



Effective date: January 1, 2020

PRIVACY POLICY FOR CONSUMERS

This Privacy Policy for Consumers (“Consumer Privacy Policy”) is provided by Lead Intelligence, Inc. d/b/a Jornaya (“Jornaya,” “we,” “us,” or “our”) to inform interested parties who happen to visit our website at jornaya.com know what information is collected through our proprietary Platform for the products/services we provide our Clients (as further defined below), how it’s collected, and how we protect it, use it, and share it as applicable. It also describes choices available to Consumers regarding protecting your information and how to opt-out of Internet-based advertising services.

For our purposes, “Consumer” refers to an individual who visits and interacts with a third party website or application, such as a website operated by a Publisher (as further defined below) on which the individual indicated an interest in a particular product or service and provided contact information in response to a form or questionnaire, as well as browsed or otherwise interacted within such sites.

Please Note: If you are a Jornaya Client (i.e. Publisher, Querier or Partner), please visit our Privacy Policy for Services by [clicking here](#) or by visiting our website at jornaya.com.

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. For additional information about how our Platform works, please review the Terms of Use, located on our website at <http://jornaya.com/>.

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 CONSUMER 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. WE ENCOURAGE CONSUMERS, AND WE EXPECT OUR CLIENTS TO ENCOURAGE

CONSUMERS, TO READ ALL APPLICABLE TERMS AND CONDITIONS, POLICIES AND/OR STATEMENTS OF THE WEBSITES CONSUMERS VISIT, ESPECIALLY THOSE WEBSITES THAT COLLECT PERSONAL INFORMATION FROM CONSUMERS (“CONSUMER PI”).

Our collection, processing, use, and storage of Consumer PI is dependent upon our Clients implementing our Scripts and/or Services on their Publisher Platforms, which we do not control. Under our Terms of Use, if our Clients use our Platform in connection with their collection and use of Consumer PI, they must comply with all applicable laws, including, where applicable, publishing and complying with an adequate privacy policy that discloses the use of our Platform and how our Platform collects and processes data, as described in our Terms of Use and Privacy Policies. To the extent required by law, Publishers must provide detailed information about, and ensure Consumers consent to, the storing and accessing of cookies or other information on the Consumer’s device in connection with use of our Platform on the Publisher Platforms. Our Clients are not permitted to circumvent any opt-out options or other privacy features of our Platform; and are solely responsible for ensuring that they have permission from Consumers to use any Consumer PI (for example, name, email, phone, address) in connection with their access and use of our Platform.

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.

HOW WE COLLECT, STORE AND USE CLIENT DATA

Many Publisher Platforms utilize our Services. When you visit, enter information into, or otherwise interact with a Publisher Platform, the technology associated with our Services (previously installed by the Publisher at a Publisher Platform with that Publisher’s approval) captures certain information and automatically creates and returns to the Publisher a unique lead identifier 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. The information associated with a Universal LeadiD is subject to confidentiality obligations at all times.

If you enter information into an open text field within a form on a Publisher Platform, our Services automatically encrypt that information using a cryptographic hash function which makes it infeasible for anyone, including us, to store, retrieve, reverse-engineer, or utilize the information that you volunteered.

We collect and encrypt the following categories of information:

Category of Personal Information	Source of Personal Information
Identifiers (e.g. name, email address, postal address, or other similar identifiers)	Publishers, Queriers, and Partners
Demographics (e.g. age, gender, race, or other protected classifications under applicable law)	Publishers, Queriers, and Partners
Commercial information (e.g. products or services purchased, or other purchasing or consumption histories or tendencies)	Publishers, Queriers, and Partners
Internet or other electronic network activity information (e.g. browsing history, IP address, browser information, or information regarding your interaction with Publisher Platform websites)	Publishers, Queriers, and Partners; directly from your browser
Professional information (e.g. employer, salary, or job title)	Publishers, Queriers, and Partners
Educational information	Publishers, Queriers, and Partners
Inferences regarding other characteristics (e.g. Derived Data, as defined below)	Derived by Jornaya from Event Data or Contributed Data, as defined below

