

## **Tips From Former Smokers Campaign**

### **Tips 2 Rough Cut Testing**

#### **Privacy Policies**

*(Harris Interactive and Survey Sampling International)*

November 28, 2012

# Privacy Policy



*Updated and Effective as of: July 24, 2012*

Harris Interactive Inc. (collectively with its affiliates, subsidiaries and divisions, "Harris Interactive" or "we" or "us"), a leading market research company, is firmly committed to protecting your privacy. We routinely review our security features and privacy practices, and enhance them to better protect your privacy. This Privacy Policy explains in general terms how we collect, store, use, and disclose your Personal Information (as defined below) and certain other information that we receive from you.

You acknowledge your consent to this Privacy Policy if you:

1. Use any of the following websites: [www.harrisinteractive.com](http://www.harrisinteractive.com), [www.harrispollonline.com](http://www.harrispollonline.com), and [engage.harrisinteractive.com](http://engage.harrisinteractive.com) (our "Websites"),
2. Become a member (a "Panel Member") of any of the panels created, maintained, or operated by us, such as the Harris Poll Online<sup>SM</sup> panel or the Research Lifestreaming<sup>SM</sup> panel (our "Panels"), or
3. Participate in market research activities, including questionnaires, surveys, and online focus groups, offered, provided, hosted, or administered by us (collectively, "Research Activities").

Harris Interactive Inc. has been awarded TRUSTe's Privacy Seal signifying that this privacy policy and practices have been reviewed by TRUSTe for compliance with TRUSTe's program requirements including transparency, accountability and choice regarding the collection and use of your personal information. TRUSTe's mission, as an independent third party, is to accelerate online trust among consumers and organizations globally through its leading privacy trustmark and innovative trust solutions. If you have questions or complaints regarding our privacy policy or practices, please contact us [here](#). If you are not satisfied with our response you can contact TRUSTe [here](#).

We also participate in and adhere to the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union and Switzerland (the "Frameworks"). Information about the Safe Harbor program can be found at [www.export.gov/safeharbor](http://www.export.gov/safeharbor). Our compliance with the

Frameworks may be limited in certain cases to the extent necessary to meet national security, public interest, or law enforcement requirements.

## **What is Personal Information?**

Personal Information is any information that is identifiable with you. Personal Information may include, but is not limited to, your name, date of birth, gender, mailing address, phone number, email address, identification numbers and, in certain circumstances, your opinions and individual preferences. Personal Information, however, does not include your name, business title, business address, business telephone number, business fax, or business email in your capacity as an employee of an organization, or, depending upon the jurisdiction, publicly available information. However, if you participate in Research Activities in your capacity as an employee of an organization, your responses will not be identified to you without your consent.

## **How Do We Collect Your Personal Information?**

We always will collect your Personal Information by fair and lawful means. For instance, we collect Personal Information from Panel Members when they register for a Panel, non-Panel Members when they participate in Research Activities ("Non-Panel Participants"), and other users of our Websites ("Site Users") when they request information regarding our products and services. We also obtain e-mail addresses of prospective Panel Members and Non-Panel Participants from providers of address lists who have assured us that such lists are comprised of individuals who have consented to be listed. Further, we may receive your email address from a third party if you indicate to the third party that you would like to join one of our Panels. In such case, we will send you a link to our registration page so that you can join the applicable Panel.

## **How Do We Use Your Personal Information?**

We may use your Personal Information (i) to contact you and communicate with you about your Panel membership and/or your participation in Research Activities, (ii) to conduct Research Activities with you and provide you with the results of such Research Activities, (iii) to validate answers you provide us in connection with your participation in Research Activities, (iv) to notify you about new features on our Websites, or other products or services that we think you may be interested in, (v) to administer and manage our incentives programs and fulfill your requests for incentives, (vi) to allow you to participate in sweepstakes and to notify you if you are a sweepstakes winner, (vii) to update our records of your information, (viii) to provide service and support to you, (ix) to verify the integrity of submitted information, and (x) as otherwise permitted by law or authorized by you.

We may maintain your Personal Information in order to satisfy your requests and/or our business requirements. For instance, we may retain the email address of persons who opted out, or requested to be removed from, one of our Panels in order to ensure that we conform to such wish.

We do not share your Personal Information with, or sell or rent your Personal Information to, third parties, except with your consent or as described in this Privacy Policy. We follow applicable laws and industry best practices with respect to the disclosure of Personal Information to third parties. We may disclose your Personal Information to third parties as follows:

- In accordance with market research industry guidelines, we may provide your Personal Information to a third party, including the client who commissioned the Research Activity you participated in, so long as the third party is contractually bound to keep your Personal Information confidential and use it only for research or statistical purposes;
- In connection with market research services, to our authorized and approved agents, contractors, or partners that facilitate such services, including, without limitation, incentive program and sweepstakes prize fulfillment, web hosting, list matching, quality control, and the like; provided, however, such parties may use your Personal Information only to provide services to Harris Interactive and may not share your Personal Information with any other third parties;
- In response to the request or requirement of any law enforcement agency or governmental authority, to such government agencies or instrumentalities;
- Pursuant to required legal process, to the related compelling party;
- When necessary or desirable to exercise or preserve our legal rights;
- When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with suspected or actual illegal activity;
- In connection with a change of ownership, such as a merger or an acquisition or a sale of any or all of our business assets; or
- As otherwise authorized by you.

