



JDEtips, Inc. PRIVACY POLICY

SERVICES

SUMMARY

JDEtips, Inc. (the “Company,” “we,” “us,” or “our”, including our subsidiaries) provide online training courses in a number of areas.

We collect personal information you choose to share with us and our partners for a number of reasons, the primary ones of which are so we can provide you with a more customized experience and so we can determine products and services that you might be interested in and bring those to your attention.

This policy has been updated to reflect EU Regulation 2016/679 General Data Protection Regulation (GDPR) principles and applicable law effective from 25 May 2018 onwards and explains our data collection and processing practices and your options regarding the ways in which your personal data is used. It forms part of our contract with you and should be read together with our Website Terms of Use, and any other documents referred to in this policy. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Please read this Privacy Policy, which includes our policy regarding cookies, carefully, along with our Terms of Use (collectively, the “Agreement”). By continuing to use our Services, which includes accessing our website <http://www.jdetips.com> and by subscribing to our newsletter; by providing us information about yourself, including personally identifiable information (defined below); and by attending our retreats or seminars, you are expressly consenting to the collection, storage, use and disclosure of your personal information as described in this Privacy Policy.

1. INTRODUCTION TO OUR PRIVACY POLICY

We at the Company know that our users care how their personally identifiable information (“Information”) is used and shared, and we take your privacy seriously. This Privacy Policy (the “Policy”) describes how we collect, use and disclose Information when you use any of our Services, including but not limited to:

- Company websites; which currently includes <http://www.jdetips.com>, pages; site; and accounts; (“Website”);
- Company online platforms and related offerings;
- By providing us information about yourself, including personally identifiable information, in person, over the phone or via email; and
- By attending our online events.

By visiting or using the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Agreement.

You must be 18 or older to use our Services. Minors under 18 and at least 13 years of age are only permitted to use our Services through an account owned by a parent or legal guardian with their appropriate permission and under their direct supervision. We do not knowingly collect or solicit Information from anyone under the age of 13 or knowingly allow such persons to register for the Service.

We do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register for the Services. If you are under 13, please do not attempt to register for the Services or send any information about yourself to us, including your name, address, telephone number, or email address. In the event that we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at Privacy@JDEtips.com.

By visiting or using the Services, you will be providing us or allowing us to collect Information and also personally consent to the collection, use and transfer of your information under the terms of this policy.

2. WHAT INFORMATION WE COLLECT

Information You Provide to Us

You don't have to create an account to use some of our Services. However, you may create an account and subscribe for our Knowledge Express Pricing by providing us certain information, such as your contact information including your name, telephone number, email and physical address and by providing us financial information sufficient to allow us to charge you for our Knowledge Express Pricing service. You may also create an account with us by providing us your contact information and by creating a username and password.

If you are paying for any of our Services, standard payment and billing information is required. We do not require users to provide their race, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual orientation or criminal record in their account. Please do not post or add personal data to any information sheet, inquiry, survey, online form, or other content that you provide to us that you would not want to be publicly available.

Depending on which Services you choose to use, additional information may be collected and stored, if necessary in order for us to provide a particular Service. Such information includes:

- (ii) contact information, such as name, email, address, country/province/state, and phone number;
- (ii) and financial information for billing purposes;

- (ii) information responsive to polls or surveys, disclosed in applications for employment, or requested in order to provide information about our business, employment, products or services;
- (iii) transactional information based on your activities on the Website;
- (iv) shipping, ordering, billing and other similar information you provide to purchase or ship an item;
- (v) computer sign-on data, time and date data, statistics on page views, your IP address, your GPS location, the type of computing environment you use, and traffic to and from the Website (including data about you whenever you interact with the Website, such as when you search, click on links, send messages, make comments, replies or queries, and select best replies);
- (vi) other technical information or data collected from Website traffic, including IP address and standard web log information and information gathered from cookies, beacons and other mechanisms;
- (vii) supplemental or additional information we may request from you in the event previous information you've provided cannot be verified;
- (ix) information that you opened or otherwise interacted with an email and what email you opened or otherwise interacted with; and
- (x) other information that you voluntarily provide to us.

