

## JOLT'S PRIVACY POLICY

**Last Updated: December 18, 2018**

This privacy policy (“**Privacy Policy**”) governs how we, Casual Speakers Ltd., (together, “**Jolt**” “**we**”, “**our**” or “**us**”) use, collect and store Personal Data we collect or receive from or about you (“**User**”, “**you**”) such as in the following use cases:

- (i) When you browse or visit our website, <https://www.jolt.io/> (“**Website**”);
- (ii) When you make use of, or interact with, our Website
  - a. When you get a membership of our services and/or create an account
  - b. When you apply as a student in Jolt and/or when you want to learn and/or fill out these form on the Website: *"want to push your career forward?"* and/or *"Learn how Jolt can help future-proof your career. Leave your details and we'll be in touch!"*
  - c. When you apply to teach at Jolt and/or *apply to be an international speaker*
  - d. When you want Jolt to come to your city
  - e. When you sign up to receive *"career hacks"*
  - f. When you subscribe to the email list / newsletters / blog
  - g. When we process your job application
  - h. When you contact us (e.g. customer support, help, chat, submit a request)
- (iii) When you make use of, or interact with our Eye Level software product (“**Software**”) to teach or participate in classes.
  - a. When you access our Software as a teacher
  - b. When you teach a class via the Software.
  - c. When you participate in a Jolt class as a student
- (iv) When you make use of, or interact with the app mobile software application, and any other mobile software application, that we license (each individually, and collectively, the “**Jolt App**”).
  - a. When you download our Jolt App and register an account on our Jolt App
  - b. When you pick a class, register for a class and/or reserve a seat through the Jolt App
  - c. When you make reviews
- (v) When you attend a marketing event and provide Personal Data
- (vi) When you exchange business cards with us
- (vii) When we use the Personal Data of our service providers
- (viii) When we use the Personal Data of our customers
- (ix) When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn, etc) and we use the publicly available information

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. “Personal Data” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals.

Table of contents:

1. What information we collect, why we collect it, and how it is used
2. How we protect and store your personal data
3. How we share your personal data
4. Additional information regarding transfers of personal data
5. Your rights
6. Use by children
7. Public information about your activity on the services
8. How can I delete my account?
9. Links to and interaction with third party product
10. Log files
11. Cookies and other tracking technologies
12. Use of Google Analytics
13. California privacy rights
14. Our California do not track notice

15. Deletion of content from California residents
16. How to contact us

This Privacy Policy may be updated from time to time and therefore we ask you to check back periodically for the latest version of the Privacy Policy, as indicated below. If there will be any significant changes made to the use of your Personal Data 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

Data we collect	Why is the data collected and for what purposes?	Legal basis (GDPR only)	Third parties with whom we share your data	Period of storage	Consequences of not providing the data
<b><i>When you browse or visit our website</i></b>					
Cookies  For more information, please see our <a href="#">Cookies Policy</a>	Improved internet experience quality, Marketing & advertising needs.	Consent  Legitimate interest (e.g. essential cookies)	3rd party platforms such as: <ul style="list-style-type: none"> <li>• Hubspot</li> <li>• Mailchimp</li> <li>• Google</li> <li>• Facebook</li> </ul>	Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period.	Cannot collect and store the information  Cannot use or access some parts of the website
<b><i>When you make use of, or interact with our Website</i></b>					
<b><i>When you get a membership of our services and/or create an account</i></b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Phone number</li> <li>• Age</li> <li>• If someone referred you</li> <li>• Information about yourself</li> <li>• Topics of interest</li> <li>• Credit card details</li> <li>• Password</li> </ul>	<ul style="list-style-type: none"> <li>• Creating an account</li> <li>• To get a membership</li> <li>• Processing your application</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.  Legitimate interest (e.g. to create an account)	3rd party platforms such as: <ul style="list-style-type: none"> <li>• Hubspot</li> <li>• Mailchimp</li> <li>• Google</li> <li>• Facebook</li> </ul>	Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period.	Cannot create an account  Cannot get a membership  Cannot process your application
<b><i>When you apply as a student in Jolt and/or when you want to learn and/or fill out these form on the Website: "want to push your career forward?" and/or "Learn how Jolt can help future-proof your career. Leave your details and we'll be in touch!"</i></b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Phone number</li> <li>• Preferred time to call</li> <li>• Age</li> <li>• Link to pages that represent you and your career</li> <li>• Your picture</li> </ul>	<ul style="list-style-type: none"> <li>• To apply as a student in jolt</li> <li>• To receive more information about Jolt services</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.	3rd party platforms such as: <ul style="list-style-type: none"> <li>• Hubspot</li> <li>• Mailchim</li> <li>• Google</li> <li>• Facebook</li> </ul>	Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a	Cannot apply as a student in jolt  Cannot receive more information about Jolt services  Cannot send newsletters and marketing

