

**Effective Date 2/18/2021**

## **JQBX PRIVACY POLICY**

### **1. WHAT THIS PRIVACY POLICY COVERS**

This Privacy Policy covers JQBX's treatment of information gathered when you are using or accessing a JQBX website and any service we provide you (each a "Service"). This Privacy Policy also covers our treatment of any information that you share with us or that we share with you. This Privacy Policy does not apply to the practices of third parties that JQBX does not own or control, including but not limited to any third party domains, websites, tools, services and applications ("Third Party Services") that you elect to access through the Service, or to individuals that we don't manage or employ. By using the Service or interacting with us offline, you agree to our Terms of Use and consent to our collection, use and disclosure practices, and other activities as described in this Privacy Policy. If you do not agree and consent, please discontinue use of the Service.

If you are a California resident or an individual located in Europe, please see the "Additional Disclosures for California Residents" and "Additional Disclosures for People in Europe" below. If you have any questions about our privacy practices, please contact us as set forth in the section entitled "Contact Us" below.

### **2. OPTING OUT**

At any time, you can unsubscribe from our mailing lists or newsletters, by emailing us at [support@audionautic.co](mailto:support@audionautic.co). At any time, you can stop using the JQBX Service. Termination of your JQBX Service account is subject to the terms and conditions in this Privacy Policy and JQBX's Terms of Use.

At any time, you can exercise your following opt-out options:

1. object to the disclosure of your Personal Information to a third party, other than to third parties who act as our agents to perform tasks on our behalf and under our instructions; or
2. object to the use of your Personal Information for a purpose that is materially different from the purposes for which we originally collected such information, pursuant to this policy, or you subsequently authorized such use.

You can exercise your choice by contacting us at [support@audionautic.co](mailto:support@audionautic.co).

Web browsers offer a “Do Not Track” (“DNT”) signal. A DNT signal is a HTTP header field indicating your preference for tracking your activities on a service or through cross-site user tracking. Our Service does not respond to DNT signals.

### **3. WHAT INFORMATION WE COLLECT**

#### **A. Personal Information**

In connection with the Services we provide, we may ask you to provide us with certain information, including (i) your first and last name, email address, home or business address, other shipping or billing addresses, telephone number, mobile number, username, your birthdate, your purchase and/or service history, or other information that could reasonably be used to identify you personally or identify your household or device (hereinafter, “Personal Information”); and/or (ii) demographic information, such as your country, state, or county of residence or business operation (“Demographic Information”).

We may collect this information when you:

- Request information from us via forms or emails, such as signing up for our newsletter.
- Contact us regarding a question, concern, or inquiry, such as when you make inquiries concerning our Services.
- Register and create an account.

- Sign up or request to be placed on our mailing and/or email marketing lists;
- Provide billing information to us;
- Provide payment information to us (e.g., Venmo™, PayPal™, Zell™, or bank account information);
- Post user-generated content on or through the JQBX website
- Otherwise interact with the Service or our representatives.

Your decision to provide us with information is voluntary, but if you choose not to provide any requested information, you may not be able to take advantage of all of the website or app features, or our Services, including ordering products or Services, submitting inquiries, or signing up for newsletters or marketing lists.

## **B. General Browsing**

In addition to information that you choose to submit to us, we and/or our service providers may automatically collect and/or store certain information when you visit or interact with the Service (“Usage Information”). This Usage Information may be stored and/or accessed from your personal computer, laptop, tablet, mobile phone or other device (a “Device”) whenever you visit or interact with our Service. Usage Information may include:

- Your IP address, IDFA, Android/Google Advertising ID, IMEI, or another unique identifier (“Device Identifier”);
- Your Device functionality (including browser, browser language, operating system, hardware, mobile network information);
- Referring and exit web pages and URLs;
- The areas within our Service that you visit and your activities there, including remembering you and your preferences;
- Your Device location or other geolocation information, including the zip code, state or country from which you accessed the Service;
- Your Device characteristics; and

- Certain other Device data, including the time of day you visit our Site(s).

For location information, we may use this information to provide customized Services, content, promotional offers, and other information that may be of interest to you. If you no longer wish for us or our service providers to collect and use location information, you may disable the location features on your device. Consult your device manufacturer settings for instructions. Please note that if you disable such features, your ability to access certain features, Services, content, promotions, or products may be limited or disabled.

