

JEENIE® PRIVACY NOTICE

Effective Date: March 2020

We at Global Professional Search, Inc. d/b/a Jeenie (“**Global Professional Search**”, “**Jeenie**” “**We**”, “**Us**”, or “**Our**”) recognize the importance of privacy and are committed to protecting the privacy of Our customers and users. Jeenie provides on-demand, live access to human language interpreters over mobile devices. This Privacy Notice (“**Notice**”), describes Our practices relating to how We collect, use, store and disclose (collectively “**Process**”) information that We obtain about users of Our website at Jeenie.com and any associated sub-domains (the “**Sites**”), Our applications (the “**Platform**”), and the services available through Our Sites and Platform (collectively, the **Sites**, the **Platform** and the services available therein are the “**Services**”). This Notice also applies to any company, business or organization that has signed a separate user agreement, subscription agreement and/or Business Associate Agreement (“**BAA**”) with Us (“**Enterprise Customers**”). In addition to the uses described in this Notice, We will use and process Personal Data collected from Enterprise Customers in accordance with any additional rights and obligations set forth in that separate terms of use agreement, subscription user agreement, and/or BAA entered into between the Enterprise Customer and Us. In the event of a conflict between the user agreement, terms of use agreement, subscription agreement, and this Notice, with respect to Enterprise Customers only, the user agreement shall control. As used herein, the term “**You**” refers to the individual end user of the Platform and Services or the Enterprise Customer who has signed a BAA and/or other separate user agreement. This Notice does not apply to any websites, webpages, or mobile apps that are run or owned by any other third party.

For the purpose of this Notice, “**Personal Data**” means any information that identifies or could be used to identify an individual person. Personal Data may include Protected Health Information (“**PHI**”), which we may collect, process, and store on behalf of our Enterprise Customers.

Your use of Our Services, and any dispute over privacy, is subject to this Notice and Our [Terms of Use](#), including, where permitted by law, its applicable limitations on damages and the resolution of disputes. Jeenie [Terms of Use](#) are incorporated by reference into this Notice.

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Information We Collect

We collect Personal Data directly from individuals, from third parties, and automatically through the use of Our Services and may combine the information We collect from these various sources. If You would like to use Our Services, but decide not to provide Us with Your Personal Data, You may browse Our Sites and Platform, but Our Services may not be available to You.

Account and Registration Information

You can view Our Sites and Platform without Your creating an account or Your submitting of Personal Data. However, in order to use Our Platform and Services, such as to see a home screen, search for or request a linguist, or to sign up as a linguist, You must register an account with Us and provide Us with Personal Data. We collect this information (including Personal Data) about You directly from You, including Your name, email address, cell phone number, and Your native language; if You are a linguist We also ask You about any languages You speak, proficiency levels, countries You have lived in, the time zone You are usually located in, and payment information (e.g. Your PayPal email address). For the purpose of providing more

personalized and enhanced Services, We may also ask or allow You to submit additional, optional account information, such as nickname, profile picture, gender information, the city You are located in, areas of expertise and domain knowledge, and other voluntary profile information. You may, at some point, also be able to sign into Our Services using third-party accounts, such as through Your Google, Facebook, WeChat, or LINE account. When You log in through these third-party accounts, You must grant Us permission to access and use certain information from these accounts (as explained on the permissions page), including Your name, email address, and certain profile information.

User Content

We collect information regarding the text, image, audio and video files You share with other Jeenie users, or any use of future chat functions to chat with other users on Our Sites or Platform (for example, when You upload a profile picture, request interpretation/translation services, leave comments and ratings). When users submit content, We maintain a copy of this content. We may also collect certain information metadata associated with Your content (e.g., location, date/time stamp, device type).

Protected Health Information

Jeenie complies with all federal and state laws governing the confidentiality and privacy of Protected Health Information (PHI) that are applicable to Us, including, without limitation, the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the regulations promulgated thereunder, and the Health Information Technology for Economic and Clinical Health Act (HITECH) and the regulations promulgated thereunder, in each instance, where applicable.

Usage of Service

We collect information about Your use of Our Services, such as Your booking and purchase history, and other transaction information.

