



# SSI Privacy Policy

Effective: August 15th, 2013

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Survey Sampling International, LLC and its parent, subsidiary and affiliated companies (collectively “SSI”) provide sampling solutions and technology 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 serves a vast array of for-profit and not-for-profit businesses, universities and governmental agencies and departments. This Privacy Policy sets forth the collection, use and disclosure of personal data or personally identifiable information (“PII”) and other information by SSI in connection with SSI’s Services (as defined herein). SSI’s Services provide you with the opportunity to join a Panel (as defined herein), participate in surveys (whether as a Panel member or a non-Panel member), use the websites associated with the Panels, and receive and redeem rewards and incentives, including, without limitation, sweepstakes entries, offered in connection with Panel membership and/or the completion of surveys (collectively “Services”). Registration with, use of, and access to SSI’s Services is subject to [SSI’s Terms and Conditions](#).

Your use of SSI’s Services is completely voluntary and therefore SSI’s processing of your PII in connection with the Services and this Privacy Policy is with your consent. SSI strives to conform its privacy practices to applicable laws, codes, and regulations, and the codes of standards of applicable market and opinion survey research associations, including, without limitation, CASRO and ESOMAR. For clarification, except for Panels that have a separate privacy policy, this Privacy Policy applies to all of SSI’s survey research panels, including, without limitation, SurveySpot, Opinion Outpost, OpinionWorld, Choozz and YourVoice (each a “Panel” and collectively the “Panels”). All references in this Privacy Policy to SSI include SSI and its parent, subsidiary and affiliated companies. All references to “us” or “we” refer to SSI.

All PII is stored on servers located in the United States, which servers are owned and maintained by SSI. SSI complies with the United States (“US”) - European Union (“EU”) and US – Swiss Safe Harbor Frameworks as set forth by the US Department of Commerce regarding the collection, use and retention of personal data from EU member countries and Switzerland. 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/>.

For the purpose of this Privacy Policy, the term “PII” shall include, without limitation, your name, address(es), telephone number(s) (including home, cell, and/or business telephone numbers), email address(es), date of birth, the unique identification number we assign to you (individually a “UID” and collectively “UIDs”), reward, loyalty, or incentive account numbers and Sensitive Data (as defined herein).

What information is collected by SSI, how is PII collected, and how is it used?

## 1. Information You Submit

SSI collects information from Panel members during and after registration with a Panel, including, without limitation, during participation in a survey and in connection with the receipt and redemption of rewards and incentives. When you sign up for a Panel you will be asked to provide certain PII and demographic information, including, without limitation, your name, address(es), telephone number(s) (including home, cell, and/or business telephone numbers), email address(es), date of birth, and occupation/education, and racial and gender information. In addition to the collection of PII mentioned above, during and subsequent to the registration process, you may be asked to voluntarily provide or disclose Sensitive Data. **“Sensitive Data”** means PII that discloses or reveals health and medical conditions, sexual orientation or sexual life, political opinions/views, race/ethnic origin, religious and philosophical beliefs and trade-union membership. Sensitive Data is used to target survey opportunities to you. By way of clarification, by voluntarily disclosing Sensitive Data to SSI you expressly consent to the transfer of Sensitive Data by SSI to the United States for storage and processing.

SSI collects PII and demographic information from non-Panel members prior to and during participation in a survey.

You may submit, upload or transmit content or material, including, without limitation, photos, videos and/or any other similar or related content or material (“User Content”). If you submit User Content in connection with SSI’s Services, the User Content may become publicly available and may be shared with third parties including, without limitation, SSI’s clients, clients of SSI’s clients and third party service providers. User Content should only include audio, video, images, or the likeness of the individual submitting the User Content and should not contain copyrighted or trademarked content or material of any third party. User Content should not include audio, video, images, or the likeness of anyone other than the user and should not contain any PII of or about anyone other than the user.

