



## Website Privacy Policy

### Overview

Welcome to this Global Payroll Management Institute website, owned and produced by the Global Payroll Management Institute, Inc. (GPMI). Our website is available to all visitors, although some content and features are restricted to GPMI subscribers.

GPMI's website may contain forms for visitors to request information, products, and services. These forms may ask for contact information (such as your phone number or email address), unique identifiers (for example, user names), financial information (for example, your credit card number), or demographic information (for example, your title or location). Contact information from these forms is used to provide the products, services, or subscriber benefits that you request. Forms on our site that request financial information do so in order to bill you for products or services ordered. Unique identifiers (specifically, your user ID) are collected from website visitors to verify the user's identity for access to restricted content or features on the site.

All products and services on GPMI's website are made available subject to this Privacy Policy. By using the products and services, you agree, without limitation or qualification, to be bound by this Privacy Policy.

Questions regarding this statement should be directed to:

**Global Payroll Management Institute, Inc.**

1601 18<sup>th</sup> St. NW, Suite 1

Washington, DC 20009

(210) 226-4600

[support@gpminstitute.com](mailto:support@gpminstitute.com)

GPMI will update this policy from time to time, so please check back periodically. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will post such changes prior to implementing them.

The Global Payroll Management Institute, Inc. (GPMI) is the data controller for the purpose of the General Data Protection Regulation (GDPR). This privacy policy describes how we as the controller protect and use the information you give to us when you use this website and our services.

When you provide personal information to us it will only be used in the ways described in this privacy policy.

Your privacy is protected by law. According to the GDPR, we are allowed to use personal information only if we have an acceptable reason to do so.

The law says we must have at least one or more of the following reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When we have your consent

When we have a business or commercial reason to use your information, this is classified as a legitimate interest.

If GPMI has a business or commercial reason to use your information, this is known as 'legitimate interest' and if we need to rely on legitimate interest as the reason for using your data, we will tell you what that is. In the event that we use your data under legitimate interest, we cannot unfairly go against your interests as a subscriber.

### **What information of yours does GPMI's website collect?**

Our goal is to become your destination for global payroll-related information by providing information, services, and product offerings that are most relevant to you in the most convenient way. To achieve this goal, GPMI collects information about site visitors. Information collected online is usually defined as being either anonymous or personally identifiable.

**Anonymous information** refers to data that cannot be tied back to a specific individual and is not personally identifiable. GPMI collects some information each time a visitor comes to the GPMI website, so we can improve the overall quality of the visitor's online experience. For example, GPMI collects the visitor's IP address, browser, and platform type (e.g., an Internet Explorer browser on a Windows platform). Gathering this data helps us to learn what browsers we need to support and to diagnose problems with our website. Other anonymous information helps us determine what sections of GPMI's website are most popular and how many visitors come to our site. You do not have to log in to the site before we can collect this anonymous information.

**Personally identifiable information** refers to data that tells us specifically who you are (e.g., your name and postal address). GPMI collects personal information in the following ways from different parts of its website: GPMI Subscriber Applications, New User Signup pages, or product purchases. You are sharing personally identifiable information, including your name and email address, with us when you become a new user or subscriber to GPMI or purchase products through our website. GPMI subscribers, users, and customers are allowed to choose a user name, and this user name and password enable subscribers, users, and customers to take advantage of restricted content and features on GPMI's website.

To ensure we are able to respond to our subscribers and visitors, we will collect the following personal information, which is not an exhaustive list:

- Name
- Contact information including email address

- Information about your company and position
- Website usage data
- Transactional details
- Information identifying computers/devices used to connect to the internet, including your Internet Protocol (IP) address
- Details of access to online resources

**Below is a list of all the ways that we may use your personal information and specific reasons we rely on to use this information.**

Use of your personal information	Reason
<ul style="list-style-type: none"> <li>• To manage your relationship with us</li> <li>• To develop new ways to understand our subscribers' and users' requirements</li> <li>• To provide advice or guidance about our services</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Our legal duty</li> </ul>
<ul style="list-style-type: none"> <li>• To manage how we work with other companies that provide services to us and our subscribers</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Our legal duty</li> </ul>
<ul style="list-style-type: none"> <li>• To deliver our services</li> <li>• To make and manage subscribers', users', and customers' payments</li> <li>• To manage fees, charges and interest due on customer, user, and subscriber accounts</li> <li>• To collect and recover money that is owed to us</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Our legal duty</li> </ul>
<ul style="list-style-type: none"> <li>• To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit</li> </ul>	<ul style="list-style-type: none"> <li>• Our legitimate interests.</li> <li>• Our legal duty</li> </ul>
<ul style="list-style-type: none"> <li>• To exercise our rights set out in agreements or contracts</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> </ul>
<ul style="list-style-type: none"> <li>• To communicate changes to legislation relating to global payroll compliance</li> </ul>	<ul style="list-style-type: none"> <li>• Our legitimate interests</li> <li>• Our legal duty</li> </ul>

**We may collect personal information about you from these sources:**

**Data you give to us:**

- When you apply for our services
- When you talk to us on the phone or at meetings
- When you use our website
- In emails and letters
- In customer surveys

**Data we collect for use of our services including:**

- Personal details
- Financial details
- Goods or services provided

**Other Registration:** You may be asked for personal information when registering for specific services. For example, if you download certain whitepapers, you will be asked to provide your email address.

