



JANNE PRIVACY POLICY

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INTRODUCTION & SCOPE

This Privacy Policy ("Policy") outlines how Janne and its subsidiaries and affiliates (collectively "Janne," "we," "us," or "our") collect, use, store, process, and protect personal data obtained through our website, WhatsApp integration, and other platforms (collectively, the "Platform") when you ("you," "User," "your") register directly on our Platform, use our services, or interact with us through any of our partners.

Janne is an AI-powered personal networking assistant designed to help professionals create, improve, and maintain closer business relationships through various digital channels, including WhatsApp. To provide our services, we need to process certain personal data about you and your contacts.

We may modify this Policy at any time, but we will notify you of any substantial changes. You will be required to agree to these modifications. We always indicate the date of the last update at the beginning of the Policy.

It's important to note that this Policy only applies to the Platform. If you are redirected to another website during your browsing, you should consult that site's privacy policy.

Here's a summary of the key points of this Privacy Policy:

- a) Janne collects personal data that you provide during registration, through your use of the Platform, and/or via cookies and similar technologies.
- b) We collect this data to enable your registration, provide our networking assistant services, and offer you the best experience possible through our Platform.
- c) We may share your personal data with third parties for the direct or indirect purpose of offering our services to you and/or performing activities necessary for Janne's operations.



d) We may use anonymized data for statistical and operational control purposes.

e) We implement reasonable security measures to protect your personal data.

f) Depending on your location, you have various rights regarding your personal data, which we detail in this Policy.

g) We comply with international data protection regulations, including GDPR, CCPA, LGPD, and others as applicable.

KEY DEFINITIONS

To better understand the protection we apply to your personal data, the limits of our use, and your rights, please review these important definitions:

Anonymization: The process of removing personal identifiers from data so that individuals cannot be identified. Anonymized data is not personal data.

Controller: The entity responsible for making decisions about the processing of personal data. In this case, it's Janne.

Data Subject: An identified or identifiable natural person to whom the personal data relates. You are the data subject of your personal data.

Deep Connection Information: Information about relationships, interaction history, preferences, and other data used to foster meaningful professional connections.

Personal Data: Any information relating to an identified or identifiable natural person. Examples include your name, date of birth, phone number, address, email, profile pictures, and in some cases, usage data and online identifiers.



Platform: Janne's website, mobile applications, WhatsApp integration, and any other software and/or device owned and/or contracted by Janne to perform its activities and offer its services to you.

Processing: Any operation performed on personal data, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, dissemination, combination, restriction, erasure, or destruction.

Processor: A natural or legal person, public authority, agency, or other body that processes personal data on behalf of the controller.

Special Categories of Personal Data: Sensitive personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, or data concerning a person's sex life or sexual orientation.

DATA SUBJECT RIGHTS AND HOW TO EXERCISE THEM

Depending on your location and applicable laws, you may have some or all of the following rights regarding your personal data:

a) **Right to be Informed:** You have the right to be informed about the collection and use of your personal data, including the purposes for processing your data, retention periods, and who it will be shared with.

b) **Right of Access:** You have the right to obtain confirmation that your personal data is being processed and to access your personal data.

c) **Right to Rectification:** You have the right to have inaccurate personal data rectified or completed if it is incomplete.

d) **Right to Erasure (Right to be Forgotten):** In certain circumstances, you have the right to request the deletion of your personal data. However, we



cannot delete personal data that is necessary to comply with legal obligations.

e) **Right to Restrict Processing:** You have the right to request the restriction or suppression of your personal data in certain circumstances.

f) **Right to Data Portability:** You have the right to obtain and reuse your personal data for your own purposes across different services.

g) **Right to Object:** You have the right to object to the processing of your personal data in certain circumstances, including processing for direct marketing.

h) **Right Not to be Subject to Automated Decision-making:** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

i) **Right to Withdraw Consent:** Where we rely on your consent to process your personal data, you have the right to withdraw that consent at any time.