When we provide our Services to our Clients, the Platform facilitates the capture of data from unique consumer events, which includes, but is not limited to, lead history information, the URL where a consumer event occurred, Publisher’s account number, Publisher name, referrer URL, and information that is entered by website visitors/end users of Publisher Platforms (“Event Data”). Our Clients also may provide to Jornaya additional information in their possession, such as conversion data, or Consumer information and/or Identifiers, through a query or batch file (“Contributed Data”). We do not retain, use, or disclose Event Data or Contributed Data for any purpose other than to provide the Services specified in our contract with our Clients. For our Clients utilizing the Services, certain “Derived Data” may be returned as requested by a Client. Derived Data are derived from, but do NOT include or expose Event Data or Contributed Data. Derived Data may be (i) related to an Event associated with a

Universal LeadID (for example, Lead Age, Data Integrity, TCPA Disclosure Match Status, Lead Origin, and Lead Velocity); (ii) related to a consumer associated with an Identifier; or (iii) associated with any aspects of Contributed Data (as defined above).

COOKIES AND RELATED TECHNOLOGIES

Our technology uses cookies, JavaScript®, website scripts, APIs, pixel tags and related technologies to provide our Services to our Clients. WE CANNOT AND DO NOT use these technologies to associate the information we collect with your name or other contact information although our Clients may be able to do so.

Cookies are small data files that are served by our platform and stored on your device. They enable your device to be identified when you move between different websites and applications. Our Clients may choose to use this information as part of our Services. We may also drop cookies from our Clients for the purposes described above. You can choose to configure your web browser to refuse any or all attempts to serve a cookie, at your discretion.

You can find out more about how cookies work and how you can control them by going to various websites offering helpful information, such as allaboutcookies.org or networkadvertising.org.

DATA SHARING

The following categories of your personal information may be shared with Clients, including Partners, Publishers, or Queriers for our business purposes:

- Identifiers;
- Demographics;
- Commercial information;
- Internet or other electronic network activity information;
- Geolocation;
- Professional information;
- Education information; and
- Inferences regarding preferences or other characteristics.

The following categories of personal information may be shared with Clients, including Partners, Publishers, or Queriers for monetary or other valuable consideration:

- Identifiers; and
- Inferences regarding preferences or other characteristics.

A Client may provide certain additional information in its possession, such as conversion data, Identifiers, and/or other Consumer PI (“Contributed Data”) when utilizing certain aspects of our Services. If any Contributed Data is provided by a Client, this information is utilized solely to generate applicable Jornaya derived data (which does NOT contain your name or other contact information)

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.

CONSUMER CHOICES AND HOW TO OPT-OUT

We recognize how important online privacy is to Consumers, and we support the following options for Consumers to control or opt out of certain collection and disclosure of information:

- **Opting out of Internet-based advertising.** Our Clients may use certain insights gained by the use of our Platform to tailor the advertising Consumers see on our Clients' websites. **We do not deliver advertising on our own, including targeted advertising.** Consumers may be able to opt-out of Interest-based advertising by our Clients either through options provided through the websites Consumers visit and interact with, or by using an industry-wide opt-out tool, such as:

- o Digital Advertising Alliance (DAA): <http://www.aboutads.info/choices/>

- o National Advertising Initiative (NAI): <http://www.networkadvertising.org/choices/>

Please note that in some cases, Consumers will still see advertisements after opting out; these advertisements may just not be tailored to the Consumers' interests.

- **Opting out of cookies and beacons.** If a Consumer does not want cookies placed on the Consumer's device at all, the Consumer can adjust the device's browser settings to display a notification before any cookie is placed. Browser settings may also be changed to refuse all cookies, or only third-party cookies. Likewise, the Consumer can remove any cookies that have already been placed on the device. Please note that settings may need to be adjusted on each browser and device used by the Consumer.

- **Avoiding certain websites.** A Consumer may avoid the collection and use of certain information by not visiting Publisher Platforms that utilize our Services. Consumers must consult the privacy policies of the websites they visit to determine whether our Scripts or Services are used on those websites.

