



EFFECTIVE ON JANUARY 1, 2020

SERVICES PRIVACY POLICY

This Services Privacy Policy (“Services Policy”) is provided by Lead Intelligence, Inc. d/b/a Jornaya (“Jornaya,” “we,” “us,” or “our”) to inform interested parties about how information is collected through our Platform, how we use such information, and how we share it as applicable. Unless otherwise defined in this Services Policy, terms used in this Services Policy have the same meanings as in our Terms of Use.

This Services Policy applies only to our Platform. We do not control the privacy policies of other websites or companies. It is strictly up to you to learn more about the online privacy and data security policies of other third party websites you may come in contact with (whether or not through our Platform) directly from such third parties, as their policies may differ from ours.

WHAT WE DO

Jornaya provides a proprietary technology Platform, including any scripts or code provided by Jornaya (“Scripts”), and any products/services provided by Jornaya (“Services”) (collectively the “Platform”), which allows our Clients (as further defined below) who are sharing their data with one another to (i) verify the data’s origin and history, (ii) help advertisers, vendors and marketers analyze first, second and third-party consumer (“Consumer(s)”) interactions to, for example, focus their attention and efforts on consumers who may be interested in certain products and/or services, and (iii) supplement our Services with related services provided by our strategic partners. If the Consumer’s browser allows it, a persistent cookie is dropped so that the same browser can be identified in future events and tied to a LeadiD or other identifiers.

OUR CLIENTS

We have three types of Clients who access, use and interact with our Platform in different ways, as follows:

“Publishers” are companies who are accessing and using the Services to create Universal LeadiDs (as further defined below) on their own web site(s) or platform(s) (“Publisher Platforms”).

“Queriers” are companies who generate data on their own or receive data from another party with a Universal LeadiD or other identifiers (“Identifiers”) and desire to verify and/or append certain attributes to the Identifiers by querying our network. A Querier can also be a Publisher.

“Partners” are companies who work with Jornaya to provide supplemental services to Publishers or Queriers through our Services, either by incorporating certain aspects of our Services, or by integrating with our Services. Partners may contribute their own data or access data via APIs, SDKs, web related services. In some cases, we may use Partner pixels, cookies, scripts or tags alongside our Script.

USING OUR SERVICES ON PUBLISHER PLATFORMS

Many Publisher Platforms utilize our Services. When a Consumer visits, enters information into, browses or otherwise interacts with a Publisher Platform, the technology associated with our Services, including applicable Scripts (previously installed at a Publisher Platform with that Publisher's approval), captures certain information and automatically creates and returns to the Publisher a unique lead identifier associated with each unique online or application event known as a "Universal LeadiD". The Services may use various technologies to do this, including JavaScript®, website scripts, pixel tags, cookies, local storage, and device identification.

If a Consumer enters information into open text fields within a form on a Publisher Platform, our Services consider this information as potential personal information ("PI") and is designed to automatically encrypt that information using a cryptographic hash function. The Consumer PI that an applicable Client may obtain from our Platform includes this hashed information, other information captured through the Publisher Platform at the time a Consumer visits a Publisher Platform, including the Consumer's Internet Protocol (IP) address, browser type, browser language and the date and time that web page was visited, as well as other information.

INFORMATION SHARING

We share Consumer PI only as necessary to enable us to provide our Services to Queriers who wish to verify that a certain event(s) took place at the Publisher Platform in which a Consumer participated. At times, Consumer PI is shared with Partners to enable us to provide certain Services to Publishers and/or Queriers. When we act as a "service provider" under the California Consumer Privacy Act ("CCPA") to our Clients, we do not retain, use, or share any personal information shared with us for any purpose other than to provide our services as specified by our contract with our Clients.

A Client may provide certain additional information in its possession, such as conversion data, Identifiers, and/or other Consumer PI ("Contributed Data"), when querying the Jornaya API, or by batch processing. If any Contributed Data is provided by the Querier as part of a query or batch data, this information is utilized solely to generate applicable Jornaya Derived Data associated with that query. We rely solely on our Clients to have secured the proper permissions from Consumers or other sources where they have been provided with the Contributed Data.

If a Consumer does not want us to store his or her information, the Consumer can accomplish this by not visiting or not engaging with Publisher Platforms that utilize our Scripts or Services, or by requesting at the Publisher Platforms the Consumer visits not to capture or use certain information captured during an event on the Publisher Platforms pursuant to the terms contained on such Publisher Platforms. A Consumer may also have options to prevent cookie storage through their browser settings.

We offer California residents the ability to access, delete, and opt out of the sales of their personal information consistent with the CCPA only for personal information we hold in the capacity of a "business" under the CCPA. Where we act as a service provider under the CCPA to our Clients, we will comply with applicable requests to the extent that our Clients pass them along to us.

