

# Jargon's Privacy Policy

## Privacy Policy for Jargon Chrome Extension

### Who We Are and the Purpose of this Privacy Policy

Welcome to Jargon, a chrome extension designed to provide in-context language learning for everyday use by integrating seamlessly into your internet browsing experience.

This Privacy Policy ("Policy") explains the privacy practices of Jargon ("we," "us," "our" or "Jargon") relating to your access and use of Jargon's Services. This Policy is designed to help you better understand how we collect, use, store, and share any personal information about you (your "Personal Data"). It also describes your rights in relation to your Personal Data. Under data protection law, the term Personal Data refers to all information that relates to an identified or identifiable person. At Jargon, we only process Personal Data in compliance with applicable data protection laws and regulations. Jargon is responsible as the controller for the data processing described in this Policy, unless stated otherwise. The term "controller" under data protection law refers to the entity which decides what to do with the Personal Data that has been collected, and how to do it. This Policy is incorporated into the Terms and is a part and parcel of the Terms. By registering for or using any of our Services, you consent to the collection, transfer, processing, storage, and other uses of your information as described in this Policy.

We may update this Policy from time to time by publishing a new version on our website. We will notify you of any changes by posting the new Privacy Policy on this page and through in-app notifications. You are advised to review this Privacy Policy periodically for any changes.

### 1. On what basis do we process your Personal Data?

We process your Personal Data using the following legal bases: (i) with your consent, (ii) in order to provide services to you under the terms of a contract between you and Jargon, or to enter into a contract between you and Jargon at your request (e.g., when you sign up for a Jargon account), (iii) for compliance by Jargon with a legal obligation, or (iv) if the processing is necessary for the protection of our legitimate interests or the legitimate interests of a third party, unless your interests or fundamental rights and freedoms requiring the protection of your Personal Data override these.

### 2. What kinds of Personal Data do we use?

At Jargon, we collect and use (process) your Personal Data in different ways, depending on how you interact with Jargon. This includes:

- **User Accounts:** Information provided when creating a user account, such as name, email address, and password (encrypted).
- **Browsing Activity:** URLs of websites you visit and their content to generate language learning questions.
- **Interaction Data:** Frequency and timing of interactions with the extension.

- **Preferences and Settings:** Your language preferences, permissions for accessing different websites, and usage settings within the extension.
- **Data Collection by Third-Party Services:** We utilize various third-party services to provide functionalities and improve our platform. These third-party services may collect certain user information independently in accordance with their own privacy policies. While we do not directly collect this information, we encourage you to review the privacy policies of these third-party services to understand how they handle user data. For example: Supabase: We use Supabase for our database needs. Supabase collects user IP addresses for security purposes. You can find more information about Supabase's privacy practices in their privacy policy located here: <https://supabase.com/privacy>.
- Jargon utilizes third-party services, such as GPT-4 Turbo and assistants API, to generate personalized learning content for you. These services may collect and use your data in accordance with their own privacy policies. We recommend that you review the privacy policies of these services to understand their data practices.

### **3. Your Rights in Relation to Your Personal Data**

You have the right to exercise certain data subject rights under applicable laws. To exercise your data subject rights, please use the contact details available in this Policy. Depending on the data protection laws that apply to you, you have at least the following rights:

- To ask for access to information confirming whether and, if so, to what extent we are processing Personal Data concerning you.
- To ask us to correct your Personal Data if it is incorrect or out of date. You have the right to access and update your personal information. You can request access or updates to your information by contacting us at the contact details available in this Policy.
- To ask us to delete your Personal Data.
- To ask us to restrict the processing of your Personal Data.
- To receive your Personal Data in a structured, commonly used, and machine-readable format, and the right to transfer your Personal Data to another company.
- Where you have consented to a specific processing activity, you can withdraw this consent at any time.
- To make a complaint about Jargon to the appropriate supervisory authority.

### **Your Choices**

You can control your data and preferences by:

- Adjusting the settings within the Jargon extension.
- Disabling the extension at any time if you no longer wish to use it.

### **4. Where Do We Process Your Personal Data? And what security measures we take?**

In principle, we process your data on servers with commercially reasonable security standards. In providing our services, we are supported by external service providers to whom we may send your data. Some data processing may involve the transfer of certain Personal

Data to “third countries” outside of your jurisdiction. Such a transfer is permissible if appropriate safeguards exist, or if one of the conditions listed in applicable data protection laws is met.

