

PRIVACY POLICY

Effective Date: August 24, 2023

1. General information

We/us (either capitalized or not) in this Privacy policy means BOOSTHUB, LLC, a legal entity registered under the laws of Ukraine, registration number (EGRPOU) 45095836.

This Privacy policy describes how and why we might collect, store, use, and/or share (process) your information when you use our services, such as when you:

- Visit our website, or any website of ours that links to this privacy policy
- Download and use our mobile application, or any other application of ours that links to this privacy policy
- Engage with us in other related ways, including any sales, marketing, or events.

Reading this privacy policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our services.

This Privacy policy applies to all information collected through our website <https://salesjinn.com/> website, and/or any related services, sales, marketing or events.

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit this website. The term “personal data” comprises all data that can be used to personally identify you.

2. An overview of data protection

2.1. Personal information you disclose to us

We collect personal information that you voluntarily provide to us when you register on the services, express an interest in obtaining information about us or our products and services, when you participate in activities on the services, or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the services, the choices you make, and the products and features you use.

The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses
- Mailing addresses
- Usernames
- Passwords
- Contact or authentication data
- Contact preferences
- Billing addresses
- Debit/credit card numbers
- Job titles
- Other information.

Sensitive information. We do not process sensitive information.

Social Media Login Data. We may provide you with the option to register with us using your existing social media account details, like your Facebook, Twitter, or other social media account. If you choose to register in this way, we will collect the information described in the section called «How do we handle your social logins?» below.

Application Data. If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

- **Geolocation information.** We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device`s settings.
- **Mobile device access.** We may request access or permission to certain features from your mobile device, including your mobile device`s Bluetooth, calendar, social media accounts, sms messages, storage, and other features. If you wish to change our access or permissions, you may do so in your device`s settings.
- **Mobile device data.** We automatically collect device information (such as mobile device ID, model and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device`s operating system or platform, the type of mobile device you use, your mobile device`s unique device ID, and information about the features of our application(s) you accessed.
- **Push notifications.** We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device`s settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

2.2. Information automatically collected

We automatically collect certain information when you visit, use, or navigate the website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our website/services, and other technical information. This information is primarily needed to maintain the security and operation of our website/services, and for our internal analytics and reporting purposes.

2.3. Information collected from other sources

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behaviour data), IP addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion. If you interact with us on a social media platform using your social media account (e.g. Facebook or Twitter), we receive personal information about you such as your name, email address, gender. Any personal information that we collect from your social media account depends on your social media account`s privacy settings.

2.4. Data recording on this website

Who is the responsible party for the recording of data on this website (i.e., the “controller”)?

The data on this website is processed by the operator of the website, whose contact information is available under section “Information about the responsible party (referred to as the “controller” in the GDPR)” in this Privacy Policy.

2.5. How do we record your data?

We collect your data as a result of your sharing of your data with us. This may, for instance be information you enter into our contact form.

Other data shall be recorded by our IT systems automatically or after you consent to its recording during your website visit. This data comprises primarily technical information (e.g., web browser, operating system, or time the site was accessed). This information is recorded automatically when you access this website.

2.6. What are the purposes we use your data for?

A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyze your user patterns.

2.7. What rights do you have as far as your information is concerned?

You have the right to receive information about the source, recipients, and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a complaint with the competent supervising agency.

In some regions (like the EEA, UK, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure, (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

<https://ec.europa.eu/newsroom/article29/items/612080>

If you are located in Switzerland, the contact details for the data protection authorities are available here:

<https://www.edoeb.admin.ch/edoeb/en/home.html>

Withdrawing your consent: if we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time.

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us using the details provided below. You will be removed from the marketing list. However, we may still communicate with you – for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Please do not hesitate to contact us at any time if you have questions about this or any other data protection related issues.

2.8. Information Use

We only have access to/collect information that you voluntarily give us via email or other direct contact from you. We will never sell or rent this information to anyone. We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request, e.g., to inquire about our products and services.

