

Privacy Policy

This is the **Privacy Policy** of JO1N LTD (hereinafter "JO1N").

Its purpose is to explain to data subjects how JO1N processes personal data, to communicate in a transparent manner the procedures and measures for the exercise of data subjects' rights and to describe other issues related to the protection of personal data. It is also designed to ensure that data subjects can exercise their statutory rights in a simple, accessible, and comprehensible way. As the personal data protection framework sets the general objective of ensuring the privacy of individuals and the only way to ensure that this objective is met is to make the protection of personal data an integral part of the activities of private and public entities, JO1N ensures that all personal data are adequately protected and secure. Adequate protection is the use of the necessary technical and organizational means and the processing of personal data in accordance with internal procedures and regulations.

The terms used in this Privacy Policy and their meaning are the same as in the definitions provided in Article 4 of the GDPR.

JO1N encourages all data subjects from time to time to read this Privacy Policy carefully to obtain up-to-date information on JO1N's personal data processing processes.

Controller

The Controller of your personal data is JO1N LTD, registration No. 12993623, 35 Waveley Road, Coventry, CV1 3AG. You can contact JO1N regarding personal data matters by writing to privacy@jo1n.com.

Ways of obtaining personal data

JO1N collects personal data about you in the following ways:

- Information provided by you directly to JO1N, for example, by subscribing to newsletters, filling forms on webpage, contacting JO1n etc.;
- Information that JO1N collect automatically, for example, by cookies placed in your device.

Categories of personal data

JO1N can process the following personal data:

No.	Category	Examples
1.	Identification data	Name, surname,
2.	Contact data	Telephone, e-mail
3.	Company data	Company name, website
4.	Online data	Cookies, IP address, login data, browser type and version, time zone setting, operating system and platform

Purposes of personal data processing

JO1N can process your personal data for the following purposes:

No.	Purpose	Examples
1.	Services	<ul style="list-style-type: none">• Identification• Communication / marketing• Fulfillment of contractual obligations• Provision / maintenance of services• Review of applications• Review and handling complaints• Improvement of services• Statistics• Analytics
2.	Security	<ul style="list-style-type: none">• Information security• Information system security

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		<ul style="list-style-type: none"> • Prevention of fraudulent activities and risks
3.	Provision of information	<ul style="list-style-type: none"> • Public administration institutions, courts, law enforcement institutions in accordance with the procedures and to the extent specified in regulatory enactments

Legal basis

No.	Purpose	Examples
1.	Consent <i>processing based on your freely given and explicit consent, which you can withdraw at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before the withdrawal</i>	<ul style="list-style-type: none"> • Direct marketing • Cookies
2.	Fulfillment of the provisions of regulatory enactments <i>processing carried out to fulfill requirements of the law towards Controller</i>	<ul style="list-style-type: none"> • Provision of personal data to state institutions, courts etc. under obligations of law and/or under request
3.	Legitimate interests of the Controller <i>processing carried out to defend and realize Controller's legitimate interests (elimination of business and security risks, analysis of service, prevention of fraudulent and other illegal activities, monitoring of service delivery for troubleshooting, corporate governance, protection of legal interests, provision of information to public, direct marketing)</i>	<ul style="list-style-type: none"> • Newsletters and other marketing activities • Services

Protection of personal data

As a data controller, JO1N provides:

- the confidentiality of personal data, ensuring that personal data are processed (including accessed) only by those persons who need it for the performance of their official duties. JO1N representatives who deal with information containing personal data in the course of their day-to-day duties are trained in personal data protection measures and are contractually committed to confidentiality;
- appropriate technical and organizational measures for the protection of personal data. Such measures shall consider, as far as possible, for example, logical data protection measures in the work environment and such technical means that use only tested, licensed and updated software. JO1N regularly reviews, updates and improves its technical and organizational arrangements;

We wish to point out that data security is also guaranteed by our partners who are responsible for storage of personal data and whose applied measures in this matter are at the highest level.