<ul style="list-style-type: none"> <li>Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>Sending newsletters and marketing communication of Jolt</li> </ul>	<p>Legitimate interest (e.g. to apply as a student in Jolt)</p>		<p>longer or a shorter period</p>	<p>communications of Jolt</p>
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**When you apply to teach at Jolt and/or apply to be an international speaker**

<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Information regarding your work experience - CV</li> <li>How often would you like to teach?</li> <li>What would you like to teach</li> <li>Company</li> <li>Job title</li> <li>Video admission</li> <li>Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>To apply to teach at Jolt</li> <li>To establish Jolt's teacher group</li> <li>Sending emails to applicants that didn't finish onboarding to complete their registration</li> </ul>	<ul style="list-style-type: none"> <li>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</li> <li>Legitimate interest (e.g. to apply to teach at Jolt)</li> </ul>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Intercom</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period</p>	<p>Cannot apply to teach at Jolt</p> <p>Cannot establish Jolt's teacher group</p>
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**When you want Jolt to come join your city**

<ul style="list-style-type: none"> <li>Email address</li> <li>Phone number</li> <li>Your city</li> </ul>	<ul style="list-style-type: none"> <li>To have Jolt come to your city</li> <li>To evaluate the possibility of opening new Jolt centers and class rooms</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to expand Jolt's business platform and reach new cities)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Hubspot</li> <li>Mailchimp</li> <li>Google</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period</p>	<p>Jolt cannot come to your city</p> <p>Cannot evaluate the possibility of opening new Jolt centers and class rooms</p>
	<p>Sending newsletters and marketing communication of Jolt</p>	<p><b>Consent</b></p>			<p>Cannot send newsletters and marketing communication of Jolt</p>

**When you sign up to receive "career hacks"**

<ul style="list-style-type: none"> <li>Email address</li> </ul>	<ul style="list-style-type: none"> <li>To send you "career hacks"</li> <li>To send you tips to boost your career</li> <li>To send you updates about Jolt coming to other cities</li> </ul>	<p>The data subject has given <b>consent</b> to the processing of his or her personal data for one or more specific Legitimate interest (e.g. sending you tips to boost your career)</p> <p>Purposes</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Hubspot</li> <li>Mailchimp</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period.</p>	<p>Cannot send you "career hacks"</p> <p>Cannot send you tips to boost your career</p> <p>Cannot send you updated about Jolt coming to other cities</p>
	<ul style="list-style-type: none"> <li>Sending newsletters and marketing communication of Jolt</li> </ul>	<p><b>Consent</b></p>			

***When you sign up for our newsletters / email list / blog***

<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> </ul>	<ul style="list-style-type: none"> <li>Adding you to our mailing list</li> <li>Sending newsletters or other marketing communications</li> </ul>	<p>The data subject has given consent to the processing of his or her personal data for one or more specific purposes.</p> <p>Legitimate interest (e.g. send you more information about Jolt)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Hubspot</li> <li>Mailchimp</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period.</p>	<p>Cannot add you to our mailing list</p> <p>Cannot send you newsletters and marketing communications</p>
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***When we process your job application***

