

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 let Consumers who may be directed to, or happen to visit, our website at jornaya.com know what information is collected through our proprietary Platform, how it’s collected, and how we protect it, use it, and share it with our Clients (as further defined below). It also describes the choices available to Consumers regarding protecting your information and how to opt-out of Internet-based advertising services. Unless otherwise defined in this Consumer Privacy Policy, terms used in this Consumer Privacy Policy have the same meanings as in our [Terms of Use](#), located on our website at jornaya.com.

For our purposes, “Consumer” refers to an individual who visits and interacts with a 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 Clients by clicking [here](#) or by visiting our website at jornaya.com.

WHAT WE DO

Jornaya provides a proprietary technology Platform, which includes the Jornaya online portal (“Site”), any scripts or code provided by Jornaya (“Scripts”), and any services provided by Jornaya (“Services”), which allows our Clients (as further defined below) who are sharing their data with one another to (i) verify that the data’s origin and history are authentic and represented accurately, (ii) help advertisers, vendors and marketers analyze first-, second- and third-party consumer 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. For additional information about how our Platform works, please review the [Terms of Use](#), located on our website at jornaya.com.

OUR RELATIONSHIP TO CONSUMERS

AS DESCRIBED ABOVE, 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 THEY VISIT, ESPECIALLY THOSE WEBSITES THAT COLLECT CONSUMER PERSONALLY IDENTIFIABLE INFORMATION (“CONSUMER PII”).

Our collection, processing, use, and storage of Consumer information 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 personally identifiable information, 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 to use any Consumer PII (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) (e.g., 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, JavaScript®, pixels, scripts, codes, tags, cookies or batch data processing, only as required for the provision of our Services as applicable. In some cases, we may use Partner pixels, cookies, scripts or tags alongside our Script; and opt-out may be available in some cases, provided such are not deemed to be a core component of our Services.

HOW WE COLLECT, STORE AND USE 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 at a Publisher Platform with that Publisher's approval) capture certain information and automatically create and return 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 anonymous and 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 consider this information as potential personally identifiable information (“PII”) and automatically encrypts that information using a cryptographic hash function which makes it infeasible for anyone, including us, to store, retrieve, reverse-engineer, or utilize the PII that you volunteered. The only information our Clients may learn from utilizing our Services is anonymous, non-personally identifiable information (“Non-PII”).

Examples of Non-PII which may be collected include:

- **Device and browser information:** This is technical information about the device or browser you use on the Publisher website. This information is found in every communication sent over the Internet such as Internet Protocol (IP) Address, browser type, browser language and operating system.
- **Browsing activity:** This is information regarding your browsing activity on a Publisher Platform. This information is similar to the information a Publisher may collect as part of their web analytics service

(e.g. Google Analytics) or web server logs; such as what pages you visited and when, which parts of the Publisher's content you were exposed to, and how long you remained on an individual page.

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 personally identify you.

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

We share anonymous, Non-PII only as necessary to enable us to provide our Services to our Clients who wish to certify that a certain event(s) took place at the Publisher Platform in which a Consumer legitimately participated and to ensure that the data was not tampered with as it was transmitted to other companies; and/or subsequently through the consumer's browser journey. At times, anonymous Non-PII is shared with Partners to enable us to provide certain Services to Publishers and/or Queriers.

For Partners who may work with us to provide certain services through our Platform that are supplemental to our Services, we may be requested to share certain information (including PII captured on a Publisher Platform prior to it being encrypted, as referenced above) with those Partners to provide the requested results. Such Partners are bound by obligations to (i) keep the information confidential, (ii) utilize it only for the purpose as required to provide certain requested services, and (iii) utilize it to derive requested information that is Non-PII. Such derived Non-PII may be provided to Queriers as part of our Services or supplemental services provided by the Partners. Once any PII is shared with a Partner as required, the PII is automatically and immediately encrypted, as referenced above, and only the hash values are retained.

A Client may provide certain additional information in its possession, such as conversion data, and consumer information and/or Identifiers ("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 is anonymous and does NOT expose any PII) 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. In order to opt-out of targeted advertising, Consumers must opt-out of Interest-based advertising either through options provided through the websites Consumers visit and interact with, or by using an industry-wide opt-out tool, such as:

- Digital Advertising Alliance (DAA): <http://www.aboutads.info/choices/>
- National Advertising Initiative (NAI): <http://www.networkadvertising.org/choices/>

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

- **Opting out of cookies and beacons.** If a Consumer does not want us to place cookies 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.

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 Non-PII data for reporting, analytics, and other business reasons, including to promote or describe the use of our Services and Platform.

ONLINE TRACKING

Some web browsers may be configured to send Do Not Track signals to websites, or web users may use similar mechanisms, to indicate a preference that certain web technologies not be used to track the user's online activity. Our Site, and our Scripts and Services implemented on Publisher Platforms, do not accept or process any such 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

We do not knowingly collect or maintain information from individuals who are under 13 years of age, and no part of our Platform is designed to attract people under the age of 13. Protecting the privacy of children is very important to us. If we obtain knowledge that a Client or Consumer is under the age of 13, 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 Partner, whether we collaborate with Partners to make their products and services available to Publishers and Queriers, or to make our Platform available to our Partners' clients, we do not intend by such collaboration to make any implied representation about our Partners generally or our Partners' products and services. This Privacy Policy applies only to our Platform. The websites and services of our Clients are provided to you subject to separate terms and conditions and separate policies, potentially including separate privacy policies regarding the use and disclosure of Consumer PII. We encourage Consumers, and we expect our Clients to encourage Consumers, to read all applicable terms and conditions and policies or statements of the websites they visit, especially those websites that collect Consumer PII.

GEOGRAPHICAL RESTRICTIONS

Our Platform is intended for use solely within the United States of America and is directed to Clients 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. We reserve the right to limit, in our sole discretion, the provision of any feature, product, or service to any person or geographic area. Any offer for a feature, product, or service made on or through the Platform is void where prohibited. If you choose to access the Platform, or implement our Scripts on, or make the Services available via, a Publisher Platform, you do so on your own initiative and are solely responsible for compliance with all applicable local laws. If you access the Platform from outside the United States, you acknowledge and agree that your information may be transferred to and maintained on computers and servers located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. Your submission of such information represents your agreement to the transfer of such information to the United States and the collection, use, and disclosure of your information in accordance with United States law and our Privacy Policies.

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.