Privacy Policy

AMT-Sybex Limited is part of the Jonas family of companies (hereinafter used as “Jonas” or “we” or “us” or ”our”). We are committed to protecting your privacy. There are various ways you might interact with Jonas, and the information you provide when doing so allows us to improve our services.

This website, our related websites and any mobile site or mobile application that link to this Privacy Policy (individually, the “Site” and collectively “Sites”) are owned and operated by AMT-Sybex Limited with its principal place of business at Jonas House, Hithercroft Road, Wallingford, Oxfordshire, OX10 9BT, UK. AMT-Sybex Limited is wholly owned by Jonas Computing (Uk) Limited.

This policy explains:

- What information we collect, and why we collect it
- How we use that information
- How we protect that information
- How you can control your information, including accessing, updating, and deleting what we store; and
- How we share information collected

Acceptance

You should review this policy carefully, and be sure you understand it, prior to using the Site. Your use of the Site is deemed to be acceptance of this policy. If you do not agree to this policy, you should not use, and should immediately terminate your use of, the Site. For purposes of this policy, accessing the Site only to review this policy is not deemed to be use of the Site.

Information We Collect

Information Voluntarily Provided

We may collect or record basic personal data which you voluntarily provide through completing forms on the Site, through questions you send to us, or through other means of communication between you and us. The categories of personal information you provide may include:

- First and last name
- Job title and company name
- Email address
- Phone number
- Mailing address
- Password to register with us
- Your personal or professional interests
- Any other identifier that permits us to contact you

Information from Site Visits

We collect, store, and use information about your visits to the Sites and about your computer, tablet, mobile or other device through which you access the Sites. This includes the following information:

- Technical information, including the Internet protocol (IP) address, browser type, internet service provider, device identifier, your login information, time zone setting, browser plug-in types and versions, operating system and platform, and geographical location; and

- Information about your visits and use of the Site, including the full Uniform Resource Locators (URL), clickstream to, through and from the Site, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), and Site navigation and search terms used.

Employee Information

We also collect personal information from our employees and from job applicants in connection with administration of our human resources programs and functions, including, with respect to: job applications and hiring programs, compensation and benefit programs, performance appraisals, training, access to our facilities and computer networks, employee profiles, employee directories, human resource recordkeeping, and other employment related purposes. It is our policy to use commercially reasonable efforts to keep all past and present employee information from disclosure to third parties. There are certain business-related exceptions, and they are: to comply with requests from governmental or regulatory authorities; inquiries from third parties with a signed authorisation from the employee to release the information, except in situations where limited verbal verifications are acceptable; and third parties with which we have contractual agreements to assist in administration of company-sponsored benefits. Prospective employers, government agencies, financial institutions, and residential property managers routinely contact us requesting information on a former or current employee's work history and salary. All such requests of this type shall be referred to and completed on a confidential basis by the human resources department or payroll department.

Purposes for which we will Process Information	Legal Basis under the UK GDPR, if applicable, for Processing
• To provide you with information and materials that you request from us.	It is in our legitimate interests to respond to your queries and provide any information and materials requested in order to generate and develop business. To ensure we offer an efficient service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.
• To personalise our services and products and the Sites to you.	It is in our legitimate interests to improve the Site in order to enhance your experience on the Site, to facilitate system administration and better our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you.
• To update you on services, products and benefits we offer.	It is in our legitimate interests to market our services and products. We consider this use to be proportionate and will not be prejudicial or detrimental to you. For direct marketing sent by email to new contacts (i.e. individuals who we have not previously engaged with), we need your consent to send you unsolicited direct marketing. Known as Opting in.
• To send you information regarding changes to our policies, other terms and conditions and other administrative information.	It is in our legitimate interests to ensure that any changes to our policies, other terms and administrative information are communicated to you. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.
• To administer the Sites including troubleshooting, data analysis, testing, research, statistical and survey purposes; • To help keep the Sites safe and secure.	For all these categories, it is in our legitimate interests to continually monitor and improve our services and your experience of the Sites and to have network security. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.
• To measure or understand the effectiveness of any marketing we provide to you and others, and to deliver relevant marketing to you.	It is in our legitimate interests to continually improve our offering and to develop our business. We consider this use to be necessary in order to effectively generate business and will not be prejudicial or detrimental to you. For direct marketing sent by email to new contacts (i.e. individuals who we have not previously engaged with), we need your consent to send you unsolicited direct marketing. Known as Opting in.
• To enforce the terms and conditions and any contracts entered into with you.	It is in our legitimate interests to enforce our terms and conditions of service. We consider this use to be necessary for our legitimate interests and proportionate.

