



# JNR Incorporated — Privacy Policy

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## 1. Purpose & Scope

This Privacy Policy explains how JNR Incorporated (“JNR,” “we,” “us,” or “our”) collects, uses, protects, and shares personal information from individuals who use our websites, mobile and web applications, program portals, or interact with us offline (collectively, the “Services”). It replaces prior versions

It describes:

- The types of data we collect
- How that data is collected
- How we use, protect, and share collected data
- Your privacy rights and how you can exercise them

To use services provided by JNR, including participation in programs, promotions, and use of websites, you may be asked to provide information relating to yourself. This information will be used for different functions relating to the program, services, promotion, and improvement of JNR services. This Policy outlines the use of that information and how it is protected to both yours and JNR’s benefit.

This Policy applies any time you interact with JNR Inc. sites with any medium owned and controlled by JNR Inc. including, but not limited to websites, telephone and email correspondence. If you are directed to a Third-Party page, that party’s Privacy Policies will apply for interactions on that site, unless otherwise specified.

By using our Services, you acknowledge and agree to the practices described in this Privacy Policy.

Please note, this Privacy Policy does not apply to personal information that we collect on behalf of our clients. When we provide products or services to our clients, we may receive personal information about their employees and other individuals, and process that information on our clients’ behalf. This Privacy Policy does not apply to that information, and we are not responsible for our clients’ handling of personal information that we collect on their behalf. To learn about how a particular client, such as your employer, handles your personal information, we encourage you to contact them or review their privacy policies and notices. Our use of personal information provided by our clients is subject to a separate agreement between JNR and our client.

JNR reserves the right, at any time, to modify this Privacy Policy. If we make revisions that change the way we collect, use, or share personal information, we will post those changes in this Privacy Policy. You should review this Privacy Policy periodically so that you keep up to date on our most current policies and practices. We will note the effective date of the latest version of our Privacy Policy at the end of this Privacy Policy.



**This Privacy Policy covers the following topics:**

1. Purpose & Scope
2. Our Role and Relationships
3. Types of Information Collected
4. Method of Collecting Information
5. Sources of Personal information
6. Use of Information
7. Your Privacy Choices (Sale/Sharing; Targeted Advertising
8. Your Rights (U.S.) and How to Submit Requests
9. Cookies & Similar Technologies
10. Data Retention
11. How We Disclose Personal Information
12. Security
13. International Transfers & Regional Disclosures
14. Changes to this Policy
15. How to Contact Us

## **2. Our Role and Relationships**

Depending on the context, JNR may act as a Controller (e.g., for our websites, apps, direct communications, and accounts) or as a Service Provider/Processor when we operate a program on behalf of a client or issuer/bank. In the latter case, we process personal information only under the sponsor's instructions, and the sponsor's or issuer's privacy notice governs that processing. Where applicable, please review the program sponsor's and/or issuing bank's privacy notice for details at <https://www.onbe.com/policy/privacy-notice>.

## **3. Types of Information Collected**

To provide intended services JNR Inc. will collect information from users which is both Personally Identifiable and General information. What types of information we collect, and share will depend on the services provided to you by JNR.

Personally Identifiable information is information which can identify a specific user including, but not limited to name, address, phone number, email address, Social Security number, or other information maintained in a personally identifiable form. This may also include financial information, such as bank account, credit card number, or billing address. Personally Identifiable information will be stored for the life of the program.

General information is information which does not identify a specific user.

Information collected includes, but is not limited to device type, browser, IP address, or Operating System.



JNR sites are directed for use by adults, or individuals over the age of thirteen (13). We do not intentionally collect Personally Identifiable information from any individual under the age of thirteen (13). If you are under the age of thirteen (13), please refrain from the usage of our site and the submission of Personally Identifiable information.

#### **4. Method of Collecting Information**

Personally Identifiable information will be collected voluntarily. This will be done through online applications, registration, email and phone calls when applicable. Personally Identifiable information may also be collected by use of Social Media functions. Social Media buttons on the site may collect information linking to your online profile, location, cookies, or other identifiable information.