### **C. Use of Cookies and other Tracking Technologies**

We may use various methods and technologies to store or collect Usage Information (“Tracking Technologies”). Tracking Technologies may set, change, alter or modify settings or configurations on your Device. A few of the Tracking Technologies used on the Service, include, but are not limited to, the following (as well as future-developed tracking technology or methods that are not listed here):

- **Cookies.** A cookie is a file placed on a Device to uniquely identify your browser or to store information on your Device. Our Site may use HTTP cookies, HTML5 cookies, Flash cookies and other types of cookie technology to store information on local storage.
- **Web Beacons.** A Web Beacon is a small tag (which may be invisible to you) that may be placed on our Site’s pages and messages.
- **Embedded Scripts.** An embedded script is programming code that is designed to collect information about your interactions with the Site, such as the links you click on.
- **Etag, or entity tag.** An Etag or entity tag is a feature of the cache in browsers. It is an opaque identifier assigned by a web server to a specific version of a resource found at a URL.
- **Browser Fingerprinting.** Collection and analysis of information from your Device, such as, without limitation, your operating system, plug-ins, system fonts and other data, for purposes of identification.

- **Recognition Technologies.** Technologies, including application of statistical probability to data sets, which attempt to recognize or make assumptions about users and devices (e.g., that a user of multiple devices is the same user).

We may use Tracking Technologies for a variety of purposes, including:

- To allow you to use and access the Service, including for the prevention of fraudulent activity and improved security functionality or to allow you to make use of cart or payment functionality;
- To assess the performance of the Service, including as part of our analytic practices or otherwise to improve the content, products or services offered through the Service as explained below under “AGGREGATED AND ANALYTICAL INFORMATION”;
- To offer you enhanced functionality when accessing the Service, including identifying you when you sign into our Service or keeping track of your specified preferences or to track your online activities over time and across third-party sites; and
- To deliver content relevant to your interests on our Service and third-party sites based on how you interact with our advertisements and/or content.

You can get more information about Cookies and Tracking Technologies, and instructions on how to opt out of cookies and certain tracking technologies, in our “Ads and Information About You” section below and in our Cookie Policy.

#### **D. Information We Collect When You Interact with Third Party Services**

The Service(s) may include functionality that allows certain kinds of interactions between the Service and your account on a Third Party Service. The use of this functionality may involve the third-party site providing information to us. For example, we may provide links on the Service to facilitate sending a communication from the Service or we may use third parties to facilitate emails or postings to social media (like a “Share” or “Forward” button). We also may provide links to allow third parties to process credit card and/or electronic payments. These third parties

may retain any information used or provided in any such communications or activities and these third parties' practices are not subject to our Privacy Policy. We may not control or have access to your communications through these third parties. Further, when you use Third Party Services, you are using their services and not our services and they, not we, are responsible for their practices. You should read the applicable third-party privacy policies before using such Third Party Services on or through our Service.

#### **E. Information from Third Parties.**

In addition, we may collect information about you from other sources, including consumer credit reporting agencies, in order to evaluate your request for a Service, contractor/employment opportunities, including to be a JQBX customer. We may also obtain information about you from marketers and market research firms. We may combine the information we collect from third parties with information that we have collected from you or through your use of the Service.

#### **4. WHAT WE DO WITH YOUR INFORMATION**

We use the Personal Information we collect and receive to provide the Service to you and to other users, to enable the Service's tools and features, to study and analyze the functionality of the Service and users' activities, to provide support, to measure Service activity for pricing purposes, to maintain the Service, to make it better and to continue developing the Service.

We do not expose your private information to the public or third parties except in the limited circumstances set forth in this Privacy Policy. We will use the contact information you have provided (e.g., email address or mobile number) to contact you when necessary, to send you reminders and to provide you information and notices about the Service. We will include commercial and marketing information about our Service and related services.

We obey the law and expect you to do the same. If necessary, we will use your Personal Information to enforce our terms, policies and legal agreements, to comply with court orders and warrants, and assist law enforcement agencies, to collect debts, prevent fraud, misappropriation,

infringements, identity thefts and any other misuse of the Service, and to take any action in any legal dispute and proceeding. We commit to process Personal Information solely for the purposes described in this policy.