## 2. Information Collected Through Automated Means.

SSI may also collect certain information automatically, such as information about: (i) your device or computer and its capabilities, including, without limitation, the operating system, the applications or programs on your device or computer, IP address, device carrier, device type, time zone, network status, browser type, browser identifier, unique device identification number, carrier user ID (a number uniquely allocated to you by your network provider), media access control address, international mobile equipment identity, locale and other information that alone or in combination may be used to uniquely identify your device or computer; and (ii) your activities in

connection with SSI's Services, including, without limitation, survey data and responses, and reward, incentive, and/or sweepstakes information. Specific examples of this information, and the technology that collects it, are below:

Social Media Information. You may be offered the opportunity to access SSI's Services through third party social media platforms. If you select such option, SSI may collect certain profile information stored in your social media platform account.

Cookies.

## SSI's Use of Cookies Generally.

Cookies are small files that store certain data on a device or computer. SSI may use session and persistent cookies for several purposes including, without limitation, to provide a better survey experience, quality control, validation, to enable or facilitate survey participation, tracking of completed surveys or other completed actions, and for fraud detection and/or prevention. Session cookies expire when you close your browser. Persistent cookies remain on your device or computer indefinitely until deleted.

## Use of Cookies by Subcontractors Generally.

SSI uses third parties to provide services and certain functionality to SSI, including, without limitation, fraud detection services. SSI uses contracts with such third parties to control their use of cookies and to limit their use of cookies to the limited purposes set forth in the contracts.

## SSI's Online Ad Effectiveness Program.

In connection with SSI's online ad effectiveness program, you can participate in surveys regarding specific ads and promotions that SSI is testing for its clients. To facilitate the completion of these surveys, SSI's clients may write, set, or read cookies, locally shared/stored objects, flash cookies and/or any other related technology (each a **“Third Party Technology”** and collectively the **“Third Party Technologies”**). The Third Party Technologies may be written, set or read in various locations, including, without limitation, SSI's servers or systems. If you participate, your UID will be stored in the Third Party Technology to allow you to be re-contacted about the online ad or promotion and SSI's client will use the Third Party Technology to determine whether you have seen, clicked on, or otherwise interacted with the online ad or promotion. If you have interacted with the online ad or promotion, SSI's client will send your UID and the specific survey to SSI and SSI will provide you with the opportunity to complete the survey.

If you live outside of the EU and you have not previously agreed to participate in the

Online Ad Effectiveness Program, as of the Effective Date of this Privacy Policy, you hereby consent to participate. If you wish to opt-out, please follow the opt-out process and procedures here.

Cookie Notice: SSI values your privacy. Below please find a list of the cookies set or deployed by SSI and/or its partners, clients, and/or subcontractors in connection with the Services. For certain cookies no opt-out mechanism is provided. For the cookies with an opt-out mechanism, you can opt-out by clicking on the link provided below or by going to the appropriate website and following the opt-out instructions.

#### A. Essential Cookies:

Name:	Purpose	Consent
flch	Nebu DubInterviewer Session Cookie	no opt-out provided
flv	Nebu DubInterviewer Session Cookie	no opt-out provided
flvsn	Nebu DubInterviewer Session Cookie	no opt-out provided
flvuf	Nebu DubInterviewer Session Cookie	no opt-out provided
sfcRelevantId	Imperium RelevantID	no opt-out provided
RVCOOKIE	Imperium RelevantID	no opt-out provided
RVIDExtId	Imperium RelevantID	no opt-out provided
__EC_TEST__	Imperium RelevantID	no opt-out provided
ISISstest	Imperium RelevantID	no opt-out provided
thx_guid	ThreatMetrix	no opt-out provided
.SSI-ASPXAUTH	Session cookie	no opt-out provided

ASP.NET_SessionId	Session cookie	no opt-out provided
PHPSESSID	Session Cookie	no opt-out provided
ANYSSIDOMAIN#lang	Display the proper language	no opt-out provided
JSESSIONID	NewRelic Performance Monitoring - Session Cookie	no opt-out provided
PHPSESSID	FraudLogix Fraud Prevention	no opt-out provided

## B. Advertising - Online Ad Effectiveness Program/Advertising

Name	Purpose	Consent
ComScore	Online Ad Effectiveness Program	
Dynamic Logic	Online Ad Effectiveness Program	
	Ad Serving, Ad Targeting, Analytics/ Measurement, Content Customization	no opt-out provided
HotTraffic	Online Ad Effectiveness Program	
Nielsen	Online Ad Effectiveness Program	
YouTube	Ad Targeting	

MSI ACI	Online Ad Effectiveness Program	
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### C. Analytics and Customization - Data Collection

Name	Purpose	Consent
	Ad Targeting, Analytics/Measurement, Optimization	go to site

Log Files. SSI's Services may automatically gather and store certain information in log files, including, without limitation, data available from your web browser, including, without limitation, IP Address, browser type, internet service provider, referring/exiting pages, operating system, date/time stamp and click stream data.