If your Personally Identifiable information changes or if you wish to terminate your service arrangement with JNR, you can request to edit, update, or remove information. JNR will take reasonable steps to comply.

Third-Party Service Providers are not authorized to collect Personally Identifiable information on our site.

General information is collected automatically through your browser and other technologies. We may use technologies such as cookies, pixel trackers, scripts, and more to identify your visits and track your activity on the site.

Third-Party Service Providers may collect General information from the site. This information is not personally identifiable and is collected automatically.

You may adjust settings on your device or browser to refuse saving cookies and sharing your location. This will need to be individually managed on each device and browser. However, blocking cookies may result in limited or impaired usage of the site or certain features of the site.

We may also collect or create de-identified information from personal information in a manner that it cannot reasonably be used to infer information about, or otherwise be linked to, a particular individual. To the extent that we classify such information as “de-identified,” we commit to maintaining and using such information in a de-identified form and to not attempting to re-identify such information (except for purposes permitted by law).

**Our Clients.** We may receive information about you from our business customers, such as when they provide us personal information of attendees to an event that we manage on their behalf.



## 5. Sources of Personal Information

We collect personal information directly from you; from your devices and browsers; from our service providers and partners (e.g., program sponsors, issuing banks, payment processors, analytics/advertising providers); from social media features you use to interact with us; and from publicly available sources.

## 6. Use of Information

Personally Identifiable information is used primarily to provide our intended services, including communication regarding the program, verifying your identity and/or location to allow access to your account, sending you program assets, and fulfilling requests and inquiries. Communication regarding the program may include program updates, newsletters, and inquiries.

We may share your personal information with our corporate subsidiaries and divisions (e.g., affiliates, parent company, sister companies, joint ventures, or other companies under common control).

Personally Identifiable information will also be used to verify your identity and/or location to access accounts, conduct transactions, secure information for risk control and fraud detection, and send program and account updates such as changes to program terms, conditions or policies. Some programs and parts of the site require Personally Identifiable information to register and log in for use of the site.

General information will be used primarily to analyze trends and site performance. This will include site optimization, site usage trends, crash reports, measuring the effectiveness of advertising, marketing, and promotional campaigns, and other information which does not require Personally Identifiable information.

JNR makes no attempt to track online movement across different websites. Our tracking applies and relates solely to our sites. Therefore, our practices will remain unchanged whether or not we receive a “Do Not Track” signal.

Service Providers. We may share your personal information with service providers. Among other things, service providers may help us to administer our websites, facilitate events or travel, conduct surveys, provide technical support, promotions, and communications related to our business, process payments, and for other legitimate purposes permitted by law.

Business Partner or Client Promotions and Offerings. We may offer events, contests, sweepstakes, promotions, or any other offerings with business partners or our clients, which may be your employer. The personal information that you submit through an event, contest, sweepstakes, promotion, or other offering may be combined and transmitted with the Registration Information related to your Account. Our business partners may collect information directly from you, which may be combined with



personal information disclosed by JNR. This information may be collected through the Platform or during a JNR Event. If you decide to enter into or participate in an event, contest, sweepstakes, promotion, or other offering that is offered by JNR, or a third-party business partner or client, the information that you provide may be shared with us and with them.

Professional Advisors. We may share your personal information with our professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.

Personally Identifiable information may be shared with Third-Party Service Providers. This will be done only with Service Providers with which we have service agreements and who are associated with the product or service being provided to you. If Personally Identifiable information is shared with a Third-Party Service Provider to support JNR in providing service, the information will be protected under their Privacy Policy. Some services may have unique sharing requirements.

As required by law, JNR may disclose Personally Identifiable information to comply with a subpoena or other legal processes. Personally Identifiable information may also be disclosed when we believe, in good faith, it is needed to protect our rights, your safety, the safety of others, to investigate fraud, or in response to a government request.