## **5. WITH WHOM YOUR INFORMATION IS SHARED**

We never share information we receive from you unless (a) we have your permission to share that information; (b) we have given you prior notice, including through this Privacy Policy, that the information will be shared and with what recipient or category of recipients; (c) that information is aggregate information or other information that does not identify you; or (d) to respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law.

### **A. Information Shared with the Public Through the Service**

As noted above content published through the Service may be available to the public. Such information includes, but is not limited to, anything you choose to publish, including your image and any information that may describe you. Because this kind of information can be seen by anyone and may be indexed by search engines, you should be careful in what you choose to disclose publicly and make sure it is information that you want to share with everyone.

### **B. Information Shared with Third Party Service Providers**

We do not sell, rent or lease your Personal Information. We will share your Personal Information with service providers and other third parties, if necessary, to fulfill the purposes for collecting the information. Third-party service providers use personal information solely for the purposes of providing services to us so we can provide JQBX Services to you, including, for example, audio and messaging services. Any such third party are expected to commit to protect your privacy as required under the applicable law and this policy.

For example, we will share your payment transaction details with the payment services providers, to process and verify your payments. We will use a service provider to manage our email, text and private messaging message transmission.

We will also share your Personal Information with our affiliates. These mean companies within the JQBX group and include subsidiaries, sister-companies and parent companies, with the express provision that their use of your Personal Information will comply with this policy.

We will report any content that you upload and share user Personal Information, if we believe, in our sole discretion that such content is illegal or abusive or may violate any third-party rights.

Additionally, a merger, acquisition or any other structural change will require us to transfer your Personal Information to another entity, as part of the structural change, provided that the receiving entity will comply with this policy.

### **C Ads and Information About You**

You may see certain ads on our Service because we participate in advertising networks administered by third parties. These networks track your online activities over time and across third party websites and online services by collecting information through automated means, including through the use of the Tracking Technologies described above, and they use this information to show you advertisements that are tailored to your individual interests. The information they collect includes information about your visits to our Service(s), such as the pages you have viewed. This collection and ad targeting takes place both on our Service(s) and on third-party websites that participate in the ad network. This process also helps us track the effectiveness of our communications and marketing efforts.

We may also use Tracking Technologies, such as our own cookies, to provide you with personalized online display advertising tailored to your interests. We and third-party vendors,

including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as a DoubleClick cookie) together to report how your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our Site. To learn more about how to opt out of Google's use of the Google analytics cookies, visit, here: <https://tools.google.com/dlpage/gaoptout>. To learn more about how to opt out of DoubleClick's use of cookies, visit the DoubleClick opt-out page, here: <https://support.google.com/ads/answer/2662922?hl=e>. If you would like more information about behavioral advertising practices, go to the Digital Advertising Alliance's WebChoices tool at [www.aboutads.info](http://www.aboutads.info). To learn about your choices in connection with these practices on the particular device on which you are accessing this Privacy Policy, please visit <http://www.networkadvertising.org/choices> and <http://www.aboutads.info/choices>. You may also click on the informational icon contained within each interest-based ad. We do not control these opt-out links or whether any particular company chooses to participate in these opt-out programs. We are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

Please note that even if you exercise the opt-out choices above, you may continue to receive advertisements, for example, ads based on the particular website you are viewing (e.g., contextually based ads). Also, if your browser (like some Safari browsers) is configured to reject opt-out cookies when you opt out on the DAA or NAI websites, your opt-out may not be effective.

## **6. AGGREGATED AND ANALYTICAL INFORMATION**

We use standard analytics tools. The privacy practices of these tools are subject to their own privacy policies and they use their own cookies to provide their service.

We use the standard analytics tools of Google Analytics and we will use additional or other analytics tools, from time to time, to learn about how you and other users use the Service, in

support of our Service-related activities and operations. The privacy practices of these tools are subject to their own privacy policies.

We use anonymous, statistical or aggregated information and will share it with our partners for legitimate business purposes. It has no effect on your privacy because there is no reasonable way to extract data from the aggregated information that we or others can associate specifically to you. We will share your Personal Information only subject to the terms of this policy, or subject to your prior consent.

## **7. ACCESSING YOUR PERSONALLY INFORMATION**

If you find that the information on your account is not accurate, complete or up to date, please provide us the necessary information to correct it. At any time, you can contact us at: [support@audionautic.co](mailto:support@audionautic.co) and request to access the Personal Information that we keep about you. We will ask you to provide us certain credentials to make sure that you are who you claim to be and to the extent required under the applicable law, will make good-faith efforts to locate your Personal Information that you request to access.