To exercise any of these rights, you can contact us at privacy@janne.ai. We will respond to your request within the timeframe required by applicable law, typically within 30 days. We may ask you to verify your identity before responding to your request.

LEGAL BASIS FOR PROCESSING

We aim to process your personal data in accordance with applicable data protection regulations that may include, depending on your location and our operations:

a) The General Data Protection Regulation (EU) 2016/679 (GDPR), where applicable



- b) The California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), where applicable
- c) The Brazilian General Data Protection Law (LGPD) – Law No. 13,709/2018, where applicable
- d) The UK Data Protection Act 2018 and UK GDPR, where applicable
- e) Other applicable national and regional data protection laws

The specific laws that apply to your data will depend on your location and the context of data processing.

We only process your personal data when we have a valid legal basis to do so. The legal basis for our processing of personal data will be one of the following:

- a) **Consent:** You have given clear consent for us to process your personal data for a specific purpose.
- b) **Contractual Necessity:** The processing is necessary for the performance of a contract we have with you, or to take steps at your request before entering into a contract.
- c) **Legitimate Interests:** The processing is necessary for our legitimate interests or the legitimate interests of a third party, except where such interests are overridden by your fundamental rights and freedoms.
- d) **Legal Obligation:** The processing is necessary for us to comply with a legal obligation.
- e) **Vital Interests:** The processing is necessary to protect someone's life.
- f) **Public Interest:** The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.



PURPOSES OF PERSONAL DATA PROCESSING

Below are the personal data we may collect and store and what we intend to do with them. We will use your personal data according to the purposes listed below:

PERSONAL DATA	PURPOSE
Name, Email address, Phone number	To enable registration on the Platform and maintain contact with you.
Name, Address, Email address, ID documents, Phone number, e-mails and calendar data	To provide AI networking assistant services, manage professional connections, and offer additional features through our Platform or our partners.
Contact details, professional history, communication preferences, interaction data	To generate insights and recommendations to help you build and maintain professional relationships.
Location data, device information, IP address	To improve our services, provide location-based features, and ensure security.
Usage data, analytics, behavioral data	To enhance user experience, develop new features, and improve the Platform.

The personal data indicated above will be retained in our system as long as necessary to fulfill the described purposes and to comply with legal obligations.

LIMITATIONS ON THE COLLECTION, USE AND DISTRIBUTION OF PERSONAL DATA

When collecting personal data, Janne:



- a) Will not use your personal data for marketing purposes without first requesting your consent.
- b) Will take all appropriate measures, through contract or other means, to provide adequate protection to personal data that is transferred to third parties.
- c) Will only use the personal data collected for the purposes described in this Policy.
- d) Will implement data minimization principles to collect only what is necessary for the stated purposes.
- e) Will not process special categories of personal data unless explicitly permitted by law or with your explicit consent.
- f) Will provide transparent information about our data processing activities.

INTERNATIONAL DATA TRANSFERS

Your personal data may be stored and processed outside your country of residence, which, according to national legislation, constitutes an "international data transfer." By agreeing to this Policy, you understand and consent to such transfers. We ensure that your data will also be protected and well cared for overseas.

Janne will only transfer your personal data to countries, international organizations, or third parties that provide an adequate level of protection similar to that provided by the legislation of your country of residence. We will always take appropriate measures to ensure that your data is secure.

You can request more information about these safeguards by contacting us at privacy@janne.ai.



SECURITY MEASURES TO PROTECT PERSONAL DATA

Janne implements organizational, physical, technical, and administrative measures to protect your personal data under our control. We adopt security measures designed to protect against unauthorized access, alteration, disclosure, or destruction of your personal data.

These measures may include reviews of our data collection, storage, and processing practices, as well as security measures to protect against unauthorized access to systems where we store personal data. However, please note that no method of transmission over the internet or method of electronic storage is completely secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

If you have reason to believe that your interaction with us is no longer secure, please immediately notify us at the contact information provided in this policy. In the event of a security breach that affects your personal data, we will notify you in accordance with applicable laws.