Information Collected Automatically By Us / Our Policy Regarding Cookies

Whenever you interact with our Service, we automatically receive and record technical information such as your device, IP address, “cookie” information, the version of your operating system (“OS”), and the page you requested. When you use the Service on a mobile platform, we may also collect and record your unique device ID (persistent / non-persistent), hardware type, media access control (“MAC”) address, international mobile equipment identity (“IMEI”), your device name, and your location (based on your IP address). We may also collect information regarding your activity on the Service (both individually and on an aggregate basis) and your interactions with other users of the Service.

What are Cookies?

We use cookies and similar technologies (e.g. web beacons, pixel tags, or other device identifiers) to store login information and recognize you and/or your device(s) on, off, and across different Services and devices.

“Cookies” are text files transferred to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are widely used to make websites work more efficiently, recognize your browser or device, improve your user experience, customize features and advertising, and provide reporting information about the Services. Cookies, for example, enable us to keep track of your movement from page to page so you do not get asked for the same information you have already provided us. Cookies

also allow you to proceed through many pages of a website quickly and easily without having to authenticate or reprocess each new area you visit.

You can configure your desktop or mobile browser's settings to reflect your preference to accept or reject cookies, including how to handle third-party cookies (see [How Can I Manage Cookies?](#) below).

You can find out more information about cookies at <http://www.allaboutcookies.org> and <http://www.youronlinechoices.eu>.

In addition to cookies, there are other similar technologies used by us and elsewhere on the web or in mobile sites or applications. Web beacons, browser storage and plugins and other technologies often work in conjunction with cookies, and may store small amounts of data on your device.

How do we use Cookies?

The Services offered by the Company may use cookies and other technologies that work in conjunction with cookies (such as SDKs, pixels, tags, or web beacons) to collect and store the Information we automatically collect about our users' device and use of the Services. Cookies may be served directly by us to your device (a first party cookie) or may be served by one of our service providers on our behalf (a third party cookie). Cookies can be used to recognize you when you visit our Services, remember your preferences, and give you a more personalized experience. Cookies can also make your interactions with the Services faster and more secure.

While specific types of cookies and technologies may change from time to time as we improve and update the Services, cookies used by the Services generally fall into the categories below:

- **Security and Authentication (Strictly Necessary Cookies):** These cookies are essential to provide you with the Services and to use some of its features, such as access to secure areas. Without these cookies, we can't provide parts of the Services that you request, like secure login accounts and transactional pages.
- **Performance & Functionality Cookies:** We use performance cookies to analyze how the Services are being accessed and used, or how the Services are performing to maintain, operate and continually improve the Services and provide a better overall user experience. Functionality cookies record information about choices you've made and allow us to customize the Services to you. When you continue to use or return to the Services, we can remember

choices you make (such as login credentials, language preference, country location or other online settings) and provide the personalized or enhanced features that you select. We also employ Google Analytics to help understand how the Service is used.

- **Social Networks:** Some technologies help you to interact with social networks you are signed into while using the Services, such as sharing content with the social network, logging in with the social network, and other features you employ with the social network, or that are allowed in the social network's privacy policy. These may be set and controlled by the social networks, and your preferences with those social networks. You can manage your privacy preferences for these social networks and their tools and widgets via your account with the social network.
- **Advertising or Targeting Cookies:** These cookies allow us and third parties to gather information about the content you're browsing, your visit, or your interaction with ads and our communications, and to display ads that are relevant to you and measure their effectiveness. Certain third party cookies may also track your activity across various sites to display ads relevant to you and your interests on third party sites and applications. Most advertising or targeting cookies set by the Services belong to our service providers.

What Third-Party Cookies do we use?

