

JCI privacy policy

Your privacy and trust are important to us. This Privacy Statement explains how Shanghai JC Intelligence Co. Ltd. (we refer to these as “JCI”, “we”, “us”, or “our”) collect, use, and share your personal information in connection with the website, application (including a mobile application), product, software, or service that links to this Privacy Statement (we call these our “Services”).

Information we collect

The type of personal information we collect depends on how you are specifically interacting with us and which Services you are using. Generally, we collect the following categories of personal information:

- Contact Information, such as name, alias, address, phone number, social media user ID, email address, and similar contact data.
- Organization and Contacts Information, such as your employer or organizations that you are a member of, information about your colleagues or those within your organization, your status with an organization, and similar data.
- Account Information, such as security-related information (including user names and passwords, authentication methods, and roles), service-related information (including purchase history and account profiles), billing-related information (including payment, shipping, and billing information), and similar data.
- User Content, such as content of communications, suggestions, questions, comments, feedback, and other information you send to us, that you provide to us when you contact us, or that you post on our Services (including information in alerts, folders, notes, and shares of content), and similar data.
- Device & Browser Information, such as network and connection information (including Internet Service Provider (ISP) and Internet Protocol (IP) addresses), device and browser identifiers and information (including device, application, or browser type, version, plug-in type and version, operating system, user agent, language and time zone settings, and other technical information), advertising identifiers, cookie identifiers and information, and similar data.
- Usage Information and Browsing History, such as usage metrics (including usage rates, occurrences of technical errors, diagnostic reports, settings preferences, backup information, API calls, and other logs), content interactions (including searches, views, downloads, prints, shares), and user journey history (including clickstreams and page navigation, URLs, timestamps, content viewed or searched for, page response times, page interaction information (such as scrolling, clicks, and mouse-overs), and download errors), advertising interactions (including when and how you interact with marketing and advertising materials, click rates, purchases or next steps you may make after seeing an advertisement, and marketing preferences), and similar data.
- Location Data, such as the location of your device, your household, and similar location data.

- Demographic Information, such as country, preferred language, age and date of birth, marriage status, gender, physical characteristics, personal or household/familial financial status and metrics, military status, and similar data.
- Your Image, such as still pictures, video, voice, and other similar data.
- Identity Information, such as government-issued identification information, tax identifiers, social security numbers, other government-issued identifiers, and similar data.
- Financial Information, such as billing address, credit card information, billing contact details, and similar data.
- Social Media and Online Content, such as information in social media and online profiles, online posts, and similar data.
- Career, Education, and Employment Related Information, such as job preferences or interests, work performance and history, salary history, status as a veteran, nationality and immigration status, demographic data, disability-related information, application information, professional licensure information and related compliance activities, accreditations and other accolades, education history (including schools attended, academic degrees or areas of study, academic performance, and rankings), and similar data.

Sources of information

We collect personal information about you either directly from you, from certain third parties (such as your employer or the subscriber providing access to our Services), or from other sources (such as publicly available sources) as follows:

You provide personal information to us when you:

- Search for, subscribe to, or purchase our Services.
- Use our Services or otherwise interact with us.
- Create or maintain a profile or account with us.
- Purchase, use, or otherwise interact with content, products, or services from third party providers who have a relationship with us.
- Create, post, or submit user content on our Services.
- Register for or attend one of our events or locations.
- Request or sign up for information.
- Communicate with us by phone, email, chat, in person, or otherwise.
- Complete a questionnaire, survey, support ticket, or other information request form.
- When you express an interest in working with us or apply for a job or position with us.

We collect personal information automatically when you:

- Search for, visit, interact with, or use our Services (including through a device).
- Access, use, or download content from us.
- Open emails or click on links in emails or advertisements from us.

- Otherwise interact or communicate with us (such as when you attend one of our events or locations, when you request support or send us information, or when you mention or post to our social media accounts).

We also collect personal information about you from third parties, such as:

- Your organization and others with whom you have a relationship that provide or publish personal information related to you, such as from our customers when they arrange access to our Services for you or from others when they create, post, or submit user content on our Services that may include your personal information.
- Professional or industry organizations and certification / licensure agencies that provide or publish personal information related to you.
- Third parties and affiliates who resell or integrate with our Services.
- Service providers and business partners who work with us in relation to our Services and that we may utilize to deliver certain content, products, or services or to enhance your experience.
- Marketing, sales generation, and recruiting business partners.
- Credit bureaus and other similar agencies.
- Government agencies and others who release or publish public records.
- Other publicly or generally available sources, such as social media sites, public and online websites, open databases, and data in the public domain.

How we use information

This section includes details of the purposes for which we use personal information and the different legal reasons for processing that personal information.

