

**SUPPORTING STATEMENT (PART B) FOR NEW AND  
REVISED INFORMATION COLLECTIONS**

**OMB CONTROL NUMBER 3038-0107**

**B. Collections of Information Employing Statistical Methods**

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

**1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

Total universe of potential respondents is 64,443,716 individuals aged 50-65 (November 2012, Current Population Survey). We estimate that overall, 10,000,000 could potentially meet the screening criteria:

- Ages 50-65
- College educated
- Middle to upper income
- Financial decision-maker in household

The typical response rate for an online study drawn from a panel sample for a 15 minute interview is approximately 50%. Based on our estimates we anticipate that 50% of those 10,000,000 individuals will self-identify as financially literate and thus qualify for the study.

**2. Describe the procedures for the collection of information including:**

- **Statistical methodology for stratification and sample selection,**
- **Estimation procedure,**
- **Degree of accuracy needed for the purpose described in the justification,**
- **Unusual problems requiring specialized sampling procedures, and**
- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The CFTC proposes to collect information from a specific segment of consumers to gather data on messaging designed to drive consumers toward educational resources on investment fraud. Some questions in the survey will inform the specific content of those messages. Other questions will be used to help segment the audience by those more likely to be fraud victims

based on their contextual responses (e.g. seeing which message statements are rated highest among those who perform minimal background research on investment advisors).

The proposed study will involve a sample of approximately 1,100 respondents who are ages 50-65, have a household income of at least \$60,000, and are familiar with a set number of investment products. This screening criterion reflects common characteristics of a relatively new vulnerable target for financial fraud, given the increased level and diverse types of investments pre-retirement Americans now consider. Additionally, this target is considered one of the more difficult to reach in these educational efforts given the common belief they are knowledgeable enough about investments to avoid common fraud scams. Therefore, a survey of this size among this select, narrow audience will allow us to prioritize our messaging efforts, especially among those most vulnerable for fraud given their investment behaviors, research steps, life events, or other circumstances measured in the survey. A survey among a more broad audience, even one narrowed to 50-65 year olds, would likely not produce enough sample to analyze messaging among small but key groups like those familiar with investments who have been approached with fraudulent offers in the past (to offer one example).

Although quota sampling will ensure that the respondents share characteristics similar to the target population, and although the panel will include nationwide coverage, CFTC staff does not expect this Internet sampling procedure to yield a national probability sample. As such, CFTC staff does not intend to generate nationally representative results or precise estimates of population parameters from this study.

CFTC and OMB agree that the use of the Internet panel for this study will not yield nationally representative results or precise estimates of the population. However, the use of the Internet panel does provide strong internal validity for comparisons of the different treatments. CFTC will appropriately qualify the results from this research.

As discussed in section A2, a primary purpose of the study is to validate the findings from the qualitative research using a quantitative methodology in an effort inform outreach efforts from the OCO on investment fraud. As such, a primary research objective is to compare the audience reactions to educational messages.

In addition, this summary report will be made publically available. CFTC will post it in PDF format on the Consumer Protection sub-section of the agency website, under its 'Resources' page. Therefore, anyone visiting the site will be able to view report. The only external communication OCO will undertake indicating this report is available is through its monthly e-newsletter to roughly 800 generally government, nonprofit, and academic contacts who have an interest in financial literacy, investor education, and/or consumer protection. The posting will include language indicating the report is not for any particular government statistical, policy, or regulator purpose, but rather possibly helpful in the overall body of knowledge within investor education."

Therefore, the statistical power to detect small differences in audience reactions is of paramount importance. The sample size of 1100 has sufficient power to compare 4 stimulus materials between subjects to detect a small effect size (.15) with alpha = .95. Online data collection

modality affords the most cost effective approach to collecting these data. We propose to use the blended sample approach to recruit participants. The blended sample approach relies on multiple sample sources:

- Up to 30 independent opt in panel sources
- Internet intercepts (individuals recruited through banner ads and/or widgets embedded on web sites and social networking sites)

Our partner, Ipsos, uses the Ampario system to generate blended samples. The concept behind this application is that 90% of the American population has access to the Internet either at home, work, school, or some other public place. Ipsos has arrangements with some of the most visited websites to immediately invite people who visit those websites into our surveys, in real time. These people are directed to Ipsos's website which is governed by Ampario. Ampario gathers basic information about people such as age, gender, and zip code and then randomly assigns them to studies. Gathering this basic information helps to optimize the random assignment so that for example, regional quotas can be maintained or gender specific or age specific studies can be addressed. For this project, respondents over the age of fifty who are college educated, middle to upper income, and the financial decision-maker in their household will be directed to the study.