CALIFORNIA CONSUMER PRIVACY RIGHTS

California law provides California residents with the following privacy rights:

- **Right to access personal information:** Individuals exercising this right may request access to the categories and specific pieces of their personal information we have collected in the prior 12-month period. Individuals exercising this right may receive their personal information, when provided electronically, in a readily-useable format.
- **Right to deletion:** Individuals exercising this right can ask us to delete their personal information we have collected, though we may be permitted to retain personal information for certain purposes.
- **Right to disclosure:** Individuals exercising this right can receive additional information regarding the sources from which we collect information, the purposes for which we collect and share

personal information, the information of theirs we hold, and the categories of parties with whom we share their information.

- **Right to opt out of sales:** As permitted by applicable law, we may share your personal information for monetary or other valuable consideration (under California law, this is considered a “sale”). You may opt out of such a “sale” of your personal information to third parties. You can exercise your right to opt-out here: [Do Not Sell My Personal Information](#).
- **Right to be free from discrimination:** Users may freely exercise these rights without fear of being denied goods or services.

Currently, this law specifically applies to California residents, but Jornaya will respond to requests to exercise your rights which we receive from any resident of the United States. If you are a resident of California or the United States, and would like to exercise one of your rights, please contact us at privacy@jornaya.com or through our main website at jornaya.com. You may designate an authorized agent to request the exercise of one or more of these rights on your behalf. Please note all consumer requests are subject to verification and there may be circumstances where we do not honor your request, as permitted under the law. We may verify your request by asking for additional information about how you found out about Jornaya, who referred you to Jornaya to make a request (which Publisher, Querier or Partner referred you to us) and which websites you made the same requests to; and we will need to be able to verify with that Publisher or Partner as to the validity of your request first. If you are using an authorized agent, such requests are subject to the same criteria.

Under Reg 999.317(g) of the California Consumer Privacy Act (CCPA), we are required to compile and post within our privacy policy the following information:

	Source of Personal Information
a. The number of requests to know (disclosures) that the business received, complied with in whole or in part, and denied.	<ul style="list-style-type: none"> • 2 total request to know (disclosures) requests. • 2 of those requests were not fulfilled due to incomplete, inaccurate, or data not located.
b. The number of requests to delete that the business received, complied with in whole or in part, and denied.	<ul style="list-style-type: none"> • 3 total deletion requests. • 3 were declined or denied due to incomplete, inaccurate, or data not located.
c. The number of requests to opt-out that the business received, complied with in whole or in part, and denied.	<ul style="list-style-type: none"> • 8 total opt-out requests. • 7 were declined or denied due to incomplete, inaccurate, or data not located.
d. The median or mean number of days within which the business substantively responded to requests to know, requests to delete, and requests to opt-out.	<ul style="list-style-type: none"> • Request to know (disclosure) requests were responded to on an average of 7 days. • Deletions requests were responded to on an average of 10 days. • Opt-out requests were responded to on an average of 9 days.

ADDITIONAL 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 to promote or describe 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. As described above, our Platform does implement technologies, including cookies, which enable the identification of a web user's device as it interacts with different websites and applications. Whether any Publisher Platform accepts or processes any such Do Not Track signals or similar mechanisms is determined by the Publisher that owns or operates the Publisher Platform(s) you may visit, and should be addressed in the privacy policy published by those Publishers on the Publisher Platform(s).

INFORMATION SECURITY AND RETENTION

We use security measures 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 as required by applicable law.

CHILDREN

Our Services are limited to companies who are interested in a formal business relationship. 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. Protecting the privacy of children is very important to us. 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 Consumer Privacy 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 CONSUMER PRIVACY POLICY

This Consumer Privacy Policy may change from time to time. We will post any changes to the Consumer Privacy Policy on the Site as they become available. All information Jornaya collects is and will be subject to the latest Privacy Policies 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 Consumer Privacy 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: Consumer Privacy Policy](#).