<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Phone number</li> <li>CV</li> <li>Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>Process your job application</li> <li>To assess you as a potential candidate</li> </ul>	<p>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to assess a candidate)</p>	<p>None</p>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period.</p>	<p>Cannot process your job application</p> <p>Cannot assess you as a potential candidate</p>
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<b>When you contact us (e.g. customer support, help, chat, submit a request)</b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Phone number</li> <li>• Call recording</li> <li>• Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>• Answer your questions</li> <li>• Provide support</li> <li>• To chat with us</li> </ul>	<ul style="list-style-type: none"> <li>• The data subject has given consent to the processing of his or her personal data for one or more specific purposes.</li> <li>• Legitimate interest (e.g. provide support and answer your questions).</li> </ul>	3 <sup>rd</sup> party platforms such as: <ul style="list-style-type: none"> <li>• Toky</li> <li>• Hubspot</li> </ul>	Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period.	Cannot assist you and respond to your query  Cannot provide support  Cannot chat with us
<b>When you make use of, or interact with our Eye Level software product (“Software”) to teach or participate in classes.</b>					
<b>When you access our Software as a teacher</b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Phone number</li> <li>• Age</li> <li>• Company</li> <li>• Job title</li> <li>• City</li> <li>• What do you teach</li> <li>• Video submitted for teacher audition</li> </ul>	<ul style="list-style-type: none"> <li>• To access the Software and deliver a lecture</li> <li>• For Jolt to evaluate and approve you as a lecturer in Jolt classes</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.  Legitimate interest (e.g. to select appropriate lecturers and to provide Jolt’s learning service)	3 <sup>rd</sup> party platforms such as: <ul style="list-style-type: none"> <li>• Hubspot</li> <li>• Mailchimp</li> <li>• Facebook</li> <li>• Google</li> </ul>	Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period.	You cannot teach a class  Jolt cannot evaluate and approve you as a lecturer in Jolt classes
<b>When you teach a class via the Software</b>					
A video of your class	<ul style="list-style-type: none"> <li>• To keep record of the classes performed in Jolt</li> <li>• To improve our service</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.  Legitimate interest (e.g. to keep record of the service and to improve it)	3 <sup>rd</sup> party platforms such as: <ul style="list-style-type: none"> <li>• Hubspot</li> <li>• Mailchimp</li> <li>• Facebook</li> <li>• Google</li> </ul>	Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period.	You cannot keep record of the classes performed in Jolt  Cannot improve our services

<b>When you participate in a Jolt class as a student</b>					
A video of your class recorded by Jolt	<ul style="list-style-type: none"> <li>To keep record of the classes performed in Jolt</li> <li>To participate in classes</li> <li>To improve our service</li> <li>To verify attendance in classes.</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Legitimate interest (e.g. to keep record of the service and to improve it)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Hubspot</li> <li>Mailchimp</li> <li>Facebook</li> <li>Google</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period.</p>	<p>Cannot keep record of the classes performed in Jolt.</p> <p>Cannot participate in class</p> <p>Cannot improve our service</p> <p>Cannot verify attendance in classes.</p>
<b>When you make use of, or interact with the app mobile software application, and any other mobile software application</b>					
<b>When you download our Jolt App and register an account on our Jolt App</b>					
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Phone number</li> <li>Age</li> <li>Information about yourself</li> <li>Topics of interest</li> <li>Credit card details</li> <li>Password</li> <li>IP address</li> <li>Device information</li> <li>Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>Creating a user</li> <li>Creating an account</li> <li>Processing your application</li> <li>To send you emails if you have no scheduled classes yet</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to successfully provide you with our service)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Hubspot</li> <li>Mailchimp</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period</p>	<p>Cannot create a user</p> <p>Cannot create an account</p> <p>Cannot process your application</p> <p>Cannot send you emails if you have no scheduled classes yet</p>
<b>When you pick a class, register for a class and/or reserve a seat through the App</b>					
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>The picked class</li> <li>The seat that you selected</li> <li>Any other information that you decide to provide/supply us</li> </ul>	<p>To schedule a class</p> <p>To select the seats in the class</p> <p>To perform the service</p>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to provide the service)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Hubspot</li> <li>Mailchimp</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period</p>	<p>Cannot schedule a class</p> <p>Cannot select the seats in the class</p> <p>Cannot perform the service</p>
<b>When you make reviews</b>					

<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Review</li> </ul>	<ul style="list-style-type: none"> <li>• Processing your review</li> <li>• To collect information regarding the users experience with the service</li> </ul>	<p>The data subject has given <b>consent</b> to the processing of his or her personal data for one or more specific purposes.</p> <p>Legitimate interest (e.g. collection of information regarding the users experience with the service)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>• Hubspot</li> <li>• Mailchimp</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period.</p>	<p>Cannot process your review</p> <p>Cannot collect information regarding the users experience with the service</p>
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***When you attend a marketing event and provide Personal Data***

