.apple.com/kb/HT4228>
- Android: <http://www.google.com/policies/technologies/ads/>
- Windows: <http://choice.microsoft.com/en-US/opt-out>

Please note that opting out of advertising network services does not mean that you will not receive any advertising while using our services or other services, nor will it prevent the receipt of interest-based advertising from non-affiliated parties that do not participate in these programs.

Facebook. For certain Facebook advertising services, Facebook Ireland is a Joint Controller (as defined in the GDPR) and that information required under the GDPR related to such processing can be found at <https://www.facebook.com/about/privacy>. We work with Facebook and use their advertising services to measure and improve our ads and marketing efforts, as well as to display more relevant advertising to you. For further information on how Facebook Ireland processes your personal information, including the legal basis, and the ways to exercise your rights, please visit <https://www.facebook.com/about/privacy>.

Do Not Track: Currently, our systems do not recognize browser “do not track” requests. You may however disable certain tracking as discussed in our [Cookie Notice](#).

Email and SMS Marketing Communications

In certain cases, when we obtain your contact information, we may send you marketing communications via direct mail, email, SMS (available in select markets only), or other available channels about various products, services, newsletters, or general updates of GIA Alumni Association and GIA Alumni Association’s affiliated entities. If you no longer wish to receive marketing and promotional communications from us, you may opt out by emailing our Privacy Office or as follows:

- for email: click the “unsubscribe” option; and
- for SMS: text STOP in response to the text message.

If you opt out of receiving marketing communications from us, please note that we will continue to communicate with you regarding your ongoing relationship with us and for customer service–related purposes.

Retention of Personal Data

As a general matter, we do not retain personal data for longer than is required or appropriate for the purposes for which it was collected, unless a longer or shorter period is necessary for our legal obligations; or customs of the industry; or to defend a legal claim; or to comply with legal, accounting, regulatory or reporting requirements; and consistent with applicable law.

Security of Personal Data

We take reasonable steps to protect your personal data by using technical, physical, and organizational measures that are designed to protect against unauthorized or unlawful use, alteration, unauthorized access or disclosure, accidental or wrongful destruction, and loss.

We take steps to limit access to your personal data to those persons who need to have access to it for one of the purposes listed in this Notice.

Disclosure, Transfer, and Storage of Personal Data

We share and jointly use your personal data with other GIA-affiliated entities for the following purposes: to provide the products and perform the services that you have requested; for billing and collections; to host your data; for marketing efforts; to assist us in performing our legal compliance obligations; to protect our rights and property and the rights and property of others; and for any other purpose as set forth in this Notice and permitted by applicable law. We will rely on agreements based on the standard contractual clauses or another legally valid mechanism to validly transfer your personal data outside the European Economic Area.

We also share your personal data with non-affiliated vendors and suppliers that provide products and services to GIA Alumni Association or its affiliated entities (e.g., payment processing, transmission of marketing emails, web hosting, couriers). These entities do not use your information for their own purposes, including marketing purposes, but rather act on the instructions of GIA Alumni Association or its affiliated entities. As an example of our sharing with third-party service providers, we may disclose certain information (such as your email address) with non-affiliated parties such as Facebook (more information on Facebook Custom Audience [here](#) or see above) so that we can better target ads and content to you, and others with similar interests on these non-affiliated parties' platforms or networks ("Custom Audiences"). We may also work with ad networks and marketing platforms that enable us and other participants to target ads to Custom Audiences submitted by us and others. To opt out of being included in our Custom Audiences going forward, email us at alumniprivacy@gia.edu.

We may also disclose your personal data to another entity in connection with, including during negotiations of, an acquisition or merger, sale or transfer of a business unit or assets, bankruptcy proceeding, or as part of any other similar business transfer. We may also disclose your personal data when we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, or violations of this Notice. GIA Alumni Association may also make personal data available to other parties such as legal and regulatory authorities and law enforcement upon their request and/or where we believe it appropriate to do so. When transferring personal data to GIA Alumni Association – affiliated entities and non-affiliated entities (which may be located outside the country in which your personal

data was collected and may not guarantee the same level of protection) we have executed legally necessary contracts with the recipients of your data.

Updates to this Notice

GIA Alumni Association may amend this Notice from time to time as laws change and as our organization, products, and services change. The revisions will take effect on the publication date of the amended Notice, as stated, and supersede all previous Notices regarding our privacy practices.

Unless prohibited by applicable law, we reserve the right to amend the Notice at any time, for any reason, without notice to you, other than the posting of the amended Notice at this site.

Rights of California Residents

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information regarding the types of personal information the business shares with third parties for direct marketing purposes by such third party, and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To see a copy of the information disclosure provided by GIA Alumni Association pursuant to Section 1798.83 of the California Civil Code, please contact alumniprivacy@gia.edu.

