

## **1.1 Toluna USA Privacy Policy**

### **Commitment**

Toluna is an online data collection company focused on providing high quality data to the full-service marketing research industry, advertising agencies and consultancies. We build and maintain large online consumer panels. You can be assured your privacy and the confidentiality of your information is our number one priority. All of the data that Toluna collects in our research studies report as aggregate information, that is, information about groups - not individuals. Individual information is never reviewed or published without your consent, as it is irrelevant to the research conducted by our clients. All individual information provided is held confidential in accordance with the terms of this Privacy Policy.

### **The information we gather**

Toluna gathers personal information when an individual registers to become a member of our panels. Your participation in any of our panels and surveys is voluntary. After registration we ask panel members to provide us with more personal information so that we may invite them to appropriate surveys. To become a panel member, we ask that you fill out a registration survey that gathers some personal and general consumer information. We ask for your Email address so that we can send you Email invitations to participate in our upcoming surveys. The other information we gather, such as your name, address, gender, birthday, and employment status, is for matching you with the appropriate marketing research projects. Your birthday is used to automatically update your age for us to target age-related marketing groups. We ask you for this information as a means to see if you might qualify for particular projects. All Email contact from Toluna will be sent to your primary Email address that you gave to us upon registration. If you become a panel member, your information (name, address, city, state, and zip) is also used for the purposes of incentive fulfillment. When incentive points are deposited in your account and you wish to redeem them, this information is required so that we may send your reward to the appropriate recipient address. From time to time, a third party may be used for issuing checks or processing the delivery of rewards; your personally identifiable information will not be used for any other reason, but to mail you your reward.

In some circumstances, Toluna may ask you to inform us of your sensitive personal data, unless we are permitted to process such sensitive personal data by law, we will ask for your consent. In general sensitive data that may be collected by Toluna may cover: your racial or ethnic origin; your political opinions; your physical or mental health or condition; and your sexual life. This information is not shared with any third party, except as required by law and as part of a transfer of Toluna's business.

If you take a survey or provide us with personal information without being a member of our panel, the only personally identifiable information we will preserve is your Email address, gender, age, ethnicity and zip code, machine ID and IP address. We do this so we may contact you if you have won a prize or are entitled to an incentive, to match you to appropriate surveys and improve the user experience. Unless you elect to become a member of the Toluna panel, we will not contact you for any reason other than to notify you that you have won a prize or are eligible for an incentive. If you are entitled to a prize or an incentive, we will collect and maintain such personally identifiable information, as we are required to maintain or report by virtue of any law or regulation.

You should be aware that any personally identifiable information you choose to make public on the site, in the Community area (under a public message on your wall, as an opinion, topic, battle, thumb it, or any other public area or forum) can be read, collected, or used by other users and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit or make

public. In addition, we are not responsible for the content you publicly post on the site that can be found via web-based search engines.

### **Use of this information**

Toluna does not sell or transfer the personally identifiable information collected about the members of its panels or the individuals that take surveys for us. Information which is personally identifiable will only be transferred with your prior permission on a case-by-case basis, except for the narrow exceptions specified below. If you are a member of the Toluna panel, your information is stored in our proprietary database so we may call upon it to determine which people match up with specific research studies. If we think your profile makes you a potential candidate for a study, we will Email you an invitation to make you aware of this opportunity. From time to time Toluna may use third-party software for Email list management and Email distribution, or may use third party list management providers to match the members of our Panel to members of other lists or panels, or to validate accuracy of personal information you provide. We may use third parties to provide us with data they have collected about you, and append this data to your demographic profile. In such cases only a minimum amount of information is transferred to these third parties so as to enable them to perform specific functions on our behalf. We also may share your information with our service providers, such as to provide prizes you have won or other incentives for your participation in our panels.

Your information may be transferred to other countries, including the United States. All such transfers shall solely be made in accordance with applicable law.

### **Sharing**

Though we make every effort to preserve your privacy, we may need to disclose your personal information when we have a good-faith belief that such action is necessary to comply with a judicial proceeding or a court order or if we believe it is necessary in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of the Toluna site terms, or as otherwise required by law. Toluna may also disclose your personal information to third parties where it has your express permission to do so, or where it can reasonably be inferred from the circumstances that you consent to the disclosure to the third parties.

