



## **GDPR Statement**

Last updated 10th October 2020

### **I. Collection and Use of Personal Information.**

JayBee Marketing (referred to hereafter as JAYBEE) may collect personal information from You. Personal information is information relating to an identifiable person who can, by virtue of such information, be directly or indirectly identified.

You may be asked to provide your personal information anytime You are in contact with JAYBEE or a JAYBEE affiliated company. JAYBEE and its affiliates may share this personal information with each other and use it consistent with their Privacy Policy. They may also combine it with other information to provide and improve their products, services, content, and advertising.

You are not required to provide the personal information that we have requested, but, if You chose not to do so, in many cases we will not be able to provide You with our products or services or respond to any queries You may have.

### **II. What personal information we collect**

When You create a JAYBEE User Account, purchase a product, download a software update, or contact us, we collect a variety of information, including Your name, mailing address, phone number, email address, and contact preferences. When payment, or payment information, is required, we will direct You to submit credit card information through a third-party such as Stripe. When You, as a JAYBEE Account Holder, acquire information regarding Your customers you are legally obliged to store whatever personal information regarding Your customers that You have received on production servers.

### **III. How we use Your personal information.**

The personal information we collect allows us to keep You posted on JAYBEE's latest product announcements, software updates, and upcoming events. If You don't want to be on our mailing list, You can opt out anytime by navigating to the unsubscribe link in the last email You received from JAYBEE. You will have the option to unsubscribe from an individual list, or from all JAYBEE's lists.

We also use personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti-fraud purposes. We may use Your personal information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services. From time to time, we may use Your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies.

Because this information is important to Your interaction with JAYBEE, You may not opt out of receiving these communications. We may also use personal information for internal purposes such as auditing, data analysis, and research to improve JAYBEE's products, services, and customer communications.

#### **IV. Collection and Use of Non-Personal Information.**

We also collect data in a form that does not identify any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- a) We may collect information such as business, language, zip code, area code, unique device identifier, referrer URL, and the time zone where a JAYBEE's product is used so that we can better understand customer behaviour and improve our products, services, and advertising.
- b) We may collect information regarding customer activities on any of our websites. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is non personal information.
- c) We may collect and store details of how You use our services. This information may be used to improve the relevancy of results provided by our services.

#### **V. Cookies and Other Technologies.**

JAYBEE's websites, email messages, and advertisements may use "cookies" and other technologies such as tracking, re-marketing tags, and pixels based on context, e.g., a search query, a channel You are reading, or inferred interests. These technologies help us better understand user behaviour, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches.

We treat information collected by cookies and other technologies as non-personal information. We design and target advertising based on how You interact with JAYBEE. If You do not wish to receive ads targeted to Your interests from JAYBEE, You can choose to limit ad tracking. You may still see ads based on context like a search query or a channel You are reading. JAYBEE and our partners also use cookies and other technologies to remember how You use our website and software. Our goal in these cases is to make Your experience with JAYBEE more convenient and personal, and provide You better customer service.

To limit ad tracking, you may optout by clicking on specific links for (USA) and for (EU) both of which are not directly JAYBEE affiliated. You may also use Your browser's settings to disable cookies and other tracking tools. Please note that certain features of the JAYBEE website will not be available once cookies are disabled. We gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to administer the site, to learn about user behaviour on the site, to improve our product and services, and to gather demographic information about our user base as a whole. JAYBEE may use this information in our marketing and advertising services. In some cases we use a "click-through URL" linked to content on the JAYBEE website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our marketing communications. We also use it to account for Affiliate activity and pay Affiliate commissions and bonuses.

#### **VI. Disclosure to Third Parties.**

At times JAYBEE may make certain personal information available to strategic partners that work with JAYBEE to provide products and services, or that help JAYBEE market to customers. Personal information will only be



shared by JAYBEE to provide or improve our products, services and advertising; it will not be shared with third parties for their marketing purposes.

**Affiliates:** JAYBEE will provide Your email address to affiliates or users who refer You to us.

**Service Providers:** JAYBEE shares personal information with companies who provide services such as information processing, fulfilling customer orders, delivering products to You, managing and enhancing customer data, providing customer service, and assessing Your interest in our products and services. JAYBEE also shares Your information with financial institutions who provide payment (both to and from You) services.

**Legal:** It may be necessary, by law, litigation, or requests from government authorities within or outside Your country of residence, for JAYBEE to disclose Your personal information. We may also disclose information about You if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. We may also disclose information about You if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users.

**Corporate Change:** Additionally, in the event of a reorganization, merger, or sale of JAYBEE MARKETING, we may transfer any and all personal information we collect to the relevant third party.

#### **VII. Protection of Personal Information.**

JAYBEE takes the security of Your personal information very seriously. When Your personal data is stored by JAYBEE, we use computer systems with limited access housed in facilities using physical security measures. When You use some JAYBEE products and services that by their nature are public facing, such as when You post on a JAYBEE forum, the personal information and content You share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information You choose to share or submit in these instances. For example, if You list Your name and email address in a forum posting, that information is public. Please take care when using these features.