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly. This type of technology includes the following:

Google Analytics

We use Google Analytics' which Google uses the information shared by sites and apps to deliver our services, maintain and improve them, develop new services, measure the effectiveness of advertising, protect against fraud and abuse, and personalize content and ads you see on Google and on our partners' sites and apps. To learn more about the Company's use of Google Analytics and what Google Analytics does, please see *How Google uses information from sites or apps that use or services*.

If you do not want your data collected with Google Analytics, you can install the Google Analytics opt-out browser add-on. This add-on instructs the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) running on websites to prohibit sending information to Google Analytics.

To opt-out of Analytics for the web, visit the [Google Analytics opt-out page](#) and install the add-on for your browser. For more details on installing and uninstalling the add-on, please see the relevant help resources for your specific browser.

Updates to your browser or operating system may affect functionality of the opt-out add-on. Learn about managing add-ons for Chrome [here](#). If you are not using Chrome, check directly with the manufacturer of your browser to determine whether add-ons will function properly on the browser version that you are using.

The latest versions of Internet Explorer sometimes load the Google Analytics opt-out add-on after sending data to Google Analytics. Therefore, if you are using Internet Explorer, the add-on will set cookies on your computer. These cookies ensure that any collected data is immediately deleted from the collection server. Please make sure that third party cookies aren't disabled for your Internet Explorer browser. If you delete your cookies, the add-on will, within a short timeframe, reset these cookies to ensure that your Google Analytics browser add-on remains fully functional.

The Google Analytics opt-out browser add-on does not prevent data from being sent to the website itself or in other ways to web analytics services.

Learn about how Google Analytics collects, uses, and processes data [here](#).

Learn about the cookies Google Analytics uses [here](#).

Handling Payments

Payment processing services allow us to process payments by credit card, bank transfer and other means. To ensure greater security, we share only the information necessary to execute the transaction with the financial intermediaries handling the transaction. Some of these services may also enable the sending of time messages to use, such as emails containing invoices or notifications concerning the payment.

Service	Privacy Policy	Description
Braintree (PayPal Inc.)	Privacy Policy	<p>Braintree is a payment service provided by Braintree, a division of PayPal, Inc.</p> <p>Personal Data collected: various types of Data as specified in the privacy policy of the service.</p> <p>Place of processing: Refer to the Braintree privacy policy.</p>
cardconnect (First Data)	Privacy Policy	<p>cardconnect is a payment service provided by cardconnect, a First Data Company.</p> <p>Personal Data collected: various types of Data as specified in the privacy policy of the service.</p> <p>Place of processing: Refer to the cardconnect privacy policy.</p>

How You Can Manage Cookies?

You can choose whether or not to accept cookies and other technologies, as explained below. However, you should be aware that disabling cookies may prevent you from enjoying the full functionality of the Services.

Most browsers allow you to change your cookie settings. The “Options” or “Preferences” menu of most browsers detail how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. Your browser’s settings may also allow you to disable or delete similar technologies and data used by browser add-ons (such as Flash cookies), for instance by changing the add-on’s settings or clearing browser storage. Browser manufacturers provide help pages relating to cookie management in their products. Please see below for more information:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera](#)
- [Opera Mobile](#)
- [Cloudflare](#)

For other browsers, please consult the documentation that your browser manufacturer provides.

If you only want to limit third party advertising cookies, you can turn off most of these cookies by visiting the following links (but be aware that not all of the companies listed on these sites drop cookies via our Services):

[Your Online Choices](#)
[Network Advertising Initiative](#)
[Digital Advertising Alliance](#)

You can also exercise your Website cookie preferences by visiting the TRUSTe preference center by clicking this link: <http://preferences-mgr.truste.com/>

Browser Controls: You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our Websites though your access to some functionality and areas of our Websites may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

Disabling Most Interest Based Advertising: Most advertising networks offer you a way to opt out of Interest Based Advertising. If you would like to find out more information, please visit <http://optout.aboutads.info/?c=2&lang=EN> or <http://www.youronlinechoices.com>.