If you are eligible for the right of access under the applicable law, you can obtain confirmation from us of whether we are processing Personal Information about you, and receive a copy of that data, so that you could –

- verify its accuracy and the lawfulness of its processing;
- request the correction, amendment or deletion of your Personal Information if it is inaccurate or if you believe that the processing of your Personal Information is in violation of the applicable law.

We will use judgement and due care to redact from the data which we will make available to you, personally identifiable information related to others.

## **8. INTERNATIONAL TRANSFER OF INFORMATION**

If you are located outside the United States, the information that we collect from you may be transferred to, and stored and processed at, a destination in the United States. By submitting information, you agree to this transfer, storing or processing.

From time to time, we will make operational decisions which will have an impact on the sites in which we maintain Personal Information. We make sure that our data hosting service providers, provide us with adequate confidentiality and security commitments. If you are a resident in a jurisdiction where transfer of your Personal Information to another jurisdiction requires your consent, then you provide us your express and unambiguous consent to such transfer. You can contact our privacy team at: [support@audionautic.co](mailto:support@audionautic.co) for further information about data transfer.

## **9. DATA RETENTION AND YOUR RIGHTS**

Following the termination or expiration of the Service, we will stop collecting any Personal Information from or about you. We retain personal information as long as necessary to provide the Service to you, to host your content, to contact you about the Service, or as otherwise needed to operate our business and comply with our legal obligations. When you elect to provide your contact information, we may continue to communicate with you about our Service, and let you know about products and services that may interest you, unless you have opted out of receiving marketing communications.

JQBX respects your rights and intentions regarding use of your private data. You can request to review, update, modify or delete the data we hold about you. You can also change your marketing preferences at any time. To exercise these rights, please contact us at [support@audionautic.co](mailto:support@audionautic.co). We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

## **10. SECURITY**

We endeavor to protect the security and integrity of information we collect to ensure it is kept private. We and our hosting services implement systems, applications and procedures to secure

your Personal Information, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information; however, we cannot guarantee the security of any information. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of your information at any time.

Your access to some of our services and content may be password protected. We recommend that you refrain from disclosing your username(s) and password(s) to anyone. We also recommend that you sign out of your account or service at the end of each session. You may also wish to close your browser window when you have finished your work, especially if you share a computer with someone else or if you are using a computer in a public place like a library or Internet cafe.

## **12. CHANGES TO THIS PRIVACY POLICY**

From time to time, we will update this policy. If the updates have minor if any consequences, they will take effect 7 days after we post a notice on the Service's website. Substantial changes will be effective 30 days after we initially posted the notice.

Until the new policy takes effect, if it materially reduces the protection of your privacy right under the then-existing policy you can choose not to accept it and terminate your use of the Service. Continuing to use the Service after the new policy takes effect means that you agree to the new policy. Note that if we need to adapt the policy to legal requirements, the new policy will become effective immediately or as required by law.

## **13. CHILDREN'S PRIVACY**

The services are intended for users who are 18 years old or older. We do not knowingly collect personal information from children. If we become aware that we have inadvertently received personal information from a child, we will delete such information from our records.

## **14. DISCLOSURE OF INFORMATION TO AUTHORITIES**

We will need to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## **15. ADDITIONAL DISCLOSURES FOR CALIFORNIA RESIDENTS**

This section applies solely to users of our Service who reside in the State of California.

### **A. The Personal Information that We Collect**

In the preceding twelve (12) months we have collected the following categories of personal information:

- Identifiers and personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, email address and IP address.
- Commercial information, such as payment details.
- Internet or other similar network activity.
- Inferences drawn from other personal information.

Please note that the above list includes the categories of personal information that we are aware of. We may have been collecting other categories of personal information which you have uploaded to our Service as further described previously in the Privacy Policy.

### **B. Our Business Purposes for Collecting Your Personal Information**

We collect your personal information for various business purposes, such as to provide you with the Service and make it better, all as described above under the section titled What We Do with Your Information.

### **C. The Categories of Sources from Which Your Personal Information is Collected**

We obtain the categories of personal information listed in section A from various sources, including directly from you and from your Service activities and from third party service providers, as further described above under the section titled The Personal Information That We Collect.