**Online Purchases:** We also ask for personal information when you make a purchase using our ecommerce store. The number and variety of useful services on GPMI's website that may require collection of personally identifiable information will continue to grow in the future. GPMI subscribers, users, and customers are allowed to choose a user name and password, and this user name and password enable customers to take advantage of restricted content and features on GPMI's website.

**What are "cookies" and how does GPMI use them?**

A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer. This unique number identifies your web browser – but not you – to GPMI computers whenever you visit GPMI's website. A cookie will not provide personally identifiable information about you, such as your name and address. The use of cookies is now an industry standard, and cookies are currently used on most major websites.

Most web browsers are initially set up to accept cookies. If you prefer, you can reset your browser to notify you when you have received a cookie. You can also set your browser to refuse to accept cookies altogether. While GPMI does not require you to use cookies, keep in mind that certain services will not function properly if you set your browser to refuse all cookies.

To help serve you better, GPMI generally uses cookies to identify return visitors. Cookies let us remember your web browser so we can provide personalized subscriber and customer services.

**What organization collects the information and who has access to it?**

Data collected through GPMI's website is generally collected and maintained solely by GPMI and/or its parent organization, the American Payroll Association. More specifically:

**Personally identifiable information.** When you provide personally identifiable information on GPMI's website to register for a service or buy a product, that information is collected and maintained solely by GPMI, unless specifically stated otherwise at the point of collection. If you

subscribe to GPMI through our website or become a user, you provide personally identifiable information to GPMI.

**Anonymous information.** We disclose to third-party sponsors/advertisers aggregate statistics (i.e., impressions and click-throughs on a company's advertisement). Also, we may share aggregate website statistics with the media or other third parties. No personally identifiable information is disclosed to these sponsors/advertisers or other third parties as part of this process – only information in an aggregate form.

Be aware that GPMI's sponsors, advertisers, and third-party content providers have links on our site that take you to other websites. For example, when you click on an ad displayed on GPMI's website, you may be linked to another site. Please note also that links to other websites are provided throughout GPMI's website for users' information and convenience. GPMI's website Privacy Policy does not cover third-party data collection practices, and GPMI does not assume any responsibility for any actions of third parties.

#### **How does GPMI use the information it collects?**

GPMI collects information to provide you with the services you request and to improve our website. If you subscribe to GPMI through our website, we use the personally identifiable information you provide to send you GPMI publications, white papers, information about subscriber benefits, and other information that GPMI believes is relevant and useful to its subscribers and users.

As mentioned above, GPMI uses the aggregate, anonymous data collected to let our sponsors/advertisers know the number of impressions or views and the number of "click throughs" on their advertisements. GPMI also uses this aggregate, anonymous data to perform statistical analyses of the collective characteristics and behavior of our site visitors; to measure user interests regarding specific areas of the GPMI website; and to analyze how and where best to use our resources. Without such data, we would not know which parts of the site are the most popular, and we would not be able to change and update the content and services appropriately.

GPMI may be required by law enforcement or judicial authorities to provide information on individual users to the appropriate governmental authorities. In matters involving a danger to personal or public safety, GPMI may voluntarily provide information to appropriate governmental authorities.

#### **If you choose not to give personal information**

Data collection that is optional will be clearly stated when collected. However, if you decide not to share required personal data with us, it may delay or stop us from meeting our obligations and this can also mean that we cannot perform services needed to carry out requested transactions. We are required to collect certain personal information by law, and/or under the terms of a contract we have with you. By not sharing the required data with us, it may lead to cancelling a service you have with us.

## **How long we keep your personal information**

We will keep your personal information for as long as you are a subscriber or customer of GPMI.

After that, we may keep your data for up to eight years for one of these reasons:

- To respond to any questions or complaints
- To show that we treated you fairly
- To maintain records

We may keep your data for longer than eight years if we cannot delete it for legal, regulatory or technical reasons.

## **Marketing material you receive**

GPMI markets to our subscribers, users, and customers to let you know about products, services and offers that we think you might be interested in.

We sometimes use your personal information to decide which of these products, services and offers may be of particular interest to you. You have the right to contact us and ask us to stop using your data in this way at any time.