Our Websites may contain links to information on other websites. We do not have any control over these other websites, and therefore we cannot be responsible for the protection and privacy of any information that you provide while visiting those websites. Those websites are not governed by this Privacy Policy, and if you have questions about how another website uses your information, please consult that website's privacy statement.

## **What Other Information Do We Collect And How Do We Use The Information?**

If you elect to register for one of our Panels and/or participate in Research Activities, we also may collect certain demographic information about you, including, without limitation, your income level, interests, hobbies, and product/technology usage. We collect this information so that we can invite you to participate in Research Activities that correspond with your interests and/or background. We also use this information to ensure that our Panel Members and Non-Panel Participants meet the demographic requirements for each Research Activity.

We also may separately invite Panel Members and Non-Panel Participants to participate in a program where we will ask you to grant us permission to monitor

certain of your conduct, behavior, interactions, communications, and/or exchanges, both online and offline, as part of certain Research Activities. Any information, including Personal Information, that we collect or receive in connection with your participation in any such program will be handled in accordance with this Privacy Policy and the applicable terms and conditions provided to you in connection with your invitation to participate in such program.

Additionally, we may automatically collect a variety of machine readable information about you and/or use certain technologies when you participate in certain Research Activities, as discussed below.

- **Log Files.** As is true of most websites, our servers collect certain information automatically and store it in log files. This information includes your Internet Protocol (IP) address, your browser type, your Internet service provider (ISP), referring/exit pages, your operating system, and date/time stamp. We use this information for administration of our Websites, gathering demographic information about our Panel Members and Non-Panel Participants, monitoring compliance with our terms of use, troubleshooting, and investigating security breaches. We do not link this automatically-collected data to your Personal Information.
- **Cookies.** Like many companies, we use browser cookies on our Websites. Browser cookies are bits of text that are placed on your computer's hard drive when you visit certain websites. We use browser cookies to tell us, for example, whether you've visited us before or if you're a new visitor, and to help us identify features on our Websites in which you may have the greatest interest. Browser cookies may enhance your online experience by saving your preferences while you are visiting our Websites. We and our authorized and approved agents, contractors, and partners also may use session ID cookies to make it easier for you to navigate our Websites. The "help" portion of the toolbar on most browsers will instruct you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Remember though, without cookies, you may not be able to take full advantage of all of the features on our Websites or participate in certain Research Activities. We also may use Flash cookies (also known as a Local Shared Objects) for a variety of research purposes, including, without limitation, to enhance your online experience, help maintain the integrity of our research data, store certain of your preferences, display content based upon what you view, personalize your visit, track your behavior and activities across multiple visits to our Websites, detect duplicate Panel Members, and combat fraudulent participation in Research Activities. Flash cookies are similar to browser cookies, except that they can store data more complex than simple text. Flash cookies, by themselves, cannot do anything to or with the data on your computer. In addition, Flash cookies cannot access or remember your email address or other Personal Information unless you provide the information on our Websites. If you want to delete Flash cookies, you will need to access your Flash Player settings management tool available on Adobe's website at

[www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html).

- **Web Beacons.** We as well as our clients and other third parties employ a software technology called web beacons (also known as Internet tags, pixel tags, and clear GIFs), which we use for market research purposes and to help us better manage content on our Websites by informing us what content is effective. Web beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, web beacons are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. Remember though, without web beacons, you may not be able to take full advantage of all of the features on our Websites or participate in certain Research Activities. In addition, web beacons do not access your Personal Information; however, we may tie the information gathered by web beacons to your Personal Information that we already collected or received from you.
- **Digital Fingerprinting.** As a quality control measure to maintain the integrity of Internet-based research, we may use a digital fingerprinting technology, also known as "machine identification" technology, to gather certain information about your computer, including, without limitation, your IP address, the type of operating system type/version you are using, your browser type, version and parameter values, your computer configuration, the software and cookies residing on your computer, the display settings on your monitor, and the plug-ins residing on your computer. This information is sent to our trusted third-party partner who converts it into a unique serial number for your computer – the digital fingerprint – through use of a proprietary algorithm and determines if it matches any previous digital fingerprint. We use this technology to assist our clients in ensuring the integrity of our research by detecting duplicate Panel Members or Non-Panel Participants and combating fraudulent participation in Research Activities. Our third party partner also may store Flash cookies (which are discussed above) on your computer solely in connection with its efforts on our behalf to ensure the integrity of our research. We will not use this technology to collect any of your Personal Information, or track your online activities. Also, our use of this technology will not disrupt or interfere with your use or control of your computer, or alter, modify, or change the settings or functionality of your computer. In furtherance of our efforts to ensure the integrity of our research, we may link or associate a unique identifier to you and/or your Personal Information, share your unique identifier with our clients and with other sample or panel providers, and receive or obtain a unique identifier linked to you from a third party, including without limitation, a sample or panel provider or one of our clients. Any unique identifier(s) received or obtained by us and linked to you will be protected in accordance with this Privacy Policy. We will use commercially reasonable efforts to ensure that this technology that we use is safe, secure, and does not cause undue privacy or data security risks, and is conducted in a professional and ethical manner and in accordance with applicable industry standards and laws. If we discover that this technology is not being used in accordance with the foregoing, we will take prompt corrective action.