Jonas Software as Data Controller

As a data controller, we will only use your personal data in compliance with applicable law. For example, under the UK GDPR, we may be required to have a legal basis for processing your personal data. The purpose for which we use and process your information and the legal basis on which we carry out each type of processing is explained in the table above(?). Note that we may process your personal data for more than one legal basis.

Updating Your Information And Opting Out

If you do not wish to provide us with your personal data and processing such data is necessary for the performance of a contract with you and to fulfil our contractual obligations to you, we may not be able to perform our obligations under the contract between us. Where you provide consent, you can withdraw your consent at any time and free of charge, but without affecting the lawfulness of processing based on consent before its withdrawal. No withdrawal of consent will be effective until we receive it and have had a reasonable period of time to act on it. You can update your details or change your privacy preferences by contacting us as provided in "Contacting Us" below.

To review, correct, update, delete, object, or otherwise limit our use of your personal data that has been provided to us, or request portability and/or details of your personal data that is held by us, please contact us using the contact information listed below in the "Contacting Us" section and clearly describe your request.

If you have registered for an account with us, you can help to ensure that your personal data is accurate and up to date by logging into your account and updating your personal data.

You may unsubscribe from marketing communications at any time by clicking the "Unsubscribe" button available at the bottom of any electronic communication we may send to you. You may also unsubscribe from any medium of communication by contacting us using the information set out in the "Contacting Us" section below.

Jonas Software As Data Processor

In certain cases, we also operate as a data processor and we collect, process, and transfer personal data on behalf of our business customers in the provision of our services and products. In these circumstances, Jonas Software is acting as a data processor and our business customers remain the data controller in respect of personal data they provide to us.

Our business customers remain the data controllers with respect to any personal data that they provide to us for our provision of services. To the extent that we are acting as data processor, we act in accordance with the instructions of such customers regarding the collection, processing, storage, deletion, and transfer of customer data, as well as other matters such as the provision of access to and rectification of personal data. We will only use such personal data for the purposes of providing the services and products for which our business customers have engaged us.

Our business customers are responsible for ensuring that these individuals' privacy is respected, including communicating to the individuals in their own privacy policies who their personal data is being shared with and processed by. Where Jonas Software is acting as a data processor, we will refer any request from an individual for access to personal data which we hold about them to our customer. We will not usually respond directly to the request.

As a data processor, we may share personal data where instructed by our business customer. Where authorised by the business customer, we may also share personal data with third party service providers who work for us and who are subject to security and confidentiality obligations.

We will retain personal data which we process on behalf of our customers for as long as appropriate to provide services and products to our customers and in accordance with any agreement with our customers or as permitted by applicable law.

Disclosure Of Your Personal Data To Third Parties

We may share your personal data with our group companies, affiliates, subsidiaries, or contractors as appropriate to carry out the purposes for which the information was supplied or collected (i.e. to provide the services and products you have requested from us) or as otherwise provided in this policy. Personal data will also be shared with our third-party service providers and business partners who assist with the running of the Sites and our services and products (including hosting providers, email service providers and payment processing partners). Our third-party service providers and business partners are subject to security and confidentiality obligations and are only permitted to process your personal data for specified purposes and in accordance with our instructions.

In addition, we may disclose personal data about you when we believe that such use or disclosure is reasonably appropriate to: comply with any legal or regulatory obligation; enforce the terms of our agreements; establish, exercise or defend the rights of Jonas Software, our staff, customers or others; protect our rights, property, safety or vital interests, or the rights, property, safety or vital interests of our users or other third parties; and implement the purchase of all or substantially all of our assets, a merger, or other similar transaction that results in a change of control.