Our security measures may include:

- a) Encryption of data in transit and at rest
- b) Security assessments
- c) Access controls and authentication requirements
- d) Employee training on data protection and security
- e) Incident response procedures
- f) Data backup procedures



THIRD-PARTY SERVICES AND SITES

This Policy does not address, and we are not responsible for, the privacy practices of third parties, including any third party operating any site to which our Platform links. The inclusion of a link on our Platform does not imply endorsement of the linked site by Janne.

When using our services, particularly our WhatsApp integration, you acknowledge that certain information may be processed in accordance with WhatsApp's own privacy policies and terms of service.

We recommend that you examine the privacy policy of any site you visit before using them or providing personal data.

DATA RETENTION

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Different types of personal data may be kept for different periods, depending on the purpose for processing. In determining the appropriate retention period for personal data, we consider:

- a) The amount, nature, and sensitivity of the personal data
- b) The potential risk of harm from unauthorized use or disclosure of your personal data
- c) The purposes for which we process your personal data and whether we can achieve those purposes through other means
- d) The applicable legal, regulatory, tax, accounting, or other requirements



When we no longer need to use your personal data, we will either delete it from our systems or anonymize it so that it can no longer be associated with you.

SPECIAL PROVISIONS FOR SPECIFIC REGIONS

European Economic Area (EEA) and United Kingdom

If you are located in the EEA or the UK, the GDPR or UK GDPR (as applicable) provides you with specific rights regarding your personal data. In addition to the rights outlined in the "Data Subject Rights" section, you also have:

- a) **Right to Lodge a Complaint:** You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or place of the alleged infringement.
- b) For transfers of data to the United States or other countries without an adequacy decision, we implement appropriate safeguards as described in the "International Data Transfers" section.

United States

California

Under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), California residents have the right to:

- a) Know what personal information is being collected about them
- b) Know whether their personal information is sold or disclosed and to whom
- c) Say no to the sale of their personal information
- d) Access their personal information
- e) Request deletion of their personal information
- f) Not be discriminated against for exercising their privacy rights



- g) Correct inaccurate personal information
- h) Limit the use and disclosure of sensitive personal information

Virginia, Colorado, Connecticut, Utah, and Other States

Residents of states with comprehensive privacy laws may have additional rights similar to those provided under the GDPR and CCPA. Please contact us for specific information regarding your state.

Brazil

Under the Brazilian General Data Protection Law (LGPD), you have rights similar to those under the GDPR, including the right to:

- a) Confirmation of the existence of processing
- b) Access to your data
- c) Correction of incomplete, inaccurate, or outdated data
- d) Anonymization, blocking, or deletion of unnecessary or excessive data
- e) Portability of data to another service provider
- f) Deletion of data processed with consent
- g) Information about public and private entities with which the controller has shared data
- h) Information about the possibility of not providing consent and the consequences
- i) Revocation of consent

CHILDREN'S PRIVACY

Our Platform is not directed to individuals under the age of 18, and we do not knowingly collect personal data from children. If we learn that we have



collected personal data from a child, we will take steps to delete that information as quickly as possible.

If you believe that we might have any information from or about a child, please contact us at privacy@janne.ai.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time in response to changing legal, technical, or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws. You can see when this Privacy Policy was last updated by checking the "Last Updated" date displayed at the top of this Privacy Policy.

CONTACTING THE DATA CONTROLLER

If you have any questions about this Privacy Policy, please contact us at:

Email: privacy@janne.ai

Data Protection Officer: dpo@janne.ai

If you wish to review, correct, update, suppress, restrict, or delete your personal data, object to the processing of your personal data, or if you wish to receive an electronic copy of your personal data for purposes of transmitting it to another company, you may contact us through the means provided above.



AMENDMENT CONTROL

DATE	VERSION	DESCRIPTION OF CHANGE
May, 2025	1.0	Original Version