Digital Fingerprinting. Generally, digital fingerprinting assigns a unique identifier to your device or computer based upon the device's or computer's technical settings, characteristics and IP Address. SSI uses digital fingerprinting technology for quality control and validation purposes and fraud detection and/or prevention, including, without limitation, identifying duplicate or fraudulent respondents. SSI may implement and use digital fingerprinting directly or through a third party vendor.

Watermarking. Generally, watermarking involves placing a technology or file on your device or computer to identify that it has previously been used to register with or access SSI's Services. Watermarking is used for quality control and validation purposes and fraud detection and/or prevention purposes. SSI may engage in watermarking activities directly or through a third party vendor.

## 3. Information collected from Third Parties

SSI may obtain PII and demographic information from third parties, including, without limitation, information services bureaus, other sample suppliers and/or social media platforms. SSI may use the PII for various purposes, including, without limitation, data validation, data append, fraud detection purposes, and/or sending you a one-time email to invite you to participate in a survey and/or join a Panel.

## 4. SSI's Use of Information

In addition to other purposes set forth in this Privacy Policy, SSI uses information collected through SSI's Services as follows: (i) to

communicate with you regarding your membership with a Panel; (ii) to communicate with you regarding your participation in a survey (s); (iii) to tailor survey opportunities to you; (iv) to send you notifications of survey opportunities; (v) to comply with any and all legal obligations, including, without limitation, tax obligations; (vi) to administer and manage SSI's reward and incentive programs and fulfill your requests for rewards and incentives; (vii) to facilitate your entry into SSI's sweepstakes and promotions and communicate with you regarding such entries; (viii) to update SSI's records; (ix) to comply with any data suppression obligations or requirements; (x) for fraud detection and/or prevention purposes; and (xi) as otherwise permitted pursuant to this Privacy Policy or as otherwise authorized by you.

## [What communications will I receive through SSI's Services?](#)

SSI and/or SSI's agents, processors, and/or vendors or subcontractors may contact you or communicate with you as follows:

1. Via "push" notifications or SMS/text messages, if you expressly agree to receive such communications, for participation in surveys.
2. Via email communications for the purpose of: (i) sending you survey invitations, (ii) communicating with you regarding your survey participation (past, present and/or future), (iii) communicating with you regarding reward or incentive information, inquiries, and/or redemption, (iv) sending you newsletters, (v) sending you notices required to be provided hereunder or required by law, (vi) communicating with you regarding sweepstakes or prize draw promotions, including, without limitation, winning entries to or for such sweepstakes or prize draws, and (vii) responding to inquiries received from you.
3. Via telephone for the purpose of: (i) communicating with you on or about your survey participation (past, present and/or future), (ii) communicating with you regarding reward or incentive information, inquiries, and/or redemption, (iii) sending you notices required to be provided hereunder or required by law, (iv) communicating with you regarding sweepstakes or prize draw promotions, including, without limitation, winning entries to or for such sweepstakes or prize draws, and (v) responding to inquiries from you. Additionally, SSI may use the business or work telephone number you provide during panel registration or during completion of SSI's business-to-business profiler questionnaire to call you to verify: (a) your qualification for surveys designed for individuals working in certain professional or business roles or capacities, and/or (b) your registration or qualification for a survey panel(s) specifically designed for individuals in certain professions. The verification process may involve verifying information or data you have previously provided or supplied to SSI.