#### **VIII. Retention of Personal Information.**

JAYBEE will retain Your personal information for as long as You have a JAYBEE account. After Your JAYBEE account is terminated, we will retain Your personal information for as long as necessary to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

#### **IX. Children & Education.**

We understand the importance of taking extra precautions to protect the privacy and safety of children using JAYBEE products and services. Children under the age of 18 years old are NOT permitted to use this website. We do NOT knowingly collect data from children under the age of 18 years old.

#### **X. Third Party Sites and Services.**

JAYBEE websites, products, applications, and services may contain links to third-party websites, products, and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties is governed by their privacy practices. We encourage You to learn about the privacy practices of those third parties.

#### **XI. Your Rights Under the GDPR.**

If You are a citizen or a resident of a country in the European Union, the GDPR grants You the following rights:

- a) **Access to Your Personal Data.** You have the right to receive a copy of Your personal data that is subject to processing by JAYBEE. Ordinary requests will be granted without charge to You within one calendar month of when You make the request. In cases of excessive, unreasonable, or repeated requests JAYBEE may charge You a reasonable fee and may require additional time to grant Your request. Also, JAYBEE may use reasonable means to confirm Your identity before granting any request for data so as to prevent granting fraudulent requests. To request a copy of Your personal data, please contact us by email at: [admin@jaybeemarketing.com](mailto:admin@jaybeemarketing.com)
- b) **To have Your Data Corrected.** If Your personal data is erroneous or outdated, You have the right to have it corrected. To do so, please contact JAYBEE via email at: [admin@jaybeemarketing.com](mailto:admin@jaybeemarketing.com)
- c) **To be Forgotten.** You have the right to be forgotten by JAYBEE. You may exercise this right by emailing us at: [admin@jaybeemarketing.com](mailto:admin@jaybeemarketing.com). We will comply with Your request, at no charge to You, within one calendar month by deleting Your account, along with all of Your personally-identifiable data that is subject to any JAYBEE processing. Naturally, after we grant Your request You will not have access to any JAYBEE products or services unless and until You open a new JAYBEE account. JAYBEE may use reasonable means to confirm Your identity before granting any request for data so as to prevent the granting of fraudulent requests.
- d) **To Restrict Processing of Your Data.** You can request that Your data not be processed via JAYBEE partners. You can make that request by emailing us at: [admin@jaybeemarketing.com](mailto:admin@jaybeemarketing.com) and, if you wish, you can even specify which third parties to restrict from processing Your data. We will respond to Your request, at no charge to You, within thirty (30) days from when You make Your request. Please be advised that some of our partners, e.g., Stripe, are essential to JAYBEE services, so that if You block processing by them, JAYBEE's services may be unavailable to You.
- e) **Portability.** You have the right to receive a copy of Your personal data that is subject to processing by JAYBEE in a portable format, or to have it transferred directly from JAYBEE to another party. Ordinary requests will be granted without charge to You within one calendar month of when You make the request. JAYBEE may use reasonable means to confirm Your identity before granting any request to transfer data to You or another party so as to prevent granting fraudulent requests. To request a copy of Your personal data in a portable format, or to request a direct transfer of Your data, please contact us by email at: [admin@jaybeemarketing.com](mailto:admin@jaybeemarketing.com)



## **XII. Your Responsibility Under GDPR.**

If You are a JAYBEE User, then that probably means You are a business owner, using the JAYBEE service to generate you leads. With respect to the customer data that You provide to JAYBEE, JAYBEE is a data processor and will comply with its obligations under the GDPR; but with respect to Your customers, You are probably a data controller, and if any of Your customers is a citizen or a resident of a country in the European Union, then You must ensure that You comply with Your obligations as a data controller under the GDPR; namely, You must ensure that You afford Your Customers the rights identified in section (a) above.

JAYBEE sells Pay Per Lead Services; it does not provide legal advice or legal services, nor does it sell a “done-for-you” GDPR compliance package. Please consult legal counsel of Your own choosing for advice on what You need to do to comply with GDPR.

## **XIII. Our Companywide Commitment to Your Privacy.**

To make sure Your personal information is secure, we communicate our privacy and security guidelines to JAYBEE employees and strictly enforce privacy safeguards within the company.

## **XIV. Privacy Questions.**

If You have any questions or concerns about JAYBEE’s Privacy Policy or data processing or if You would like to make a complaint about a possible breach of local privacy laws, please contact us at: [admin@jaybeemarketing.com](mailto:admin@jaybeemarketing.com). When a privacy question or an access or download request is received we have a team dedicated to addressing the specific concern or query which You are seeking to raise.

In responding to Your request, we may need to request more information from You. If You are unsatisfied with the response You receive, You may refer Your complaint to the relevant regulator in Your jurisdiction. If You ask us, we will endeavour to provide You with information about relevant complaint avenues which may be applicable to Your circumstances.

If You live in the European Economic Area, United Kingdom, or Switzerland, and You wish to contact us regarding questions or to exercise Your statutory rights, please contact us at: [admin@jaybeemarketing.com](mailto:admin@jaybeemarketing.com)

## **XV. Updates to the Policy.**

JAYBEE may update its Policies from time to time. In such instances, information will be posted on our website.

END OF POLICY