3. General information and mandatory information

3.1. Data protection

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Privacy Policy.

Whenever you use this website, a personal information will be collected. Personal data comprises data that can be used to personally identify you. This Privacy Policy explains which data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you that the transmission of data via the Internet (i.e., through e-mail communications) may be prone to security gaps. It is not possible to completely protect data against third-party access.

3.2. Information about the responsible party (referred to as the “controller” in the GDPR)

The data processing controller on this website is:

BOOSTHUB, LLC

Address: 01103, Ukraine, Kyiv, Pechersk district, Mendeleev Street, 12, office 94/1

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g., names, e-mail addresses, etc.).

3.3. Storage duration

Unless a more specific storage period has been specified in this privacy policy, your personal data will remain with us until the purpose for which it was collected no longer applies. If you assert a justified request for deletion or revoke your consent to data processing, your data will be deleted, unless we have other legally permissible reasons for storing your personal data (e.g., tax or commercial law retention periods); in the latter case, the deletion will take place after these reasons cease to apply.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

3.4. Do we collect information from minors?

We do not knowingly solicit data from or market to children under 18 years of age. By using the website, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the website. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records.

3.5. General information on the legal basis for the data processing on this website:

3.5.1. If you are located in Ukraine, the EU or UK, this section applies to you.

If you are located in Ukraine, your personal data is processed in accordance with the requirements of the Law of Ukraine "On Protection of Personal Data" dated 01.06.2010 No. 2297-VI.

If you are located in the EU or UK, the General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information.

If you have consented to data processing, we process your personal data on the basis of Art. 6(1)(a) GDPR or Art. 9 (2)(a) GDPR. In the case of explicit consent to the transfer of personal data to third countries, the data processing is also based on Art. 49 (1)(a) GDPR. The consent can be revoked at any time. If your data is required for the fulfillment of a contract or for the implementation of pre-contractual measures, we process your data on the basis of Art. 6(1)(b) GDPR. Furthermore, if your data is required for the fulfillment of a legal obligation, we process it on the basis of Art. 6(1)(c) GDPR. Furthermore, the data processing may be carried out on the basis of our legitimate interest according to Art. 6(1)(f) GDPR. Information on the relevant legal basis in each individual case is provided in the following paragraphs of this privacy policy.

In legal terms, we are generally the data controller under European data protection laws of the personal information described in this privacy policy, since we determine the means and/or purposes of the data processing we perform. This privacy policy does not apply to the personal information we process as a data processor on behalf of our customers. In those situations, the customer that we provide services to and with whom we have entered into a data processing agreement is the data controller responsible for your personal information, and we merely process your information on other behalf in accordance with your instructions. If you want to know more about our customers`privacy practices, you should read their privacy policies and direct any questions you have to them.

3.5.2. Information on data transfer to the USA and other non-EU countries

Among other things, we can use tools of companies domiciled in the United States or other non-EU countries. If these tools are active, your personal data may potentially be transferred to these non-EU countries and may be processed there.

3.5.3. If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e. express consent) to use your information for a specific purpose, or in situations where your permission can be inferred (i.e. implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- Of disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records

- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations.

3.5.4. Do California residents have specific privacy rights?

California Civil Code Section 1798.83, also known as the Shine The Light law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with website, you have the right to request removal of unwanted data that you publicly post on the website. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the website, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

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The California Code of Regulations defines a resident as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose.

All other individuals are defined as non-residents.

If this definition of resident applies to you, we must adhere to certain rights and obligations regarding your personal information.

3.6. What categories of personal information do we collect?

We may collect the following categories of personal information:

Category	Examples
Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, IP address, account name
Personal information	Name, contact information, education, employment history, and financial information
Protected classification characteristics	Gender and date of birth
Commercial information	Transaction information, purchase history, financial details and payment information
Internet or other similar network activity	Browsing history, search history, online behaviour, interest data, and interactions with our and other websites, applications, systems, and advertisements.
Geolocation data	Device location.
Inferences drawn from other personal information.	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.