Mobile Advertising: You can opt out of having your mobile advertising identifiers used for certain types of Interest Based Advertising, including those performed by us, by accessing the settings in your Apple or Android mobile device and following the most recent published instructions through the Digital Advertising Alliance's [YourAdChoices](#). In addition, on your iPhone, iPad or Android, you can change your device settings to control whether you see online interest-based ads. If you opt out, we will

remove all data about you and no further data collection or tracking will occur. The random ID we (or our third party partners) had previously assigned to you will also be removed. This means that if at a later stage, you decide to opt-in, we will not be able to continue and track you using the same ID as before, and you will for all practical purposes be a new user to our system.

For Google Analytics, you can [opt-out](#) through [Google Ads Settings](#), Ad Settings for mobile apps, or any other available means (e.g. the NAI's consumer opt-out listed above). Google also provides a [Google Analytics opt-out plug-in for](#) the web.

Please note that even if you opt-out and limit cookies or these third party tracking technologies, they may still collect data and you may still see ads, but they will not be targeted based on information collected through these technologies.

What is Do Not Track?

Do Not Track is a privacy preference that users can set in their web browsers. Some Internet browsers - like Internet Explorer, Firefox, and Safari - include the ability to transmit "Do Not Track" or "DNT" signals. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. Since uniform standards for "DNT" signals have not been adopted, we do not currently process or respond to "DNT" signals. We deploy cookies and other technologies on our Service to collect information about you and your browsing activity, even if you have turned on the Do Not Track signal.

Information from Third Parties and Advertisers

We work with third party advertisers, networks, and service providers who assist us in managing or providing the Service (e.g., payment processors) and who collect some of the information described above. These third parties also help us understand how users interact with our content or offerings. We may also collect contextual or demographic data about our users from third parties, in order to more effectively deliver the Service or content in which we think you would be interested. Unless you have been notified otherwise, all information collected through our authorized third party service providers remains governed by security and confidentiality obligations consistent with this Policy and applicable law.

Using Other Sites to Login to our Websites or Services

Some users may choose to connect to our Website or Services using third-party account credentials (for example, your Facebook login or YouTube account). If you choose to connect your account using a third-party account, you understand some of your Information may be shared with us or

the respective third-party platform. Your information may also be subject to separate policies of such third-party platform. You should review those policies before providing consent. Connecting your account to third-party applications or services is optional. You can revoke this permission anytime in your account settings.

Advertisements

Some of our Services allow advertisers and their networks to collect and use certain anonymous Information about you (e.g. click stream information, browser type, time and date, subject of advertisements clicked or scrolled over) in order to provide advertisements of interest to you. These companies typically use a cookie or third party web beacon to collect this information. To learn more about this behavioral advertising practice or to opt-out of this type of advertising, you can visit networkadvertising.org.

Other

Our Services are dynamic, and we often introduce new features, which may require the collection of new information. If we collect materially different personal data or materially change how we use your data, we will notify you and may also modify this Privacy Policy.

3. WHY WE COLLECT AND HOW WE USE YOUR INFORMATION

How we use your Information will depend on which Services you use, how you use those Services and the choices you make in your settings. The primary reason we collect Information is to provide and improve our Services, to allow us to work with our partners who contract with us to provide marketing services for their products and services, and to provide you with a more customized experience on our Services.

The following is a summary of more specific ways we may use your personal information:

- To deliver the Service to you
- To correspond and communicate to you with respect to delivering the Service
- To notify you about any changes to our Service to you
- To allow you to participate in the Service
- We use credit/debit card information solely to collect payment from you and we use a third-party service provider to manage that processing and it is not permitted to store, retain, or use that information except for the sole purpose of processing credit/debit information on our behalf
- To provide payment processing and account management, operate, measure and improve our Service, keep our Service safe, secure and operational, and customize Website content
- As part of our efforts to keep you safe and secure
- To contact you regarding your account, to respond to your requests or questions, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed or as otherwise necessary to provide you customer service