- **Advertising Research Purposes.** We also may use browser cookies, Flash cookies, and web beacons for advertising research purposes by monitoring the types of online advertisements that you see on the websites that you visit (whether such websites are owned or operated by us or by unrelated third parties), the number of times that you see those ads, and the addresses of the websites where you saw those ads. Specifically, this technology will identify tags contained in certain online advertisements relating to our clients and will update us when you are exposed to these advertisements so that we can seek your participation in relevant Research Activities. This will not affect the performance of your computer; rather it will simply provide you with additional opportunities to receive invitations to participate in Research Activities related to your interests. The information collected will not be used to advertise or market products or services to you and will not include any Personal Information; however, we may tie the information gathered by this technology to your Personal Information that we already collected or received from you. If at any point you decide that you no longer wish to be monitored for online advertisement exposure, please submit a request [here](#) and you will receive instructions on how to do so.
- **Technology Used to Secure Images.** We occasionally employ technology to provide security of images displayed during Research Activities. A script embedded in certain pages displaying images prevents you from using your computer's clipboard when you are on that page. The script is used only for certain images that are presented while you participate in applicable Research Activities. Information you may have copied to your clipboard is not captured or read, but is overwritten with blank data to prevent the secure images from being copied to your clipboard. We recommend that you paste any information that you have copied to your clipboard before commencing a Research Activity.

The use of browser cookies, Flash cookies, or web beacons by third parties on our Websites is not covered by this Privacy Policy, as we do not have access or control over their use. We recommend that you carefully read the privacy policies of each website that you visit for information on their privacy, security, data collection, and distribution policies.

## **How Do You Access, Correct Or Update The Information You Provide Us?**

We will store your Personal Information for as long as necessary to fulfill the purposes indicated in this Privacy Policy or as otherwise permitted or required by law. We will make available to you your Personal Information in our custody or control upon your written request, to the extent required and/or permitted by law. To request access to your Personal Information, please submit your request to us in writing at the applicable e-mail address or postal address shown below in the "How Do You Contact Us?" section of this Privacy Policy. We will attempt to fulfill your request within 30 days. However, we may not be able to provide you with access to all of your Personal Information if doing so would likely result in us revealing



Personal Information about a third party or confidential commercial information, or if such Personal Information has been collected for the purposes of a legal investigation. If this is the case, we will advise you of the reason we are unable to accommodate your request.

For Panel Members, not only is it important that you be able to correct or update information you provide to us, it is important to us as well. The results from our public studies (which report aggregate, non-identifiable information) often get reported by the media. We encourage Panel Members to keep their account profiles up-to-date, which can be done on the applicable Panel Website or by contacting us [here](#), so that we continue to have accurate demographic information behind our results. For other Panel Members, Non-Panel Participants, and Site Users, you may correct or update any information that you have provided to us by contacting us [here](#).

## **What Is Our Opt-Out Policy?**

For Panel Members, you may terminate your membership in a Panel by filling out a request on the Member Services section [here](#). For Panel Members of the Harris Poll Online<sup>SM</sup> Panel, you also may terminate your membership in such Panel by filling out a request on the Member Services section at [www.harrispollonline.com](http://www.harrispollonline.com). If you opt-out of any of our Panels, we will retain your information in our "unsubscribe" database for that Panel to ensure that we do not send you emails in the future inviting you to participate in Research Activities involving that Panel.

For Non-Panel Participants and Site Users, if you would like to be removed from our contact list, please contact us [here](#).

## **What Safeguards Have We Implemented To Help Ensure The Security Of Your Information?**

We have security measures in place on our Websites that are designed to prevent the loss, misuse, and alteration of the information under our custody or control. We will not activate a prospective Panel Member's account without confirmation. Once the registration process is completed, the prospective Panel Member will be sent an email that requests confirmation of registration. The account will not be activated until confirmation is received. Additionally, all Panel Members are required to use their passwords and usernames when registering, updating their contact information, or accessing "members only" sections of our Websites. If a Panel Member cannot remember his or her password, he or she can send a message to the Panel Website's Help Desk to retrieve it. To protect the security of our Panel Members' contact information, requests to retrieve passwords must include certain information to allow us to verify the Panel Member's identity.

We maintain commercially reasonable technical, administrative, and physical safeguards to protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of Personal Information. Additionally, only those authorized employees, contractors, and agents who have a need to know Personal

Information in connection with the performance of their services are allowed to access this information. In addition, these individuals and or entities are required to be bound by confidentiality obligations and may be subject to disciplinary actions, including termination and criminal prosecution, if they fail to meet their confidentiality obligations. In the unlikely event that we suffer a breach of our security systems and an individual or entity gains unauthorized access to any Personal Information stored on our servers, we will immediately investigate such security breach, and will provide prompt notice to any individual whose Personal Information was affected.

Your Personal Information may be collected, stored, processed, used, and transferred by Harris Interactive affiliated companies or non-affiliated service providers in one or more countries outside your originating country. By using our Websites, becoming a Panel Member, or participating in Research Activities, you freely and specifically consent to the transfer, storage, use, and disclosure of your Personal Information among our affiliated companies and non-affiliated service providers, wherever located. Our service providers are contractually bound to respect the confidentiality of your Personal Information.