Ipsos staff monitors the traffic coming from various websites and controls the blending rate of these respondents, so that the total mix of people being sampled reflects the U.S. population across many demographic and behavioral measures.

**3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

As noted above, this is a convenience sample from the Internet, not a national probability sample. As such, no meaningful response rate can be calculated and not nationally representative results or precise estimates of population parameters can be derived from this study. However, the use of the Internet panel does provide strong internal validity for comparisons of the different treatments, and CFTC will appropriately qualify the results from this research.

As noted in our response to Question 9, cooperation rates are maximized using token incentive structures.

**4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.**

No pretesting will be implemented.

**5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

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## Attachment A: Ipsos Privacy Policy

Revised on August 6, 2013

The purpose of this Privacy Policy is to inform you about the practices and procedures of Ipsos Interactive Services, commonly known as "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 or that is provided to us through our web site(s). The Privacy Policy applies to any information we collect or receive about you, from any source, and 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. has been awarded TRUSTe's Privacy Seal signifying that this Privacy Policy has 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. The TRUSTe certification covers the sites [www.i-say.com](http://www.i-say.com) and [www.i-say.ca](http://www.i-say.ca), but does not cover information that may be collected through downloadable software. 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 are a resident of the United States of America and have any questions or comments regarding this statement, please contact Ipsos i-Say Member Services by:  
In writing: 1600 Stewart Avenue, Suite 500, Westbury, NY, 11590, USA  
Phone: 1.866.893.1188  
Email: [questions@i-say.com](mailto:questions@i-say.com).

If you are a resident of Canada and have any questions or comments regarding this statement, please contact Ipsos i-Say Member Services by:  
In writing: 160 Bloor Street East, Suite 300, Toronto, ON, Canada M4W 1B9  
Phone: 1.888.618.2056  
Email: [panel@i-say.com](mailto:panel@i-say.com).

If you are not satisfied with our response you can contact TRUSTe [here](#).

We are proud to demonstrate our commitment to your privacy. As part of this commitment we review our privacy policies regularly and may update this Privacy Policy at any time. Therefore please check the website periodically for the most up to date version of our Privacy Policy. Continued participation in our panels or use of our applications after we publish an updated Privacy Policy is considered acceptance of the modified or changed Privacy Policy.

[1. What is Personal Information?](#)

[2. How do we collect your Personal Information?](#)

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- [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 other third parties?](#)
- [9. How long will we use, disclose or retain your Personal Information?](#)
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- [11. How do you know your Personal Information we possess is accurate?](#)
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- [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. What apps do we use, and what information do they collect?](#)
- [18. How do you contact us regarding access to your Personal Information or our Privacy Policy and practices?](#)
- [19. How will we inform you of any changes to this Privacy Policy](#)
- [20. How do we use log files, cookies, digital fingerprinting, etc.?](#)

## **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.

## **2. How do we collect your Personal Information?**

We will always collect your Personal Information, including email address, by fair and lawful means, where we have obtained your consent to do so or as otherwise permitted by law. We collect your information when you join one of our online research panels and complete one of our recruitment questionnaires. We also collect your information when you participate in any of our surveys, or you communicate with us by email, telephone, through our web sites or by letter. Members of Your Household - 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. Refer Friends - We offer a refer-a-friend feature on our websites, which enables you to invite your friends to participate in our surveys. This process will ask that you provide your friends first

name and email address. Upon submission, an automated email message is sent to your friend's email address which includes the registration link where they can join. We also include an Opt Out link in this same email and the referral is able to Opt Out from receiving emails from our refer-a-friend feature. We limit the number of referrals to five (5) per day.

We may also use a third party agent to host surveys that collect your Personal Information on our behalf, 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 without your consent.

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 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 without your consent.

