

## **Privacy Policy**

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Your privacy is important to us. This is the Privacy Policy of the website and e-marketing of Jack Rouse Associates (“JRA”). JRA is a private corporation incorporated under United States law, with registered office at 600 Vine Street, Suite 1700, Cincinnati, Ohio, USA.

This Privacy Policy can be modified, e.g. as a result of new functionalities on the JRA websites that require the processing of personal data. We thus advise you to check this Privacy Policy regularly. Any major changes will be notified via our website.

This version of the Privacy Policy was modified on May 24, 2018.

### **When does this Privacy Policy apply?**

This Privacy Policy applies to the processing of personal data obtained via the JRA website ([www.jackrouse.com](http://www.jackrouse.com)) or our e-mail marketing efforts.

### **Who is responsible for the processing of your personal data?**

JRA is the party responsible for the processing of your personal data. This means that JRA determines for what purposes and with what means your personal data will be processed.

### **Which personal data do we process about you?**

We collect your personal data in three ways:

#### **a. Information provided by you**

We receive your information in the first place if you share it with us by:

- Contacting us via the contact form
- Filling in a form on our website
- Requesting services (e.g., master planning and/or design)
- Signing up for email communications
- Participating in a survey
- Inquiring about a job opportunity
- Distributing to us a business card or other printed material with your information included

In these cases, we usually receive information such as your first name, last name, e-mail address, telephone number, address details (street, number, postcode, city, country), the project or the region in which you are interested, your position, your correspondence with JRA, your market and application segments, and other personal and/or contact details.

## **b. Automatically obtained information**

When you browse our website, we receive data about your activity on our website through Google Analytics, such as the time and duration of your visit, the hyperlinks that you clicked which brought you to our website and the hyperlinks on our website which link to other websites, your IP address the pages you visit, the browser you use, geographical data such as your location and your preferred language.

## **c. Information obtained from third parties**

Sometimes we also receive your information from industry associations, conferences and/or trade shows. We do not sell our mailing lists to third parties.

## **For what purposes do we process your personal data?**

### **a. In order to respond to your requests and keep you informed**

We process your personal data when you request a brochure, inquire about or request a service, ask to be kept informed of our activities, projects, open positions, events, actions, and so on.

For this purpose we may process data such as your name, your address, your e-mail address, your telephone number, your preferred language and the project or the region in which you are interested.

These data are processed on the basis of your unambiguous consent, the performance of a contract to which you are a party, or your request to take steps prior to entering into a contract.

If you have previously sent us a request to receive our marketing collateral, we will keep you informed about our services. All our emails contain an “unsubscribe” button. You can also contact JRA at any time for more information (see paragraph of the Privacy Policy in connection with your right to object).

### **b. In order to answer your questions and exchange information**

If you ask us questions by telephone or e-mail, we will process your personal data in order to respond to your question.

For this purpose we may process data such as your name, your company name, your position, your e-mail address, your telephone number, your correspondence with JRA and all other personal data that you provide to us that can be relevant for answering your question.

These data are processed on the basis of your request to take steps prior to entering a contract, the performance of a contract to which you are a party, or JRA’s legitimate interest in informing you about its activities.

### **c. For email marketing purposes**

Under the GDPR we use the legitimate interests as the basis for anyone receiving our newsletters. Any email marketing messages we send are done so through an email marketing service provider, which allows you to unsubscribe at any time. We never transfer your personal data to a third party.

Email marketing messages that we send may be tracked through clickable links or similar server technologies in order to track reader and customer activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P. addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations, will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR. We provide you with an easy method to withdraw your consent by clicking the 'Unsubscribe' link at the bottom of the emails.

### **d. For employment purposes**

Potential job applicants may be requested to provide contact and other relevant information. This information is used solely to contact potential applicants regarding employment. We will use reasonable efforts to send all new applicants an email to verify receipt of employment inquiries.

### **e. For the technical and functional management of our website**

We process personal data for the technical and functional management of our website, in order to personalize the website and to ensure that the website is easy to use.

For this purpose we may process data through Google Analytics such as your IP address, the pages you visit, the browser you use, the websites you visited earlier, geographical data such as your location, your preferred language and the time and duration of your visit.

These data are processed on the basis of your unambiguous consent or JRA's legitimate interest in improving its websites and protecting itself against cyber-attacks.

### **Who has access to your personal data?**

We may share your personal data with certain third parties:

- E-marketing service providers, for the distribution of our digital marketing campaigns;

- IT service providers that provide technical support;
- Payment service providers;
- Attorneys and external advisors: in certain cases JRA may transfer your personal data to attorneys and external advisors if this is necessary to give us advice or to defend our rights;
- Supervisory authorities in case of a lawful request;
- Possible acquirers of the whole or part of JRA in the event that (a part of) our activities would be taken over by a third party.

JRA is committed to always ensuring an adequate and sufficient level of protection for your data. If you have any questions or would like more information about the transfer of your personal data, you can send an email to [JRAnews@jackrouse.com](mailto:JRAnews@jackrouse.com).

Personal data are not provided to other parties, unless required by law or pursuant to a court order.

### **What about links to other websites and social media?**

The JRA website can contain references (e.g. via hyperlinks) to other websites, which are offered by third parties. JRA is not responsible for the processing of personal data via these websites. JRA advises you to check the privacy policies of these websites. This privacy policy applies only to the JRA website.

If you share content from the JRA website via social media, this content will be visible for the visitors of these social media. JRA is not responsible for the processing of personal data via these social media. This privacy policy applies only to the JRA website.

### **How long do we keep your personal data?**

JRA will retain your personal data for the period necessary to fulfill the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law.

If no legal retention period applies, JRA will process your data at least as long as it has a contractual relationship with you.

### **How are your personal data protected?**

JRA strives to protect your personal data by means of technical and organizational measures, such as firewalls and secured servers that may only be accessed by a limited number of persons holding special access rights and with respect to the nature of the data.

Despite these measures, due care should be taken when storing and/or sharing your personal data and login, particularly when connecting via unsecure or public networks.

### **What are your rights and how can you exercise them?**

The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling
- Right to be forgotten

If you believe that any information we are holding on you is incorrect or incomplete, please email or write to us as soon as possible. We will promptly correct any information found to be incorrect.

If you have any further questions or complaints about the processing of your personal data, about JRA's websites or about this Privacy Policy you can always contact us:

- by e-mail at [JRAnews@jackrouse.com](mailto:JRAnews@jackrouse.com); or
- by phone at the number +1 (513) 381-0055
- by mail to:  
Jack Rouse Associates, Inc.  
600 Vine St., Suite 1700  
Cincinnati, OH, 45202

JRA may from time to time review and revise our privacy policy. If we change or revise our policy, we will publish an updated version of the policy on our website.