While navigating our Websites you may be directed to content or functionality that is hosted by a third party supplier, not on a Harris Interactive owned domain. For example, this is done on our "Careers" webpage. When information is collected on behalf of us exclusively on one of our Websites, this Privacy Policy will be referenced on such Website and will govern how your information is used. For other websites, the website owner's privacy policy will be referenced and will govern how your information is used. We recommend that you carefully read the privacy policies of each website that you visit for information on their privacy, security, data collection, and distribution policies.

## **How Do We Notify You of Changes To This Privacy Policy?**

We reserve the right, in our discretion, to modify our privacy practices and update and make changes to this Privacy Policy at any time. As we modify our Websites to accommodate changes in our business model, developments in our industry, and take advantage of technological advances, the practices described in this Privacy Policy may change. For this reason, we encourage you to refer to this Privacy Policy on an ongoing basis. This Privacy Policy is current as of the "last revised" date which appears at the top of this page. We will treat your Personal Information in a manner consistent with the version of this Privacy Policy under which it was collected, unless we have your consent via email, telephone or other appropriate means to treat it differently. By using our Websites, continuing as a Panel Member, or participating in Research Activities following any Privacy Policy change, you freely and specifically give us your consent to collect, use, transfer, and disclose your Personal Information in the manner specified in such then-current Privacy Policy.

## **How Do You Contact Us?**

If you are a Panel Member and have questions or comments about this Privacy Policy or, as mentioned earlier, wish to correct, update or delete any of your information, please contact us as follows:

Survey Help Desk

60 Corporate Woods

Rochester, NY 14623-1457 USA

Research Activity Online Help, [here](#)

Telephone: (800) 600-2493 or (585) 214-7009

If you are a Non-Panel Participant or Site User and have questions or comments about this Privacy Policy or, as mentioned earlier, wish to correct, update or delete any of your information, please contact us [here](#). We will endeavor to respond to all inquiries via email or regular mail within 30 days of receipt.

## SURVEY SAMPLING INTERNATIONAL, LLC

# Privacy Policy

### Contents

1. Commitment; Applicability.
2. Types of Information Collected; Collection Process; Data Storage.
3. Tell-A-Friend.
4. Uses of Information.
5. Onward Transfers and Disclosures of Personal Information; Collection of Personal Information by Clients.
6. Data Security.
7. Cookies; Online Ad Exposure Programs; Log Files; Clear GIFs.
8. Digital Fingerprinting; Data Validation.
9. Children’s Privacy Protection.
10. Third Party Links.
11. Rights Pertaining to Personal Information.
12. Enforcement: Safe Harbor Dispute Resolution
13. Agreement to Privacy Policy; Changes to Privacy Policy.

### **1. Commitment; Applicability.**

Survey Sampling International, LLC (“**SSI**”) is a global provider of sampling solutions for survey research, providing clients with access to consumer and business-to-business respondents via internet, telephone (both fixed/landline and wireless/mobile), postal, and multi-mode methodologies. SSI also offers value-added services including data processing, data collection, offline data analysis, consulting, programming and hosting services. SSI serves a vast array of for-profit and not-for profit businesses, universities, and governmental agencies and departments.

In addition to SSI’s commitment to provide the highest standard of actionable marketing intelligence, SSI is committed to protecting the privacy and security of all Personal Information (as defined herein) collected or received by SSI. SSI strives to conform its privacy practices with applicable international, national, Federal, state and/or local laws, codes, and regulations; and the industry codes, standards, rules, and regulations of various market and opinion research professional associations, including, without limitation, the ICC/ESOMAR International Code on Market and Social Research and the Code of Standards and Ethics for Survey Research of the Council of American Survey Research Organizations, with whom SSI is a member (collectively “**Applicable Laws and Codes**”). Panel membership and/or participation in any survey or study offered, provided, hosted, or administered by SSI (individually a “**Survey**” and collectively “**Surveys**”) is completely voluntary. All references to SSI in this Privacy Policy include SSI’s parents, subsidiaries and affiliates.

SSI complies with the United States (“**US**”) - European Union (“**EU**”) Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of

personal data from EU member countries. SSI has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access and enforcement. To learn more about the Safe Harbor program, and to view SSI's certification page, please visit <http://www.export.gov/safeharbor/>.

**This Privacy Policy applies to:**

(i) Members of SSI's panels and subpanels, including, without limitation, SurveySpot Research Panel, Opinion Outpost Research Panel, OpinionWorld Research Panel, Choozz Research Panel, and Your Voice Research Panel (individually each a "**Panel**" and collectively "**Panels**");

(ii) Non-Panel members participating in Surveys;

(iii) Any individual who visits a Panel website(s); and

(iv) Any individual who discloses or provides Personal Information to SSI (except for Personal Information disclosed or provided in connection with <http://www.surveysampling.com/>).

**2. Types of Information Collected; Collection Process; Data Storage.**

For the purpose of this Privacy Policy: (i) "**Personal Information**" means any information identifiable with you, including, without limitation, first and last name, residential address, email address, telephone number(s) (home and/or cell), and date of birth; (ii) "**Demographic Information**" includes, without limitation, marital status, income range, ethnicity, employment status, hobbies, interests and product ownership; (iii) "**Survey Data**" means responses to Survey questions; and (iv) "**Information**" means Personal Information, Demographic Information and Survey Data.

SSI collects Information through fair and lawful means.

