



Privacy Policy for Global Force Management Solutions

Effective Date: August 19, 2025

1. Introduction

Global Force Management Solutions ("GFMS," "we," "us," or "our") is a consulting firm based in Maryland, United States, providing professional services to the Department of Defense (DoD) and other government and private organizations, both domestically and internationally.

This Privacy Policy describes how we collect, use, process, and disclose personal information in connection with our business operations, including through our website (if any), client engagements, and communications. We are committed to protecting the privacy and security of the information entrusted to us.

2. Scope of this Policy

This policy applies to all personal information we collect, including:

- Information collected from individuals visiting our website or engaging with our online services.
- Personal information of contact persons at our clients, prospective clients, and suppliers.
- Information provided to us by individuals during our consulting engagements.

Given our work with the Department of Defense and international clients, we adhere to a number of legal and contractual obligations that may not be covered by a standard privacy policy. This includes, but is not limited to, compliance with:

- Maryland state laws, including the Maryland Online Data Privacy Act (MODPA) and the Maryland Personal Information Protection Act (PIPA).
- Federal laws and regulations related to government contracting and data security.
- International data protection laws, such as the EU's General Data Protection Regulation (GDPR), for our work with international clients and organizations.

3. Information We Collect

The types of personal information we may collect depend on the nature of our engagement and interaction with you. This may include:

- **Contact Information:** Name, job title, company/organization, mailing address, email address, and telephone number.
- **Professional Information:** Employment history, qualifications, and other information related to professional roles.
- **Engagement-Specific Information:** Information provided to us by our clients or on their behalf during a consulting project. This can be highly sensitive and may include, for example, information related to personnel, security clearances, or proprietary data.
- **Technical Information:** When you visit our website, we may automatically collect information about your device and internet connection, such as your IP address, browser type, and operating system.
- **Communications:** Information you provide to us when you communicate with us via email, phone, or other means.

4. How We Use Your Information

We use the personal information we collect for the following purposes:

- **Provide Consulting Services:** To fulfill our contractual obligations to our clients and deliver our consulting services. This is the primary purpose for which we process most data.
- **Business Operations:** To manage our business, including billing, accounting, and internal record-keeping.
- **Communication:** To respond to your inquiries, provide information about our services, and manage our business relationship with you.
- **Compliance:** To comply with legal and regulatory obligations, including those related to government contracting, and to defend our legal rights.
- **Security:** To protect the security and integrity of our systems, data, and services.

5. Legal Basis for Processing (for GDPR compliance)

For personal data of individuals in the European Union (EU) or European Economic Area (EEA), we rely on the following legal bases for processing their personal data:

- **Contractual Necessity:** The processing is necessary to perform a contract with you or to take steps at your request before entering into a contract.

- **Legitimate Interests:** The processing is necessary for our legitimate business interests, provided these interests do not override your fundamental rights and freedoms. This includes, for example, our interest in managing our business relationships and ensuring the security of our services.
- **Legal Obligation:** The processing is necessary to comply with a legal or regulatory obligation.
- **Consent:** In certain cases, we may rely on your explicit consent to process your personal data. Where we do so, you have the right to withdraw your consent at any time.

6. Disclosure of Your Information

We may disclose your personal information to the following categories of recipients:

- **Clients and Partners:** We may share information with our clients, partners, and subcontractors as necessary to fulfill our contractual obligations and provide our services. For engagements with the DoD, this sharing is governed by strict contractual and legal requirements.
- **Service Providers:** We may share personal information with third-party service providers who perform services on our behalf, such as IT support, data hosting, and professional advisors. These providers are obligated to protect your information and only use it for the purposes for which we have engaged them.
- **Legal and Regulatory Authorities:** We may disclose personal information if required by law, court order, or a government request, particularly in relation to our DoD contracts. We may also disclose information to protect our rights, property, or safety, and the rights, property, or safety of others.
- **Business Transfers:** In the event of a merger, acquisition, or sale of assets, your personal information may be transferred to the acquiring entity.

7. Data Security

We implement and maintain reasonable technical and organizational security procedures and practices appropriate to the nature of the personal information we handle. This is particularly critical given our work with sensitive data and our obligations to the DoD. We take measures to protect against unauthorized access, alteration, disclosure, or destruction of your personal information.

8. International Data Transfers

As we work with international clients, personal information may be transferred to, and processed in, countries outside of your country of residence, including the United States. We take steps to ensure that such transfers comply with applicable data protection laws, such as the GDPR, and that your personal information is adequately protected. This may include using standard contractual clauses or other legally recognized transfer mechanisms.

9. Your Rights

Depending on your jurisdiction and the nature of our relationship, you may have certain rights regarding your personal information, including:

- **The Right to Know:** The right to know what personal information we collect, use, and disclose.
- **The Right to Access:** The right to request a copy of the personal information we hold about you.
- **The Right to Rectification:** The right to request that we correct any inaccurate or incomplete personal information.
- **The Right to Deletion:** The right to request that we delete your personal information, subject to certain exceptions.
- **The Right to Object:** The right to object to the processing of your personal information in certain circumstances.
- **The Right to Opt-Out:** The right to opt-out of the processing of your personal data for certain purposes, such as targeted advertising.

To exercise these rights, please contact us using the details in the "Contact Us" section below. Please note that in some cases, our contractual obligations with the DoD or other clients may limit our ability to fulfill certain requests.

10. Children's Privacy

Our services are not intended for children, and we do not knowingly collect personal information from individuals under the age of 13. If you believe we have inadvertently collected such information, please contact us so we can take appropriate steps to delete it.

11. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or applicable laws. We will post the updated policy on our website with a new effective date. We encourage you to review this policy periodically.

12. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices, please contact us at:

Global Force Management Solutions
15250 Rolling Meadows Rd
Upper Marlboro, MD 20772-8331

ricardo.garraton@gfmsolutions.net
240.535.3349