

JDMA PRIVACY POLICY

Last Updated: 5/30/2019

This Privacy Policy explains how J.D. Massey Associates, Inc. *dba* JDMA Inc., a California corporation ("**JDMA**", "**we**" or "**us**") collects, uses, and discloses information about you when you access or use our websites and surveys (collectively, the "**Services**").

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our website homepage or sending you a notification). We encourage you to review the Privacy Policy whenever you access the Services or otherwise interact with us to stay informed about our information practices and the choices available to you.

CONTENTS

[Collection of Information](#)
[Use of Information](#)
[Sharing of Information](#)
[Social Sharing Features](#)
[Advertising and Analytics Services Provided by Others](#)
[Transfer of Information to the U.S. and Other Countries](#)
[Your Choices](#)
[Your California Privacy Rights](#)
[Individuals in the European Economic Area](#)
[Contact Us](#)

COLLECTION OF INFORMATION

Information You Provide to Us

We collect information you provide directly to us. For example, we collect information when you complete a survey, fill out a form, participate in a contest or promotion, make a purchase, apply for a job, communicate with us via third party social media sites, request customer support, or otherwise communicate with us. The types of information we may collect include your name, email address, postal address, phone number, credit card and other payment information, and any other information you choose to provide.

Automatically Collected Information

When you access or use our Services or transact business with us, we automatically collect information about you, including:

- **Transactional Information:** When you make a purchase or return, we collect information about the transaction, such as product details, purchase price, and date and location of the transaction.

- **Log and Usage Information:** We collect information related to your access to and use of the Services, including the type of browser you use, access times, pages viewed, your IP address, and the page you visited before navigating to our Services.
- **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Location Information:** We may derive the approximate location of your device from your IP address.
- **Information Collected by Cookies and Similar Tracking Technologies:** We (and our service providers) use different technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that may be used in our Services or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness. For more information about cookies and how to disable them, see [Your Choices](#) below.

Information We Collect from Other Sources

We may also obtain information about you from other sources. For example, we may collect information about you from third parties, including but not limited to mailing list providers and publicly available sources.

USE OF INFORMATION

We use the information we collect to provide corporate communication and management consulting. We may also use the information we collect to:

- Provide, maintain and improve our products and services;
- Send you technical notices, updates, security alerts, and support and administrative messages and to respond to your comments, questions, and customer service requests;
- Communicate with you about products, services, and events offered by JDMA and others, and provide news and information we think will be of interest to you (see [Your Choices](#) below for information about how to opt out of these communications at any time);
- Monitor and analyze trends, usage, and activities in connection with our Services;
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of JDMA and others; and
- Carry out any other purpose described to you at the time the information was collected.

SHARING OF INFORMATION

We may share information about you as follows or as otherwise described in this Privacy Policy:

- With your employer, if you are completing a JDMA survey at your employer’s direction and in connection with your employer’s engagement with JDMA;

- With vendors, service providers, and consultants that perform services for us, including IT consultants and third-party software companies that host and provide the surveys;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- If we believe your actions are inconsistent with our user agreements or policies, if we believe you have violated the law, or to protect the rights, property, and safety of JDMA or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among JDMA and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
- With your consent or at your direction.

We may also share aggregated or de-identified information that cannot reasonably be used by those third parties to identify you.

SOCIAL SHARING FEATURES

The Services may offer social sharing features and other integrated tools (such as the Facebook “Like” button), which let you share actions you take on our Services with other media, and vice versa. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

ANALYTICS SERVICES PROVIDED BY OTHERS

We may allow others to provide analytics services on our behalf across the web and in mobile applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked, and conversion information. This information may be used by JDMA and others to, among other things, analyze and track data, determine the popularity of certain content, and better understand your online activity.

TRANSFER OF INFORMATION TO THE U.S. AND OTHER COUNTRIES

JDMA is based in the United States and we process and store information in the U.S. and other countries. Therefore, we and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction.

YOUR CHOICES

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

Promotional Communications

You may opt out of receiving promotional emails from JDMA by following the instructions in those emails. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

INDIVIDUALS IN THE EUROPEAN ECONOMIC AREA

If you are in the European Economic Area ("**EEA**"), you have certain rights and protections under the law regarding the processing of your personal data.

Legal Basis for Processing

If you are in the EEA, when we process your personal data we will only do so in the following situations:

- We need to use your personal data to perform our responsibilities under our contract with you (e.g., processing payments for and providing the products or services you have requested).
- We have a legitimate interest in processing your personal data. For example, we may process your personal data to send you marketing communications, to communicate with you about changes to our products and Services, and to provide, secure, and improve our products and Services.
- We find such processing is necessary to comply with our legal obligations.
- We have your consent to do so. When consent is the legal basis for our processing, you may withdraw such consent at any time.

Data Subject Requests

You have the right to access personal data we hold about you and to ask that your personal data be corrected, erased, or transferred. You may also have the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, [you can log into your account. Alternatively,] you may contact us as indicated below.

Data Retention

We store the information we collect on you for as long as is necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations.

Questions or Complaints

If you have a concern about our processing of personal data that we are not able to resolve, you have the right to lodge a complaint with the data privacy authority where you reside. For contact details of your Data Protection Authority, please see: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.

CONTACT US

If you have any questions about this Privacy Policy, please contact us at: 45 Rockefeller Plaza, 20th Floor, New York, NY 10111, (212)-332-3260, or press@jdmainc.com.