OUR RELATIONSHIP TO CONSUMERS

JORNAYA PROVIDES ITS PLATFORM TO OUR CLIENTS, NOT DIRECTLY TO CONSUMERS. WE HAVE NO DIRECT RELATIONSHIP, INCLUDING ANY ESTABLISHED BUSINESS RELATIONSHIP, WITH CONSUMERS. THIS SERVICES PRIVACY POLICY APPLIES ONLY TO OUR PLATFORM.

JORNAYA DOES NOT CONTROL THE PRIVACY POLICIES OF OTHER WEBSITES OR PARTIES CONSUMERS MAY INTERACT WITH, INCLUDING THOSE OF OUR CLIENTS. IT IS OUR EXPECTATION THAT OUR CLIENTS REQUIRE CONSUMERS TO READ ALL APPLICABLE TERMS AND CONDITIONS, POLICIES AND/OR STATEMENTS OF THE WEBSITES THEY VISIT, ESPECIALLY THOSE WEBSITES THAT COLLECT CONSUMER PI.

ADDITIONAL SHARING AND DISCLOSURES

In addition to the specific disclosures of data related to our Platform described above, we may also disclose or share data collected by our Platform under the following circumstances:

- As required by appropriate third parties, including government and law enforcement authorities, if we have a good faith belief that disclosure of such data is reasonably necessary to (i) satisfy applicable law, regulation, legal process, or an enforceable governmental request; (ii) enforce our agreements with Clients, including in the course of investigation of potential breaches of such agreements; or (iii) detect, prevent, or otherwise address fraud, security, or technical issues;
- To protect against harm to the rights, property, or safety of Jornaya, our Clients, Consumers, or the public, as required or permitted by law;
- In the event we go through a business transition, such as a merger with, or acquisition by, another company; or the sale of all or a portion of our assets, we may disclose data to the party or parties involved in preparation for, and as incident to, such business transition; and
- To aggregate data for reporting, analytics, and other business reasons, including promoting or describing the use of our Services and Platform.

ONLINE TRACKING

Our Scripts and Services implemented on Publisher Platforms do not accept or process any Do Not Track signals or similar mechanisms. Whether any Publisher Platform accepts or processes any Do Not Track signals or similar mechanisms is determined by the Publisher that owns or operates the Publisher Platform and should be addressed by the Publisher on the Publisher Platform.

INFORMATION SECURITY AND RETENTION

We use security measures designed to protect against unauthorized access to and unauthorized alteration, disclosure, and destruction of data collected, processed, and stored by our Platform. These security measures include firewalls; encryption; internal reviews of our data collection, storage, and processing practices; obligations of confidentiality; and restrictions on logical and physical access to data. However, we are unable to guarantee that the security measures we take will not be penetrated or compromised or that information will remain secure under all circumstances. In the event we utilize third party services in the provision of the Platform, we rely on those third parties' representations and warranties. We retain information we collect through the Platform indefinitely, or a shorter period of time if required by applicable law.

CHILDREN

We do not knowingly collect, maintain, disclose, or sell information from individuals who are under 16 years of age, and no part of our Platform is designed to attract people under the age of 16. If we obtain knowledge that a Client or Consumer is under the age of 16, we will take steps to remove that individual's information from our databases.

INDEPENDENT SERVICE PROVIDER

We are an independent service provider to our Clients. The fact that we provide our Platform and related services to our Clients is not meant to be an implied endorsement of, authorization of, or representation about any particular Client, nor is it an endorsement of, or representation about any Client's privacy or information security policies or practices. When we choose to work with a Client, we do not intend by such collaboration to make any implied representation about our Clients generally or our Clients' products and services. This Services Policy applies only to our Platform. Our Clients' websites and services are provided subject to separate terms and conditions and separate policies, including separate privacy policies regarding the use and disclosure of Consumer PI. Our Clients are responsible for instructing Consumers to read all applicable terms and conditions, policies or statements of the websites they visit, especially those websites that collect Consumer PI.

GEOGRAPHICAL RESTRICTIONS

Our Platform (including our Services) is intended for use solely within the United States of America and is directed to Clients solely located in the United States of America. We make no representation that the Platform is appropriate or available for use in locations outside the United States. Unless otherwise expressly stated, all marketing or promotional materials found on or accessible through the Platform are intended to be directed to individuals, companies, and other entities located in the United States.

CHANGES TO THIS SERVICES POLICY

This Services Policy may change from time to time. We will provide notice of any material changes by posting the new Services Policy on the Site. All information Jornaya collects is and will be subject to the latest Services Policy in effect at the time the information is collected by our Platform.

QUESTIONS OR COMMENTS

Please feel free to direct any questions or comments regarding this Services Policy by emailing us at privacy@jornaya.com or writing to us at: Lead Intelligence, Inc., 1001 E. Hector Street, Suite 230, Conshohocken, PA 19428, ATTN: Services Policy.