If you have been chosen as a winner in one of our contests you will be given the option to provide a testimonial and, should you wish to provide one, an electronic picture of yourself to be posted in the Winners section of our website. Providing this additional information is optional, and your testimonial, together with you first name and last initial, and photo if you provided one, will only be posted on the website if you provide your consent.

**Panel+ Application** – If you join our Panel+ program and install the Ipsos Panel+ Application, we will also collect information from you via the Ipsos Panel+ Application. Please see Section 17 (What apps do we use and what information do they collect?) below for details of what information we collect using the Ipsos Panel+ Application.

**Facebook Application** – We collect your Facebook basic profile information (meaning your name, e-mail address, gender, birthday and location) that you have consented to our using when you connect to, and use the Ipsos Facebook Applications within your Facebook account. Please see Section 17 (What apps do we use and what information do they collect?) below for details of what information we collect using the Facebook Application.

### **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 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 provide you with

details in advance and obtain your express consent for the collection, use and disclosure of this 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.

On the website, there are various features that require your email address to be provided and/or will result in an email message confirmation or notification to be sent. These features include, but are not limited to: Sign In, Forget Your Password, Refer Friends, Address Change, Electronic redemptions, and gift eligibility, and Report a Vacation. 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 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 receipt.

#### **6. 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;
- if Ipsos is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information
- 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 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.



## **7. 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 may provide your consent to allow us to use your Personal Information to disclose to our clients, including your email address, for the purposes of conducting social and market research and, in other circumstances, if you want to be contacted about a bad experience with a product or service which you are being surveyed about. 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.

## **8. 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 that 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 would be required to comply with this requirement.

## **9. How long will we use, disclose or retain your Personal Information?**

We will use, disclose or retain your Personal Information, including email address, for as long as necessary to fulfil 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, or if you wish to cancel your account or request that we no longer use your information to provide you services, you can contact our Member Services team using any of the methods described in the Contact Us section of our website. You can update or delete most of your Personal Information, including email address and phone numbers, from the My Profile page on our website.

## **10. 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, about 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. All comments, questions, concerns or complaints regarding your Personal Information or our Privacy Policy and practices, should be forwarded to our Privacy Officer as indicated below (See Section 17).

If you were chosen as a winner in one of our contests, and consented to and provided a testimonial in your name and/or provided a picture on the Winners page of our website, you can request to have this information removed at any time. To make a request for your testimonial and Personal Information to be removed from our Winners section, please contact our Member

Services using any of the methods described in the Contact Us section or on 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

160 Bloor Street East, Suite 300

Toronto, ON, M4W 1B9, CANADA

### **11. 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.

If you are a resident of the USA, you may submit changes to your Name, e-mail Address, Telephone Number online at [www.i-say.com](http://www.i-say.com), by e-mail at [questions@i-say.com](mailto: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, e-mail Address, Telephone Number online at [www.i-say.com](http://www.i-say.com), by e-mail at [panel@i-say.com](mailto:panel@i-say.com), by telephone 1.866.893.1188, or by writing to us at Ipsos, Member Services, 160 Bloor Street East, Suite 300, Toronto, ON, M4W 1B9, Canada.

### **12. 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.

### **13. 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.

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

We do not normally charge you for requesting any of your Personal Information we may hold, or for information about our Privacy Policy or practices. If it is necessary to charge you, we will always provide you with an estimate of the approximate costs before proceeding with your

request. You may then withdraw your request for access to information by notifying us within the thirty-day notice period disclosed on the estimate.

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

We take your privacy very seriously and will only release information once we are satisfied the request has been made by you. To help us keep your Personal Information safe and before we permit access to the existence, use or disclosure of your Personal Information, including email address, we may request that you provide sufficient identification to confirm the request has been made by you. We can assure you that any such identification information we request will only be used for this purpose, and will not be retained any longer than is necessary for this purpose.

**16. 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, including email address, from loss or theft, unauthorized access, disclosure, copying, use or modification. The only employees, who are granted access to your Personal Information, including email address, 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, including email address. The systems used to store your Personal Information, including email address, are located in secure data centers. We prevent electronic intrusion by using firewall technology. The employees who are granted access to your Personal Information, including email address, can only access it using secure connections and passwords from within our networks.

