

## Privacy Policy

Last updated: October 25, 2022

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy. This Privacy Policy has been created with the help of the TermsFeed Privacy Policy Generator.

# Interpretation and Definitions

---

## Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

## Definitions

For the purposes of this Privacy Policy:

**Account** means a unique account created for You to access our Service or parts of our Service.

**Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to ML Commerce ApS, Horsensgade 9, 1.tv, 2100, Copenhagen, DK.

**Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

**Country** refers to: Denmark

**Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.

**Personal Data** is any information that relates to an identified or identifiable individual.

**Service** refers to the Website.

**Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

**Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

**Website** refers to Jeteca, accessible from <http://www.jeteca.com>

**You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

# Collecting and Using Your Personal Data

---

## Types of Data Collected

### Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Age
- Usage Data
- Any other information you choose to provide

### Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

### Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to

collect and track information and to improve and analyze Our Service. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser. You can learn more about cookies on TermsFeed website article.

We use both Session and Persistent Cookies for the purposes set out below:

**Necessary / Essential Cookies**

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

**Cookies Policy / Notice Acceptance Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

**Functionality Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

For more information about the cookies we use and your choices regarding cookies, please visit our Cookies Policy or the Cookies section of our Privacy Policy.

## Use of Your Personal Data

The Company may use Personal Data for the following purposes:

**To provide and maintain our Service,** including to monitor the usage of our Service.

**To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.

**For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.

**To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

**To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.

**To manage Your requests:** To attend and manage Your requests to Us.

**For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.

**For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.

- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

### Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

### Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

### Delete Your Personal Data

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You.

Our Service may give You the ability to delete certain information about You from within the Service.

You may update, amend, or delete Your information at any time by signing in to Your Account, if you have one, and visiting the account settings section that allows you to manage Your personal information. You may also contact Us to request access to, correct, or delete any personal information that You have provided to Us.

Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.

## Disclosure of Your Personal Data

### Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

### Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

## Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

# Children's Privacy

---

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

## **Analytics and Tailored Marketing Content**

Certain cookies may be stored on your machine by third parties when you use or access to the Website. We have no control over these cookies or how the third parties use them. These cookies allow third parties to provide us with a service, for example, analytics about the effectiveness of our marketing activities and user behavior.

You may opt-out of targeted advertising utilizing the Digital Advertising Alliance (“DAA”) AdChoices Program at [optout.aboutads.info](http://optout.aboutads.info). For more information on the DAA AdChoices Program at visit [www.youradchoices.com](http://www.youradchoices.com). In addition, the Network Advertising Initiative (“NAI”) has developed a tool that allows consumers to opt out of certain Tailored Advertising delivered by NAI members’ advertising networks. To learn more about opting out of such targeted advertising or to use the NAI tool, see <https://optout.networkadvertising.org/>.

# California Consumer Privacy Act

---

Under the California Consumer Privacy Act (“CCPA”), we must disclose our practices regarding the collection, use, and disclosure of the Personal Information of California Residents (“Consumers”). Consumers are also afforded additional rights with regard to the Personal Information we collect about them that include the rights of access, deletion, and to be free from discrimination.

## **Collection of Personal Information**

For additional information concerning the specific types of Personal Data we collect, please see the section concerning “What Information/Personal Data Do We Collect?” above. We have collected and will collect the following general categories of Personal Information about Consumers:

- Personal identifiers, including names, postal addresses, unique personal identifiers, IP addresses, and email addresses;
- Categories of personal information enumerated in Cal. Civ. Code § 1798.80(e), including telephone numbers;
- Protected classifications, including sex and age;
- Commercial information, including products or services you have purchased, and your purchasing history;
- Biometric information, such as retina or iris scans, fingerprints, voiceprints, or scans of the hand or face geometry;

- Internet or other electronic network activity information; and
- Inferences for use in creating a consumer profile.