SSI collects Personal Information and Demographic Information from Panel members during and after registration for membership with a Panel. The collection of Personal Information and Demographic Information after registration for membership with a Panel occurs in various ways, including, without limitation, during participation in a Survey. The disclosure of Information by Panel members is voluntary.

SSI collects Personal Information and Demographic Information from non-Panel members prior to and during participation in a Survey. The disclosure of Information by non-Panel members is voluntary. SSI retains Personal Information collected by SSI from non-Panel members to fulfill incentives and rewards and to improve user experience.

SSI may obtain Personal Information and Demographic Information of prospective Survey respondents or Panel members from vendors or partners. Prior to obtaining Personal Information from a vendor or partner, SSI requires written assurances that: (i) the data subjects have consented to have their Personal Information listed or compiled by the vendor or partner; and (ii) the vendor or partner has the right to disclose the Personal Information to SSI and to allow SSI to

use the Personal Information for the specific purpose(s) for which it was disclosed by the vendor or partner.

SSI engages third parties to recruit individuals for Survey participation and for joining a Panel. Recruitment includes, without limitation, the third party placing banner ads or links on its website(s) and/or the website(s) of its affiliate(s). The banner ads or links provide an individual with the opportunity to join a Panel and/or participate in a Survey. The collection of Personal Information by such a third party does not constitute collection by SSI and this Privacy Policy does not cover such collection. This Privacy Policy applies to Personal Information only when SSI actually receives or collects the Personal Information.

SSI may collect the Internet Protocol Address (the "**IP Address**") that is publicly available on your computer. The IP Address is not collected for the purpose of tracking or monitoring online activity. SSI collects, uses, maintains, secures, and discloses IP Addresses in accordance with Applicable Laws and Codes.

Survey Data is collected from Panel members and non-Panel members during Survey participation.

**All Information collected or received by SSI is stored in the US. By joining a Panel, participating in a Survey, or otherwise disclosing Information to SSI, you hereby explicitly consent to SSI's collection and storage of your Information in the US and the collection processes set forth in this Section 2.**

### **3. Tell-A-Friend.**

Where applicable and if you choose to use SSI's Tell-A-Friend referral program, you will need to provide the first and last name and email address for your friend. SSI will send a one-time email inviting your friend to join a Panel. By using SSI's Tell-A-Friend referral program, you acknowledge and agree you have the right and permission to disclose your friend's Personal Information to SSI and you are initiating the email invitation to your friend voluntarily.

Your friend may request the removal of the friend's Personal Information from SSI's database by: (i) clicking on the unsubscribe link contained in the email from SSI to the friend; or (ii) contacting SSI in accordance with Section 12.A. of this Privacy Policy. Any written removal request should include the friend's first and last name, email address, and the words "remove me."

### **4. Uses of information.**

SSI does not use Information for direct marketing or advertising purposes. All Information collected by SSI is collected in furtherance of, or in connection with, legitimate market research. SSI does not collect any Information under the guise of research for any non-research purpose.

Generally, SSI uses Personal Information and Demographic Information: (i) to communicate with you regarding Panel membership and/or Survey participation; (ii) to tailor Survey

opportunities to you; (iii) to send you Survey opportunities; (iv) to comply with legal obligations, including, without limitation, complying with taxation requirements; (v) to administer and manage SSI's incentive programs and fulfill your requests for incentives; (vi) to facilitate your entry into SSI's sweepstakes and communicate with you regarding sweepstakes entries; (vii) to update SSI's records; (viii) to comply with any data suppression obligations or requirements; and (ix) as otherwise permitted pursuant to this Privacy Policy or as otherwise authorized by you.

SSI may contact you to participate in Surveys in one of several ways, including, without limitation, email Survey invitations, "push" notifications or SMS text messages, or via telephone. By disclosing your email address you hereby expressly consent to receive email communications, including, without limitation, Survey invitations, promotion or incentive information, and notices required hereunder, from SSI and/or any Subcontractor (as defined herein). SSI does not send unsolicited commercial emails. SSI will only contact you for Survey participation via "push" notifications or SMS text messages and/or via telephone if you expressly agree to receive such communication(s).

Survey Data is used for legitimate scientifically based market research purposes. Survey Data helps organizations research opinions and attitudes about products and services. Generally, SSI provides Survey Data to clients in aggregate form, which does not permit the client or any other party or person to identify individual respondents.

SSI may disclose Demographic Information to third parties in either single or aggregate summary form. Singular summary includes providing Demographic Information about a person to a third party without specifically identifying the person to the third party. For example, this summary does not contain personal information such as a name or e-mail address, nor does the combination of Demographic Information make it possible to identify the person. Aggregate summary includes providing Demographic Information about a group of persons without specifically identifying any person within the group.

Certain Panel websites allow Panel members to access Facebook Connect to interact with friends and to share their recent activity on Facebook through various Facebook features including, without limitation, walls and news feeds. If you are logged into both a Panel website and Facebook when you click the "Connect with Facebook" button, you will be prompted to merge your user profiles. If you are already logged into a Panel website but are not logged into Facebook when you click the "Connect with Facebook" button you will be prompted to enter your Facebook login information or to "Sign up for Facebook." By proceeding, you are allowing SSI to access your information and you are agreeing to the Facebook Terms of Use in connection with your use Panel websites.