### **The Use of Cookies and Local Shared Objects on Our Site**

#### **Cookies:**

One or more "cookies" will be placed on the hard disk of the computer(s) used by site visitors, panelists and survey takers in order to allow Toluna to recognize the participant when they connect to the Toluna website, in order to facilitate the management of Toluna, for statistical purposes (pages consulted, date and time of consultations etc.), and to enable us to provide the participant with surveys specifically tailored to his / her interests. This will not affect the performance of your computer but simply provide you with additional opportunities to receive more surveys relevant to your interests.

Only information collected by cookies as specified in this section of our privacy policy is automatically collected from users of the site. In the event that we do collect any personal data about visitors to the site it is available only to Toluna.

By the use of the site all site users authorize cookies to be put in place and their use by Toluna and Toluna's clients and business partners. The cookies will expire after one year.

Site users may disable the installation of "cookies" or to delete cookies installed by Toluna or its clients. To do so you should modify your browser settings click on the help section of your Internet browser and follow the instructions.

Local shared objects:

In order to enhance your experience as a panel member and to increase your opportunities to participate in surveys, Toluna would like to install an application on your computer that will collect limited data about certain websites you visit and certain advertisements that are displayed to you during your website browsing. The application consists of an HTML cookie and local shared object (LSO).

The application will signal when you visit a website that utilizes a participating internet advertising network. The signal emitted from the application identifies tags contained in certain on-line advertisements relating to our clients. It will update us when you interact with these ads so we can send you relevant surveys for you to complete. This will not affect the performance of your computer but simply provide you with additional opportunities to receive more surveys relevant to your interests.

In addition, it will be possible for clients to determine on which site the specific advertisement was viewed. We provide only limited non-personally identifiable information to our clients, including certain demographic information and a coded user identification number so that your personal information will not be tied to your browsing data. In addition, in the event of a merger or other sale of Toluna or its client or as required by applicable law, the anonymous data collected by the application may be shared with third parties.

LSOs are different from browser cookies because of the amount and type of data stored and how the data are stored. Cookie management tools provided by your browser and many anti-spyware applications will not remove Flash cookies, nor will the "Private Browsing" modes on your browser prevent their placement on your computer. You can, however, manage privacy and storage settings for local shared objects or disable their use entirely by visiting the website of Macromedia, the manufacturer of Flash Player, at the following link: [http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html)

Please note that the local shared object may restore a deleted HTML cookie in order to keep the application functioning properly.

If in the future you change your mind about participating in the application program, please contact: [privacyna@toluna.com](mailto:privacyna@toluna.com).

We will record your preference not to participate in the application. Our clients and we take commercially reasonable efforts to keep your data secure, including technical, physical and administrative safeguards. For example, all of our storage servers are protected by firewalls.

Digital Fingerprinting:

In general, digital Fingerprinting technologies assign a unique identifier or "Machine-ID" to a user's computer to identify and track the computer. Toluna will not use digital fingerprinting technology (the "Technology") to collect personal information, or track the online activities, of the user of a computer; and will not disrupt or interfere with the use or control of a computer or alter, modify or change the settings or functionality of a computer. Toluna will use the technology to assist Toluna's clients in ensuring the integrity of survey results. The technology will analyse publicly available information and data obtained from the 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 will be an alpha-numeric ID. After creating the unique identifier, Toluna does not retain the information ID by the Technology to create the unique identifier. In furtherance of Toluna's efforts to assist its clients in protecting and ensuring the integrity of survey results, Toluna (a) may link or associate your unique identifier to you and any of your Personal Information; (b) may share your unique identifier with Toluna's clients and with other sample or panel providers; and (c) 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 Toluna. Any unique identifier(s) received or obtained by Toluna and linked to a specific individual will be protected in accordance with this privacy policy.

Toluna shall use commercially reasonable efforts to ensure that the technology is safe, secure and does not cause undue privacy or data security risks.

Toluna shall use and distribute the technology in a professional and ethical manner and in accordance with (a) Toluna's privacy policy, (b) any statements and/or disclosures made by Toluna to respondents, and (c) applicable Laws and Codes.

In the event that Toluna discovers or learns of any unethical conduct in connection with the use of the technology, or that the technology is being used in a manner that is inconsistent with the statements and/or disclosures made by Toluna to respondents or in violation of applicable Laws and Codes, Toluna will take immediate action to prohibit such unethical conduct and to ensure the proper administration of the technology.