Your Location

Our Platform may access and collect Your geolocation information, and Our Sites may also track and collect Your location information in order to improve Our Services by connecting You with the right linguists in Your area who can provide a more stable call connection with You and be better suited to respond to Your request. You can enable or disable location services when You use Our Service at any time by way of Your device settings.

Information We Collect About You from Third Parties

We may also collect information about You from third parties and affiliates, which We append to the information We have collected. Also, if You take advantage of a third party or affiliate offer through the Services, We may collect certain information from that third party about Your order or interaction with them, such as information You provide to Us or the third party, for example when filling out a questionnaire in relation to Our Services or being referred to us by a partner affiliate.

Information We Collect Automatically

We automatically collect the following information about You through Your use of Our Services including, but not limited to Your domain name; Your browser type and operating system; web pages You view; links You click; Your IP address; the length of time You visit Our Sites and/or use Our Services; and the referring URL, or the webpage that led You to Our Sites, as well as the following: access time, browser type, domain name, IP address, page views, and referring URL. We also may collect the following information about Your use of the Platform: mobile device ID; location and language information; device name and model; operating system type, name, and version; Your activities within the Platform; and the length of time that You are logged into Our Platform. We may combine this information with other information that We have collected about You, including, where applicable, Your user name, name, and other personal information. Please see the section “**Cookies and Other Tracking Mechanisms**” below for more information.

Use and Processing of Information

Jenie uses the collected data for various purposes:

- To provide and maintain Our Service
- To notify You about changes to Our Service
- To allow You to participate in interactive features of Our Service when You choose to do so
- To provide customer support
- To troubleshoot and improve Our Service
- To gather analysis or valuable information so that We can improve Our Service
- To monitor the usage of Our Service
- To detect, prevent, and address technical issues
- To provide You with news, special offers, and general information about other goods, services, and events which We offer that are similar to those that You have already purchased or inquired about unless You have opted not to receive such information

Jenie may process Your Personal Data because:

- We need to execute on a contract We have with You.

- You have given us permission to do so.
- The processing is in Our legitimate interests and it is not overridden by Your rights.
- For payment processing purposes.
- To comply with the law.

Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)

Where European Economic Area (EEA) data protection law applies, and where relevant under other applicable data protection laws, We process Your personal data for the purposes set out in the table below, 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 (for example, to verify the information You have provided to Us).

Our Legitimate Interests

Our processing is necessary for Our legitimate interests, including to protect the security of Our Services; to protect the health and safety of others; to establish, protect and defend Our legal rights and interests; to monitor and protect Our Services; to prevent fraud and verify identity and authorization of users; to personalize user experiences and content; to understand and analyze usage trends; and to improve the Services.

- **Legal Compliance.** Our processing is required to comply with applicable law (for example, to maintain Your payment transaction history for tax reporting purposes).
- **Your Consent.** When We have Your express consent as defined by applicable law. For example, where We record calls for quality and assurance, and research, development, and product improvement purposes.

In addition, We may process personal information to the extent necessary to protect the health, safety or vital interests of any person and to establish, protect and defend Our legal rights. We will seek Your express consent if We are going to use Your Personal Data for any purpose other than those set forth in this Notice.

Purposes of Use and Processing of Personal Information	EU Legal Bases
Providing Support and Services	<i>Our Contract with You</i> <i>Our Legitimate Interests</i>

