

JUSTCQ INC. PRIVACY POLICY

LAST REVISED: OCTOBER 5, 2023

UNITED STATES USE ONLY: JustCQ’s website and products are intended for use only in the United States, therefor, all product licensees must live in, or have their principal place of business in, the United States, and the JustCQ products must only be used by, for, with, or on behalf of, persons or companies living, headquartered, or domiciled in the United States. As such, this Privacy Policy applies only to product use and website access in the United States. Individuals and companies who live, are headquartered, or are domiciled, outside of the United States may not license or otherwise access or use the website or products, even as an end-user.

JustCQ Inc. (“**JustCQ**,” “**we**,” “**our**,” or “**us**”) values your business, respects your privacy, and is committed to maintaining the integrity and confidentiality of the information we collect. This privacy policy (“**Privacy Policy**” or “**Policy**”) describes how and why we might collect, store, use, and/or share your information when you use our website, products, platform, environment, services or otherwise interact with us such as entering into a subscription agreement, providing your information, or communicating with us. This Privacy Policy applies only to JustCQ and does not apply to the websites of our customers, vendors, contractors or any other third parties, even if we have links to their websites on our website.

When you visit the JustCQ website(s), use our products, enter into a subscription agreement, or provide your information to JustCQ, you are agreeing to the terms of this Privacy Policy. **If you do not agree with this Policy, do not access or use our website or Products or interact with any other aspect of our business.**

CHANGES TO OUR PRIVACY POLICY

This Privacy Policy is effective as of October 5, 2023 and is reviewed periodically. JustCQ reserves the right to modify this Privacy Policy at any time and without notice to customers or the public. If we materially change this Privacy Policy, we will post a prominent notice on our website. Changes are effective as of the date we post them on the Privacy Policy page of our website, which date will be reflected in the “Last Revised” date set forth above. The Last Revised date shall be updated whenever JustCQ makes changes to its Privacy Policy. We encourage you to periodically review this Privacy Policy so you stay aware of the most up-to-date version.

WHAT THIS POLICY COVERS

Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

- What personal information we collect about you

- When do we collect personal information?
- How we use and share personal information we collect
- How we secure personal information we collect
- How to access and control your personal information
- Other important privacy information
- Additional disclosures for California residents
- Contact us

WHAT INFORMATION WE COLLECT ABOUT YOU

Personal Information We Collect

JustCQ gathers data from its users, customers, and potential customers of its website and products. We use the data we gather in various ways, such as, to help improve our website and product content and functionality, assess customer and potential customer interest, gather demographic information, provide targeted information about JustCQ and our products, and enhance and improve user and customer experience. You provide some of this data directly, such as when you subscribe to and submit payment information for one of our products, and we get some of it by collecting data about your interactions, use, and experiences with our products and website, such as when you visit our website or create an account on our website or communicate with us.

The data we collect depends on various factors such as the context of your interactions with JustCQ including the products and features you use, and decisions you make such as decisions about your privacy settings. The data we collect may include personal information or other data that could identify you individually, such as:

- Your name
- Contact information (email address, mailing address, phone number)
- Payment information (if processed directly by JustCQ and not through a third party) IP addresses, Browser details, Device info, Operating System, URL info, etc.
- Live chat messages
- Telephone and email conversations
- Products licensed and metrics associated with those products
- Other personal data that is voluntarily provided

Cookies:

When you visit our website, JustCQ may use cookies to gather personal information and to utilize analytics software to identify and track potential customers. A cookie is a piece of information stored on your computer that allows us to uniquely identify your browser to help us identify website users and tracks their activity, such as which website pages are viewed, time spent on a page and the number of unique views. Cookies are not executable code, do not contain viruses, and can be disabled in the web browser's security settings. Please note, disabling cookies may limit the level of personalization provided during a visit to our website. Additional information on our use of cookies can be found below in the section **How To Access And Control Your Information**.

Devices: When you license and use JustCQ products we automatically collect information on your use of the product(s) such as your IP address, the type of device you use and location, device screen resolution, the frequency of usage, application version, operating system version, and the time it been used.

WHEN DO WE COLLECT PERSONAL INFORMATION?

JustCQ makes every effort to conform to all applicable laws and regulations when collecting and using personal information. When and how we collect personal information and use it are determined by the types of data collected and the particular context in which we collect it. We will primarily collect and use personal information when you enter into a product subscription agreement with us and we need your information for our performance under the agreement and to maintain and support the licensed product(s). By entering into such an agreement with us and by agreeing to our Privacy Policy, you are consenting that JustCQ may use your information as necessary.

