

# **PRIVACY POLICY**

Janus Worldwide is committed to protecting personal data of our website visitors. This privacy notice describes how we protect, gather, and use information from our website.

This privacy notice applies to all personally identifiable information obtained from or about website visitors and/or registered users and related to or arising from the use of Janus Worldwide website. This website (www. Jausww.com) is maintained by Janus Worldwide GmbH, with its seat at Peter-Jordan-Strasse175/6, Postal Code 1180, Vienna, Austria, Corporate Identification Number: FN 430871. Janus Worldwide also serves in a capacity of a data controller. Some of the data collected during the website traffic may be considered personal data pursuant to the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data (hereinafter the "GDPR"). Janus Worldwide GmbH greatly values the privacy of the website visitors and strives to protect it.

# **NON-PERSONAL DATA**

Non-personal data is information we collect through this website that does not identify you as an individual person. It may include information such as:

- Type of web browser software you use
- Internet address of the website from which you linked directly to our website
- Date and time you access our website
- Which pages you have visited on our website
- Search terms you use
- Links on which you click
- Cookie identifiers that do not identify a user

### **USE OF NON-PERSONAL DATA**

If you visit our website to read or download information, we may collect certain non-personal data (such as noted above) about your use of our website from your computer. This data is collected from your computer's web browser. If you only read or download information on our website, we do not collect or learn your name, e-mail address, home address, or other personal data about you.

Non-personal data is used by Janus Worldwide GmbH primarily for website use and traffic monitoring purposes and may be shared with trusted third parties to:

• Improve our services and website content





- Generate information about site visitors so we can make this website more useful and valuable
- Create reports for internal use to develop marketing programs, products, services or content

# **PERSONAL DATA**

"Personal Data" means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly through use of such data. Personal Data we collect through our website that we can use to specifically identify you, is information such as your:

- First Name
- Last Name
- Job Title
- Company
- E-mail Address
- Telephone Number
- City
- State/Province
- Country
- Postal Code
- Name of the domain and/or IP address from which you access the internet sometimes with associated information about your Country, State and/or City
- Cookie identifiers and information contained in cookies

You provide us with this Personal Data when visiting our website and reading and/or downloading content from the website. For this purpose, we and our third party service providers are primarily using IP address of the device from which you access the internet and cookie identifiers, sometimes with associated information as indicated above. Provision of this Personal Data is voluntary, albeit collected automatically by the information technology used, as we rely on your choice to visit our website and read and/or download content.

You also provide us with the above Personal Data during the registration process for some or all of our website services. Provision of this data is voluntary. You are not obliged to provide it. If you do not provide this data, we will not be able to finalize the registration process relating to that particular service e.g. download privileged content.





# **USE OF PERSONAL DATA**

In some places on this website you have the opportunity to voluntarily provide us with Personal Data about yourself using an online form, to view or download specific privileged content, to request information from us, when you apply online for a position at Janus Worldwide GmbH or at our other offices and subsidiaries and affiliates, or when you apply to become our partner and complete our online profile form.

#### **Purposes of Use of Your Personal Data**

We may retain and process your Personal Data to:

- Respond to your requests for information
- Contact you with information and marketing communications that might be of interest to you, including information about our services or other updates
- Develop internal company reports, based on personal data, for promotion, research, and website content
- Commence talent recruitment process after you have applied for a job vacancy
- Commence partner cooperation process after you have applied to become our partner
- Track website usage so we can improve website content and functionality
- Learn about our website visitors, including our customers and learn about their markets so we can serve you with the content you find most relevant
- Research, develop and improve marketing programs, products, services and content
- Analytical purposes to understand the performance of our website and to improve online experience for our visitors

#### Legal Basis for Use of Your Personal Data

The legal basis for our use of your Personal Data will be one or more of legitimate interest instances described above, unless we are relying on your consent for a specific purpose/specific purposes, such as registration for a particular website service.

#### **Automated Decision-Making**

We do not carry out any automated decision-making.

#### **Disclosure of Your Personal Data**

Your Personal Data may be shared with other Janus Worldwide GmbH branches, subsidiaries, affiliates or with third parties where appropriate or relevant.





#### **Third Parties**

We may also share your Personal Data with service suppliers that are engaged to perform services or functions on our behalf and under our instructions, for example, to provide cloud-based or non-cloud-based services, survey tools etc. In all such cases, Janus Worldwide GmbH will put in place appropriate contracts with these parties to ensure that they only process Personal Data in accordance with our instructions and in order to provide these services and protect the integrity and confidentiality of the personal data.

From time to time and for the purposes set out in this Website Privacy Notice or where required by applicable law, we may also disclose your Personal Data to our auditors, lawyers, consultants and law enforcement and public authorities.

#### **Third Parties**

Some of the third parties with whom we share Personal Data are also located outside the EEA. Certain third countries, such as Argentina, Canada, Japan or USA – limited to the Privacy Shield Network – have been officially recognized by the European Commission as providing an adequate level of protection. Transfers to third parties located in other third countries outside the EEA take place using an acceptable data transfer mechanism, such as the Privacy Shield for transfers to self-certified US organizations, the EU Standard Contractual Clauses, Binding Corporate Rules, approved Codes of Conduct and certifications or in exceptional circumstances on the basis of permissible statutory derogations.