<ul style="list-style-type: none"> • To provide and operate the Services and related features, fulfill Your orders and requests and to process Your payments • To update the Services • To permit You to update, edit, and manage Your content • To communicate with You about Your use of the Services and respond to Your inquiries and complaints, including via email, phone or SMS, to respond to Your inquiries, to provide after-sales support • For troubleshooting, technical, and customer service and support purposes 	<i>Protect Legal Rights</i>
<p><i>Verification</i></p> <ul style="list-style-type: none"> • To verify the identity of users and others with whom We interact • To confirm authorization of users that access and use the Services 	<i>Our Contract with You</i> <i>Our Legitimate Interests</i>
<p><i>Improve Services and Analytics</i></p> <ul style="list-style-type: none"> • To create anonymous or aggregate information • To optimize or improve Our products, Services and operations • To perform statistical, demographic, and marketing analyses of Our users, to analyze and understand usage and activity trends, demographic trends and for other research, analytical and statistical purposes 	<i>Our Legitimate Interests</i>
<p><i>Communicate with You</i></p> <ul style="list-style-type: none"> • To communicate with You about Your account or transactions with Us (including Services-related announcements) or Your comments and ratings • To communicate with You about changes to Our policies 	<i>Our Contract with You</i> <i>Our Legitimate Interests</i> <i>Protect Legal Rights</i>
<p><i>Personalize Services and Ads</i></p> <ul style="list-style-type: none"> • To personalize content and experiences on Our Services, including providing You recommendations and feedback based on Your preferences, and to use Your location information for personalization and to match You with linguists • In the case that We were to implement ads, to better target ads so that users receive ads that are relevant to them 	<i>Our Legitimate Interests</i> <i>Your Consent</i>
<p><i>Marketing and Promotions</i></p> <ul style="list-style-type: none"> • To send You information, news, updates and offers about Us or Our Services (subject to Your consent where required by applicable law) • For other direct marketing and promotional purposes • To administer Our rewards program, for example assign, track, issue, and post rewards and credits to user accounts 	<i>Our Legitimate Interests</i> <i>Your Consent</i>

Protect Legal Rights and Prevent Misuse	<ul style="list-style-type: none"> • To protect the Services and Our business operations • To detect, investigate, prevent, or take action regarding illegal activities, misuse, suspected fraud or situations involving potential threats to the safety or legal rights of any person or entity, and as evidence in litigation • To investigate, enforce, and prevent violations of Our policies and terms (including this Privacy Notice and Our Terms of Use) • As otherwise necessary to establish, protect and defend Our legal rights 	<i>Our Legitimate Interests Our Contract with You Protect Legal Rights</i>
Complying with Legal Obligations	<ul style="list-style-type: none"> • To comply with the law • To respond to legal process or enforcement or legal process requests, e.g. in response to subpoenas, court orders, and other lawful requests by regulators, courts and law enforcement agencies, or related to national security requests 	<i>Comply with Law Our Legitimate Interests Protect Legal Rights</i>
General Business Operations	<ul style="list-style-type: none"> • Where necessary for the administration of Our general business, accounting, recordkeeping, and legal functions • As part of Our routine business administration, such as employee training, compliance auditing, and similar internal activities • If necessary, in connection with potential or actual sale of Our company or any affiliate, or of any of Our assets or those of any affiliated company, in which case Personal Data held by Us about Our users may be one of the transferred assets. 	<i>Our Legitimate Interests Protect Legal Rights Comply with Law</i>

Sensitive Personal Data

Sensitive Personal Data means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that are deemed to be sensitive under applicable law. Where it becomes necessary to process Your Sensitive Personal Data for any reason, We rely on one of the following legal bases:

- **Protected Health Information (PHI).** We do NOT collect, process, store, record, monitor or otherwise use Protected Health Information (PHI) of any kind;

- **Compliance with applicable law.** We may process Your Sensitive Personal Data where the processing is required or permitted by applicable law (e.g., to comply with Our diversity reporting obligations);
- **Detection and prevention of crime.** We may process Your Sensitive Personal Data where the processing is necessary for the detection or prevention of crime (e.g., the prevention of fraud);
- **Establishment, exercise or defense of legal rights.** We may process Your Sensitive Personal Data where the processing is necessary for the establishment, exercise or defense of legal rights; or
- **Consent.** We may process Your Sensitive Personal Data where We have, in accordance with applicable law, obtained Your prior, express consent prior to processing Your Sensitive Personal Data (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way).

If You provide Sensitive Personal Data to Us, You must ensure that it is lawful for You to disclose such data to Us, and You must ensure a valid legal basis applies to the processing of those Sensitive Personal Data.