- **Use of Personal Information**

We may use the categories of Personal Information described above for the following business or commercial purposes:

- Advance our commercial or economic business interests;
- Maintain or service customer accounts;
- Provide customer service;
- Process or fulfil orders and transactions;
- Provide advertising or marketing services;
- Provide analytic services;
- Perform internal research for technological development;
- Ensure and improve the quality and safety of services;
- Debugging to address impairments to operational functionality;
- Detect security incidents;
- Comply with applicable law and law enforcement requirements;
- Protect against malicious, deceptive, fraudulent or illegal activity;
- Prosecute those responsible for malicious, deceptive, fraudulent or illegal activity;
- and
- Defend against or bring legal action, claims and other liabilities.

- **Categories of Sources of Personal Information**

We collect or obtain Personal Information about you from the following sources:

- Data you provide to us: We obtain Personal Information when it is provided to us (e.g., where you create an account, where you contact us via email or telephone, or by any other means).
- Relationship data: We collect or obtain Personal Information in the ordinary course of our relationship with you.
- App data: We collect or obtain Personal Information when you download or use any of our apps.
- Site data: We collect or obtain Personal Information when you visit any of our websites or use any features or resources available on or through a website.
- Registration details: We collect or obtain Personal Information when you use, or register to use, any of our websites, apps or services.
- Content and advertising information: If you interact with any third party content or advertising on a website or in an app (including third party plugins and cookies) we



receive Personal Information from the relevant third party provider of that content or advertising.

- Third party information: We collect or obtain Personal Information from third parties who provide it to us (e.g., law enforcement authorities; etc.).

- **Consumer Rights under the California Consumer Privacy Act**

Subject to certain exceptions permitted by law, if you are a California resident, and upon your verifiable consumer request, you have the rights listed below:

- **Right to Access.** You can request the following information about how we have collected and used your Personal Information during the past 12 months: (1) the categories of “Personal Information” (as contemplated by the CCPA) that we have collected; (2) the categories of sources from which we collected Personal Information; (3) the business or commercial purposes for collecting; (4) the categories of third parties with whom we share Personal of information so that we can provide our Services to you; (5) our business or commercial purpose for collecting Personal Information; (6) the specific pieces of Personal Information we have collected about you; (7) the categories of Personal Information we have disclosed for a business purpose.
- **Right to Request Deletion.** Subject to certain exceptions, you have the right to request we delete any Personal Information we have collected from you. However, if you ask us to delete some or all of your information, you may no longer be able to access or use the Services.
- **Right to Nondiscrimination.** You are entitled to exercise the rights described above free from discriminatory practices as prohibited by California law.

**Exercising your rights.** You may exercise your California privacy rights described above by calling us toll free at [XXX-XXX-XXX], emailing us at [customerservice@jeteca.com](mailto:customerservice@jeteca.com), or via the Website contact methods from time to time. We will need to confirm your identity and California residency to process your requests to exercise your access or deletion rights. We cannot process your request if you do not provide us with reasonably sufficient detail to allow us to understand and respond to it.

**Authorized Agent.** Under the CCPA, you may appoint an authorized agent to submit requests to exercise your rights on your behalf. Should you choose to do so, for your and our protection, we will require your authorized agent to provide us with a signed permission demonstrating they are authorized to submit a request on your behalf. We note, should your authorized agent fail to submit proof that they have been authorized to act on your behalf, we will deny their request.

Response Timing. We aim to respond to a consumer request for access or deletion within 45 days of receiving that request. If we require more time, we will inform you of the reason and extension in writing.

### California's "Shine the Light" Law

Under California's "Shine the Light" law, California residents are entitled to ask us for a notice describing what categories of personal customer information Jeteca shares with third parties or corporate affiliates for those third parties or corporate affiliates' direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident, and would like a copy of this notice, please submit a written request to [customerservice@jeteca.com](mailto:customerservice@jeteca.com).

## Changes to this Privacy Policy

---

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## Contact Us

---

If you have any questions about this Privacy Policy, You can contact us:

- By email: [customerservice@jeteca.com](mailto:customerservice@jeteca.com)