UK GDPR Compliance

We are committed to protecting your personal data and complying with the UK GDPR and all other applicable UK data protection and privacy legislation. We process data lawfully, securely, and only for specified purposes, ensuring transparency and respecting your rights. You can access, rectify, or erase your data, and you have the right to object to processing (these rights are further explained below).

International Transfers

If you are based in the UK, or EEA

We may share your personal data within the Jonas group of companies. This involves transferring your data outside the European Economic Area (EEA) to Jonas' affiliates and third-party service providers in Canada, United States, Australia, New Zealand, South Africa, and Malaysia. Canada and New Zealand have been deemed by the EU as having an adequate level of protection for personal data.

Whenever we transfer your personal data outside the EEA to the countries identified above which have not been deemed by the EU to have an adequate level of protection for personal data, and specifically to the United States, we ensure a similar degree of protection is afforded to it by using standard data protection clauses approved by the European Commission.

Security Of Your Personal Data

The security of your personal data is important to us. We follow generally accepted industry standards to protect the personal data received by us. We use commercially reasonable measures to safeguard personal data, which measures are appropriate to the type of information maintained and follow applicable laws regarding the safeguarding of any such information under our control. No method of transmission over the Internet, or method of electronic storage, can be 100% secure. Therefore, we cannot guarantee the absolute security of your personal data. The Internet by its nature is a public forum, and we encourage you to use caution when disclosing information online.

Often, you are in the best situation to protect yourself online. You are responsible for protecting your username and password from third party access, and for selecting passwords that are secure.

Data Retention: How Long We Keep Your Personal Data

We will retain personal data which we process on behalf of our customers for as long as appropriate to provide services and products to our customers in accordance with any agreement in place with our customers and for other legitimate purposes. When you contact us, we may keep a record of personal data contained in your communication to help solve any issues that you might be facing. Your personal data may be retained for as long as appropriate to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirement, and for other legitimate purposes. In determining how long we will retain personal data; we will consider all relevant factors.

Your Rights

You may request from us access to, correction of, blocking of and/or deletion of your personal data in line with applicable law. You may also withdraw your consent for us to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. Where your personal data is processed by us with your consent or for the performance of a contract by automated means, we will, to the extent required by applicable law, provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format upon request.

Responding To Requests

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights) under applicable law. This is a security measure to protect personal data from being disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. You will not have to pay a fee to access your personal data (or to exercise any of your other rights) under applicable law. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances. Also, please note that we may refuse a request for blocking and/or deletion where continued processing is necessary to comply with a legal obligation or necessary for the establishment, exercise, or defence of legal claims or for other purposes permitted by applicable law.

Use Of Cookies

We may collect data in connection with your use of the Sites using small files commonly known as “cookies”. Cookies are a technology that can be used to help personalise your use of a website. A cookie is a small amount of data which often includes a unique identifier that is sent to your computer, mobile phone (your “device”)from the Sites and is stored on your device’s browser or hard drive. We may also collect data that your browser sends to us, such as your IP address, browser type, location, language, access time and referring website addresses. Such data may be used to analyse trends, to administer the Site, to track your movements around the Site and to gather demographic data about our visitor base as a whole. The data gathered by these cookies is in the form of aggregated anonymous data.

By continuing to browse the Sites, you are agreeing to our use of cookies.

If you don't want us to use cookies when you use the Sites, you can set your browser to not accept cookies or notify you when you receive a cookie, giving you the chance to decide whether to accept it or decline at any time. However, if you block cookies some of the features on the Sites may not function as a result.

You can find more information about how to do manage cookies for all the commonly used internet browsers by visiting www.allaboutcookies.org. This website will also explain how you can delete cookies which are already stored on your device.