- To send you transactional communications. For example, we might send you emails about your purchase or to confirm your registration for an event. We might also contact you about this policy or our website terms and/or to send an email on behalf of our marketing partners
- To provide other services requested by you as described when we collect the Information
- To share with our marketing partners for marketing purposes or to use for our own marketing purposes. For example, to send you information about events or special promotions, to tell you about new features or products, etc. To learn about your choices for these communications, read Section 8.2 below
- To determine your level of engagement with email or promotional marketing materials that are sent to you, including whether you opened an email or promotional marketing materials and/or otherwise engaged with it
- To improve our Services, for example by reviewing information associated with stalled or crashed pages experienced by users allowing us to identify and fix problems and give you a better experience
- For security purposes. To prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities and/or attempts to harm our users
- To monitor and improve the information security of our Websites and mobile applications
- To comply with governmental regulations or to respond to a subpoena or other governmental, court, administrative order/requirement;
- To hire, train, and manage our staff;
- To support the functions of our human resource management, including the coordination of third-party vendors that provide insurance and personal financial services such as retirement planning and savings and investment accounts;
- To carry on our business and serve our customers as described above;
- For other purposes with your consent;
- We may combine information received from other sources with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above.
- To enforce our Terms of Use, this Policy, or other policies, and to monitor for violations of our policies or applicable laws
- We also use Information as otherwise described in this Policy, permitted by law, or as we may notify you

The collection of personal information shall be limited to that which is necessary for the purposes identified above.

4. HOW YOUR INFORMATION IS SHARED

We may share non-personally identifiable information, such as aggregated user statistics, with third parties. We do not share your personal information with third parties for third-party marketing purposes, or for any other purpose other than as described in this Privacy Policy.

We may share the information we have collected about you, including personal information, as disclosed at the time you provide your information and in the following circumstances:

4.1 Sharing by you

Certain Services offered are social by their very nature, so your participation in such a Service will allow others to see your name and/or username, profile picture, social profile, and any other content you upload or disclose through that profile.

4.2 Sharing by us

We share your Information with third parties as listed below and as otherwise described elsewhere in this Policy:

Internally With our Employees/Agents

We will share your information with our employees/agents who are responsible for providing you the Services in line with the scope of their employment/agency with us.

Business Transfers

We may choose to buy or sell assets. In these types of transactions, customer Information is typically one of the business assets that would be transferred. Also, if we (or our assets) are acquired or merged, or if we go out of business, enter bankruptcy, or go through some other change of control, Information would be one of the assets transferred to or acquired by a third party.

Protection of Company and Others

We reserve the right to access, read, preserve, and disclose any Information that we reasonably believe is necessary to comply with law or court order; enforce or apply our conditions of use and other agreements; or protect the rights, property, interests, or safety of our Company, our employees, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

Legal Obligations

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Compliance

Where we are requested to provide information by authorized third parties or regulatory or governmental agencies investigating illegal activities;

Emergency

Where we believe that an emergency, illegal activity or some other reasonable basis exists for notifying the relevant authority.

Aggregated and Anonymized Information

We also may share (within our affiliated entities or with third parties) aggregated or anonymized information that does not explicitly identify you or any individual user of our Services. From time to time, the Company may provide demographic and statistical information to prospective partners for the purposes of securing advertising and/or for general promotion of the Service. This disclosure will not share any personal information of individual users but is intended to give a broad overview of the Service's membership.

5. THE SECURITY OF YOUR INFORMATION

The security of your Information is important to us. We take commercially reasonable security measures, including administrative, technical, and physical safeguards, to protect your Information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction.

Your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Information by selecting and protecting your password and/or other sign-on mechanism appropriately. To help protect your Information, you should not share your account information or password, reuse your password on other sites, or use a password you have used on other sites.

