



PRIVACY POLICY

Effective Date: August 2, 2019

Welcome to J.Thelander Consulting (“J.Thelander,” “we,” “us” or “our”). This Privacy Policy applies to your use of our website, www.jthelander.com, any other websites where this Privacy Policy is posted, and services (collectively, the “Services”), and describes how we collect, process, and share personal information. By using our Services, you acknowledge you have read and understood the terms and conditions of this Privacy Policy. If you do not agree to the terms and conditions of this Privacy Policy, please do not use the Services.

Your use of the Services is also governed by our Terms of Use <https://analytics.jthelander.com/platform/J.Thelander%20Terms%20of%20Use.pdf>.

1. INFORMATION WE COLLECT

Depending on your use of the Services, we collect certain personal and non-personal information about you. Personal information is any information that identifies, relates to, or could reasonably be linked to—directly or indirectly—a natural person or household. Non-personal information is information that does not identify you personally. We collect the following information from and about you:

- **Information you directly and voluntarily provide to us** – Voluntarily provided information may include your name, phone number, company name, username, email address and password when you register for an account or participate in a survey. It may also include your name, email address and phone number when you contact us with an inquiry or request. We may also collect payment information, which will be processed by PayPal, our third party payment processor.
- **Information collected at events** – We may collect information such as your name and email address when you attend our events.
- **Information automatically collected through the Services** – We may automatically collect information about you when you use the Services. For example, we may use cookies and third party tracking technologies in connection with the Services that may automatically collect information about your use of the Services. This information may include the type of browser you’re using, the IP address of the device that you are using or the type of operating system that you are using. For more information, please see Section 2 below.

2. COOKIES

We use cookies and other similar technologies. Cookies are small text files placed on your device that uniquely identify your device and which a website can transfer to a consumer’s hard

drive to keep records of his or her visit to a website. We may use session cookies or persistent cookies. Session cookies only last for the specific duration of your visit and are deleted when you close your browser. Persistent cookies remain on your device's hard drive until you delete them or they expire. Different cookies are used to perform different functions, which we explain below:

- Essential. Some cookies are essential in order to enable you to move around our website and use its features, such as accessing secure areas of our website. Without these cookies, we cannot enable appropriate content based on the type of device you are using.
- Browsing and Functionality. These cookies remember choices you make on our website. For example, when you return to our website, these cookies help remember your preferences.

There are several ways to manage cookies. You can control the use of cookies at the browser level, by instructing your browser to accept cookies, disable cookies or notify you when receiving a new cookie. Please note that if you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited.

3. HOW WE USE THE INFORMATION WE COLLECT AND OUR LEGAL BASES FOR PROCESSING

We use the information we collect from and about you for the following purposes:

- To provide and manage our Services.
- To communicate with you for marketing purposes, including by sending you newsletters and invitations to participate in surveys or attend events. You can opt-out of these communications at any time.
- To respond to your inquiries and/or requests.
- To improve our Services.
- For other legitimate business purposes.

We process personal information per applicable law and with transparency and fairness. We rely on the following legal bases for our processing activities:

- Necessity for the performance of a contract to which you are a party, or at your request prior to entering into a contract.
- Your consent, where required.
- As otherwise required by applicable law.

4. HOW WE SHARE THE INFORMATION WE COLLECT

We may sell, rent, release, disclose, disseminate, make available, transfer or otherwise communicate the personal information described in Section 1 above to the following categories of third parties in the following circumstances:

- We will share your personal information with employees, contractors, vendors, and suppliers (i.e., third party service providers) who provide certain services or content to us or on our behalf, such as operating and supporting the Services, analyzing data, or

performing marketing services. These third party service providers will only have access to your personal information to perform these limited functions.

- We may share your personal information in the course of any reorganization process including, but not limited to, mergers, acquisitions, and sales of all or substantially all of our assets.
- We may disclose your personal information to law enforcement, government agencies, and other related third parties, in order to comply with the law, enforce our policies, or protect our or others' rights, property or safety.

5. COLLECTION OF INFORMATION FROM CHILDREN

Our Services are not intended for children. We do not knowingly collect personal information from children under the age of 13. In the event that we learn that a child under the age of 13 has provided personal information to us, we will delete such information as soon as possible.