We implement appropriate data collection, storage, and processing practices and security measures to protect against unauthorized access, alteration, disclosure, or destruction of your information. All sensitive data is transmitted via modern cryptography (HTTPS) and stored using strong encryption methods such as RSA or AES.

#### **4.1 Processing Pseudonymized Behavioral Information**

We process pseudonymized information about your behavior on our app. This includes server log files, IP addresses, and user IDs, some of which are assigned by third-party providers.

**This Personal Data is processed for the following purposes, and on the following legal bases:**

- **Security and Stability:** Ensuring the security, operability, and stability of our services, including defense against cyber-attacks.
- **Product Optimization:** Measuring our reach and analyzing user behavior to optimize our products, increase customer satisfaction, and improve error analysis.
- **Tracking and Conversion:** Tracking and conversion rate measurement for assessing our reach and tracking the conversion rates of our business affiliate partners.

#### **5. How Do We Use "Cookies" and Other Tracking Technologies?**

We use cookies and similar technologies on our website and in providing our services. More information about how we use these technologies and how you can manage your cookie preferences can be found in our cookie banners and settings.

#### **6. How Long Do We Store Your Personal Data?**

Unless otherwise stated, we only store Personal Data for as long as is necessary to achieve the processing purpose or to fulfill our contractual or legal obligations. Specific retention periods are determined based on legal requirements and the necessity to retain data for specific purposes.

#### **7. How Can You Contact Us?**

If you have any questions about this Policy or would like to exercise your data subject rights, please contact us at [support@jargonlearn.com](mailto:support@jargonlearn.com).

#### **8. Who Do We Share Your Personal Data With, and Why? How do we use your Personal Data?**

We share your Personal Data with:

- **Hosting Providers:** To host our systems and services.
- **IT and SaaS Providers:** To help us provide our services.
- **Advertising and Marketing Providers:** To improve and promote our services.
- **Affiliated Companies:** For cross-border and cross-company collaboration.
- **Authorities:** To comply with legal requirements.
- **Payment Providers:** To process payments.

- **Service Providers:** For various operational purposes, such as delivery services and tax consultancy.

We will only use your Personal Data for the purposes described in this Policy. We will not sell or share your Personal Data with third parties without your prior consent, except as necessary for us to provide our services to you or as required by law or as otherwise stated herein.

We use the information we collect to:

- Provide and improve the functionality of the extension.
- Personalize language learning content based on your browsing activity.
- Adjust query frequencies and learning prompts according to your preferences.
- Monitor and analyze usage patterns to enhance user experience.
- Track the number of times users have answered a question to measure progress.

We do not sell, trade, or otherwise transfer your personal information to outside parties. We may share generic aggregated demographic information not linked to any personal identification information with our business partners, trusted affiliates, and advertisers for the purposes outlined above.

## 9. Joint Controllorship

If we are joint controllers of your Personal Data with other entities, you will be informed of this in the descriptions of the individual data processing operations.

## 10. Legal Basis According to the GDPR

- **Consent:** Art. 6(1)(a) GDPR
- **Performance of a Contract:** Art. 6(1)(b) GDPR
- **Legal Obligation:** Art. 6(1)(c) GDPR
- **Legitimate Interest:** Art. 6(1)(f) GDPR

## 11. California Privacy Rights

California residents have specific rights regarding their personal information under the California Consumer Privacy Act (CCPA). This section describes those rights and explains how to exercise them. You can learn more about these rights at the California Attorney General's website <https://oag.ca.gov/privacy/ccpa>.

If you are a California resident, you have the right to:

- **Access:** You have the right to request that we disclose to you the following:
  - The categories of personal information we have collected about you.
  - The specific pieces of personal information we have collected about you.
  - The categories of sources from which we collected your personal information.
  - The business purposes for which we collect or sell your personal information.
  - The categories of third parties with whom we share your personal information.

