

CALIFORNIA PRIVACY LAW (CCPA)

JTC USA Holdings, Inc. (“JTC”) is committed to safeguarding the privacy and confidentiality of information we obtain about you. We will not collect personal information about you just because you visit this Internet site. Following, you will find specifics on our commitment to protecting your privacy, including the types of information we collect and how we use that information both within and outside of JTC. Our privacy policy applies to all new clients and is extended to each of our former clients. We reserve the right, at any time, to add to, change, update or modify this privacy policy by posting such changes on our Internet site:

YOUR INFORMATION IS NOT FOR SALE

We do not and will not sell your personal information to anyone, for any reason, at any time.

INFORMATION TO BE COLLECTED

We collect personal information about you in the following manner:

- > **Applications and forms.** We may collect information that you provide to us in written or web-based applications or forms. The information we collect may include your name, address, phone number, email address, Social Security number or date of birth, as well as details about the assets, properties and parties involved in your transaction.
- > **Third-party information.** We may collect information about you from information services and consumer reporting agencies and publicly recorded documents to verify your identity or creditworthiness, or to better facilitate your transaction.
- > **Website.** When you visit our website, our computer servers may use devices known as “cookies”, graphic interchange format files (GIFs), or other similar web tools to enhance your web experience. These tools enable us to recognize you when you return to our site, and help us provide you with a better, more personalized experience. Cookies do not, standing alone, collect personally identifiable information; they merely recognize your browser or IP address. You may set your browser to notify you when cookies are to be received and you are free to refuse them. However, refusing cookies may limit some of the functions on our internet site.

PRIVACY POLICY

Last updated: September 29, 2021

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you access our internet site and tells you about your privacy rights and how the law protects you.

We use your personal data to provide and improve the website interface. By using the service, you agree to the collection and use of information in accordance with this Privacy Policy

YOUR RIGHTS UNDER THE THIS POLICY

Under this Privacy Policy, and by law if You are a resident of California, You have the following rights:

- > **The right to notice.** You must be properly notified which categories of personal data are being collected and the purposes for which the personal data is being used.
- > **The right to access / the right to request.** You may request and obtain from JTC information regarding the disclosure of your personal data that has been collected in the past 12 months by JTC or its subsidiaries to a third-party for the third party's direct marketing purposes.
- > **The right to say no to the sale of personal data.** You also have the right to ask JTC not to sell your personal data to third parties. You can submit such a request by visiting the "Do Not Sell My Personal Information" section of our web page.

The right to know about your personal data. You have the right to request and obtain from JTC information regarding the disclosure of the following:

- > The categories of personal data collected
- > The sources from which the personal data was collected
- > The business or commercial purpose for collecting or selling the personal data
- > Categories of third parties with whom we share personal data
- > The specific pieces of personal data we collected about you
- > The right to delete personal data. You also have the right to request the deletion of your personal data that have been collected in the past 12 months.

The right not to be discriminated against. You have the right not to be discriminated against for exercising any of your consumer's rights, including by:

- > Denying goods or services to you
- > Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
- > Providing a different level or quality of goods or services to you
- > Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

EXERCISING YOUR PRIVACY POLICY RIGHTS

In order to exercise any of your rights under this Policy, you can email or call us or visit the "Do Not Sell My Personal Information" section of our web page.

JTC will disclose and deliver the required information free of charge within 45 days of receiving your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

DO NOT SELL MY PERSONAL INFORMATION

We do not sell personal information. However, one or more of the Service Providers we partner with (for example, our advertising partners) may be considered a "business" that uses technology on our website and "sells" personal information as defined by the California Consumer Privacy Act .

If you wish to opt out of the use of your personal information for interest-based advertising purposes and these potential sales, you may do so by following emailing digital@jtcgroup.com

Please note that any opt out is specific to the browser you use. You may need to opt out on every browser that you use.

WEBSITE

You can opt out of receiving ads that are personalized as served by our Service Providers by following our instructions presented on the following:

- > Our “Cookie Consent” notice banner
- > Our “Opt-out” link in the notice banner
- > Our “Do Not Sell My Personal Information” link

The opt out will place a cookie on your computer that is unique to the browser you use to opt out. If you change browsers or delete the cookies saved by your browser, you will need to opt out again.

MOBILE DEVICES

Your mobile device may give you the ability to opt out of the use of information about the apps you use in order to present ads that are targeted to your interests. Please refer to the following on your mobile device:

- > “Opt out of Interest-Based Ads” or “Opt out of Ads Personalization” on Android devices
- > “Limit Ad Tracking” on iOS devices

You can also stop the collection of location information from your mobile device by changing the preferences on your mobile device.

“Do Not Track” Policy as Required by California Online Privacy Protection Act (CalOPPA)

Our web page does not respond to “Do Not Track” signals.

However, some third party websites do keep track of your browsing activities. If you are visiting such websites, you can set your preferences in your web browser to inform websites that you do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of your web browser.

CHILDREN’S PRIVACY

Our web page 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 will take steps to remove that information from our servers.

YOUR CALIFORNIA PRIVACY RIGHTS (CALIFORNIA’S SHINE THE LIGHT LAW)

Under California Civil Code Section 1798 (California’s Shine the Light law), California residents with an established business relationship with us can request information once a year about sharing their personal data with third parties for the third parties’ direct marketing purposes.

If you’d like to request more information under the California Shine the Light law, you can contact us using the contact information provided below or fill out the form.

California Privacy Rights for Minor Users (California Business and Professions Code Section 22581)

California Business and Professions Code section 22581 allows California residents under the age of 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted.

To request removal of such data, and if you are a California resident, you can contact us using the contact information provided below, and include the email address associated with your account OR fill out the form.

Be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

To request removal of such data, and if you are a California resident, You can contact Us using the contact information provided below, and include the email address associated with Your account OR fill out the form.

Be aware that Your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over, and assume no responsibility for, the content, privacy policies or practices of any third party sites or services.

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 website, 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: info.USA@JTCTGroup.com

By phone number: 1-800-339-1031

By mail: 50 W San Fernando St., Ste. 300, San Jose, CA 95113