If you attempt to access a Panel website by clicking the "Sign in Using Facebook" button and you are not currently a member of a Panel, you will first be asked to enter your Facebook login details and will be given the option to register and join the applicable Panel. Once you are registered with the Panel and connect with Facebook, you will be able to automatically post your recent activity using Facebook's features. You can edit privacy settings for the reviews that appear on Facebook, or disconnect this service, by visiting the Facebook Application Settings page.

**By joining a Panel, participating in a Survey, or otherwise disclosing Information to SSI, you hereby expressly consent to the uses of Information as set forth in this Section 4.**

**5. Onward Transfers and Disclosures of Personal Information; Collection of Personal Information by Clients.**

SSI shall not transfer or disclose Personal Information to any third party without the prior written consent of the data subject, except as follows:

- (i) As required pursuant to Applicable Laws and Codes; or a valid court or governmental order or subpoena.
- (ii) To protect the safety of an individual or to protect SSI's rights and/or property.
- (iii) Between various Panels if an individual signs up for more than one Panel.
- (iv) To a parent, subsidiary, or affiliate of SSI: (1) in the event of a reorganization or restructuring, or (2) for use and processing in accordance with this Privacy Policy or as authorized by you.
- (v) To authorized agents, consultants, vendors, and subcontractors of SSI, and/or of SSI's clients, who are providing services to SSI and/or SSI's client, including, without limitation, data append services, data validation services, and incentive fulfillment and sweepstakes related services (individually a "**Subcontractor**" and collectively the "**Subcontractors**"). Prior to disclosing Personal Information to a Subcontractor, SSI requires the Subcontractor to enter into a written agreement restricting the Subcontractor's use of Personal Information for only the purpose of providing services to SSI and/or SSI's client and requiring the Subcontractor to ensure the security and confidentiality of the Personal Information.
- (vi) To a client for limited market research related uses including modeling, Survey validation, data append, or database segmentation. Prior to disclosing Personal Information to a client, SSI requires the client to enter into a written agreement restricting the client's use of Personal Information for only a market research related use and requiring the client to ensure the security and confidentiality of the Personal Information.
- (vii) In connection with a change of ownership or control, including, without limitation, a merger or an acquisition of any or all of SSI's business assets ("**Business Transaction**"). In the event of a Business Transaction, which includes the transfer of Personal Information, SSI shall require the other party (e.g. the surviving or resulting entity in a merger, or the acquiring entity in an acquisition) to agree in writing to use, protect, and maintain the security, integrity, and confidentiality of the transferred Personal Information in accordance with this Privacy Policy.
- (viii) As otherwise permitted pursuant to this Privacy Policy or as otherwise authorized by you.



Please contact SSI in accordance with Section 12.A. of this Privacy Policy if you have any questions or concerns regarding the processing of Personal Information by SSI and/or its Subcontractors.

SSI may allow a client to collect Personal Information from Survey respondents; however, disclosure of Personal Information by respondents is strictly voluntary and, prior to the collection of Personal Information by the client, SSI requires the client to enter into a written agreement restricting the client's use of Personal Information for only a market research related use and requiring the client to ensure the security and confidentiality of the Personal Information.

**By joining a Panel, participating in a Survey, or otherwise disclosing Personal Information to SSI, you hereby expressly consent to the transfers and disclosures set forth in this Section 5.**

## **6. Data Security.**

SSI maintains reasonable technical, administrative, and physical safeguards to protect and secure Information. SSI reviews, monitors, and evaluates its privacy practices and protection systems on a regular basis. Sensitive Personal Information (e.g. credit card number(s), social security number, national ID, etc.) submitted via an online registration or web form, SSI uses reasonable encryption methods (e.g. secure socket layer technology, etc.) to protect and secure the sensitive Personal Information. Notwithstanding the foregoing, you acknowledge and agree that transmissions over the Internet are never one hundred percent (100%) secure or error free and SSI does not and cannot guarantee the security of online transmissions.

## **7. Cookies; Online Ad Exposure Programs; Log Files; Clear GIFS.**

### **A. Cookies.**

(i) *SSI Cookies.* Cookies are small text files or other forms of data which are stored on a computer by a website that assign a numerical user ID and stores certain information about the internet browsing activity of the user of a computer. SSI uses session and persistent cookies to make it easier for you to navigate SSI's websites, to provide a better experience for Survey participants, and for quality control and validation purposes. Session cookies expire when you close your browser. Persistent cookies remain on your computer, indefinitely, until deleted. Personal Information is not stored or collected in the cookies used by SSI. You may disable and/or delete cookies via your browser and/or plug-in settings; however, this may: (1) decrease the functionality of the websites you visit; (2) limit your ability to use and view SSI's web sites; and (3) limit your participation in Surveys.

(ii) *Third Party Cookies.* The use of cookies by SSI's affiliates, partners, Subcontractors, and/or clients is not covered by this Privacy Policy. SSI does not have control over the policies and practices of such parties.

**B. Online Ad Exposure Programs.** SSI may send you Surveys related to advertisements you see online. The intent is to help advertisers understand what their ads communicate to

internet users. Online ad exposure programs include: (i) a locally stored object (“**LSO**”), which can identify tags contained in on-line advertisements, being dropped onto a person’s Web browser; (ii) when the person views a Web page containing an online ad that has been tagged, the tag reads the LSO and provides SSI’s client with a unique identification number that does not personally identify the person; and (iii) SSI’s client supplies SSI with the identification number and requests that SSI provide the person associated with, or connected to, the identification number, a Survey related to the advertisement.