Lawful Basis

First, some laws require us to explain the lawful basis upon which we process your personal information. With respect to these laws, we process personal information about you for one or more of the following basis:

- To Perform a Contract. Where the processing is necessary for the performance of contract.
- Legitimate Interests. Where the processing is necessary for legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal information.
- Your Consent. Where you have given us consent to process your personal information for specified purposes, such as to provide our Service and other items requested by you.
- Comply with the Law. Where the processing is necessary for compliance with a legal obligation.

Processing of Personal Information

We process your personal information in connection with our Services and for other business purposes, including to:

- Provide, deliver, analyze, and administer our Services (including in connection with the performance of a contract).
- For internal research and development purposes for new content, products, and services, and to improve, test, and enhance the features and functions of our current Services.
- Process transactions related to our Services and administer accounts or profiles related to you or your organization (including registrations, subscriptions, purchases, billing events, royalty calculations, and payments).
- Personalize and make recommendations related to our Services and other offerings.
- Contact and communicate with you in connection with our Services or other notifications, programs, events, or updates that you may have registered for.
- Send you offers, advertising, and marketing materials, including to provide personalized advertising to you.
- Conduct and communicate with you regarding recruiting and human resources administration.
- Comply with your instructions or to fulfill other, specified purposes for which you have given your consent.
- Detect and prevent fraud and abuse to ensure the security and protection of all customers and others, as well as to identify and authenticate your access to our Service or to identify and authenticate you before we provide you with certain information.
- Exercise our rights and to protect our and others' rights and/or property, including to take action against those that seek to violate or abuse our Services.
- Comply with the law and our legal obligations, including to respond to a request or order from a court, regulator, or authority, as well as to fulfill our contractual obligations with our customers when they arrange access to our Services for you.
- Effectuate the sale, merger, acquisition, or other disposition of our business (including in connection with any bankruptcy or similar proceedings).

How we share information

We share personal information for the purposes set out in this Privacy Statement and with the following categories of recipients:

- **Your Organization and Contacts.** We may share your personal information with your organization and others with whom you have a relationship in order to fulfill or perform a contract or other legal obligation, including with our customer that arranges access to our Services for you and pays us in connection with your access. We may also share your personal information with your contacts if you are in the same organization or to facilitate the exchange of information between you and the contact(s).
- **Business Partners.** We may share your personal information with our business partners to jointly offer, provide, deliver, analyze, administer, improve, and personalize products or services (including these Services) or to host events. We may also pass certain requests from you or your organization to these business providers.

- **Third Party Content Providers.** We may share your personal information with our third party content providers to perform tasks on our behalf and to assist us in providing, delivering, analyzing, administering, improving, and personalizing content that are delivered as part of our Services. We may also pass certain requests from you or your organization to these content providers.
- **Social Media Services.** We may work with certain third party social media providers to offer you their social networking services through our Services. These social networking services may be able to collect information about you, including your activity on our Services. These third party social networking services also may notify your friends, both on our Services and on the social networking services themselves, that you are a user of our Services or about your use of our Services, in accordance with applicable law and their own privacy policies.
- **Third Party Service Providers.** We may share your personal information with our third party service providers to perform tasks on our behalf and to assist us in offering, providing, delivering, analyzing, administering, improving, and personalizing our Services. For example, service providers who assist us in performing, delivering, or enhancing certain products and services related to our delivery and operation of our Services, who provide technical and/or customer support on our behalf, who provide application or software development and quality assurance, who provide tracking and reporting functions, research on user demographics, interests, and behavior, and other products or services. These third party service providers may also collect personal information about or from you in performing their services and/or functions on our Services. We may also pass certain requests from you or your organization to these third party service providers.
- **Advertisers.** We may share your personal information with advertisers, advertising exchanges, and marketing agencies that we engage for advertising services, to deliver advertising on some of our Services, and to assist us in advertising our brand and products and services. Those advertising services may also target advertisements on third party websites based on cookies or other information indicating previous interaction with us and/or our Services.
- **Users.** For some of our Services, we aggregate information from public records, phone books, social networks, marketing surveys, business websites, and other sources made available to us to create listings and profiles that become a part of our content in these Services. These listings and profiles may be made available to all users of these Services. As described above, we may also share your personal information with other users who are your contacts if you are in the same organization or to facilitate the exchange of information between you and the contact(s). Additionally, if you choose to include your personal information in any reviews, comments, or other posts that you create, then that personal information may be displayed other users as part of your posting.
- **In the Event of Merger, Sale, or Change of Control.** We may transfer this Privacy Statement and your personal information to a third party entity that acquires or is merged with us as part of a merger, acquisition, sale, or other change of control (such as the result of a bankruptcy proceeding).

- **Other Disclosures.** We may disclose your personal information to third parties if we reasonably believe that disclosure of such information is helpful or reasonably necessary to comply with any applicable law or regulation, to comply with or respond to a legal process or law enforcement or governmental request, to enforce our terms and conditions or other rights (including investigations of potential violations of our rights), to detect, prevent, or address fraud or security issues, or to protect against harm to the rights, property, or safety of JCI, our users, or the public.