How We Disclose Your Information

We may disclose Your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend Our rights or property
- To prevent or investigate possible wrongdoing in connection with Our Service
- To protect the personal safety of users of Our Service or the public
- To protect against legal liability

We may disclose Your information, including personal data, as follows:

- **Users.** Some of the features and functionality of Our Services involve disclosure of Your personal data to other users of Our Services; for example, including, without limitation, that Your name, email address, profile, and content may be searchable by and be displayed to other users of the Platform.
- **Affiliates.** We may disclose the Personal Data We collect from You to Our affiliates or for their own marketing, research, and other purposes; however, if We do so, their use and disclosure of Your personally identifiable information will be subject to this Notice.
- **Service Providers.** We may disclose the Personal Data We collect from You to Our service providers, who perform functions on Our behalf, such as payment processors, hosting providers, auditors, advisors, consultants, customer service, and support providers. For example, We use third-party providers to process Your payments or third parties that verify Your language skills in any assessment test You take after signing up as a linguist or interpreter with Us. If We disclose Your Personal Data to any service provider, such service provider will be subject to binding contractual obligations to: (i) only use the Personal Data in accordance with Our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

- ***Business Transfers.*** In the event that We are involved in a potential or actual bankruptcy, merger, acquisition, reorganization, sale of assets, or similar event, Your Personal Data may be sold or transferred as part of that transaction or in anticipation of a possible transaction. This Notice will apply to Your Personal Data as transferred to the new entity.
- ***In Response to Legal Process.*** We may disclose the Personal Data We collect from You to a court, legal authority, adverse litigation party, legal counsel, and other advisors in connection with a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- ***To Protect Us and Others.*** We may disclose Personal Data We collect from You to a court, legal authority, government agency, adverse litigation party, legal counsel, and other advisors where We believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the rights, property and the safety of any person, violations of Our [Terms of Use](#) or this Notice, or as evidence in litigation in which Company is involved.
- ***Aggregate and Anonymized Information.*** We may share aggregate or anonymized information about users with third parties for marketing, advertising, research, or similar purposes.
- ***Consent.*** In addition to the disclosures described in this Notice, We may share information about You with third parties whenever You consent to or direct such sharing.

Cookies and Other Tracking Mechanisms

We and Our service providers use cookies, pixels, JavaScript, and other tracking mechanisms to track information about Your use of Our Sites and Platform. We or Our service providers may combine this information with other information, including personal information We collect about You.

Cookies. Cookies are alphanumeric identifiers that We transfer to Your computer's hard drive through Your web browser for record-keeping purposes. Some cookies allow Us to make it easier for You to navigate Our Sites, while others are used to enable a faster log-in process or to allow Us to track Your activities while using Our Sites. We will not use the Cookies for any purpose other than those set forth in this Notice. Examples of Cookies We use:

- **Session Cookies.** We use Session Cookies to operate Our Service.
- **Preference Cookies.** We use Preference Cookies to remember Your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

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. For more information on how to control and/or delete several types of cookies, please see www.aboutcookies.org or visit the respective browsers' sites:

- [Cookie settings in Internet Explorer](#)

- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari](#)

For example, You can set Your browser to notify You when You receive a cookie, giving You the chance to decide whether to accept it. You can also delete all cookies that are already on Your computer and You can set most browsers to prevent them from being placed. Doing so, however, may result in Your having to manually adjust some preferences every time You visit Our Sites or use Our Platform, and some services and functionalities may not work.

Clear GIFs, pixel tags, and other technologies. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on Your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (also referred to as web beacons, web bugs, or pixel tags), in connection with Our Services to, among other things, track the activities of users of Our Services, help Us manage content, and compile statistics about usage of Our Services. We and Our third-party service providers also use clear GIFs in HTML emails to Our customers, to help Us track email response rates, identify when Our emails are viewed, and track whether Our emails are forwarded. If You would like to opt out of being tracked in this way, You may contact Us at Legal@Jeenie.com.

Do-Not-Track Signals. Our Sites do not respond to do-not-track signals. For more information about do-not-track signals, [please click here](#). You may, however, disable certain tracking as discussed above (for example by disabling cookies).