**17. What Apps do we use and what information do they collect?**

We currently make available two Applications to our members.

**The Facebook i-Say App:**

We have created an "i-Say App" that we make available to any Facebook user aged 16 or older (the "App" or the "i-Say App"). You do not have to be a member of the i-Say panel to use it. The i-Say App allows you to create your own polls on your Facebook Page, vote in Quick Polls generated by other users of the App, invite your friends to connect to the App and access information and reports posted within the App. It also provides access to the i-Say blog website where you can find out more information about our panels and how to join our panel if you are not already one of our panelists. If you are a panel member you can also login to the i-Say website using your panel username and password via the App which will allow you to open your surveys list and access your panel point's account via the App while in Facebook.

The i-Say App collects your basic Personal Information from your Facebook profile, including your name, e-mail address, gender, birthday and current city. We also collect any information you may provide when you voluntarily complete any of the surveys you are invited to participate in through the App, or you provide feedback, comments or other information on the App.

We will use the information collected using the App to

- Send you invitations to participate in surveys within the App;
- Keep a record of all Facebook users who use the App
- Create anonymous, statistical profiles of individuals based on the information provided in your Facebook account information that we will use for our research; and

- If you have given your prior explicit consent, to post on your behalf on your Facebook Wall under the App's name: App status updates, upload photos, comments, notes, questions, posting content to events or groups and similar activities related to the App and/or your participation, usage and connection to the App.

You can remove the App from your Facebook account any time you wish.

Please note that we reserve the right to disable the App or remove it completely from the i-Say Facebook Page without notice at any time. If we do remove the i-Say App or disable it, we will delete all of your Facebook contact details, together with any other information that could be used to identify you, leaving only anonymous responses to surveys that you may have participated in.

### **The Panel+ Application**

The Panel+ Application ("Panel+") is only made available to panel members who join our Panel+ program. The Panel+ program enables panelists to take part in additional research studies not open to other panelists. If you join the Panel+ program and install Panel+, it will collect information relating to advertising material, including any audio or video advertising material that we presented to you in place of, or in addition to the actual advertising material contained on the website visited.

In order to be able to provide help or support when installing, using or uninstalling Panel+, Panel+ logs the following events:

- Date and time of installation and, if applicable, uninstallation.
- Installation failure reason (examples of failure include: the version of Windows™ being used is too old to support the Panel+, the user has insufficient rights on the machine to install software, "other" error occurred, or user cancelled the installation).
- Date and times when Panel+ is active.

With your prior consent, we also use Panel+ to automatically collect information on how you use the internet. The information collected will vary from project to project, but will only include the following:

- Use of key words in comments or website posts you may make.
- Details of any Internet search engine queries and the results presented to you from those queries.
- How you navigate pages using the mouse. For example, details of any links or advertising you may click on.
- Details of any advertisements displayed to you online, including any audio or video advertising.
- Information about the websites you may have visited. This information includes:
  - o All visited website addresses (URLs);
  - o website addresses accessed by individual webpage's as they load (also known as "Background Requests"); and
  - o Details of any audio or video content accessed via the website (for example "YouTube" video content that has been viewed).

With the exception of checking for key words included in any comment or other online post you may make, Panel+ does not collect keystrokes or information that is entered into a web-form, such as website user-ids, passwords, credit card numbers, other financial account numbers or other private data or any other data on a page in secure session. As a result, Panel+ will normally not have access to any information regarding items in a website shopping basket or your interactions with financial or health-related websites that you may log into as these are normally secure sites.

However, in the event that any such private data is displayed in a URL, it is possible that such data will be collected. In addition, on certain "social networking" sites, posts, updates and pictures are unsecured and typically included as part of the page's source code. As a result, it is possible that we may gain access to your Personal Information, including sensitive health or financial information based on the way that certain websites display information. Please be assured that collecting such Personal Information is not the purpose of Panel+, and any such data will be securely deleted from our systems if found to have been collected.