Location of personal information

We will store user personal information collected within the territory of the People's Republic of China in accordance with laws and regulations.

Security of information

The security of your personal information is important to us. Taking into account the nature, scope, context, and purposes of processing personal information, as well as the risks to individuals of varying likelihood and severity, we have implemented technical and organizational measures designed to protect the security of personal information.

However, please note that no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable measures designed to protect personal information, we cannot guarantee its absolute security.

Our security procedures also means that we may request proof of identity before we disclose personal information to you or before we process your other requests.

Retention of information

We retain personal information in accordance with our enterprise records retention schedule, which varies by Service, business function, record classes, and record types.

We calculate retention periods based upon and reserve the right to retain personal information for the periods that the personal information is needed to: (a) fulfill the purposes described in this Privacy Statement, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.

Children's privacy

Our Services generally provide information solutions and, as such, our Services are intended for professionals and/or individuals over eighteen (18) years of age. We do not target children and do not knowingly collect any personal information from children under the age of thirteen (13). When a user discloses personal information on our Services, that user is representing to us that he or she is at least eighteen (18) years of age.

Marketing choices

We deliver advertising and marketing across various platforms, such as on our Services or via email, telephone, text messaging, direct mail, and various online channels. Our Services and marketing materials may also include third party advertising and links to other websites and applications. Third party advertising partners may collect information about you when you interact with their content, advertising, or services.

Your rights

These rights differ based upon local data protection laws in your country, state, or territory, but these rights may include one or more of the following:

- Access to Personal Information. You may have the right to obtain confirmation from us that we process your personal information and, if so, you may have the right to request access to your personal information. Please note that, to the extent permitted by law, we may charge a reasonable fee based on administrative costs for the first or further copies of your personal information requested by you.
- Rectification. You may have the right to request that we rectify inaccurate personal information concerning you and, depending on the purposes of the processing, you may have the right to have incomplete personal information completed.
- Erasure/Deletion. You may have the right to require us to erase some or all of the personal information concerning you.
- Restriction of Processing. You may have the right to require us to restrict the further processing your personal information. In such cases, the respective information will be marked as restricted, and may only be processed by us for certain purposes.
- Object. You may have the right to object, on grounds relating to your particular situation, to the processing of your personal information by us, and we may be required to no longer process some or all of your personal information.
- Data Portability. You may have the right to receive a copy of your personal information which you have provided to us, in a structured, commonly used, and machine-readable format, and you may have the right to transmit that personal information to another entity without hindrance from us.
- Withdraw Consent. You may have the right to withdraw consent you have provided to us where we rely solely on your consent to process your personal information. You can always provide your consent to us again at a later time.
- Right to Complain. You may have the right to lodge a complaint to an applicable supervisory authority or other regulator in China if you are not satisfied with our responses to your requests or how we manage your personal information.

Importantly, these rights are not absolutely guaranteed and there are several exceptions where we may not have an obligation to fulfill your request. PLEASE CONSULT YOUR LOCAL DATA PROTECTION LAWS TO DETERMINE WHAT RIGHTS MAY BE AVAILABLE TO YOU AND WHICH EXCEPTIONS MAY APPLY.

How do I submit a request?

To make a request or exercise your rights, please reach out to us at support@jcichina.com.

When you make a request, we ask that you help us with the following:

- **Tell Us Which Right You Are Exercising:** Please specify which right you want to exercise and the personal information to which your request relates (if not to you). If you are acting on behalf of another individual, please clearly indicate this fact and your authority to act on such person's behalf.
- **Tell Us More about Your Relationship with Us:** Please let us know how you are associated with us, such as that you use certain Services of ours or that you were a former employee.
- **Help Us Verify Your Identity:** As mentioned above, our security procedures mean that we may request proof of identity before we disclose personal information to you or before we process your other requests. Provide us enough information to verify your identity. If we cannot initially verify your identity, we may request additional information to complete the verification process (such information may include your picture, a copy of government-issued ID and/or a recent utility or credit card bill). Please note that if we cannot verify your identity, we may not be able to fulfill your request. Any personal information you disclose to us for purposes of verifying your identity may be shared with our third party service providers and/or third parties (like your phone carrier) or government agencies for the purpose of verification.
- **Direct Our Response Delivery:** Depending on your request, we will provide a response to you via email or through a link to access certain information.

Changes to this Privacy Statement

As our organization changes over time, this Privacy Statement is expected to change as well. We reserve the right to amend the Privacy Statement at any time, for any reason, and without notice to you other than the posting of the updated Privacy Statement on our Services. We may e-mail periodic reminders of our notices and terms and conditions, but you should check our Services frequently to see the current Privacy Statement that is in effect and any changes that may have been made to it.

Conflicts

Depending on the specific Service you are using or specific interactions you have with us, we may provide different or supplemental privacy statements that describe and govern how we use your personal information. When we do so, those different or supplemental privacy statements apply to that specific Service you are using or those specific interactions you have with us.