We currently use the following cookies:

Category	Name	Use
Strictly necessary cookies	• csrf_token • TERMLY_API_CACHE	These cookies are necessary to protect against hacking and malicious actors and to remember a user's cookie settings.
Performance cookies		
Functionality cookies	• wpEmojiSettingsSupports	This cookie is utilized to enable emoji support on pages using Wordpress.
Analytic cookies	• _ga • _ga_#	These cookies collect data to help us understand how our visitors use the site and how we can improve the site.
Third-party targeting and advertising cookies, including social media sharing		
Architecture cookies		

We are obliged by Google Analytics to state the following:

The Sites' use Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the Sites analyse how users use the Sites. The information generated by the cookie about your use of the Sites (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Sites, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of the Sites. By using the Sites, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

IP Addresses And Aggregate Information

An Internet Protocol ("IP") address is associated with your computer's connection to the internet. We may use your IP address to help diagnose problems with our server, to administer the Site and to maintain contact with you as you navigate through the Site. Your computer's IP address also may be used to provide you with information based upon your navigation through the Site. Aggregate information is used to measure the visitors' interest in, and use of, various areas of the Site and the various programs that we administer. We will rely upon aggregate information, which is information that does not identify you, such as statistical and navigational information. With this aggregate

information, we may undertake statistical and other summary analyses of the visitors' behaviours and characteristics. Although we may share this aggregate information with third parties, none of this information will allow anyone to identify you, or to determine anything else personal about you.

Links To Third Parties

Our Sites may contain links to third party websites. These third-party websites are operated by companies that are outside of our control, and your activities at those third-party websites will be governed by the policies and practices of those third parties. Jonas Software does not in any way endorse or make any representations about such third-party websites and applications. As such, Jonas Software is not responsible for the privacy practices or content of such third-party websites and applications that are subject to their own privacy policies. If you choose to access such links, we encourage you to review all third-party site privacy policies before submitting any of your personal data.

Social Media And Online Engagement

We occasionally use a variety of new technologies and social media options to communicate and interact with customers, potential customers, employees, and potential employees. These sites and applications include popular social networking and media sites, open source software communities and more. To better engage the public in ongoing dialog, certain of our businesses use certain third-party platforms including, but not limited to, Facebook, X, LinkedIn, Instagram, Pinterest, and Google+. Third-Party Websites and Applications (TPWA) are Web-based technologies that are not exclusively operated or controlled by us. When interacting on those websites, you may reveal certain personal data to us or to third parties. Other than when used by our employees for the purpose of responding to a specific message or request, we will not use, share, or retain your personal data.

- The Facebook data policy is available at: http://www.facebook.com/policy.php
- The X privacy policy is available at: http://x.com/privacy
- The LinkedIn privacy policy is available at: https://www.linkedin.com/legal/privacy-policy
- The Instagram data policy is available at: https://privacycenter.instagram.com/policy/?section_id=0-WhatIsThePrivacy
- The Pinterest privacy policy is available at: https://policy.pinterest.com/en/privacy-policy
- The Google privacy policy is available at: https://policies.google.com/privacy?hl=en

Age

We do not sell our services to children, and the Site is not intended for or directed at children under the age of 16 years. As such, the Sites are designed for adult user interaction. We do not intentionally collect personal data from children under the age of 16. If you believe that we may have collected personal data from someone under the age of 16 without proper consent, please let us know using the methods described in this policy.

California

We will, to the extent required by any applicable law, disclose, delete or take any other action with respect to any of personal data that is collected by us from residents of California. Residents of California may make a request pursuant to the California Consumer Privacy Protection Act (the "California Act") to have us, among other things:

Disclose to you:

(a) The categories of your personal data that is collected by us;
(b) The categories of sources from whom or which such personal data is collected by us;
(c) The purposes for our collecting such personal data;
(d) The categories of third parties to whom or which we transfer such personal data;
(e) The specific pieces of such personal data collected by us; and
(f) If such personal data is sold or disclosed for a business purpose to a third party, the categories of such personal data that are sold or disclosed for a business purpose, and the categories of third parties to which or whom such personal data are sold or disclosed for a business purpose; and

Except in certain circumstances, delete your personal data that is collected by us.