We endeavor to protect the privacy of your account and other Information we hold in our records, but we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

6. WHERE YOUR INFORMATION WILL BE HELD

The Service is hosted on US servers. The data that we collect from you may be transferred to, and stored at, a destination outside the EEA may also be processed by staff operating outside the EEA who work for us or for one of our processors, and, in particular, the United States. Such staff may be engaged in, among other things, hosting or maintaining our Website, the processing of your payment details and the provision of support Services. Any personal information you provide to us will be processed and stored on servers in the US, the laws of which may be deemed by other countries to have inadequate data protection. It may also be processed by any service providers

appointed by us who operate outside of the EEA and their staff. Accordingly, if you are located outside the US, by submitting your Information, by using the Website, or otherwise using our Service, you consent and continue to consent and agree to the processing, transfer, and storage of such data in the US and outside the EEA or your country and acknowledge that not all countries guarantee the same level of protection for your Information as the one in which you reside. We have agreements in place with our contractors and processors that include standard contractual clauses to protect your rights with respect to your data. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and, where applicable, the EU General Data Protection Regulation.

7. LAWFUL BASES FOR PROCESSING

We will only collect and process Information about you where we have lawful bases. Lawful bases include consent (where you have given consent); via contract (where processing is necessary for the performance of a contract with you (e.g. to deliver the Services you have requested)); to protect vital interest; and when we have “legitimate interests”, which includes direct marketing.

Where we process Information based on consent you may withdraw your consent at any time, but that will not affect the lawfulness of the processing of your personal data prior to such withdrawal.

Where we rely on contract, we will ask that you agree to the processing of personal data that is necessary for entering into or performance of your contract with us. We provide a voluntary service; you can choose whether or not you want to use the Services. However, if you want to use the Services, you need to agree to our Terms of Use, which set out the contract between the Company and you. As we operate in countries worldwide (including the US) and use technical infrastructure in the US to deliver the Services to you, in accordance with the contract between us, we may need to transfer your Information to the US and to other jurisdictions as necessary to provide the Services.

Where we rely on legitimate interests as a basis for Information processing, you have the right to object. We may process your Information, including personal data, for the purposes of our legitimate interests or for the legitimate interests of third parties including our partners, provided that such processing shall not outweigh your rights and freedoms. For example, we may process your personal Information to:

- Protect you, us, or others from threats (such as security threats or fraud)
- Comply with laws that apply to us
- Enable or administer our business, such as for quality control, consolidated reporting, and customer service
- Manage corporate transactions, such as mergers or acquisitions
- Engage in direct marketing;
- Understand and improve our business or customer relationships generally
- Enable us and our users to connect with each other, view content, express opinions, exchange information, and conduct business

If you have any questions about the lawful bases upon which we collect and use your Information, please contact our legal department at admin@greatamericanpublish.com.

8. WHAT INFORMATION YOU CAN ACCESS

8.1 Right to Access and Control Your Information

If you choose not to provide personal information, you may be unable to access or use the Service as we simply may not be able to perform required functions.

User Data Subject Rights (EEA Visitors Only)

The EU GDPR became effective in the European Union as of May 25, 2018. In preparation for the GDPR, we reviewed our internal processes and put policies and procedures in place to attempt to meet the requirements and standards of the GDPR and any relevant data protection laws.

We are not established in the EEA; however, individuals located in certain countries, including the EEA, have certain rights related to their personal Information. Subject to any exemptions provided by law, you may have the right to request the following for personal data that we have about you:

EEA Users have the following rights:

- **Delete Information:** You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Services to you).
- **Change or Correct Information:** You can edit some of your Information through your account. You can also ask us to change, update or fix your Information in certain cases, particularly if it's inaccurate.
- **Object to, or Limit or Restrict, Use of Information:** You can ask us to stop using all or some of your Information (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your Information is inaccurate or unlawfully held).
- **Right to Access and/or Take Your Information:** You can ask us for a copy of your Information and can ask for a copy of Information you provided in machine-readable form.
- If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. Contact details for data protection authorities in the EEA, Switzerland and certain non-European countries are available [here](#).)
- When the processing of your personal data is for directly marketing purposes, you have the right to object to subject processing.

To exercise any of your data subject rights, please contact us at Privacy@JDEtips.com. We will respond to your request without undue delay, and, in any event, within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests we receive. If we take an extension, we shall inform you within one month of our receipt of the original request, together with the reasons for delay.

