

JANRAIN PRIVACY PROGRAM

Janrain has implemented a privacy program as a framework to help us maintain compliance with the laws applicable to our business and to meet our privacy-related contractual commitments. The program is also aimed at building and retaining the trust of our clients and others, including our employees, whose personal data we process based on respect for their privacy concerns and our protection of personal data with appropriate security safeguards.

Janrain's CEO has charged the company's Chief Privacy Officer (its general counsel and Vice President of Privacy) with managing the program, and the company's senior leadership with ensuring that program requirements are met.

OUR PROGRAM HAS FOUR MAIN COMPONENTS:

Awareness

- Promote a culture of respect for, and thoughtful consideration of, privacy and personal data protection throughout Janrain.
- Communicate timely information about changes in privacy laws, regulations, and standards that affect our business.

Policies and Procedures

- Implement privacy protection policies and related operational procedures (in harmony with our Information Security Management System policies and protocols) that ensure how we handle personal information complies with the law and meets our business commitments and needs. Address program governance, accountability, incident response, and the handling of privacy related requests.
- Utilize privacy by design tools to timely raise, consider, and address privacy concerns at the early stage of product development.

Training

- Conduct trainings designed to support the Awareness and Policy and Procedures components and to provide employees and contractors with privacy-related information pertinent to their roles and responsibilities.

Accountability and Transparency

- Maintain accountability standards consistent with those articulated by the Organization for Economic Co-operation and Development in its Guidelines Governing the Protection of Privacy and Transborder Flows of Personal Data revised in 2013.
- Communicate with our employees, clients, contractors, and the public about the program and our privacy practices.
- Establish, track, and report on key program performance indicators.
- Periodically verify privacy and data protection compliance through assessments and audits.
- Review program components and report to company leadership to ensure they are informed on progress and issues that need to be addressed.

Our program is subject to ongoing review and revision as needed to better support program goals.