

In order to ensure transparency and give you more control over your Personal Information, we provide this privacy policy ("**Privacy Policy**") which governs how we, Jinigram technology (together, "jinigram technology" "**we**", "**our**" or "**us**") use, collect, and store Personal Information we collect or receive from or about any individual who uses our website, jinigramtechnologies.com (the "**Website**") and/or with whom we need to communicate in order to deliver our services.

This Privacy Policy applies to visitors to our site and the personnel of our business partners as well as users of our software solutions ("**you**"). In this Website, we provide information about our services. Our Website aims to introduce you to our software solutions. If you are a visitor to our Website, you do not need to register to our Website in order to have access to its content; and we do not require you to provide us with your contact information such as your name, email, etc. You are required to provide your personal data only if you wish to purchase our services or contact us

Please read this Privacy Policy carefully, so you can fully understand our practices and your rights in relation to personal data. "**Personal Data**" or "**Personal Information**" means any information that can be used, alone or together with other data, to uniquely identify any living human being.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement

## Definitions

"**Applicable Laws**" means the CCPA, GDPR, Data Protection Act and any other laws which apply to our services.

"**Business Representatives**" means the personnel of our service providers, resellers, distributors, agents and/or finders.

"**CCPA**" means the California Consumer Privacy Act 2018.

"**GDPR**" means the General Data Protection Regulation 679/2016.

"**Users**" means individuals who browse and/or make use of our Website.

"**you**" means Users, Business Representatives and any individual we communicate with in order to operate our Website and deliver our services.

We process your Personal Information in the following use cases:

- When you purchase our software solutions
- When you publish reviews, such as posting "likes" and comments on our website

- When we use the Personal Information of actual or potential users (e.g. contact details)
- When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

## Table of contents:

1. What information we collect, why we collect it, and how it is used
2. How we protect and retain your Personal Information
3. How we share your Personal Information
4. Your privacy rights
5. Use by children
6. Interaction with third party products
7. Log files
8. Contact us

This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your Personal Information in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

## 1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

<b>Specific Personal Information we collect</b>	<b>Why is the Personal Information collected and for what purposes?</b>	<b>Legal basis (GDPR only, if applicable)</b>	<b>Third parties with whom we share your Personal Information</b>	<b>Consequences of not providing the Personal Information</b>
<p><i>When you browse or visit our website</i></p> <p>Cookies, analytic tools and log files</p> <p>For more information, please read Sections 8 and 9 below.</p>	<p>marketing, analytics, statistics, etc.</p>	<p>For essential cookies – Legitimate interest</p> <p>Where the cookie is optional – consent</p>	<p>Google – analytics</p> <p>AWS &amp; Rackspace – storage</p> <p>CDN – hosting</p> <p>Hosting Service (may change)</p>	<p>Certain non-essential Website features may not be available</p> <p>Certain non-essential features may not be active</p>
<p><i>When you publish reviews, such as posting "likes" and comments on our website</i></p> <p>Name, Email address, Address</p>	<p>To purchase our Software Solutions</p>	<p>consent</p>	<p>Payment Processors</p> <p>AWS – CDN – hosting</p>	<p>Cannot acquire or access our Solutions</p>

Specific Personal Information we collect	Why is the Personal Information collected and for what purposes?	Legal basis (GDPR only, if applicable)	Third parties with whom we share your Personal Information	Consequences of not providing the Personal Information
<i>When we use the Personal Information of existing or prospective users(e.g. contact details)</i>				
Name, email	To communicate with you in order to manage our relationship with your workplace which is either of our: service providers, resellers, distributors, agents and/or finders.	Legitimate interest	Hosting Service (may change) Google – analytics Kayako AWS & Rackspace – storage CDN – hosting Hosting Service (may change)	Cannot communicate with our personnel

Finally, please note that some of the abovementioned Personal Information will be used for detecting, preventing, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Information may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your Personal Information. "**Anonymous Information**" means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

## 2. HOW WE PROTECT AND RETAIN YOUR INFORMATION

- Security . We have implemented appropriate technical, organizational and security measures designed to protect your Personal Information. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- Retention of your Personal Information . Your Personal Information will be stored until we proactively delete it or you send a valid deletion request. Please note that in some circumstances, we may store your Personal Information for longer periods of time, as required or permitted by applicable laws. We have an internal data

retention policy to ensure that we do not retain your Personal Information perpetually.