We may also collect other personal information outside of these categories instances where you interact with us in person, online, or by mail in the context of:

- Receiving help through our customer support channels
- Participation in customer surveys or contests and
- Facilitation in the delivery of our website or services and to respond to your inquiries.

3.7. Revocation of your consent to the processing of data

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

3.8. Right to log a complaint with the competent supervisory agency

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory agency, in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

3.9. Right to data portability

You have the right to demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

3.10. SSL and/or TLS encryption

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website may use either an SSL or a TLS encryption program. You can recognize an encrypted connection by checking whether the address line of the browser switches from “http://” to “https://” and also by the appearance of the lock icon in the browser line. If the SSL or TLS encryption is activated, data you transmit to us cannot be read by third parties.

3.11. Information about rectification and eradication of data

Within the scope of the applicable statutory provisions, you have the right to at any time demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data. You may also have a right to have your data rectified or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time.

3.12. Right to demand processing restrictions

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time. The right to demand restriction of processing applies in the following cases:

In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.

If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data in lieu of demanding the eradication of this data.

If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.

If you have raised an objection pursuant to Art. 21(1) GDPR, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons.

4. Recording of data on this website

4.1. Cookies

Our websites and pages use what the industry refers to as “cookies.” Cookies are small text files that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your visit. Permanent cookies remain archived on your device until you actively delete them, or they are automatically eradicated by your web browser.

In some cases, it is possible that third-party cookies are stored on your device once you enter our site (third-party cookies). These cookies enable you or us to take advantage of certain services offered by the third party (e.g., cookies for the processing of payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of the cookies (e.g., the shopping cart function or the display of videos). The purpose of other cookies may be the analysis of user patterns or the display of promotional messages.

Cookies, which are required for the performance of electronic communication transactions, or for the provision of certain functions you want to use or those that are necessary for the optimization (required cookies) of the website (e.g., cookies that provide measurable insights into the web audience), shall be stored on the basis of Art. 6(1)(f) GDPR, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of required cookies to ensure the technically error free and optimized provision of the operator’s services. If your consent to the storage of the cookies and similar recognition technologies has been requested, processing occurs exclusively on the basis of the consent obtained (Art. 6(1)(a) GDPR and § 25 (1) TTDSG); this consent may be revoked at any time.

You have the option to set up your browser in such a manner that you will be notified any time cookies are placed and to permit the acceptance of cookies only in specific cases. You may also exclude the acceptance of cookies in certain cases or in general or activate the delete function for the automatic eradication of cookies when the browser closes. If cookies are deactivated, the functions of this website may be limited.

In the event that third-party cookies are used or if cookies are used for analytical purposes, we will separately notify you in conjunction with this Data Protection Policy and, if applicable, ask for your consent.

4.2. Server log files

Controller is provider of this website and its pages. The provider automatically collects and stores information in so-called server log files, which your browser communicates to us automatically. The information comprises:

The type and version of browser used

The used operating system

Referrer URL

The hostname of the accessing computer

The time of the server inquiry

The IP address

This data is not merged with other data sources.

4.3. Contact form

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

The processing of these data is based on Art. 6(1)(b) GDPR, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6(1)(f) GDPR) or on your agreement (Art. 6(1)(a) GDPR) if this has been requested; the consent can be revoked at any time. The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g., after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions, in particular retention periods.

4.4. Request by e-mail, telephone

If you contact us by e-mail, telephone your request, including all resulting personal data (name, request) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent.

These data are processed on the basis of the Law of Ukraine "On Personal Data Protection", Art. 6(1)(b) GDPR if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed on the basis of our legitimate interest in the effective handling of inquiries submitted to us (Art. 6(1)(f) GDPR) or on the basis of your consent (Art. 6(1)(a) GDPR) if it has been obtained; the consent can be revoked at any time.

The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions – in particular statutory retention periods – remain unaffected.

5. Do we make updates to this policy?

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible.