



ATTACHMENT 4

Ipsos Online Panel Privacy Policy

Ipsos has a Privacy Policy in place. Potential panelists can view our extensive Privacy Policy at the time of panel registration. As well, the standard introduction to our survey invitation includes a link to the policy and reminds panelists that we hold all information provided to us in the strictest of confidence.

Please refer to Appendix A for the complete Private Policy for NA.

Our personally identifiable information collection and emailing practices have been audited and are certified to comply with all relevant privacy and spam laws by the three premier online trust authorities ([TRUSTe](#), [Habeas](#), and [Sender Score](#)). Compliance with the Children's Online Privacy Protection Act (COPPA) is guaranteed because we don't collect personal information from children, and surveying of panelists' children is only done through advocacy.



APPENDIX A IPSOS PRIVACY STATEMENT (USA)

Last revised February 2007



The purpose of this Privacy Statement is to inform you about the practices and procedures of Ipsos (as follows, “we” or “us”) in handling Personal Information and to inform you about the Personal Information we collect about you when you participate in one of our surveys. It explains how we use and disclose that information, the choices you have regarding such use and disclosure, and how you may correct that information.

Ipsos Interactive Services U.S., Inc. is a licensee of the TRUSTe Privacy Program. TRUSTe is an independent, non-profit organization whose mission is to build users' trust and confidence in the Internet by promoting the use of fair information practices. This privacy statement covers the websites www.i-say.com and www.i-say.ca. Because these website want to demonstrate their commitment to your privacy, they have agreed to disclose their information practices and have their privacy practices reviewed for compliance by TRUSTe.

If you are a resident of the United States of America and have any questions or comments regarding this statement, you should first contact i-Say USA Member Services at Ipsos, Member Services, 1600 Stewart Ave. Suite 500, Westbury, NY, 11590, USA - 1-866-893-1188 or by email at questions@i-say.com. If you are a resident of Canada and have any questions or comments regarding this statement, you should first contact i-Say Canada Member Services team at Ipsos, 200-240 Duncan Mill Rd., Toronto, Canada M3B 3R6 1-866-893-1188. If you do not receive acknowledgement of your inquiry or your inquiry has not been satisfactorily addressed, you should then contact TRUSTe at http://www.truste.org/consumers/watchdog_complaint.php. TRUSTe will then serve as a liaison with the Web site to resolve your concerns.

We are proud to demonstrate our commitment to your privacy. From time to time, we may make changes to this Privacy Statement. The Privacy Statement is current as of the “last revised” date which appears at the top of this page. We will treat Personal Information in a manner consistent with the Privacy Statement under which it was collected and our Privacy Policy, unless we have your consent to treat it differently. This Privacy Statement applies to any information we collect or receive about you, from any source.

- [1. What is Personal Information?](#)
- [2. How do we collect your Personal Information?](#)
- [3. How do we use your Personal Information?](#)
- [4. How do we use your Email Address?](#)
- [5. How can you opt-out of receiving our email messages?](#)
- [6. To whom do we provide your Personal Information?](#)
- [7. When and how do we obtain your consent?](#)
- [8. How do we ensure the privacy of your Personal Information when dealing with our affiliates and their third parties?](#)
- [9. How long will we use, disclose or retain your Personal Information?](#)
- [10. How can you review your Personal Information that we have collected, used or disclosed?](#)
- [11. How do you know your Personal Information we possess is accurate?](#)
- [12. What if the Personal Information we have on you is inaccurate?](#)
- [13. How fast will we respond to your written requests?](#)
- [14. Are there any costs to you for requesting information on your Personal Information or on our Privacy Policy or practices?](#)
- [15. How do we know that it is really you requesting your Personal Information?](#)
- [16. What safeguards have we implemented to protect your Personal Information?](#)
- [17. How do you contact us regarding access to your Personal Information or our Privacy Policy and practices?](#)

1. What is Personal Information?

Personal Information is any information that is identifiable with you. This information may include but is not limited to your name, age, gender, mailing address, phone numbers, email address, identification numbers and, in certain



circumstances, your opinions and individual preferences. Personal Information, however, does not include (i) your name, business title or business address and business telephone number, fax and email in your capacity as an employee of an organization; and (ii) depending on the jurisdiction, publicly available information. However, if in your capacity as an employee of an organization you participate in one of our surveys, your responses will be treated as Personal Information.

We may collect personal information about other members of your household. This information may include but is not limited to the age and gender of the other household members. We use this information to determine if certain surveys are relevant to you based on the composition of your household. Sometimes we use this information to invite other members of your household to participate in our surveys. If one of your household members is selected for one of our surveys we will always deliver the survey invitation to your email address, and ask you to personally invite the household member to participate.

We offer a refer-a-friend function on our websites, which allows you to invite your friends to participate in our surveys. This process will never ask you to provide the email address or any other personally identifiable information about the individuals you wish to refer. You will be asked to provide your email address, and an email message with a registration link will be sent to you at the email address you provide. You can then forward this message to the individuals you wish to refer.