Any such request by an individual under the California Act (1) can only be made twice in a 12-month period, (2) will require the collection of certain information by us to verify the identity of such individual, and (3) can be submitted to us at the toll-free number listed on the home page of the Site. We will respond to any such request within 45 days after receiving it.

The California Act requires certain additional disclosures that can be found at this link https://jonassoftware.com/california-disclosures.

We will not discriminate against any individual for exercising any right made available to such individual under the California Act.

General Data Protection Regulation

Subject to certain limitations and exceptions, if you are in the UK or European Economic Area, you have the following rights under the GDPR:

- **Access to personal data**. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Correction of personal data.** This enables you to have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of personal data (Right to be forgotten).** This enables you to ask us to delete personal data when there is no good reason for us continuing to process it. You also have the right to ask us to delete your personal data when you have successfully exercised your right to object to processing (see below), when we may have processed your information unlawfully or when we are required to erase your personal data to comply with applicable law.

When rights to be forgotten can be overridden

However, an organisation's right to process someone's data might override their right to be forgotten. Here are the reasons cited in the GDPR that trump the right to erasure:

- The data is being used to exercise the right of freedom of expression and information.
- The data is being used to comply with a legal ruling or obligation.
- The data is being used to perform a task that is being carried out in the public interest or when exercising an organization's official authority.
- The data being processed is necessary for public health purposes and serves in the public interest.

- The data being processed is necessary to perform preventative or occupational medicine. This only applies when the data is being processed by a health professional who is subject to a legal obligation of professional secrecy.
- The data represents important information that serves the public interest, scientific research, historical research or statistical purposes and where erasure of the data would likely to impair or halt progress towards the achievement that was the goal of the processing.
- The data is being used for the establishment of a legal defence or in the exercise of other legal claims.

Restriction of processing personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) when our use of personal data is unlawful, but you do not want us to erase it; (c) when you want us to hold personal data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of personal data, subject to our verifying whether we have an overriding legitimate interest to continue using it.

Request transfer of personal data. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Right to withdraw consent. You can withdraw your consent at any time when we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Complaints

If we receive formal written requests or complaints, we will follow up with the party making the request or complaint. To the extent required by applicable law, where we would not properly address properly your request, you have the right to lodge a complaint with the competent data protection authority in your locality (for example, in the UK, the supervisory authority would be the Information Commissioner's Office).

Otherwise, any complaint by you regarding personal data or otherwise relating to this policy must first be submitted to Jonas as set forth in the Contacting Us section and Jonas must be given a reasonable opportunity of not less than 30 days to investigate and respond to your complaint. Upon our completing such investigation and so responding, we and you must then, in good faith, attempt to promptly resolve any remaining aspects of your complaint. If any aspect of your complaint remains unresolved after an additional reasonable period of not less than 30 days, you may commence litigation against us in connection with the unresolved portion of your complaint only in a court located in the county (or other similar municipality) in which Jonas is located. You consent to any such court being a proper venue for such litigation and waive any right to object to such venue for inconvenience or otherwise.

Contacting Us

We have appointed a Data Protection Contact who you can reach out to about any queries you may have in relation to this policy. If you have any questions about this policy or your information, or to exercise any of your rights as described in this policy or under applicable laws, you can contact us as follows:

If you are not located in the UK or European Economic Area:

Gary Jonas Computing Ltd.
8133 Warden Avenue, Suite 400
Markham, Ontario
Canada, L6G 1B3

Email: Privacy@JonasCorporate.com

If you are located in the UK or European Economic Area:

Jonas Computing Ltd.
Hithercroft Road,
Wallingford, Oxfordshire,
OX10 9BT, UK

Email: Privacy@JonasCorporate.com

Changes To This Policy

We may change this policy from time to time. If this policy changes, the revised policy will be posted at the "Privacy Policy" link on the Site's home page. In the event that the change is significant or material, we will notify you of such a change by revising the link on the home page to read "Newly Revised Privacy Policy." Please check this policy on the site frequently. Your continued use of the Site constitutes acceptance of such changes in this policy, except where further steps are required by applicable law. This policy was last updated on the date set out at the end of the policy.

LAST UPDATED: 20 August 2025