<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Phone number</li> </ul>	<ul style="list-style-type: none"> <li>• Establishing a business connection</li> <li>• Sending newsletters and marketing communications of Jolt</li> </ul>	<p>The data subject has given <b>consent</b> to the processing of his or her personal data for one or more specific purposes.</p> <p>Legitimate interest (e.g. send you more information about Jolt)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>• Hubspot</li> <li>• Mailchimp</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period</p>	<p>Cannot establish a business connection</p> <p>Cannot send you newsletters and marketing communications</p>
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***When you exchange business cards with us***

<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Phone number</li> </ul>	<ul style="list-style-type: none"> <li>• Establishing a business connection</li> <li>• Sending marketing communications</li> </ul>	<p>The data subject has given <b>consent</b> to the processing of his or her personal data for one or more specific purposes.</p> <p>Legitimate interest (e.g. send you more information about Jolt)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>• Hubspot</li> <li>• Mailchimp</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period</p>	<p>Cannot establish a business connection</p> <p>Cannot send you newsletters and marketing communications</p>
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***When we use the Personal Data of our service providers and suppliers***

<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Phone number</li> <li>• Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To contact our service providers</li> <li>• Performing/ executing the agreement</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Legitimate interest (e.g. perform the contract, send contract-related communications).</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>• Hubspot</li> <li>• Mailchimp</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period</p>	<p>Cannot communicate with you</p> <p>Cannot perform the agreement</p>
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<b>When we use the Personal Data of our customers</b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• <b>To communicate with you</b></li> <li>• Providing services</li> <li>• Sending newsletters or other marketing communications.</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.).</p> <p>Legitimate interest (e.g. send you contract-related communications).</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>• Hubspot</li> <li>• Mailchimp</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period</p>	<p>Cannot communicate with you</p> <p>Cannot provide you with our services</p> <p>Cannot send you marketing communications</p>
<b>When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn, etc) and we use the publicly available information</b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• Establishing a business connection</li> <li>• Marketing communications</li> </ul>	<p>The data subject has given consent to the processing of his or her personal data for one or more specific purposes</p> <p>Legitimate interest (e.g. send you more information about Jolt)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>• Facebook</li> <li>• Instagram</li> <li>• Hubspot</li> <li>• Mailchimp</li> </ul>	<p>Until you send a deletion request or unsubscribe or we proactively decide to delete the data. Please note that under applicable laws, we may be required to retain the data for a longer or a shorter period</p>	<p>Cannot establish a business connection</p> <p>Cannot send you marketing communications</p>

## 2. HOW WE PROTECT AND STORE YOUR INFORMATION

- 2.1. **Security.** We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the information will not be exposed 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.
- 2.2. **Retention of your Personal Data.** In addition to the retention periods mentioned in Section 1 above, in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

## 3. HOW WE SHARE YOUR PERSONAL INFORMATION

In addition to the recipients described in Section 1, we may share your information as follows:



- To the extent necessary, with regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the minimum extent required) disclose information to a potential or actual third party purchaser of our business or assets. 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 or assign Personal Data in connection with the foregoing events.
- Where you have provided your consent to us sharing the Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality); and
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

#### **4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL INFORMATION**

Where we transfer your Personal Data outside of EU/EEA, for example to third parties who help provide our products and services, we will obtain contractual commitments from them to protect your Personal Data.

Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of Personal Data transferred from within the EU to the United States; or

Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

#### **5. YOUR 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 information held about you. Your right of access is normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we amend any Personal Data we hold that it is inaccurate or misleading.
- You have the right to request the erasure of the Personal Data that relates to you. Please note that there may be circumstances in which we are required to retain your data, for example for the establishment, exercise or defense of legal claims;
- The right to object to or to request restriction of the processing. However, there may be circumstances in which we are legally entitled to refuse your request;
- The right to data portability. This means that you may have the right to receive your Personal Data 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 a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority
- The right to withdraw your consent. 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.
- You also have a right to request details of the basis on which your Personal Data is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality.

You can exercise your rights by contacting us at [gdpr@jolt.io](mailto:gdpr@jolt.io). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Data requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

## **6. USE BY CHILDREN**

We do not offer our products or services for use by children. If you are under 18, you may not use the Website, or provide any information to the Website without involvement of a parent or a guardian. We do not knowingly collect information from, and/or about children.