2. How do we collect your Personal Information?

We will always collect your Personal Information, including email address, by fair and lawful means (for example, when you respond to one of our surveys). We collect your Personal Information where we have obtained your consent to do so or as otherwise permitted by law.

We may use a third party agent to host surveys to collect personal information, including email address. That information is delivered to Ipsos directly. Contractual agreements between Ipsos and third party vendors ensure that your personal information will not be shared with anyone and will not be used for any other purpose.

We may receive your email address from a third party through a co-registrations process. If you indicate that you would like to join our survey panel through one of our co-registration partners, your email address may be provided to us for the purpose of us sending you a link to our registration page. Our co-registration partners may just direct you to a registration page on one of our websites, in which case your email address will not be given to us until you provide it at the appropriate point in our registration process. Contractual agreements between us and our co-registration partners ensure that your personal information will not be shared with anyone and will not be used for any other purpose.

3. How do we use your Personal Information?

We identify the purposes for which we use your Personal Information at the time we collect such information from you and obtain your consent, in any case, prior to such use. One of the primary purposes for which we collect your Personal Information, including email address, is to conduct social and market research through conducting surveys. We may also use your Personal Information as otherwise permitted by law. If you provide us with sensitive personal information such as health or financial information, such as household income and the types of banking products you use, we will obtain your express consent for the collection, use and disclosure of sensitive personal information.

4. How do we use your email address?

We will use your email address to send you several different types of messages related to your participation in our survey panel. Primarily we will send you email invitations to participate in online surveys. Receiving survey invitations is a requirement of your participation in our survey panel. When you register to participate in our survey panel we will send an email message to the email address you provide us to confirm that we have received your registration information. Once a month we will send you our email newsletter. Receiving the monthly newsletter is optional. If you use the refer-a-friend feature on our websites you will receive an email message containing a registration link, which you can forward to the person you want to refer. If you use the Change of Information form on the website to update your profile or to lookup your PIN or to inform us of a planned absence, such as a vacation, you will receive an email message confirming the status of your inquiry. Our Member Services team may also contact you using the email address you provided to respond to your questions.

5. How can you opt-out of receiving our email messages?

All of our email messages clearly explain how you can opt-out of receiving future email communications. Our survey invitations always include an unsubscribe link. Clicking on the unsubscribe link will take you to a web page where you can complete the opt-out process by following the instructions on the screen. If you do not wish to receive the



monthly newsletter, you can request to be removed from the newsletter distribution by following the instructions in the newsletter email message. You can also request to opt-out of email communications via email or telephone by using the contact information provided in the Contact Us section of our website. We will always process your opt-out request within 10 business days of receiving it.

5. To whom do we provide your Personal Information?

We identify to whom, and for what purposes, we disclose your Personal Information, at the time we collect such information from you and obtain your consent to such disclosure. For example, we may disclose your Personal Information, including email address:

- to a client of Ipsos for the client's purposes of conducting further research. In such rare cases we will explain the reason for the disclosure and ask for your consent before providing disclosure of your Personal Information;
- a third party engaged by Ipsos to perform functions on its behalf;
- such other disclosures of Personal Information to such persons for which you provide your consent; and
- as otherwise permitted by law.

We reserve the right to disclose your personal identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our Web site.

6. When and how do we obtain your consent?

We obtain your consent prior to collecting, and in any case, prior to using or disclosing your Personal Information, including email address, for any purpose. You may provide your consent to us either orally or in writing. For example, when you respond to a survey, you provide your consent to allow us to use your Personal Information, including your email address, for the purposes of conducting social and market research and, in certain circumstances, for example if you want to be contacted about a bad experience with a product or service which you are being surveyed about, to disclose your Personal Information to our clients. From time to time, we may collect, use or disclose your Personal Information based on your consent and as permitted by law. If you provide us with sensitive Personal Information such as health or financial information, we will obtain your express consent for the collection, use and disclosure of such sensitive personal information.

7. How do we ensure the privacy of your Personal Information, including email address, when dealing with our affiliates and other third parties?

We ensure that all our affiliates and other third parties which are engaged to perform services on our behalf and are provided with Personal Information, including email address, are required by contract to, observe the intent of this Privacy Statement and our Privacy Policy and practices or are governed by the same Privacy Policy. For example - large volume mailing providers and online collection providers

8. How long will we use, disclose or retain your Personal Information?

We will use, disclose or retain your Personal Identifiable Information, including email address, for as long as necessary to fulfill the purposes for which it was collected and as permitted or required by law. We have established minimum and maximum retention periods and procedures for maintaining and destroying your Personal Information. If you have any questions about the Personal Information, including email address, which we have on file for you, you can contact our Member Services team using any of the methods described in the Contact Us section of our website. You can update your Personal Information, including email address, using the Change of Info form on our website.

9. How can you review your Personal Information that we have collected, used or disclosed?

We will make available to you any specific Personal Information, including email address, on you in our custody or control, that we have collected, used or disclosed, upon your written request, to the extent permitted by law. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes.