For further details about how Panel+ works, please see the Application Information Sheet that can be found here <http://www.ipsos-interactive.com/IpsosToolbar/FAQ.aspx?respondentid=100404349>

**18. 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 Avenue

Suite 500

Westbury, NY, 11590,USA

(Canada Residents)

Ipsos

Member Services

160 Bloor Street East, Suite 300

Toronto, ON, Canada, M4W 1B9

By email:

(USA Residents)

[NAPrivacyOfficer@ipsos.com](mailto:NAPrivacyOfficer@ipsos.com)

(Canada Residents)

[CdnPrivacyOfficer@ipsos.com](mailto:CdnPrivacyOfficer@ipsos.com)

## **19. How will we inform you of any changes to this Privacy Policy**

If there are changes to what information we collect or how we may use it, we will post these changes in this Privacy Policy 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' Personal Information, including email address, in a manner different from that stated at the time of collection we will notify users via email prior to the change becoming effective. 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 prior to the change becoming effective.

This Privacy Policy will always be available on our website at [www.i-say.com/Privacy/](http://www.i-say.com/Privacy/), and becomes effective upon posting. So please do check the website periodically for details of our most up to date version of our Privacy Policy. Continued participation after posting is considered acceptance of the modified or changed Privacy Policy. The Privacy Policy's "last revised" date will appear at the top of this page.

## **20. How do we use and incorporate log files, cookies, digital fingerprinting and other related third party information and applications?**

### **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 clickstream 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 Personal Information, including your email address.

### **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 Personal Information, including email address, you submit while on our site. We sometimes use other technologies to store similar information.

We use session cookies to make it easier for you to navigate our site. Ipsos may set and access Ipsos cookies on your computer to let you access our surveys. Ipsos may read third-party cookies or other objects that may have been set outside of our domain by trusted vendors. Reading these third-party cookies helps our research by allowing us to determine whether you have visited the website or have been exposed to the advertising of one of our clients.

You can have your web browser disable "cookies" but if you turn off "cookies," you will not be able to access our surveys. Cookies are used for security purposes so we can recognize your computer and prevent malicious users from taking surveys multiple times and affect the statistical validity of our results.

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](http://www.i-say.com) and [i-say.ca](http://i-say.ca) only and does not cover the use of cookies by any third parties.

Some of our business partners also use cookies on our site. We have no access or control of these cookies.

### **Use of cookies for testing advertising**

We work with carefully selected partners to carry out research on new online advertising. This involves our placing a cookie on your machine that allows our partners to identify you as one of our panelists for the sole purpose of presenting online advertising material to be tested in place of the online advertisement that would normally be presented to you. This cookie contains a unique code, but no Personal Information about you or your use of the internet. If you do not wish to take part in this type of research, you can opt out at any time by sending an email to either (i) in the US, [questions@i-say.com](mailto:questions@i-say.com) or (ii) in Canada [panel@i-say.com](mailto:panel@i-say.com). Please note this does not opt you out of being served the online advertisements that would normally be presented to you when visiting other websites.

### **Clear Gifs**

From time to time, we employ a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs). Clear gifs 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, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by clear gifs to our customers' Personal Information.

We use clear gifs in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. If you would like to opt-out of these emails, see Section 5 above for opt-out instructions.

Some of our business partners also use clear gifs on our site. We have no access or control of these clear gifs.

### **Digital Fingerprints**

We may use digital fingerprinting technology, also known as "Machine Identification" digital fingerprints, to gather certain information about your computer hardware and software, for example, your IP address, the display settings of your monitor, the type of browser you are using, the type of operating system you are using, etc. This information is sent to our trusted third-party partner who converts it into a unique serial number – the digital "fingerprint" – and determines if

it matches previous fingerprints. The data collected in this process and the digital fingerprint created is not tied to any of your Personal Information, is stored on secured servers, and is used only to help prevent panelists from completing the same survey many times and for no other purpose.

### **Public Forums**

Our Web site offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your Personal Information from our blog or community forum, contact us at the contact information above. In some cases, we may not be able to remove your Personal Information, in which case we will let you know if we are unable to do so and why.

### **Links to Other Sites**

Our Web site includes links to other Web sites whose privacy practices may differ from those of Ipsos. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the Privacy Policy of any Web site you visit.

### **Social Media Features**

Our Web site includes Social Media Features, such as the Facebook Like button. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the Privacy Policy of the company providing it.