## [Does SSI share PII and other information collected through SSI's Services with third parties?](#)

SSI will disclose PII and other information collected through SSI's Services to third parties as follows:

1. With your consent, other than your consent to the processing and sharing described in this Privacy Policy and specifically this section.
2. Pursuant to applicable law or in response to a subpoena or an order of a court or government agency.
3. To establish, exercise, or defend legal claims of an individual or SSI, including in order to protect the safety of an individual or to protect SSI's rights and/or property.
4. Between various Panels if you sign up for more than one Panel.
5. To a parent, subsidiary, or affiliate of SSI: (i) in the event of a reorganization or restructuring, or (ii) for use and processing in accordance with this Privacy Policy or as authorized by you.
6. To authorized agents and/or subcontractors of SSI and/or of SSI's clients, who are providing services, including, without limitation, data append services, data validation services, fraud detection and/or prevention services, database-matching services, coding services, data segmentation services, and reward, incentive, and sweepstakes related services.
7. To a client for limited market research related uses including, without limitation, modeling, validation, fraud detection and/or prevention, data append, database segmentation, and reward, incentive, or sweepstakes redemption, fulfillment, and/or entry in connection with your participation in or completion of a survey.
8. 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, provided that the party receiving or acquiring the PII agrees to use, protect, and maintain the security, integrity, and confidentiality of PII in accordance with this Privacy Policy.
9. To partners of SSI who offer incentives for use of SSI's Services, solely for the partners' use in connection with their incentive program and its terms of use, including, without limitation, the crediting of member accounts maintained by the partners for individuals who use or participate in SSI's Services.
10. As otherwise permitted pursuant to this Privacy Policy.



Additionally, UIDs and information collected by automated means are provided to third parties, including, without limitation, clients, partners, agents and/or vendor for several purposes including, without limitation, identifying respondents for re-contact surveys or communications, fraud detection and/or prevention, database matching, data validation, data append, coding, data segmentation, and reward, incentive, sweepstakes or promotion related services and/or developing aggregated data insights regarding our survey respondents and providing a client(s) with access to and use of the aggregated data insights.

With respect to information collected through SSI's Services, SSI will provide survey data and responses to SSI clients with no PII disclosed by SSI, other than UID. If you voluntarily disclose PII in connection with your survey responses, and SSI collects the survey responses, SSI will transfer the survey responses, UID and the voluntarily disclosed PII to SSI's client. In addition, SSI may share geographic and/or demographic data SSI collects from you during enrollment or through certain profile questions SSI may ask you. Such data may be shared with third parties in single summary form (i.e. individual respondent level) or aggregate summary form (i.e. a group of respondents).

SSI's clients may engage SSI to supply or provide demographic information of or about individuals who have viewed an advertisement or visited a website for the purpose of measuring internet and digital media audiences. The demographic information may be provided or supplied to SSI's clients. The demographic information and analysis performed by or on behalf of SSI's clients assist with the creation, development and implementation of websites, online advertisements and other Internet and digital media features, functionality and campaigns.

Generally, disclosures of PII by SSI to a third party, except for disclosures of UIDs, are made pursuant to a written agreement between SSI and the third party, which, among other things, limits use of the PII. SSI may allow a client to collect PII directly from respondents. The disclosure is voluntary and, prior to collection, the client is required to enter into a written agreement with SSI, which, among other things, limits use of the PII.

### [What if I want to tell a friend about SSI's Services?](#)

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If you would like to tell a friend about SSI's Services you can use SSI's tell-a-friend feature. To use SSI's tell-a-friend feature, you will need to complete SSI's online form that will require you to enter your name and email address. SSI will send you an email containing a link to SSI's join page. You can then forward the link to your friend.

### [Does SSI hire third parties to recruit individuals to use SSI's Services?](#)

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SSI may engage third parties to recruit individuals to use SSI's Services including, without limitation, to join a Panel or participate in a survey. The recruitment activities may include, without limitation, the third party placing banners or advertisements on websites or sending email communications offering the opportunity to join a Panel or participate in a survey. This Privacy Policy only applies to PII when SSI actually collects the PII and does not cover or apply to the recruitment activities performed by the third parties.