### PERSONAL DATA RETENTION

We retain your Personal Data for only as long as necessary for the purposes for which the data was collected, except where necessary to meet our legal obligations or in order to establish, exercise or defend potential legal claims or to pursue our legitimate interests.

Where you have provided us with a consent to process the Personal Data we will process the data for as long as the consent has been provided, unless it has been withdrawn or ceased to exist upon exercising of one of your rights outlined below.

We generally retain Personal Data post-consent, post-contractual obligation and post-legitimate interest for a retention period corresponding to statute of limitations (up to 3 years). In cases of pending or threatening dispute we may retain your Personal Data to exercise or defend potential legal claims for additional retention period (usually up to 10 years).

Finally, we may also retain a minimal set of your Personal Data for recording of optout purposes, as permitted by applicable information society services law.





# LINKS TO OTHER SITES

This website may contain links to other sites that are not owned or controlled by Janus Worldwide GmbH. Links to such other sites may open in a new browser window. Please be aware that Janus Worldwide GmbH is not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our website and to read the privacy statements of each and every website that collects your personal data. This Website Privacy Notice applies only to information collected by our website.

## MARKETING COMMUNICATIONS

Where permitted by applicable law, we may use your Personal Data to send you marketing communications relating to our business which we think may be of interest to you. In addition, you may subscribe to any our blogs. We don't spam, never sell, rent or lease your Personal Data to third parties.

You may unsubscribe from any or all of our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails, or by sending an e-mail to privacy (at) janusww.com. Our customers and partners cannot opt out of receiving transactional emails related to their business or contractual relationship with us.

# CHILDREN'S PRIVACY

Janus Worldwide GmbH does not intentionally collect Personal Data from children under the age of 16. If you have a reason to believe that a child has provided us with Personal Data, please e-mail us as soon as possible at info@janusww.com. We will use all reasonable efforts to delete such data.

### **COOKIES**

We use cookies, cookie identifiers or similar technologies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole.

We use cookies to help you personalize your online experience. A cookie is a text file that is placed on your hard disk or on the device you are using to access our website by a web server. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

You have the ability to accept or decline cookies. If you choose to decline cookies, you may not be able to fully experience all the features of our website. We keep track of our websites and pages that you visit in order to determine what portions are the most popular or most used.





## YOUR RIGHTS

You have the following rights, which can be exercised by contacting us using the details provided below.

#### The right:

- to ask us not to any longer process your Personal Data for marketing purposes;
- to access Personal Data held about you and to obtain a copy of it;
- to prevent any processing of Personal Data that is causing or is likely to cause unjustified and substantial damage or distress to you or another individual;
- to obtain the rectification or completion of Personal Data which are inaccurate or incomplete;
- to restrict or object to the processing of your personal data and to request its erasure under certain circumstances;
- in certain circumstances, to receive your Personal Data, which you have provided to us, in a structured, commonly-used and machine-readable format and the right to transmit that data to another data controller without hindrance, or to have that personal data transmitted to another data controller, where technically feasible;
- to be informed about any use of your personal data to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing;
- and to lodge a complaint about the way in which your Personal Data is being used to a supervisory authority.

Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time. The withdrawal of the consent shall not affect the lawfulness of your personal data processing based on consent before it has been withdrawn.

### **Your California Privacy Rights**

Under California Civil Code Section 1798.83 (known as "Shine the Light" law), California residents who provide Personal Data are entitled to request and obtain from us once a calendar year information about the Personal Data we shared, if any, with other businesses for their own direct marketing uses.

To obtain this information on behalf of Janus Worldwide GmbH please send an email message to email address mentioned below with "Request for California Privacy Information" on the subject line and in the body of your message. We will provide the requested information to you at your e-mail address in response.





## **SECURITY**

Security is very important to us. We also understand that security is important to you. We take reasonable steps, by implementing technical and organizational measures, to protect your personal data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. You should keep in mind that no internet transmission is ever 100% secure or error-free. In particular, e-mail sent to or from this website may not be 100% secure, and you should therefore take special care in deciding what information you send to us by e-mail.

## **CONTACT JANUS WORLDWIDE GMBH**

Please be advised that in accordance with the GDPR, every website visitor that has provided Personal Data to Janus Worldwide GmbH may ask Janus Worldwide GmbH to advise of the scope of data Janus Worldwide GmbH processes about him or her, the purpose and nature of the processing and the recipients of the data as well as can exercise other rights noted in Your Rights section of this Website Privacy Notice.

If you have any questions or comments about this Website Privacy Notice, please contact us at:

Peter-Jordan-Strasse 175/6, 1180, Vienna, Austria

E-mail address: info@janusww.com

Phone number: +43 677 619 91 176

We may change, update or amend this Website Privacy Notice at any time and for any reason. We encourage you to review this Website Privacy Notice each time you visit our website.

This Website Privacy Policy was last revised on March 20<sup>th</sup>, 2020.