## **7. PUBLIC INFORMATION ABOUT YOUR ACTIVITY ON THE SERVICES**

Some of your activity on and through the Services is public by default. This may include, but is not limited to, content you have posted publicly on the Site or otherwise through the Services.

Registered users may have some of this information associated with their Accounts. Unregistered users will not have this association, but information concerning their use of the Services (such as what pages they have visited) may be tracked anonymously through the use of cookies and stored by us.

Please also remember that if you choose to provide Personal Information using certain public features of the Services, then that information is governed by the privacy settings of those particular features and may be publicly available. Individuals reading such information may use or disclose it to other individuals or entities without our control and without your knowledge, and search engines may index that information. We therefore urge you to think carefully about including any specific information you may deem private in content that you create or information that you submit through the Services.

## **8. HOW CAN I DELETE MY ACCOUNT?**

Should you ever decide to delete your Account, you may do so by emailing [gdpr@jolt.io](mailto:gdpr@jolt.io). If you terminate your Account, any association between your Account and information we store will no longer be accessible through your Account. However, given the nature of sharing on the Services, any public activity on your Account prior to deletion will remain stored on our servers and will remain accessible to the public.

## **9. LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS**

The Site may enable you to interact with or contain links to your Third Party Account and other third party websites, mobile software applications and 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 may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.

## **10. LOG FILES**

We may make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We may use such information to analyze trends, administer the Site, track users' movement around the Site, and gather demographic information.

## **11. COOKIES AND OTHER TRACKING TECHNOLOGIES**

Our Site may utilize “cookies”, anonymous identifiers and other tracking technologies in order to for us to provide our Site and present you with information that is customized for you. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Site. Certain cookies and other technologies may serve to

recall Personal Information, such as an IP address, previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

## 12. ANALYTIC TOOLS

- **Google Analytics.** The Site may use a tool called “**Google Analytics**” to collect information about use of the Site. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this Site. We use the information we get from Google Analytics to maintain and improve the Site and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of Service, available at <https://www.google.com/analytics/terms/us.html>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- **Google Signals.** The Site uses a tool called “**Google Signals**” to collect information about use of the Site. When you activate Google Signals, some existing Google Analytics features are updated to also include aggregated data from Google users who have turned on “**Ads Personalization**” (Ads Personalization available at <https://support.google.com/ads/answer/2662856> ). Audiences that You create in Google Analytics and publish to Google Ads and other Google Marketing Platform advertising products can serve ads in cross device-eligible remarketing campaigns to Google users who have turned on Ads Personalization. Google Analytics collects additional information about users who have turned on Ads Personalization, base across device types and on aggregated data from users who have turned on Ads Personalization. The data is user based rather than session based. The Cross Device reports include only aggregated data. No data for individual users is ever exposed. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services: <https://support.google.com/accounts/answer/2662856>
- **Mixpanel.** We collect personally identifiable information such as your email address and your user activity through the use of Mixpanel. Mixpanel’s ability to use and share information is governed by the Mixpanel Terms of Use, available at <https://mixpanel.com/terms/>, and the Mixpanel Privacy Policy, available at <https://mixpanel.com/privacy/>. You can opt-out of Mixpanel’s services by clicking on the following link: <https://mixpanel.com/optout/>. If you get a new computer, install a new browser, erase or otherwise alter your browser’s cookie file (including upgrading certain browsers) You may also clear the Mixpanel opt-out cookie.
- **Facebook Pixels, ads and SDKs.** We may use Facebook pixels, ads or SDKs, which are tools that provide help to website owners and publishers, developers, advertisers, business partners (and their customers) and others integrate, use and exchange information with Facebook, as such the collection and use of information for ad targeting. Please note that third parties, including Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from your websites and elsewhere on the internet and use that information to provide measurement services and target ads. Facebook’s ability to use and share information is governed by the Facebook Tools Terms, available at: [https://www.facebook.com/legal/technology\\_terms/](https://www.facebook.com/legal/technology_terms/). You may prevent your data from being used by Facebook Pixels, ads and SDKs by exercising your choice through these mechanisms: (i) You can control your Facebook privacy settings from the following link: [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen); or (ii) you can activate or de-activate the cookies settings.
- We reserve the right to use additional analytic tools.

## 13. 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 [gdpr@jolt.io](mailto:gdpr@jolt.io).