GPMI will market to you only if we have your prior consent to do so, or if we believe there is a 'legitimate interest'. Legitimate interest is when there is a business or commercial reason to use your information to market to you.

You also have the right to have us stop collecting data while you are using our website or mobile apps. Whatever you choose, you'll still receive important information such as changes to your existing products and services. From time to time we may ask you to confirm or update your choices, or if there are changes in the law, regulations, or the structure of our business. You can contact us at any time to update your choices.

## **Can I get a copy of the personal information you hold for me?**

You can access the personal information we hold about you by writing to us at this address:

Global Payroll Management Institute, Inc.

1601 18<sup>th</sup> St. NW, Suite 1

Washington, DC 20009

[support@gpminstitute.com](mailto:support@gpminstitute.com)

If you have any questions about your information, what we do with it or believe any of the details held are inaccurate, please contact us at the above address.

## **Your rights to stop us using your personal information**

We may need to keep your data for legal or official reasons but you can inform us if you think that we shouldn't be using it. You can object to us using your data or ask to have it deleted and removed if you think there is no reason for us to have it. This is now recognized as the 'right to object', the 'right to erasure' or the 'right to be forgotten'.

We can sometimes limit the use of your data and this will mean that your data will only be used for specific things like legal rights and legal reasons. In this case, we will not use or share your information in additional ways while it is restricted.

You have the right to ask for your personal data to be restricted if you think:

- It is not correct
- If you think it has been used unlawfully, but you do not want it deleted
- It is no longer relevant, but you want us to keep it for a legal claim
- You are waiting for us to confirm if we are allowed to keep on using it but you have already asked us to stop using your data

If you want us to stop using your personal data for any of the above reasons, please contact us.

### **How you can withdraw your consent**

You have the right to withdraw your consent at any time so please let us know if you wish to withdraw consent. It may not always be possible to provide certain services to you if you do this, however, we can confirm this with you.

### **How to make a complaint**

If you are unhappy or unsatisfied with why and how we have used your personal data, you can contact us by sending an email to [support@gpmiinstitute.com](mailto:support@gpmiinstitute.com) or by writing to us at this address:  
Global Payroll Management Institute, Inc.  
1601 18<sup>th</sup> St., NW, Suite 1  
Washington, DC 20009, U.S.

### **How can GPMI subscribers, users, and customers modify their personal information?**

GPMI subscribers, users, and customers have the following options for changing and modifying information previously provided. Log on to the GPMI website, then click "Profile."

Alternately, you can contact Customer Service:

#### **ATTN: Customer Service**

Global Payroll Management, Inc.  
1601 18<sup>th</sup> St. NW, Suite 1  
Washington, DC 20009  
Call: (210) 224-6406  
[support@gpminstitute.com](mailto:support@gpminstitute.com)

### **What is the opt-out policy for GPMI's website?**

The APA provides subscribers, users, and customers the opportunity to opt-out of receiving communications from us. If you no longer wish to receive specific communications or services such as mail, email, faxes, or electronic newsletters, you have the following options: Click on the link at the bottom of a GPMI email and follow the instructions to unsubscribe.

Send mail to the following postal address:

**ATTN: Customer Service**

Global Payroll Management, Inc.

1601 18<sup>th</sup> St. NW, Suite 1

Washington, DC 20009

Call: (210) 224-6406

[support@gpminstitute.com](mailto:support@gpminstitute.com)

**What kinds of security procedures are in place to protect against the loss, misuse or alteration of your information?**

GPMI's website has security measures, such as firewalls, in place to attempt to protect against the loss, misuse and alteration of your user data under our control. GPMI has implemented strict rules for employees who have access either to the databases that store user information or to the servers that host our services. While we cannot guarantee that loss, misuse or alteration to data will not occur, we take many precautions to prevent such unfortunate occurrences. Any other particularly sensitive information, such as your credit card number, collected for a commerce transaction, is encrypted prior to transmission.

You are ultimately responsible for the security of your user name and password. You may not share your user name and password with colleagues or friends so they can access content or features on the GPMI website that are restricted to GPMI subscribers only. You should log out of your browser at the end of each computer session to ensure that others cannot access your personal information and correspondence, especially if you share a computer with someone else or are using a computer in a public place like a library or Internet cafe.

**Fraudulent Emails**

Fraudulent emails adopt many different forms and are the unauthorized actions of third parties not associated with GPMI. These email messages, also "phishing" or "spoofing," are becoming more common and may appear legitimate by incorporating company brands, colors, or other legal disclaimers.

Please be advised that GPMI does not request payments, personal information, financial information, account numbers, IDs, passwords, or copies of invoices in an unsolicited manner through email, mail, phone, or fax. GPMI also does not provide our list to other organizations to sell. GPMI accepts no responsibility for any costs or charges incurred as a result of fraudulent activity. Learn more about [protecting yourself from fraud](#).