Certain Web pages or Web-based advertisements that you view may be tracked by SSI’s client and/or its subcontractors or vendors and in connection with the tracking certain tracking data may be collected by SSI’s client and/or its subcontractors or vendors. No Personal Information should be collected in connection with online ad exposure programs. By agreeing to or accepting this Privacy Policy, you hereby agree to participate in SSI’s online ad exposure programs. Panel members may opt-out of participating in online ad exposure programs and the LSOs by going to “My Account” in the members’ area of the applicable Panel website and changing the setting called “Survey for online ad exposure.” Opting-out of online ad exposure programs will not delete any LSOs currently stored in your Web browser; LSOs must be deleted through your Web browser. Opting-out of SSI’s online ad exposure program will only apply to SSI’s program and will not affect or restrict third parties from deploying LSOs or similar technology onto your Web browser or remove you from participation in online tracking programs.

Participation is strictly voluntary and subject to the individual consenting to participate in the online tracking program. SSI is not responsible for third party applications, technologies, or tracking cookies or for the information or data collected or used in connection with the applications, technologies, or cookies.

If you need assistance or have any questions, please contact us at [helpdesk@opinionoutpost.com](mailto:helpdesk@opinionoutpost.com) with the following subject line: “Online Ad Exposure Program.”

C. Log Files. SSI’s websites automatically gather certain information and store this information in log files. This gathered information includes data available from a user’s web browser, including, without limitation, IP Address, browser type, internet service provider, referring/exiting pages, operating system, date/time stamp, and click stream data.

D. Clear GIFs. Clear GIFs are embedded invisibly on Web pages and are about the size of the period at the end of a sentence. SSI may permit certain third party suppliers to set clear GIFs on the Panel referrals obtained through their websites. In addition, we may use clear GIFs in our HTML-based e-mails to let us know which e-mails recipients have opened. These GIFs allow us to gauge the effectiveness of certain communications, panel recruitment efforts and the effectiveness of our panelist outreach campaigns. No personal information is contained in clear GIFs.

**By joining a Panel, by accessing a Panel website, by participating in a Survey, or otherwise disclosing Information to SSI, you hereby consent to SSI’s use of cookies and log files, and to participate in SSI’s online ad exposure programs, as set forth in this Section 7.**

## **8. Digital Fingerprinting; Data Validation.**

A. Digital Fingerprinting. In general, digital fingerprinting technologies assign a unique identifier to a user's computer to identify and track the computer. SSI uses digital fingerprinting technology (the "**Technology**") to assist SSI's clients in ensuring the integrity of Survey results by identifying duplicate and fraudulent respondents. SSI may engage a third party or third parties to assist SSI in the implementation and use of the Technology. The Technology analyzes publicly available information and data obtained from a computer's web browser and from other publicly available data points, including, without limitation, the technical settings of the computer, the characteristics of the computer, and the computer's IP Address, to create a unique identifier assigned to the computer. The unique identifier does not contain any information or data that individually identifies the person who is assigned the unique identifier. In furtherance of SSI's efforts to assist its clients in protecting and ensuring the integrity of Survey results, SSI: (i) may link or associate your unique identifier to you and any of your Personal Information; (ii) may share your unique identifier with SSI's clients and with other sample or panel providers; and (iii) may receive or obtain a unique identifier linked to you from a third party, including, without limitation, a sample or panel provider or a client of SSI. Any unique identifier(s) received or obtained by SSI and linked to an identified or identifiable individual shall be protected in accordance with this Privacy Policy.

SSI uses reasonable efforts to ensure that the Technology is safe, secure, and does not cause undue privacy or data security risks. SSI uses and distributes the Technology in a professional and ethical manner and in accordance with: (i) this Privacy Policy and (ii) Applicable Laws and Codes.

If SSI discovers or learns of any illegal or unethical conduct in connection with the use of the Technology, or that the Technology is being used in a manner inconsistent with the statements and/or disclosures made by SSI, SSI shall use reasonable efforts to restrict, limit, or prohibit the illegal or unethical conduct and to ensure the proper use and administration of the Technology.

B. Data Validation. From time-to-time, SSI may engage a third party or third parties to validate Panel and non-Panel members. The purpose of the data validation is to assist SSI's clients in ensuring the integrity of Survey results. For Panel members, validation may occur during and/or after registration with a Panel, including, without limitation, prior to, during, or after participation in a Survey. For non-Panel members, validation may occur prior to, during, or after participation in a Survey. The data validation process involves: (i) SSI disclosing or transferring Personal Information to a Subcontractor, (ii) the Subcontractor performing validation services, and (iii) the Subcontractor returning the Personal Information to SSI with any updates or corrections and, if applicable, with a validation score. SSI reserves the right to reject, deny, or terminate Panel membership, or to deny or reject Survey participation, if Personal Information is not validated to SSI's satisfaction.

## **9. Children's Privacy Protection.**

SSI strongly believes it is important to protect the online privacy of children. Accordingly, SSI adheres to Applicable Laws and Codes pertaining to the protection of children's privacy, including, without limitation, the Children's Online Privacy Protection Act (US).