California Automated License Plate Recognition (“ALPR”) Usage

GIA’s employees and contractors responsible for physical security use ALPR technology (the “ALPR Technology”) as vehicles enter and pass through the GIA campus in Carlsbad, California. The ALPR Technology enables automated detection of vehicle information, including license plate details. The ALPR Technology and the data it collects (the “ALPR Data”) is accessed and used by GIA employees and contractors who are responsible for managing physical security at the GIA campus. ALPR Technology and ALPR Data is used for purposes of restricting access to authorized vehicles and maintaining the safety and security of the GIA campus. Relevant GIA employees and contractors are trained to use ALPR Technology and ALPR Data in a manner that complies with this Privacy Notice and applicable law. ALPR Data may be shared with law enforcement. ALPR Data is not sold by GIA. Use of ALPR Technology and ALPR Data is monitored by GIA’s legal, information security, and compliance functions for purposes of security and compliance with applicable law. GIA deploys security measures in alignment with its company security policies that are designed to maintain the accuracy of ALPR Data. GIA will correct known errors in the ALPR Data. ALPR Data will be retained by GIA in accordance with its record retention policies, and GIA will refer to applicable legal requirements in order to determine when to destroy retained ALPR Data. The title of the official custodian of the ALPR Technology at GIA responsible for implementing this section of the Privacy Notice is the Sr. Manager, Security Operations.

Additional Information for Residents of the European Union (“EU”), or where applicable and required by the laws of your jurisdiction

To the extent the GDPR or other law granting particular rights to data subjects applies to you, you may have the following rights with regard to our processing of your personal data:

- **Right to access, correct, and delete your personal data:** GIA Alumni Association will use reasonable measures designed to ensure that all personal data is correct. You also have a responsibility to ensure

that changes in personal circumstances (for example, change of address, bank account, etc.) are notified to GIA Alumni Association so that we can ensure that your personal data is up to date.

You have the right to request access to any of your personal data that GIA Alumni Association may hold and to request correction of any inaccurate personal data relating to you. You furthermore have the right to request deletion of personal data we hold about you.

- **Right to withdraw consent:** In the event your personal data is processed on the basis of your consent, you have the right to withdraw consent at any time by sending an email to alumniprivacy@gia.edu specifying your request, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Data portability:** To the extent that we use your personal data on the basis of consent or for the performance of a contract and that personal data is processed by automatic means, you have the right to receive all such personal data that you have provided to GIA Alumni Association in a structured, commonly used, and machine-readable format, and also to require us to transmit it to another data controller where this is technically feasible.
- **Right to restrict personal data use:** You have the right to restrict our use of your personal data where (i) you contest the accuracy of the personal data; (ii) the use is unlawful but you do not want us to erase the personal data; (iii) we no longer need the personal data for the relevant purposes, but you require it for the establishment, exercise, or defense of legal claims; or (iv) you have objected to our personal data use justified on our legitimate interests pending verification as to whether GIA Alumni Association has indeed compelling interests to continue the relevant personal data use.
- **Right to object to processing justified on legitimate interest grounds:** To the extent that we are relying upon legitimate interest to process data, then you have the right to object to such processing, and we must stop such processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms or where we need to process the data for the establishment, exercise, or defense of legal claims. Normally, where we rely upon legitimate interest as a basis for processing, we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.
- **Lodge a complaint:** You also have the right to lodge a complaint with a supervisory authority, in particular in your country of residence, if you consider that the collection and use of your personal data violates this Notice or applicable law.

Legal Bases We Rely on When Processing Your Personal Data

Where EU data protection law applies, and where applicable under other applicable data protection laws, we may process your personal data under the following legal bases:

- **Our Contract With You.** Our processing is necessary to perform our obligations under a contract with you or to perform steps requested by you prior to entering into a contract with you (e.g., to verify the information you have provided to us).
- **Our Legitimate Interests.** Our processing is necessary for our legitimate interests, such as to protect the security of our services; to protect the health and safety of you or others; to establish, protect, and

defend our legal rights and interests; to prevent fraud and verify identity and authorization of clients; to understand and analyze usage trends; and to improve our products and services.

- **Legal Compliance.** Where our processing is required to comply with applicable law (e.g., to maintain your payment transaction history for tax reporting purposes, in response to subpoenas, court orders, and other lawful requests by regulators, courts, and law enforcement agencies, or related to national security requests).
- **Your Consent.** When we have obtained your consent as defined by applicable law.

Privacy Questions and Complaints

Please note that certain personal data may be exempt from the requests described above pursuant to applicable laws, and that certain rights may only be exercisable in certain jurisdictions, in accordance with applicable laws. If you have any questions or concerns about this Notice or our use of your personal data, please contact our Privacy Office, at any time. In your local jurisdiction, you may also have the right to lodge a complaint with a supervisory authority if you believe that our processing of your personal data violates applicable law.

Contact Us

If you have any questions or comments about this notice, the ways in which we collect and use your information described above, your choices and rights regarding such use, or wish to exercise your rights under applicable law, please do not hesitate to contact us at:

Email: alumniprivacy@gia.edu

Postal Address:
Privacy Office
GIA Alumni Association, LLC
The Robert Mouawad Campus
5345 Armada Drive
Carlsbad, California 92008 USA