General information may be shared with Third-Party Service Providers. It may also be collected by Third- Party Service Providers by extension of our site.

We may use your personal information for reasons not described in this Privacy Policy where permitted by law and if the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis. We will use your personal information only for the purposes for which we collected it, unless we reasonably determine we need to use it for another reason and that reason is compatible with the original purpose. For example, we consider deidentification, aggregation, and anonymization of personal information to be compatible with the purposes listed above and, in your interest, because the deidentification, aggregation, and anonymization of such information reduces the likelihood of improper disclosure of that information.

## **7. Your Privacy Choices (Sale/Sharing; Targeted Advertising)**

We do not sell personal information nor conduct targeted advertising for money.

## **8. Your Rights (U.S.) and How to Submit Requests**

You may request access, correction, deletion, or restriction of your personal information, and we will respond consistent with applicable law.

Submit a request via our [Privacy Webform](#) email [privacy@jnrcorp.com](mailto:privacy@jnrcorp.com), or call 1-949-476-2788. We will verify your identity (and, where applicable, your authorized agent's



authority) before acting on a request. If we deny your request, you may **\*\*appeal\*\*** by following the instructions in our response or contacting our Privacy Officer at the email above. We will respond to appeals within applicable statutory timelines.

## **9. Cookies & Similar Technologies**

We use cookies and similar technologies for analytics and personalization.

## **10. Data Retention**

We retain personal information only as long as necessary to achieve the purposes described in this Policy or as required by law.

## **11. How We Disclose Information**

We disclose personal information to service providers and contractors under written contracts (processing on our behalf); program sponsors and issuing banks (when necessary to operate a program you participate in); third parties as required by law or to protect rights and safety; and with your consent or at your direction. We require recipients to use the information only for the described purposes and to protect it consistent with this Policy and applicable law. We do not permit service providers to collect personal information for their own independent purposes.

Personally Identifiable information may be shared with Third-Party Service Providers. This will be done only with Service Providers with which we have service agreements and who are associated with the product or service being provided to you. If Personally Identifiable information is shared with a Third-Party Service Provider to support JNR in providing service, the information will be protected under their Privacy Policy. Some services may have unique sharing requirements. In such cases, a short privacy notice will be provided.

As required by law, JNR may disclose Personally Identifiable information to comply with a subpoena or other legal processes. Personally Identifiable information may also be disclosed when we believe, in good faith, it is needed to protect our rights, your safety, the safety of others, to investigate fraud, or in response to a government request.

General information may be shared with Third-Party Service Providers. It may also be collected by Third- Party Service Providers by extension of our site.

## **12. Security of Personal Information**

JNR holds user security in very high regard. We safeguard personal information by using appropriate technical measures. We comply with PCI regulation to ensure Personally Identifiable information is recorded and stored securely. Outside of PCI compliance we follow generally accepted standards for security. We implement reasonable physical, technical, and administrative safeguards. Although JNR attempts to protect the personal



information in its possession, no security system is perfect, and JNR cannot promise that your personal information will remain absolutely secure in all circumstances.

### **13. International Transfers & Regional Disclosures**

JNR may act as a Controller or as a Service Provider. JNR may transfer your personal information to entities in the United States or other countries.” JNR safeguards and enables the global transfer of personal information in several ways. You may email us @ [privacy@jnrcorp.com](mailto:privacy@jnrcorp.com) for further information.

### **14. Changes to this Policy**

This Privacy Policy is subject to change and may be amended at any time. All changes will be made effective when the revised Policy is posted. If we make material changes, we will notify you by posting the updated Policy and changing the "Last Updated" date. In certain cases, we may provide additional notice (e.g., by email or in-product).

### **15. How to Contact Us**

Questions or requests: email - [privacy@jnrcorp.com](mailto:privacy@jnrcorp.com) | mailing address: 19900 MacArthur Blvd, Suite 700, Irvine, CA 92612 | phone: 949-476-2788|