10. How do you know that the Personal Information we have on you is accurate?

We will ensure that your Personal Information, including your email address, is kept as accurate, complete and up-to-date as possible. When we collect Personal Information from you, we rely on you for its accuracy.

11. What if the Personal Information we have on you is inaccurate?

You can at any time, demonstrate in writing the accuracy or completeness of the Personal Information we have on you. If you successfully demonstrate that the Personal Information, including email address, we have on you is



inaccurate or incomplete, we will amend the Personal Information as required. Where appropriate, we will transmit the amended information to third parties having access to your Personal Information.

12. How fast will we respond to your written requests?

We will attempt to respond to each of your written requests not later than thirty (30) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit.

13. Are there any costs to you for requesting information on your Personal Information or on our Privacy Policy or practices?

We will not assess any costs to you for access to your Personal Information, including email address, or on our Privacy Policy or practices without first providing you with an estimate of the approximate costs, if any. You may withdraw your requests for access to information by notifying us within the thirty-day notice period disclosed on the estimate.

14. How do we know that it is really you requesting your Personal Information?

We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your Personal Information, including email address. Any such information shall be used only for this purpose.

15. What safeguards have we implemented to protect your Personal Information?

We have implemented physical, organizational, contractual and technological security measures to protect your Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification. The only employees, who are granted access to your Personal Information, are those with a business ‘need-to-know’ or whose duties reasonably require such information. We have implemented strong security measures to protect the databases containing your Personal Information. The systems used to store your Personal Information are located in secure data centers. We prevent electronic intrusion by using firewall technology. The employees who are granted access to your Personal Information can only access it using secure connections and passwords from within our networks.

16. How do you contact us regarding access to your Personal Information or our Privacy Policy and practices?

All comments, questions, concerns or complaints regarding your Personal Information, including your email address, or our Privacy Policy and practices, should be forwarded to our Privacy Officer as follows.

In writing:

(USA Residents)
Ipsos
Member Services
1600 Stewart Ave., Suite 500
Westbury, NY, 11590, USA

(Canada Residents)
Ipsos
Member Services
200-240 Duncan Mill Rd.
Toronto, ON, M3B 3R6, Canada

If you are a resident of the USA, you may submit changes to your Name, Mailing Address, e-Mail Address, Telephone Number online at www.i-say.com, by e-mail at questions@i-say.com, by telephone 1-866-893-1188 or by writing to us at Ipsos, Member Services, 1600 Stewart Ave., Suite 500. Westbury, NY, 11590, USA

If you are a resident of Canada, you may submit changes to your Name, Mailing Address, e-Mail Address, Telephone Number online at www.i-say.ca, by e-mail at panel@i-say.com, by telephone 1-866-893-1188, or by writing to us at Ipsos, Member Services, 200-240 Duncan Mill Rd, Toronto, ON, M3B 3R6, Canada

We will inform you when you make an inquiry or lodge challenges or complaints of the relevant procedures.

If you are chosen as a winner in one of our contests you will be given the option to provide a testimonial which we may post in the Winners section of our website. Your testimonial, first initial and last name, and an electronic picture of yourself, if you provide one, will only be posted on our website if you provide us with consent. You can request to have your testimonial and Personal Information removed from our Winners section by contacting our Member Services using any of the methods described in the Contact Us section or our website. You may also submit your request in writing to:



(USA Residents)
Ipsos
Member Services
1600 Stewart Ave., Suite 500
Westbury, NY, 11590, USA

(Canada Residents)
Ipsos
Member Services
200-240 Duncan Mill Rd.
Toronto, ON, M3B 3R6, Canada

Notification of Changes

If we decide to change our privacy policy, we will post those changes to this privacy statement and other places we deem appropriate so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We will use information in accordance with the privacy policy under which the information was collected.

If, however, we are going to use users' personally identifiable information, including email address, in a manner different from that stated at the time of collection we will notify users via email. Users will have a choice as to whether or not we use their information in this different manner. However, if users have opted out of all communication with the site, or deleted/deactivated their account, then they will not be contacted, nor will their personal information be used in this new manner. In addition, if we make any material changes in our privacy practices that do not affect user information already stored in our database, we will post a prominent notice on our web site notifying users of the change. In some cases where we post a notice we will also email users, who have opted to receive communications from us, notifying them of the changes in our privacy practices.

Log Files

As is true of most Web sites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and click stream data.

We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole.

We do not link this automatically-collected data to personally identifiable information, including your email address.

We use a third-party tracking service called ITracks that uses cookies to track non-personally identifiable information about visitors to our site in the aggregate, to capture number of clicks by recruitment source in order to compensate vendors.

Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on this site. We do not link the information we store in cookies to any personally identifiable information, including email address, you submit while on our site.

We use session cookies to make it easier for you to navigate our site. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

This privacy statement covers the use of cookies by www.i-say.com and i-say.ca only and does not cover the use of cookies by any third parties.

Email Tracking

We do not use any tracking technologies in our email messages.