Data recipients

JO1N does not transfer personal data to third parties unless there is a legal basis and predetermined purpose for such processing and if those third parties, taking into account the nature, extent, context and purposes of the processing, risks to the rights and freedoms of individuals, is unable to provide, in a transparent manner, appropriate technical and organizational measures to ensure and demonstrate that personal data are processed in accordance with law and / or cannot provide reasonable assurance that the processing of personal data will be secure and respect for the rights of data subjects.

To fulfill various purposes of personal data processing the data can be transferred to the following categories if recipients:

- JO1N employees or specially authorized persons;
- municipal institutions, courts, law enforcement institutions if required under the law;
- business partners that help JO1N in day-to-day business activities;
- 3rd party companies as processors of personal data such as e-mail service providers, hosting, cloud service etc. that are assisting JO1N in day-to-day business activities.

Data transfers to third countries

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JO1N does not transfer personal data to third parties outside the European Economic Area without appropriate mechanisms in place.

Duration of personal data storage

JO1N stores personal data considering the following principles:

- the data are necessary for the purpose for which they were received;
- as long as JO1N or the data subject can exercise its legitimate interests in accordance with the procedures specified in external regulatory enactments;
- as long as there is a legal obligation to store the data;
- as long as the consent to the relevant processing of personal data is valid, unless there is another basis for the processing.

In any case, except when processing is based on a consent, the storage period of personal data shall not exceed 6 months from the moment they are obtained.

Automated data processing

JO1N does not perform automated decision making with legal effect.

Rights of the data subjects

- Duty to provide information

JO1N proactively provides the information provided for in these articles to data subjects.

- Right of access

JO1N ensures that at the request of the data subject, access to the data subject's personal data shall be granted in accordance with the procedures specified in regulatory enactments.

- Right to rectification of personal data

JO1N ensures that inaccurate personal data of the data subjects are corrected without unreasonable delay. Considering the purposes of processing, the data subject has the right, when submitting the application, to request that incomplete personal data are supplemented.

- The right to be forgotten

JO1N ensures that, at the request of the data subject, the personal data attributable to the particular data subject are deleted if such deletion is permitted by law. JO1N shall inform the data subject of the deletion of the data, unless such notification would entail disproportionate costs or is not possible.

- Right to limit processing

JO1N ensures that the processing of the data subject's personal data is restricted if the criteria set out in the regulatory enactments are met.

- The right to receive information on the rectification, erasure or restriction of the processing of personal data

JO1N shall notify each recipient to whom personal data have been disclosed of any rectification or erasure of personal data or restriction of processing carried out.

- Right to data portability

JO1N allows personal data to be transferred to another controller if technically possible.

- Right to object

The data subject has the right to object to the processing of personal data in accordance with the criteria of Article 21 of the VДАР. MoneyCare shall no longer process data upon receipt of objections to the processing of data from the data subject in accordance with Article 21 of the VДАР, unless it can be demonstrated that there are compelling legitimate reasons for processing that outweigh the interests, rights and freedoms of the data subject or to raise, enforce or defend legitimate claims.

- Automated individual decision-making, including profiling

JO1N ensures that the data subject has the right not to be the subject of a decision based solely on automated processing, including profiling, which has legal consequences for the data subject or which similarly has a significant effect on the data subject.

You can exercise all of the above rights by sending a request and contacting us at [e-mail].

- The right to lodge a complaint with the supervisory authority

If the data subject considers that the processing of his or her personal data does not take place in accordance with the requirements of regulatory enactments, he or she has the right to file a complaint with the Information Commissioner's Office (additional info here: <https://ico.org.uk/>).

Disclaimer

This Privacy Policy applies to data processing performed by JO1N. Please note that if you choose to use links displayed in our webpage that leads to third party webpages and/or services, you should carefully get acquainted with how and for what purposes these third persons use your personal data.

JO1N has the unilateral right to amend and / or supplement this Privacy Policy. The current version of the Privacy Policy is always found at JO1N webpage. JO1N retains previous versions of the Privacy Policy and they are available here [[link](#)].