#### **D. The Categories of Third Parties with Whom We Share Your Personal Information**

We may share your personal information with various third parties such as our service providers and our affiliates, as further described above under the section titled Sharing Personal Information with Others.

#### **E. The Categories of Personal Information Disclosed to Said Third Parties:**

In the preceding twelve (12) months we have disclosed the following categories of personal information for business purposes:

- Identifiers and Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, email address and IP address.
- Commercial information, such as payment details.
- Internet or other similar network activity.
- Inferences drawn from other personal information.

In the preceding twelve (12) months, we have not sold personal information.

#### **F. Your Rights as a California Resident**

You are entitled to the following specific rights under the California Consumer Privacy Act ('CCPA') in relation to your personal information:

##### Access to Specific Information and Data Portability Rights

You have the right to request that we will disclose certain information to you about our collection and use of your personal information over the past 12 months. After verifying your request, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you;

If we disclosed your personal information for a business purpose, we will provide you with a list which will identify the personal information categories that each category of recipient obtained.

### Deletion Rights

You have the right to request that we delete your personal information. Upon confirmation of your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception under applicable law applies.

### Exercising Your Rights

To exercise the access, data portability, and deletion rights described above, please submit your request to us by sending an email to: [support@audionautic.co](mailto:support@audionautic.co).

Only you or a person authorized to act on your behalf, may make a request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. A request for access can be made by you only twice within a 12-months period. We cannot respond to your request or provide you with the requested personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use the personal information provided in your request to verify your identity or authority to make the request.

We will do our best to respond to your request within 45 days of its receipt. If we require more time (up to additional 45 days), we will inform you of the reason and extension period in writing. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures that we provide will only cover the 12-month period preceding receipt of your request. The response we provide will also explain the reasons for our inability to comply with your request, if applicable.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for such decision and provide you with a cost estimate before processing further your request.

## **G. ADDITIONAL DISCLOSURES FOR PEOPLE IN EUROPE**

If EU data protection laws apply to the processing of personal data related to you by JQBX, then the following terms apply:

Under EU data protection laws, JQBX will be considered a data processor as such term is defined therein, with respect to its Service, except for the JQBX website. As for the JQBX website, JQBX is a data controller, as such term is defined in the EU data protection, and the following will apply only in such case. Where we process personal data related to you as a data controller, the processing is based on the following lawful grounds:

- All processing of your personal data which are not based on the lawful grounds indicated below, are based on your consent.
- We process your account and payment details to perform the contract with you.
- We will process your personal data including your Personal Information to comply with a legal obligation and to protect your and others' vital interests.
- We will further rely on our legitimate interests, which we believe are not overridden by your fundamental rights and freedoms, for the following purposes:
  - Communications with you, including direct marketing where you are our customer or a user of our customer, or where you make contact with us through our website and other digital assets.
  - Cyber security
  - Support, customer relations, service operations

- Enhancements and improvements to yours and other users' experience with our services.
- Fraud detection and misuse of the Service.

In addition to your rights under other sections in this policy, you have the following rights:

- AT ANY TIME, CONTACT US IF YOU WANT TO WITHDRAW YOUR CONSENT TO THE PROCESSING OF YOUR PERSONAL DATA. EXERCISING THIS RIGHT WILL NOT AFFECT THE LAWFULNESS OF PROCESSING BASED ON CONSENT BEFORE ITS WITHDRAWAL.
- Request to delete or restrict access to your personal data. We will review your request and use our judgment, pursuant to the provisions of the applicable law, to reach a decision about your request.
- If you exercise one (or more) of the above-mentioned rights, in accordance with the provisions of applicable law, you may request to be informed that third parties that hold your personal data, in accordance with this policy, will act accordingly.
- You may ask to transfer your personal data in accordance with your right to data portability.
- You may object to the processing of your personal data for direct marketing purposes.
- You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affecting you.
- You have a right to lodge a complaint with a data protection supervisory authority of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation (GDPR).

A summary and further details about your rights under EU data protection laws, is available on the EU Commission's website at: [https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en).

## **16. INCORPORATION TO THE TERMS OF USE**

This policy is an integral part of JQBX's Terms of Use or, if applicable, of any other Service subscription agreement entered into between you (or the entity that you are acting on its behalf) and JQBX.

## **17. CONTACT US**

If you have questions or concerns regarding privacy using the Service, please contact us at:  
[support@audionautic.co](mailto:support@audionautic.co)