### [How can I opt out of certain data collection and/or use?](#)

– There are multiple opt-out options for users of SSI's Services:

Panel members may opt-out by: (i) following the instructions set forth in your membership account; (ii) clicking on the unsubscribe link contained in a survey invitation and following the instructions on the opt-out web page; or (iii) contacting us as set forth below.

You may opt out of email communications, by clicking the unsubscribe link in any email you receive from us or contacting us as set forth below.

You may opt-out of participation in SSI's Online Ad Effectiveness Program, by going into the membership dashboard or my profile section and checking the box next to "No, I do not want to participate in Online Ad Effectiveness Program surveys". To delete the cookies used in connection with SSI's Online Ad Effectiveness Program, please review the section of this Privacy Policy addressing cookies.

You may opt out of sharing social media platform profile data by changing your preference/profile settings with the social media platform regarding the sharing of data with third parties.

To delete all information collected by SSI please contact SSI as set forth below.

### [How long does SSI keep my PII and other information?](#)

– SSI will retain PII and other information relating to your use the Services during your use of the Services and for up to one (1) year thereafter or such other period as may be required or permissible by law.

### [How can I access the PII and other information collected about me?](#)

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You may request access to review, correct, delete or to object to the processing of your PII by contacting us as set forth below.

### [Does SSI collect data from children?](#)

SSI 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 of 1998 in the United States (as amended). SSI carefully considers both privacy issues and parental concerns in connection with surveys involving individuals under the age of eighteen (18). Certain countries where SSI operates and maintains a Panel may prescribe an age threshold under which parental consent is required for the collection of PII. SSI's Services are not designed or intended for use by any individual under such age thresholds. SSI does not knowingly collect PII from anyone under such age thresholds. If SSI became aware that it had inadvertently collected PII from anyone under such age thresholds, SSI would promptly delete such PII. For example, in the United States, SSI's Services are not designed or intended for use by any individual under the age of thirteen (13) and SSI does not knowingly collect PII from anyone under the age of thirteen (13). Parents, guardians or other persons with parental rights are encouraged to contact SSI, as set forth below, to discuss this Privacy Policy and their rights to access, review, correct, delete or object to the processing of PII of or about their child or children.

### [What security is available for the PII and other information collected through the Services?](#)

SSI maintains appropriate technical, administrative and physical safeguards to protect PII and other information disclosed or collected by SSI. SSI reviews, monitors and evaluates its privacy practices and protection systems on a regular basis. Notwithstanding the foregoing, transmissions over the Internet and/or a mobile network are not one hundred percent (100%) secure and SSI does not guarantee the security of transmissions. SSI is not responsible for any errors by individuals in submitting PII to SSI.

### [Who can I contact with questions or complaints about this Privacy Policy?](#)

#### Questions or Complaints Generally.

If you have any questions or complaints regarding SSI's privacy practices and/or this Privacy Policy or want to communicate an opt-out request to SSI, or want to exercise your rights to access, review, correct, delete or object to the processing of PII, please contact us via email at [privacy@surveysampling.com](mailto:privacy@surveysampling.com). SSI's Legal Department is responsible for the organization's compliance with this Privacy Policy.

## Questions or 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 PII. Citizens of EU member countries with inquiries or complaints regarding this Privacy Policy should first contact SSI as set forth 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

## Are there any companies within the SSI Group located in the EU that may collect, store and process PII?

- Survey Sampling Europe BV - Weena 161, 3013 CK Rotterdam, Netherlands
- SSI Denmark ApS – Frederiksholms Kanal 4B, DK-1220, Copenhagen K Copenhagen
- Survey Sampling France SASU - 22 rue de Dunkerque, 75010 Paris, France
- Survey Sampling Germany GmbH - Kaiserstrasse 13, 60311 Frankfurt am Main, Deutschland
- Survey Sampling RO S.R.L. - 12 Popa Sapca Street, Timisoara 300057
- Survey Sampling Spain S.L. - C/ Carranza, 25, 2ª planta, 28004, Madrid, Spain
- SSI Sweden AB - Drakens Gränd 8, 111 30 Stockholm, Sweden
- Survey Sampling UK Ltd. - Commonwealth House, 7th Floor, 1-19 New Oxford Street, London WC1A 1NU

