

JFDI Services Ltd / Mind My Business Privacy Policy

Introduction

MMB is committed to protecting the privacy of the personally-identifiable information that we collect from you as you use this Web site (the “Site”) and the Application (together the “Sites”). We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage. The scope of MMB’s commitment is detailed in this Privacy Policy. By submitting information, you agree to MMB’s use of such information as described herein.

This policy should be read in combination with our TOS.

Who are we

We are JFDI Services Ltd, also trading as Mind My Business of Donard Demesne, Donard, Co. Wicklow, W91 CF34, Ireland. Our data protection officer may be contacted in writing at this address.

What personally-identifiable information is collected?

MMB collects personally-identifiable information (“Personal Information”) on certain areas of the Sites when users access, register, request information or a response, enter data about Contacts in the Application and participate in user posting areas, such as bulletin boards, discussion forums, and surveys. The personally-identifiable information collected may include, without limitation, your email address, password, company or other affiliations, and contact information (names, mailing and e-mail addresses, phone and fax numbers).

For registered Mind My Business users we will hold all of your system access and usage data, invoicing and payment records, support data and all communications with us.

We do not hold any personally sensitive data about you. We do not hold bank account or credit/payment numbers of our users. Stripe collects and holds these and as a result hold a token which solely allows us to collect the monthly amounts due. We do hold bank account numbers for some of our suppliers and creditors for the purpose of making payments to them.

How may my Personal Information be used?

MMB uses your Personal Information for

- contacting our Subscribers and Users to assist with the registration and set up process
- processing necessary for the performance of our contract with you, including invoicing our Subscribers and collecting payments due
- processing in order for us to pursue our legitimate interests
- processing that is required under law
- Aggregate Market Research to identify trends of how our system is used and as a result make improvements for the benefits of our Subscribers and Users
- marketing to you – where you have given us permission
- product research – where you have given permission

- any other purpose which you have given permission for
- providing support to our Subscribers and Users

MMB may also use Personal Information in analysing the Sites' user behaviour in order to measure interest in specific items posted on our Sites. The e-mail addresses provided at registration allow MMB to send e-mail to individuals based on the areas of interest that they indicate during the registration process or in connection with the operation of the Application.

If you do not wish to receive e-mails from us, simply follow the instructions you receive in any such email or send a reply email to the sender.

From time to time we may change the way we use or store your information. Where we believe you may not reasonably expect such a change we will notify you in advance.

Where and How long do we hold your information?

Your data is stored on the dbFLEX servers in the Netherlands¹ of our hosting partner Foresoft Corporation, a US company. We do weekly backups of this data to local servers which we generally delete after a year.

We may also hold some data about you where we have email traffic with you. This data is held on our email servers which are in turn hosted by Microsoft Corporation in their Office 365 System and by Blacknight. In exceptional cases we may hold data about you in Microsoft XL or Word files which are stored on our locally and in Microsoft OneDrive or in other similar services, for example GDrive, IDrive, DropBox requested and provided by you.

We will store your information at least for the duration of any customer relationship we have with you, or as otherwise required by law (normally up to a maximum of 7 years for legal and tax reasons).

Due to various data integrity constraints of our Mind My Business system underlying user accounts cannot be entirely deleted but can be cleared of any personally identifiable data by logging on and clearing the information.

The arrangements described in the link to dbFLEX in the Security section of this policy also apply.

Is personally-identifiable information disclosed to third parties?

MMB will not intentionally disclose (and will take commercially reasonable steps to prevent the accidental disclosure of) your Personal Information to third parties (i.e., persons or entities that are not affiliates of MMB), whether for such third parties' marketing purposes or otherwise, subject only to the following four exceptions:

- MMB may disclose your Personal Information to third parties as required or permitted by the laws, rules, and regulations of any nation, state, or other applicable jurisdiction;
- MMB may disclose your Personal Information to third parties who deliver information from us to you for the purpose of performing such delivery;
- MMB may disclose your Personal Information if, in connection with submitting the information, you consent to such disclosure;

¹ Up until 16th October 2020 Foresoft servers were located in the US.