Third-Party Analytics

We may use third-party service providers to monitor and analyze Our Services. We use these tools to help Us understand use of, and to improve, Our Services, performance, ad campaigns and user experiences. These entities may use cookies and other tracking technologies, such as web beacons or local storage objects (LSOs), to perform their services.

Interest-based Ads

We work with third-party ad networks, measurement services, data analytics services, and others (“third-party ad companies”) to display more relevant advertising about Our Services, and to manage Our advertising on third-party sites, mobile apps, and online services. In order to display more relevant ads on Our behalf and others, these third-party ad companies may use cookies, pixel tags, and other tools to collect browsing and activity information on Our Services, on third-party sites and across different devices, they may also collect IP address, cookie, and advertising IDs, and other identifiers, general location information, and, with Your consent, Your device’s geolocation information. These third-party ad companies may use this information to provide You more relevant ads and content and to evaluate the success of such ads and content. As a result, Our ads may be displayed to You on a search results page or on third-party sites. For example, We may work with the following:

Google Ads (AdWords). Google Ads (AdWords) remarketing service is provided by Google Inc. You can opt out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the [Google Ads Settings page](#). Google also recommends installing the [Google Analytics Opt-out Browser Add-on](#) for Your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit the [Google Privacy Terms](#) web page.

Twitter. Twitter remarketing service is provided by Twitter Inc. You can opt out of Twitter's interest-based ads by following [their instructions](#). You can learn more about the privacy practices and policies of Twitter by visiting their [Privacy Policy page](#).

Facebook. Facebook remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from Facebook by visiting [this page](#). To opt out of Facebook's interest-based ads, follow [these instructions](#) from Facebook. Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance [in the USA](#), the Digital Advertising Alliance of Canada [in Canada](#) or the European Interactive Digital Advertising Alliance [in Europe](#), or opt out using Your mobile device settings. For more information on the privacy practices of Facebook, please visit [Facebook's Data Policy](#).

We may provide these third-party advertisers with information about Your usage of Our Sites and Our services, as well as aggregate or non-personally identifiable information about visitors to Our Sites and users of Our Services.

Custom Audiences and Matching. We may disclose certain information (such as Your email address) to third parties – such as Google Customer Match (more info on [Google Customer Match](#) here) so that We can better target ads and content to Our users, and others with similar interests on these third parties' platforms or networks ("Custom Audiences"). We may also work with third-party ad networks and marketing platforms that enable Us and other participants to target ads to Custom Audiences submitted by Us and others. If You would like to opt out of being included in Our Custom Audiences going forward, email Us at Legal@Jeenie.com.

Opting Out of Ad Networks. We do not currently place Ads on Our app but We reserve the right to change Our policy at any time. If You do not wish to have this cross-Sites information used for the purpose of serving You targeted ads, You may opt out of many ad networks by clicking [here](#) (or if located in the European Union, click [here](#)). You will continue to receive ads on the sites You visit, but the ad networks from which You have opted out will no longer target ads to You based upon Your activities on other sites. Please note, however, that these opt-out mechanisms are cookie-based; so, if You delete cookies, block cookies, or use another device, Your opt-out will no longer be effective. For more information, go to www.aboutads.info.

Third-Party Links and Widgets

Our Sites may include social media features and widgets (collectively “**Widgets**”), such as a “share this” button or other interactive mini-programs that run on Our Services. Widgets can be used to provide You specific services from other companies (for example, displaying news, opinions, music, etc.). Personal Data, such as Your email address, may be collected through the Widgets. Cookies may also be set by the Widgets to enable them to function properly. Links and Widgets displayed on Our Sites or Platform are not hosted by Us and are subject to the privacy policies of the third-party company providing the Widget, and not this Notice. Any access to and use of such linked websites and Widgets is not governed by this Notice but instead is governed by the privacy policies of those third parties. We are not responsible for the information practices of such third-party websites or applications.

Security

We have taken steps to help protect the personal information We collect. However, since the Internet is not a 100% secure environment, We cannot ensure or warrant the security of any information that You transmit to Us. Please help keep Your account safe by using a strong password. We are not responsible for any lost, stolen, or compromised passwords or for any activity on Your account via unauthorized password activity.

