

YOUR PRIVACY RIGHTS

Effective Date of Current Policy: January 1, 2012

This Privacy Policy governs the way in which the Jenesse Center Inc. (hereinafter "Jenesse Center") collects and uses personal and non-personal information we learn about you from your visit to the www.jenesse.org website (the "Website"). Please also refer to the [\[Mandatory Terms of Use\]](#), which are incorporated as if fully recited herein, if you have not already done so.

By using the Website and submitting information to it, you hereby consent to allow the Jenesse Center to process information in accordance with this Policy.

TERRITORIALITY

Regardless of where our servers are located, your personal data will be processed by us in the United States, where data protection and privacy regulations may or may not be to the same level of protection as in other parts of the world. BY VISITING THIS WEBSITE, YOU UNEQUIVOCALLY AND UNAMBIGUOUSLY CONSENT TO THE COLLECTION AND PROCESSING IN THE UNITED STATES OF ANY PERSONAL AND NON-PERSONAL INFORMATION COLLECTED OR OBTAINED BY THE JENESSE CENTER THROUGH VOLUNTARY SUBMISSIONS, AND THAT UNITED STATES LAW GOVERNS ANY SUCH COLLECTION AND PROCESSING.

COLLECTION OF INFORMATION

-Personal Information

Personal Information is defined as your name plus certain other information that would enable you to be contacted.

Through the Website, we collect no Personal Information about you unless you voluntarily submit it. It is possible to submit information by clicking on various links, such as "Contact Us." Additionally, we collect such information when you request information or Services from the Website.

-Non-Personal Information

The Jenesse Center may collect non-Personal Information about you or your activity at the Website. Non-Personal Information may be collected at various stages in the Website, including when you visit the Website or upload materials. The Website may automatically recognize and store information about the type of browser you are using; your Internet Protocol ("IP") address; the time, date, and length of your visit; the pages you visit, and the referring site. Information, if collected, may be collected via computer code sent to your computer or device (commonly referred to as "cookies"). The cookies may not expire, unless you manually delete them or set your browser to reject them. If you do not accept the cookies, however, you may have difficulty navigating the Website. Furthermore, the Website may utilize Web beacons, embedded Web links, and other commonly used information-gathering tools.

USE

The Jenesse Center uses non-personal information to manage the Website. The Jenesse Center may analyze the data about visits to the Website to make it more accessible and interesting for visitors. The Jenesse Center may share this data with third parties, usually to provide services for the Jenesse Center associated with the maintenance of the Website.

If you submit Personal Information to the Website, the information will be used for the purpose you requested or for which it is collected or for any purpose you subsequently authorize. That information may be stored and maintained for as long as is reasonable necessary to effectuate the service you request and for a reasonable time thereafter. The Jenesse Center will process this information in a manner which is consistent with the purposes for which it has been collected or subsequently authorized by you. In addition, the Jenesse Center may share data with trusted partners to help us fulfill your request, perform statistical analysis and consulting services, send you email or postal mail or provide support. The Jenesse Center may use such information to contact you regarding the Website.

Furthermore, the Jenesse Center may disclose any information collected to the extent the Jenesse Center reasonably believes that such disclosure is desirable to comply with the law, such as in response to any subpoena, to the extent reasonably necessary to establish or defend a legal claim and for other purposes permitted by applicable law. Additionally, any such information may be transferred to a third party in the event of a sale, acquisition, merger or bankruptcy involving the Jenesse Center or any subsidiary or section thereof.

If you do not wish the Jenesse Center to use your information in accordance with this Policy, please do not submit any Personal Information to the Jenesse Center.

SECURITY

The Jenesse Center attempts to secure your personal information from unauthorized access, use or disclosure through storage on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure.

ADDITIONAL PRIVACY RIGHTS

California Civil Code Section 1798.83, also known as S.B. 27, or the "Shine the Light" law, allows California residents to request certain information regarding our disclosures in the prior calendar year, if any, of their personally identifiable information to third parties. To make such a request, please contact us at adam.bialek@wilsonelser.com with "Request for Privacy Information" in the letter subject line. You must include sufficient detail for us to locate your file; at a minimum, your name, email, and username.

We will attempt to provide you with the requested information within thirty (30) days of receipt. We reserve our right not to respond to requests sent more than once in a calendar year, or requests submitted to an address other than the one posted in this notice. Please note that the California Shine the Light law does not cover all information sharing. Our disclosure only includes information covered by the law.

REVISIONS TO THE PRIVACY POLICY

The Jenesse Center reserves the right to update and revise this Privacy Policy at any time. You can determine if this Privacy Policy has been revised since your last visit by referring to the "Effective Date of Current Policy" date at the top of this page. Your use of our Website after a modification constitutes your acceptance of the terms of the Privacy Policy as amended or revised by us, and you should therefore review this Privacy Policy regularly to ensure that you are aware of its terms.

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