We may also collect your personal information when you:

- Use the JustCQ website;
- Create a user account on our website;
- Subscribe to (license) a JustCQ product from our website, obtain a product trial or update or request product information;
- Contact us, including for product subscriptions, customer service or technical support;
- Participate in a call using Microsoft Teams, Zoom, or other teleconference solution;
- Participate in a marketing/sales promotion or an online survey;
- Access or download our online product documentation and other materials
- Access or subscribe to any newsletters, promotional emails or other materials;
- Request information about our products, quotes, downloads or other materials;
- Submit billing and payment information;

- Register for a webinar or online training or view a webinar or training recording;
- Apply for a job, or otherwise enter our recruitment and hiring process

HOW WE USE AND SHARE PERSONAL INFORMATION WE COLLECT

Using Your Information

JustCQ may use personal information to perform various functions that may include the following:

- Personalize and improve your web experience based on your individual needs and patterns
- Improve the content, functionality and security of our website and related services
- Offer, maintain, analyze and improve our products
- Support the products you subscribe to and perform the transactions you request
- Provide and improve customer service and technical support
- Process and confirm transactions and respond to questions
- Identify and authenticate website visitors and permitted users
- Email you to provide important information and process transactions including to process subscriptions and payments, confirm orders, provide billing notifications, share information, or warn of system maintenance
- Communicate important information to you via mail, web (including instant messaging), or telephone (if your call is recorded, it may be monitored for quality and employee training purposes)
- Prevent and detect fraud, abuse, and other prohibited or illegal activities; protect the security and integrity of our website, business, and our products
- Advertise and market our products; provide notifications of new or updated products
- Announce changes to our terms or policies
- Perform other actions or processes that may be necessary or useful for us to provide and support the products you subscribe to
- Enforce our subscription agreements, website terms, policies and/or separate contracts (if applicable) with you
- Take such other actions or perform such other activities as disclosed to you at the point of subscription, payment, account registration, access, or as required or permitted by law

- Operate our business, which includes developing, maintaining and updating our products, analyzing our performance, meeting our legal obligations, developing our workforce, and doing research

Sharing Your Information

JustCQ does not sell, trade, give, rent, share, or transfer personal information to any unrelated entities, with the exception of trusted third parties who perform functions on our behalf or as otherwise set forth within this Policy. We may share information with third parties who perform functions such as to:

- Maintain, support and update our website and products.
- Carry out transactions you request, including payment processing.
- Make our business, website and products more responsive to your needs.
- Provide you with information about our products.
- Perform research and analysis.
- Customize, analyze and/or improve our communications or business relationship with you.

JustCQ will only share your personal information with trusted third parties who share our commitment of protecting your personal information and who have agreed to provide protection to your personal information in compliance with applicable law and regulation. JustCQ will not disclose personal information to third parties for their own marketing purposes without your consent. Additional reasons and circumstances where we may share your personal information include:

- **Legal reasons:** We may be required to disclose information in compliance with court orders, subpoenas, summons, discovery requests, warrants, statutes, regulations, or governmental or law enforcement requests or to enforce our legal rights and protect the rights and safety of others. We assume no obligation to inform users if such information is requested.
- **Business Transitions:** If JustCQ is involved in a merger, acquisition, or sale of all or a portion of its assets, your information may be shared with the new successor entity for continuation of service. Your decisions about the handling of your personal information, including your privacy settings, will also be shared.
- **Statistical analysis:** JustCQ may provide summary or group statistics and data about our customers, sales, traffic patterns, and related website information to reputable third parties for analysis but this information will be aggregated or de-identified so it will not include personal information.
- **Links to other sites:** Our website may contain links to other sites that are not owned, operated or controlled by JustCQ. Our Privacy Policy does not apply to these third-party

sites so please review the applicable privacy policy of such other sites to familiarize yourself with their practices. We encourage you to be aware when you leave our website and to read the privacy statements of each website that collects personal information. Our Policy applies only to the personal information collected and processed through our website.

- **Social Media Features:** Our website includes social media features, such as the Facebook, Instagram and Twitter (X) buttons and “Share This” button capabilities. These features may collect your IP address and the page you are visiting on our Website and also may set a cookie to enable the social media feature to function properly. Social media features are either hosted by a third party or hosted directly on our Website.
- **Testimonials:** We may post customer testimonials on our Website which may contain personal information. We obtain a customer’s consent via email prior to posting the testimonial and any personal information, including the customer’s name. A customer may always withdraw their consent to post a testimonial.
- **Surveys:** From time-to-time we may provide you with the opportunity to participate in surveys about our website and products. Participation in these surveys is completely voluntary and you therefore have a choice whether or not to disclose the requested information, which typically includes contact information, such as email or phone number. We use this information to improve our products, provide updates on product improvements based on survey responder feedback and to market our solutions.

HOW WE SECURE PERSONAL INFORMATION WE COLLECT

JustCQ takes its responsibility for managing security and compliance very seriously and is committed to taking reasonable security measures to protect the confidentiality and security of personal information in our possession. We have established a variety of security policies, procedures and controls designed to help protect personal information from loss, destruction, unauthorized access, use, or disclosure. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. When we do engage third party providers for various services, including cloud hosting services for our product offerings, we rely on the public policies and protections of those globally available cloud services for the protections we apply to your personal information.

While we strive to protect your personal information, we cannot ensure or guarantee that the personal information or private communications you transmit to us will always remain confidential, therefore, you transmit your information at your own risk.

JustCQ evaluates and responds to reports of incidents that might involve unauthorized access to personal information. If we become aware that personal information has been compromised, we report any such action or activity to you in accordance with prevailing legal and/or contractual requirements.

HOW TO ACCESS AND CONTROL YOUR PERSONAL INFORMATION

How We Use Cookies

Our website uses essential "cookies" to validate the user and enable users to sign-in to our services. These cookies are active only during active sessions and will expire when the session ends or automatically after a session remains unattended for sixty (60) minutes. We do not use cookies for any other purpose. Because we use essential cookies only for the limited purpose of validating users and allowing sign-on, if you decline the use of cookies the website may not function properly, and you will not be able to sign in. If we expand our use of cookies we will update this policy accordingly.

If you have implemented **Global Privacy Control (GPC)**, our website honors the resulting GPC signals for you to opt out of receiving cookies. Additionally, you can opt-in or out of certain communications by using the following mechanisms:

- You may be requested to opt-in to certain types of communications or processes when providing personal information to JustCQ. This opt-in process confirms that you understand and consent to our collecting and using your information in accordance with this Privacy Policy as well as applicable law and regulations. In some instances, if you do not opt-in you may not have access to some products and services.
- If you have chosen to receive certain types of communication from us, you may later choose to opt-out from receiving them as long as the communications are not related to the performance of a product subscription agreement or your use or payment for a licensed product. Once you indicate your desire to opt-out of a permitted communication we will discontinue such communication. If you wish to opt out of any communication, please notify us by clicking the unsubscribe link in the electronic communication or following the applicable directions to unsubscribe that are set forth in the specific communication. Please note that it may take up to 10 business days to process your request.

Selecting Your Marketing Communication and Preferences

You may choose to receive or not receive marketing communications from us by indicating your preferences on our website. If you prefer not to receive future marketing communications please notify us by clicking the unsubscribe link in the electronic communication or following the applicable directions to unsubscribe that are set forth in the specific communication. If you wish to change or modify prior preferences or inaccuracies, please follow the applicable directions to contact us that are set forth in the specific communication or on our website. Upon receipt of your request, your information will be updated as soon as possible, but no later than ten (10) business days after our receipt of your request. We will respond to all requests for access to your personal information within forty-five (45) days.

Even if you opt out of receiving marketing communications, we may still communicate with you in connection with servicing any existing account you may have pursuant to a subscription agreement, supporting and updating a product you license, responding to a request from you, or administering any program in which you may have elected to participate.

You may receive targeted, personalized email marketing messages from us based on your browsing history and product usage history. When you click on some links in email marketing messages, we may place a cookie on your browser that would be linked to your email address and used to gather information about the products and services you view on the website. Information gathered in this way may be used to personalize and customize future email marketing messages you receive. You may opt out of this email use by clicking on the **unsubscribe** link provided in every personalized email marketing message you receive from us.

Please note that if we use advertising cookies (and update this policy accordingly) then opting out of advertising cookies will eliminate personalized advertisements, but you will continue to see advertisements.