6. THIRD PARTY LINKS AND SOCIAL MEDIA PLUG-INS

Our website contains links to other sites. We are not responsible for the privacy practices or content of such other sites. If you have any questions about how these other sites use your personal information, you should review their policies and contact them directly.

7. SECURITY AND DATA RETENTION

We implement reasonable security measures to ensure the security of your personal information. Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you transfer to us is done at your own risk. If we learn of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using our Services, or otherwise providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of our Services. We may post a notice via our website if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

We retain your personal information for as long as required to fulfill the purposes for which such information was collected, unless a longer retention period is required by law.

8. INTERNATIONAL DATA TRANSFERS

We are a US-based company. If you choose to provide us with information, please understand that your personal information may be transferred to the US and that we may transfer that information to our affiliates and subsidiaries or to other third parties, across borders, and from your country or jurisdiction to other countries or jurisdictions around the world. If you are visiting from the European Union ("EU") or other regions with laws governing data collection and use that may differ from US law, please note that you are transferring your personal information to the US and other jurisdictions which may not have the same data protection

laws as the EU. We put in place appropriate operational, procedural and technical measures in order to ensure the protection of your personal information. You acknowledge you understand that by providing your personal information: (i) your personal information will be used for the uses identified above in accordance with this Privacy Policy; and (ii) your personal information may be transferred to the US and other jurisdictions as indicated above, in accordance with applicable law.

9. OPT- OUT AND INDIVIDUAL RIGHTS

You can manage the personal information you have provided to us at any time by logging into your account or by contacting us at info@jthelander.com. We provide you the opportunity to opt-out of marketing communications by clicking the “unsubscribe” link in email communications or by contacting us at info@jthelander.com. We will process your request as soon as possible in accordance with applicable law, but please be aware that in some circumstances you may receive a few more messages until your unsubscribe is processed.

Additionally, we may send you information regarding our Services, such as information about changes to our policies and other notices and disclosures required by law. Generally, you cannot opt-out of these communications, but they will be primarily informational in nature, rather than promotional.

If you are located in the EU, you have the following additional rights:

- You have a right to obtain confirmation as to whether or not your personal information exists and to be informed of its content and source, verify its accuracy and request its completion, update or amendment.
- You have a right to require your information to be provided to you or another company in a commonly used electronic form.
- You have a right to object to the processing, in all cases, of your personal information for legitimate reasons.
- In certain situations, you have a right to have your information ‘erased’ or to restrict the processing of your information.
- You have a right to lodge a complaint with the EU supervisory authority where your information has been processed in a way that does not comply with the laws and regulations.

If you are located in the US, you have the following additional rights:

- You have the right to request information about the categories and specific pieces of personal information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the categories of third parties with whom we share such information.
- You have the right to request information about our sale or disclosure for business purposes of your personal information to third parties.
- You have the right to request the deletion of your personal information.
- You have the right to not be discriminated against for exercising any of these rights.

If you would like to exercise one or more of the rights above, please contact us using the contact information provided in Section 14 below.

10. ASSIGNMENT

In the event that all or part of our assets are sold or acquired by another party, or in the event of a merger, you grant us the right to assign the personal data collected via the Services.

11. YOUR CALIFORNIA RIGHTS

California Civil Code Section 1798.83 permits visitors to the Services who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not share personal information with third parties for their direct marketing purposes.

12. HOW WE RESPOND TO DO NOT TRACK SIGNALS

At this time, our website does not recognize automated browser signals regarding tracking mechanisms, which may include Do Not Track Signals.

13. CHANGES TO THIS PRIVACY POLICY

We reserve the right to change this Privacy Policy from time to time. When we do, we will also revise the “Effective Date” at the top of this Privacy Policy. If we make material changes to the Privacy Policy, we will notify you by placing a prominent notice on our website and via email at the email address we have on file for you. We encourage you to periodically review this Privacy Policy to keep up to date on how we are handling your personal data.

14. CONTACT US

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

J.Thelander Consulting, Inc.
1592 Union Street, Suite 214
San Francisco, CA 94123
Email: info@jthelander.com
Phone: +1 415.525.4133