- MMB may disclose contact information for you in response to inquiries by bona-fide rights owners in connection with allegations of infringement of copyright or other proprietary rights arising from information you have posted on the Site or otherwise provided to MMB;

If MMB and/or any of its affiliates merges with or sells substantially all of its assets or a majority of its equity to a third party, information collected by MMB or such affiliates on their Web sites may be disclosed to and owned by the merged entity or third party.

We will give third party providers who supply services to us, or who process information on our behalf, incidental access to your information but will always take steps to ensure their security measures are adequate to protect your information.

Any credit or debit card details are collected and stored by our payment provider (currently Stripe) and your card issuer. Our payment processor has the sole and complete responsibility for the storage of credit card data. We do not store your credit card information.

How can I access, change, and/or delete information?

You have a right to receive a copy of the information held by us about you. You furthermore in certain circumstances have the right to have the information held by us about you corrected or deleted. To exercise such rights please contact us at support@mindmybusiness.ie.

Before we agree to your request, you must provide us with sufficient evidence of your identity and sufficient details of the information you wish to see to enable us to locate it.

You can change your communication preferences by editing these your self within the Mind My Business application or by emailing us at support@mindmybusiness.ie

Any complaints about how you perceive we are managing your data should be emailed to us at support@mindmybusiness.ie

Children's on-line privacy protection

MMB understands the importance of protecting children's privacy, especially in an on-line environment. The Site is not intentionally designed for or directed at children 13 years of age or younger, and MMB will not intentionally collect or maintain information about anyone under the age of 13.

Consent

By using the Site, you consent to the collection, use, and storage of your information by us in the manner described in this Privacy Policy and elsewhere on the Site. We reserve the right to make changes to this Privacy Policy from time to time. We will alert you to any such changes by updating this Privacy Policy.

Contact our Privacy Department

If you have any questions about our Privacy Policy, please e-mail us at support@mindmybusiness.ie.

Security

MMB has implemented generally accepted standards of technology and operational security in order to protect Personal Information from loss, misuse, alteration, or destruction. Only authorised MMB personnel are provided access to Personal Information and such persons are required to treat this

information as confidential. Despite these precautions, MMB cannot guarantee that unauthorised persons will not obtain access to your Personal Information.

Our Mind My Business application is hosted on the dbFLEX system provided by Foresoft Corporation, a US company. More information about their security arrangements can be found on their web site at <https://www.dbflex.net/privacy.html>

Trans-border hosting and transfer of information

Personal Information collected on the Sites may be transferred from time to time to MMB offices located throughout the world, including offices located outside the European Economic Area (EEA), and the Sites may be viewed and hosted anywhere in the world, including countries (such as the United States) that may not have laws regulating the use and transfer of personally-identifiable data. By using the Sites and submitting such information on them, you voluntarily consent to such trans-border transfer and hosting of such information.

Notification of Privacy Statement Changes

We may update this privacy statement to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Links to third-party sites

We may provide links to third-party Web sites as a service to our users. In addition, some of the content appearing to be on this Site is or may be in fact supplied by third parties, for example, in instances of framing of third-party Web sites or incorporation through framesets of content supplied by third-party servers. We cannot control and are not responsible for the information collection and privacy practices of such third-party Web sites, which may differ from those of this Site.

Data controlled by Mind My Business subscribers and users

Users of the Mind My Business application may also use this to store personal information about their contacts. In this case we act only as the Data Processor and our Subscribers are the Data Controllers. How this data is used is outside of our control. We will only access such data on the request of our Subscribers/Users on their request for support purposes. In general, and most importantly when they delete the data the arrangements described in the link to dbFLEX in the Security section of this policy apply.

Google Remarketing

MMB uses Google Remarketing campaigns to advertise to visitors while they browse other sites across the internet. Third party vendors, such as Google, use cookies to track your visit to this website in order to serve relevant ads during your future browsing sessions of the internet.

For more information or to opt out of Google's use of cookies visit the Google ad settings centre.