OTHER IMPORTANT PRIVACY INFORMATION

Collection and Use of Children's personal information

We take children's privacy seriously. The JustCQ website where this Policy is located is meant for adults. We do not knowingly collect personally identifiable data from persons under the age of 18 and strive to comply with the provisions of The Children's Online Privacy Protection Act (COPPA). If you are under 18 years of age, please do not submit any personal information through this Website. If you are a parent or legal guardian and think your child under 18 has provided us with information, please contact us at info@support.justcq.com Please mark your inquiries "COPPA Information Request."

Do Not Track Disclosures

Some web browsers may transmit "do-not-track" ("DNT") signals to applications with which the user communicates. As no DNT standard has been adopted, JustCQ currently does not change our tracking practices in response to DNT settings in your web browser. Our third party contractors, vendors, consultants, analytics companies and other third parties may collect information about you and your online activities over time and across our website and other online properties. These third parties may not change their tracking practices in response to DNT settings in your web browser and we do not obligate these third parties to honor DNT settings.

Retention Periods

JustCQ will retain your personal information for the purposes and uses set out in this Privacy Policy and for as long as there is a legal, taxation, accounting, risk management or business requirement or need to do so. Different retention periods apply to different types of records and data which are dependent on the nature of your interaction with us.

Your Data Rights

If you would like to exercise any of your data rights (summarized below), or receive more information about them, please contact us at info@support.justcq.com. We promptly respond to all requests from individuals seeking to exercise their rights described in this Privacy Policy and pursuant to applicable data protection laws. Please note that some of the following rights may not be applicable to your situation:

Right of access: You have the right to gain access to information about the personal data that we process about you. If you have any questions or want more information about the personal information we process from you, you are always welcome to contact us, and we will provide you with further information.

Right to rectification: You have the right to get your personal information updated or corrected. Upon your request to us, we will promptly correct incorrectly stored information and/or update or supplement incomplete personal information by including a supplementary statement that you provide to us.

Right to erasure/right to be forgotten: You have the right to request that we permanently delete your personal information if you believe that the information is no longer necessary in relation to our business relationship or other purpose for which the information was collected or processed.

Right to restrict the processing activities: You have the right to restrict our processing activities that use your personal information. Please note that if you choose to restrict our processing activities regarding certain personal information, you may not be able to use our website or products properly.

Right to data portability: You have the right to transfer your personal information, when possible.

Right to object: You have the right to object to the use of your personal information for certain purposes such as direct marketing.

Non-Discrimination

We will not discriminate against you for exercising any of your privacy rights. Unless permitted by applicable law, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

ADDITIONAL DISCLOSURES FOR CALIFORNIA RESIDENTS

Your California Privacy Rights

The California Online Privacy Protection Act (“CalOPPA”), the California Consumer Privacy Act of 2018 (“CCPA”) and the California Privacy Rights Act (CPRA), give California residents certain rights relating to the way we collect, disclose, and use your personal information. At JustCQ, we do not capture or store information on visitors to our website and we do not sell personal information. Our website is configured to honor your Global Privacy Control (GPC) preferences.

In addition to the other rights set forth in this Policy, we support the following:

- **Right to Access Specific Information and Data Portability Rights.** You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer 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 or selling 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 (also called a data portability request).
 - If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- **Right to Deletion.** You have the right to request that we delete personal information of yours we may have collected or maintained.
- **Right to Opt-Out of the Sale.** You have the right to opt-out of the sale of your personal information. JustCQ does not sell personal information and has not sold personal information.
- **Right to Designate an Agent.** You may also designate someone else as an authorized agent to make any of these requests your behalf.

- **Right to Limit the Use of Sensitive personal information.** JustCQ does not collect or use Sensitive personal information from prospective customers or customers, except in very limited circumstances and for purposes explicitly authorized by you and for no other reason. You have the right to request that we limit the use of your sensitive personal information.

To submit any of these requests please contact us at info@support.justcq.com. We will confirm all received requests and once confirmed, we will process the verifiable consumer request free of charge within 45 days of receiving the request and will provide you with confirmation the request has been completed

Sharing Personal Information

We may disclose your personal information to a third party for business purposes. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing under the contract.

CONTACT US

If you have any questions, comments or concerns about our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or with respect to California residents only you wish to exercise your rights under California law, please do not hesitate to contact JustCQ at **20 Skyview Terrace, Morris Plains, NJ 07950, info@support.justcq.com**