### 3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we share your Personal Information as follows:

- With our business partners with whom we jointly offer products or services.
- To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests/orders of such bodies;
- To the maximum extent permitted by law, we will disclose your Personal Information to third parties in connection with an actual or potential sale or transfer of some or all of our business, shares or assets to such third parties;
- In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your Personal Information in connection with the foregoing events, including, in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company; and/or
- Where you have provided your consent to us sharing or transferring your Personal Information (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

### 4. YOUR PRIVACY RIGHTS. HOW TO DELETE YOUR ACCOUNT

- Rights: The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):
- You have a right to access Personal Information held about you;
- You have the right to request that we rectify any Personal Information we hold that is inaccurate or misleading;
- You have the right to request the erasure/deletion of your Personal Information (e.g. from our records). Please note that there may be circumstances in which we are required to retain your Personal Information, for example for the establishment, exercise or defense of legal claims;
- You have the right to object, to or to request restriction, of the processing;
- You have the right to data portability. This means that you may have the right to receive your Personal Information in a structured, commonly used and machine-

readable format, and that you have the right to transmit that data to another controller;

- You have the right to object to profiling;
- You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You also have a right to request certain details of the basis on which your Personal Information is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
- You have a right to lodge a complaint with your local data protection supervisory authority.
  - The following rights (which may be subject to certain exemptions or derogations) shall apply to individuals protected by the CCPA:
- You have the right to know what Personal Information is being collected about you, This include the right to request that we disclose what Personal Information of yours we collect, use, disclose, and sell;
- You have the right to request the erasure/deletion of your Personal Information (e.g. from our records and the records of our service providers). Please note that there may be circumstances in which we are required to retain your Personal Information, for example for the establishment, exercise or defense of legal claims;
- You have the right to know whether your Personal Information is sold or disclosed and to whom;
- You have the right to restriction of, or object to, processing of your Personal Information, including the right to opt in or opt out of sale of your Personal Information to third parties, if applicable, where such requests are permitted by law;
- You have the right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA;
- You have a right to lodge a complaint with your local data protection supervisory authority or before the relevant institutions in your place of residence (e.g. the Attorney General in your State).
- Where you have consented to the processing of your Personal Information, you may withdraw that consent at any time and prevent further processing by contacting us as described in this Privacy Policy.
  - While we cannot guarantee privacy perfection, we will address any requests to the best of our ability as soon as possible. We will process such requests in accordance with applicable laws.
  - You can exercise your rights by contacting us at [support@jinigramtechnologies.com](mailto:support@jinigramtechnologies.com) or, if you are an individual protected by CCPA, you can make your requests by email. You may use an authorized

agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. To protect your privacy and data security, we may take steps to verify your identity before fulfilling your request. We will make every reasonable effort to honor your request promptly in accordance with applicable law and provided it does not adversely affect the rights and freedoms of others. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive

## 5. USE BY CHILDREN

We do not offer our products or services for use by children and, therefore, we do not knowingly collect Personal Information from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any Personal Information to us without involvement of a parent or a guardian. For the purposes of the GDPR, we do not intend to *offer information society services directly to children*. In the event that we become aware that you provide Personal Information in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at [support@jiniqramtechnologies.com](mailto:support@jiniqramtechnologies.com).

## 6. INTERACTION WITH THIRD PARTY PRODUCTS

We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a "**Third Party Service**"). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

## 7. LOG FILES

We use log files. We use such information to analyze trends, administer the Website, track users' movement around the Website, and gather demographic information.

## 8. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [support@jinigramtechnologies.com](mailto:support@jinigramtechnologies.com) .