In the event your personal data of which we collected was subject to a Personal Data Breach (defined below), We will notify you and competent Supervisory Authority(ies) within 72 hours by e-mail with information about the extent of the breach, affected data, any impact, Our plan for measures to secure the data and limit any possible detrimental effect on you. A “Personal Data Breach” is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

You may contact us using the contact information in Section 11 below, and we will consider your request in accordance with applicable laws.

8.2 What Choices You Have

You can always opt not to disclose Information or to disable certain tools on your browser or device. However, this may limit your ability to fully utilize the Service.

You may be able to add, update, or delete Information as explained above. When you update Information, however, we may maintain a copy of the unrevised Information in our records. Please note that some Information may remain in our records for legitimate business reasons even after your deletion of such Information, such as our analyzing aggregated data regarding past usage of the Service (but not in a manner that would identify you personally). Additionally, through Google’s security settings page, you may revoke consent to the use of API Data related to you that was accessed or stored by the Service pursuant to such consent. Company shall delete all such API Data no later than thirty (30) calendar days following such revocation.

If you don’t want to receive e-mail or other communications from us, you can adjust your email preferences from your account, or opt-out by clicking on the link provided in the emails.

To learn more about choices regarding cookies set through the Service, see our Cookie Policy.

9. HOW LONG WE RETAIN YOUR INFORMATION

We generally retain your Information as long as reasonably necessary to provide you the Services or to comply with applicable law. However, even after you deactivate your account, we can retain copies of Information about you and any transactions or Services in which you may have participated for a period of time that is consistent with applicable law, applicable statute of limitations or as we believe is reasonably necessary to comply with applicable law, regulation, legal process, or governmental request, to detect or prevent fraud, to collect fees owed, to resolve disputes, to address problems with our Services, to assist with investigations, to enforce our Terms



of Use or other applicable agreements or policies, or to take any other actions consistent with applicable law.

Information you have shared with others (e.g. through comments or other posts) will remain visible after you close your account or delete the information from your own account, and we do not control data that other users copied out of our Services.

10. CHANGES TO THIS PRIVACY POLICY

We may modify this Policy, our Terms of Use and our Cookie Policy from time to time. If we make material changes to it, we will provide you notice through the Service, the Website, via email or by other means, to provide you the opportunity to review the changes before they become effective. You shall be responsible for reviewing and becoming familiar with any such modifications. We agree that changes cannot be retroactive. If you object to any changes, you may close your account or discontinue use of the Services. Your continued use of our Services after we publish or send a notice about our changes to these terms means that you are consenting to the updated terms.

11. QUESTIONS OR CONCERNS

If you have any questions or concerns regarding our Policy, please send us a detailed message at the address below, and we will try to resolve your concerns.

Email: Privacy@JDEtips.com.

12. YOUR CALIFORNIA PRIVACY RIGHTS

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal Information that we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to the following address: P.O. Box 128, Sparta MI 49345. We will respond to one request per California customer each year, and we do not respond to requests made by means other than as set forth above.

California Do Not Track Disclosure: Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. At this time, we do not respond to Web browser “do not track” settings or signals. We deploy cookies and other technologies on our Service to collect information about you and your browsing activity, even if you have turned on the Do Not Track signal.

13. CAN-SPAM Act



The CAN-SPAM sets the rules for commercial email, establishes requirements for commercial messages, and gives recipients the right to have emails stopped from being sent to them.

If, at any time, you would like to unsubscribe from receiving future emails, you can email us at Privacy@JDEtips.com and we will promptly remove you from email communications.

14. LEGAL DISCLOSURES

It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you, (3) investigate and defend ourselves against any third-party claims or allegations, (4) protect the security or integrity of our Service (such as by sharing with companies facing similar threats); or (5) exercise or protect the rights and safety of the Company, our users, personnel, or others. We attempt to notify users about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

Effective: July 2018

Updated: August 2018