Retention

As a general rule, Your personal data may be stored as long as it is required for quality control purposes, to fulfill legitimate business needs, or the purposes for which the information was collected, or for as long as is required by law. In general, We will retain relevant personal data of Sites and Platform users for a period of time after the date of Our last interaction with You, as necessary to comply with Our legal obligations, resolve disputes, maintain appropriate business records, and enforce Our agreements.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer periods.

Cross-border Transfers

We are headquartered in the United States and the information We collect is governed by U.S. law. The information We collect may be transferred to, used from, and stored in the United States or other jurisdictions in which We, Our affiliates, or service providers have operations; these jurisdictions may not guarantee the same level of protection of personal data as the jurisdictions in which You reside. By using Our Services, You (i) acknowledge and agree to any such transfer of information outside of the jurisdiction in which You reside and (ii) consent to the processing of Your Personal Data in accordance with this Notice. If you would prefer not to participate in such transfers, you should not use Our Service, or provide US any Personal Data.

If You are located in the European Economic Area (“EEA”), please be aware that information You provide to Us or that We obtain as a result of the Services may be collected, transferred to, maintained, accessed, and otherwise processed in the United States or another country that the European Commission has deemed to not provide an adequate level of data protection by Us or Our service providers for the purposes mentioned above in accordance with applicable law.

We have implemented measures to adequately protect Your personal data, such as the EU standard contractual clauses for transfers to processors in third countries approved by the European Commission, or rely on another measure that provides adequate safeguards for the protection of personal data when transferred to a third country. You have the right to obtain information about the mechanism under which Your personal data is transferred outside of the EEA; to request such, please contact Us as set out in the “**Contact Us**” section below.

Payments

We may provide paid products and/or services within the Service. In that case, We use third-party services for payment processing (payment processors).

We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors whose use of Your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express, and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors We work with or plan to work with include:

Stripe. Their Privacy Policy can be viewed [here](#).

PayPal. Their Privacy Policy can be viewed [here](#).

Apple Pay. Their Privacy Policy can be viewed [here](#).

WeChat. Their Privacy Policy can be viewed [here](#).

Alipay. Their Privacy Policy can be viewed [here](#).

Access to My Personal Information

You may access and update much of the Personal Data within Your profile, by logging in and updating Your profile information. Please note that We may retain certain information about You as required by law or as permitted by law for legitimate business purposes. For example, if You request that We delete Your information, but We believe that You have violated Our [Terms of Use](#) We may retain information about You in order to attempt to resolve the issue before deleting it.

Your Choices and Rights

- **Direct Marketing.** We may send periodic promotional or informational emails to You. You may opt out of such communications by following the opt-out instructions contained in the e-mail or contacting Us at Legal@Jeenie.com. Please note that it may take up to ten (10) business days for Us to process opt-out requests. If You opt out of receiving emails about recommendations or other information We think may interest You, We may still send You administrative e-mails about Your account or any Services You have requested or received from Us. Note that the foregoing does not apply to end users associated with Enterprise Customers. We will separately obtain consent from such end users prior to sending periodic promotional or information emails.

Additional Information for Individuals from the EU/EEA

Subject to the conditions set out in the applicable law, EU individuals may have the following rights with regard to Our processing of Personal Data:

- **Right of access, erasure and rectification.** You have the right to request access to and obtain a copy of any of Your Personal Data that We may hold, and to request the deletion of Your personal data under certain circumstances. You can see and update most of this data yourself online, or by contacting Us directly at Legal@Jeenie.com. If the Personal Data We hold about You is inaccurate or incomplete, You are entitled to request to have it corrected. If You are entitled to have information corrected and if We have shared Your Personal Data with others, We will let them know about the rectification where possible. If You ask Us, We will also tell You, where possible and lawful to do so, with whom We have shared Your personal data so that You can contact them directly.
 - **Your Right to Restriction of Processing.** You can ask Us to restrict the processing of Your Personal Data in certain circumstances, such as where You contest the accuracy of that Personal Data or You object to Our use or stated legal basis. Where Your Personal Data is subject to restriction, We will only process it with Your consent or for the establishment, exercise, or defense of legal claims. If You ask Us, We will also tell You, where possible and lawful for Us to do so, with whom We have shared Your personal data so that You can contact them directly.
 - **Right to Data Portability.** Where We are relying (as the justification for processing) upon Your consent, or the fact that the processing is necessary to perform a contract to which You are party or to take steps at Your request prior to entering a contract, and the personal data is processed by automated means, You have the right to receive a copy of Personal Data We have obtained from You in a structured, commonly used, and machine-readable format, and to reuse it elsewhere or to ask Us to transfer this to a third party of Your choice.
- **Right to object to processing (including profiling) based on legitimate interest grounds.** Where We are relying upon legitimate interests to process personal data, You have the right to object to that processing. If You object, We must stop that processing unless We can demonstrate compelling