- **Deletion:** You have the right to request that we delete your personal information, subject to certain exceptions. We cannot delete your personal information if it is necessary for us to do any of the following:
  - Complete a transaction with you.
  - Provide you with a good or service.
  - Comply with a legal obligation.
- **Know Your Rights:** You have the right to receive a copy of this CCPA privacy notice free of charge upon request.
- **Do Not Sell My Information:** You have the right to opt-out of the sale of your personal information. We will not sell your personal information unless you explicitly opt-in to such sale. We will provide a clear and conspicuous link titled "Do Not Sell My Information" on our website for your easy access to exercise this right.

You have the right to not be discriminated against for exercising your CCPA rights. We will not deny you services, charge you different prices, or provide a different level of service based on your exercise of your CCPA rights.

To exercise these rights, you can contact us at the contact details stated herein. We will verify your request before processing it.

## **12. Other U.S. State Privacy Rights**

### **NEVADA RESIDENTS: YOUR RIGHT TO OPT-OUT OF THE SALE OF COVERED DATA**

Under Nevada law, you have the right to opt-out of the sale of certain covered data that a business may collect about you. We do not currently sell your personal information as defined by the Nevada Privacy Act. For more information about our data handling practices, how we share your information, and your rights under Nevada law, you can contact us at our contact details stated below.

### **COLORADO PRIVACY RIGHTS**

If you are a resident of Colorado, you have certain rights regarding your personal data under the Colorado Privacy Act (CPA). These rights include:

#### **Right to Access:**

- You have the right to confirm whether we are processing your personal data and to access such data. You may request to know the categories and specific pieces of personal data we have collected about you.

#### **Right to Correct:**

- You have the right to request the correction of any inaccurate personal data we hold about you.

#### **Right to Delete:**

- You have the right to request the deletion of your personal data that we have collected from you.

#### Right to Data Portability:

- You have the right to obtain a copy of your personal data in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.

#### Right to Opt Out:

- You have the right to opt out of:
  - The sale of your personal data.
  - Targeted advertising.
  - Profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

To exercise any of the rights described, you can contact us at our contact details stated below.

### **13. Additional Information for Residents of Brazil**

#### Specific Rights for Data Subjects in Brazil

In accordance with the Lei Geral de Proteção de Dados (LGPD), individuals located in Brazil have the following rights with respect to their personal data:

- **Confirmation of Existence and Access:** You have the right to confirm the existence of your personal data being processed by us, as well as to access it.
- **Correction:** You have the right to request the correction of any inaccurate or incomplete personal data we hold about you.
- **Anonymization, Blocking, or Deletion:** You have the right to request that we anonymize, block, or delete your personal data, unless we are legally required to retain it.
- **Data Portability:** You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another controller, if technically feasible.
- **Deletion:** You have the right to request the deletion of your personal data upon your request, with some exceptions.
- **Review of Processing Decisions:** You have the right to review certain automated decisions made about you using your personal data.
- **Opposition:** You have the right to object to the processing of your personal data for certain purposes, including direct marketing.
- **Withdrawal of Consent:** You have the right to withdraw your consent to the processing of your personal data at any time.

To exercise any of these rights, please contact us at the contact details stated herein. We will respond to your request within a reasonable timeframe.

### **14. Consent**

We may obtain your consent to our collection, use, and disclosure of your Personal Data either expressly, for stated purposes, or impliedly when the purposes are indicated by the

relevant circumstances or follow logically from other stated purposes. Before collecting browsing activity and interaction data, we will explicitly request your consent. You will be able to adjust your consent preferences or opt-out at any time through the extension settings. By providing us with your Personal Data, you consent to the collection, use, and disclosure of that information relating to providing our services, managing our relationship with you, administering our business, and as permitted or required by law, in accordance with this Policy. We rely on the GDPR's "legitimate interests" rule as authorization to process your Personal Data where the circumstances and uses of such processing are known to or would be expected by you in connection with your access and uses of our services, in particular as set out in this Policy, provided that we will always seek your express, actively provided consent in instances where we propose to process your information for purposes of profiling, tracking, advertising, or publication or if the information would be considered sensitive. We will seek your consent before using Personal Data for any purpose beyond the scope of your original consent or our stated purposes. You may withdraw your consent or request us to stop processing your Personal Data at any time, subject to legal and contractual restrictions and reasonable notice, by contacting us at [support@jargonlearn.com](mailto:support@jargonlearn.com) or by visiting our consent and opt-out page.

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This Privacy Policy is effective as of June 5th, 2024.

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