In the US, SSI does not knowingly collect or receive Personal Information from an individual under the age of thirteen (13), without prior parental consent. Outside of the US, SSI does not knowingly collect or receive Personal Information from an individual under the age of fourteen (14), without prior parental consent. Children under the age thresholds set forth above, are contacted to participate in Surveys through their parents or guardians. For Surveys involving data subjects between the age thresholds listed above and the age of seventeen (17), SSI carefully considers both privacy issues and parental concerns. Parents and guardians are encouraged to contact SSI, as set forth in Section 11.A., about this Privacy Policy and to discuss their rights to access, edit, or delete Personal Information of or about their child or children.

## **10. Third Party Links.**

SSI may provide you with the ability to voluntarily link or connect to websites maintained and/or operated by third parties ("**Third Party Websites**"). SSI does not endorse, and is not responsible for, (i) the Third Party Websites and the policies and practices in connection with the Third Party Websites; or (ii) the products, services, surveys, and/or opportunities advertised, offered, and/or sold by, through or in connection with the Third Party Websites ("**Third Party Content**"). SSI does not make any representations or warranties regarding the Third Party Websites and/or the Third Party Content. Please carefully review all policies, and the terms and conditions, applicable to the Third Party Websites and Third Party Content.

## **11. Rights Pertaining to Personal Information.**

A. Access to Personal Information; Updating Personal Information. You may access your Personal Information in order to review, correct, or delete Personal Information by: (i) accessing your membership account and following the instructions contained therein; or (ii) sending an email request to [privacy@surveysampling.com](mailto:privacy@surveysampling.com). When contacting SSI via email, please include your first and last name and your specific request. SSI shall respond to requests for access to Personal Information within thirty (30) days of receipt of a request.

### **B. Opting-Out.**

For non-Panel members, you may request to be removed from SSI's database by sending an "opt-out" request to SSI in accordance with Section 12.A. of this Privacy Policy.

For Panel members, you may terminate your Panel membership by: (i) following the instructions set forth in your membership account; (ii) sending an email request to the member services team for the appropriate Panel; (iii) clicking on the unsubscribe link contained in a Survey invitation and following the instructions on the opt-out web page; or (iv) sending an "opt-out" request to SSI in accordance with Section 12.A. of this Privacy Policy.

SSI promptly processes all "opt-out" requests; however, you may continue to receive communications and/or Survey invitations from SSI for a few days following SSI's receipt of your "opt-out" request. If you opt-out, SSI will retain your Personal Information in SSI's unsubscribe database to ensure compliance with your "opt-out" request.

## **12. Enforcement; Safe Harbor Dispute Resolution.**

A. Questions or Complaints Generally.

SSI is committed to working with individuals to address any questions about, or to obtain a fair resolution to any complaints or disputes in connection with, this Privacy Policy. Any questions or complaints about this Privacy Policy should be sent:

*via regular mail, postage prepaid, addressed to:*                      or                      *via email to:*  
[privacy@surveysampling.com](mailto:privacy@surveysampling.com)

Survey Sampling International, LLC  
6 Research Drive  
Shelton, Connecticut 06484  
Attn: Legal Department

When contacting SSI via regular mail or email, please include your first and last name and specific information regarding your question or complaint.

B. Privacy Complaints by Citizens of EU Member Countries

In compliance with the Safe Harbor Principles, SSI commits to resolve complaints about privacy and its collection or use of Personal Information. Citizens of EU member countries with inquiries or complaints regarding this Privacy Policy should first contact SSI as set forth in Section 12.A. above.

Pursuant to the Safe Harbor Principles, SSI has further committed to refer unresolved privacy complaints from Citizens of EU member countries to an independent dispute resolution mechanism, the BBB EU Safe Harbor, operated by the Council of Better Business Bureaus, Inc. If a citizen of an EU member country does not receive timely acknowledgment of his or her complaint from SSI or if such complaint is not satisfactorily addressed by SSI, he or she may contact:

Council of Better Business Bureaus, Inc.  
BBB EU Safe Harbor  
4200 Wilson Boulevard, Suite 800  
Arlington, Virginia 22203 USA  
Phone: 703-276-0100  
Web: [www.us.bbb.org](http://www.us.bbb.org)  
Email: [eusafeharbor@council.bbb.org](mailto:eusafeharbor@council.bbb.org)

**NOTE:** The dispute resolution procedure described in Section 12.B. is only available for citizens of EU member countries.

**13. Agreement to Privacy Policy; Changes to Privacy Policy.**

You acknowledge your consent to, and agreement with, this Privacy Policy by: (i) joining a Panel, (ii) participating in a Survey, (iii) visiting a Panel website(s), and (iv) disclosing your Personal Information to SSI.

SSI hereby reserves the right, in SSI's sole discretion, to make changes to this Privacy Policy. SSI encourages you to review this Privacy Policy on an ongoing basis. SSI will treat Personal Information in a manner consistent with the Privacy Policy under which the Personal Information was collected, unless SSI receives your consent to treat the Personal Information in a different manner. By joining a Panel, continuing membership in, to, or with a Panel(s), participating in a Survey, visiting a Panel website(s), or disclosing your Personal Information to SSI, after SSI changes or modifies this Privacy Policy, you voluntarily and specifically give SSI your consent to collect, use, transfer, and disclose your Personal Information in the manner specified in the then-current Privacy Policy.

**Last Updated:** August 14, 2011