- legitimate grounds for the processing that override Your interests, rights and freedoms, or We need to process the personal data for the establishment, exercise, or defense of legal claims. 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.**
- **Right to object to direct marketing (including profiling). You have the right to object to Our use of Your personal data (including profiling) for direct marketing purposes, such as when We use Your personal data to invite You to Our promotional events.**

- **Your right to withdraw Your 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, without affecting the lawfulness of processing based on consent before its withdrawal.

You may also lodge a complaint with the supervisory authority of Your habitual residence, place of work, or place of alleged infringement, if You consider that the processing of Your Personal Data infringes applicable law.

Please note that some of these rights may be limited, such as where We have an overriding interest or legal obligation to continue to process the data. Please contact Us at Legal@Jeenie.com if You wish to exercise any of Your rights, or if You have any inquiries or complaints regarding the processing of Your Personal Data by Us.

If You wish to exercise any of these rights, please contact Us at Legal@Jeenie.com. We may require additional information from You to allow Us to confirm Your identity.

Children

Our [Terms of Use](#) require that persons must be of minimum age to use Our Services. Our Services are not targeted to children under thirteen (13) years of age and We do not knowingly collect personal information from children under 13. If We discover that a child under 13 has provided Us with personal information, We will promptly delete such personal information from Our systems. Persons under the age of eighteen (18) years of age must obtain the express permission of their parent or guardian to use Our Services.

Your California Privacy Rights

Under California's "Shine the Light" law (Cal. Civ. Code § 1798.83), California residents who provide Us their personal information are entitled to request and obtain from Us, free of charge, information about the personal information (if any) We have shared with third parties for their own direct marketing use; such requests may be made once per calendar year for information

about any relevant third party sharing in the prior calendar year (so, requests submitted in 2018 would be applicable to relevant disclosures (if any) in 2017). If You are a California resident and would like to make such a request, please submit Your request in writing by emailing Us at Legal@Jeenie.com, using the subject line “**Request for California Privacy Information.**” In Your request, please attest to the fact that You are a California resident and provide a current California address. We will reply to valid requests by sending a response to the email address from which You submitted Your request. Please note that not all information sharing is covered by the “Shine the Light” requirements and only information on covered sharing and the relevant details required by the Shine the Light law will be included in Our response.

Our Policy on “Do Not Track” Signals under the California Online Protection Act (CalOPPA)

We do not support Do Not Track (“DNT”). Do Not Track is a preference You can set in Your web browser to inform websites that You do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of Your web browser.

Changes to this Notice

This Notice is current as of the Effective Date set forth above. We may change this Notice from time to time, so please be sure to check back periodically. We will post any changes to this Notice on Our Sites or Platform. If We make any changes to this Notice that materially affect Our practices with regard to the Personal Data We have previously collected from You, We will endeavor to provide You with notice in advance of such change by highlighting the change on Our Sites or Platform, or email You at the email address We have on file for You. **Under such circumstances, if You continue to use Our Services, You will be deemed to have agreed to be bound by the updated Notice.**

Contact Us

If You have questions about the privacy aspects of Our Sites, Platform or Services, Our Data Protection, would like to exercise Your right or would like to make a complaint, please email Us at Legal@Jeenie.com. For non-legal questions about Our Sites, Platform or Services, please email Us at Info@Jeenie.com.