#### Access to Your Information:

In accordance with the provisions of Law No. 78-17 concerning Data Processing and Civil Rights, dated 6 January 1978, you have the right to gain access to your data and correct it. In order to access this data you may either write to the address below or Contact Us at [privacyna@toluna.com](mailto:privacyna@toluna.com).

We provide you with a Members Area on our site; here you may correct or update your membership information or delete your membership. If you are a panel member and delete your membership, all your profile information will be permanently removed from our database, but may be stored in our disaster recovery databases, and in such circumstances will not be used for commercial purposes. Please note that in some cases it may take up to fifteen business days for your information to be removed.

#### **Opt-Out Policy**

By becoming a Toluna panel member, you agree to receive Emails inviting you to participate in surveys that we feel may match your experiences and background. You also agree to the automatic establishment of your personal prize account. From time to time, we will also email newsletters to you to make you aware of new features or contests running on our site. You may update your registration information at any time. Please see Correct/Update Policy below.

#### **Correct/Update policy**

If you need to correct any of your profile information or if you would like to update any of your information, you may automatically do so by clicking on any of Your Profiles found in the Members Area. By following the appropriate directions, your information should be automatically updated in our database.

#### **Delete/Deactivate policy**

If you choose to end your membership with Toluna or to require us to cease processing your personal data, you may automatically discontinue your membership by clicking on Unsubscribe under My Account Maintenance found in the Members area. By following the appropriate directions, your record will be marked as "do not contact", and you will no longer receive communications from Toluna. In addition, you will forfeit any incentive balance that has not been requested as of the time you opt out. In most cases it will take 2 to 3 days to process this change, but please allow up to two full weeks for your status to be finalized. In the meantime, you may receive emails from us. As an alternative, you may send an Email directly to [contact@toluna.com](mailto:contact@toluna.com) requesting to be removed. Email links are provided on the site so that you may contact us directly with any questions or concerns you may have. Each email we receive is read and responded to individually; please allow two to three business days for us to get back to you.

### **Winners policy and privacy guarantee**

Panel members and others who take our surveys are randomly selected to win prizes for participation in surveys, polls, and other promotions. All winners are notified by email of their winnings. For more information, please visit our Terms and Conditions page. Cash and other prizes awarded to non-panel members will be awarded directly. Toluna shall post the usernames of winners in the following locations: Toluna.com sites, Toluna owned blogs, <http://gifties.com>, Gifties Facebook App, and Toluna newsletters.

### **Notification of changes**

If we decide to change our privacy policy, we will post those changes to this privacy statement, the home page, or other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by Email, or by means of a notice on our home page.

### **Security**

Toluna takes strict measures to ensure every aspect of your information is kept secure. Access to all personal information is restricted and limited to few key personnel. Our website security is reviewed periodically and can only be accessed via a strict password policy. Toluna will never ask you for private information such as your credit card or social security numbers as a part of our research. We may be required by law to ask for your social security number or other government-issued identifier to comply with reporting laws and regulations if you are the recipient of survey incentives. We use SSL encryption when collecting or transmitting sensitive information. Your profile information is highly confidential and will be used only by Toluna to Email you concerning our studies, newsletters, winner notifications, and incentive redemptions, or as otherwise provided for in this privacy policy.

### **Business transfers**

As we continue to develop our business, we might sell or buy additional assets. In such transactions, Toluna's right to contact its panel members and the information you have voluntarily provided in your user profile would generally be one of the transferred business assets. Any sale or transfer of Toluna or substantially all of its business assets, which included our panel, would be to an entity that agreed to comply with all of the material terms of our privacy policy.

### **Links**

From time to time we may offer visitors the ability to voluntarily link to other sites. Toluna does not review, and is not responsible for, the content or effect of the privacy policies of these sites.

### **Legal disclaimer**

We may disclose personal information when required by law or in the good-faith belief that such action is necessary to conform to the edicts of the law or to comply with a legal process served on our website.

### **Children's privacy**

Toluna will not knowingly collect any information from any child without permission from his/her parents or legal guardian.

### **Privacy contact**

Privacy Officer  
Toluna  
21 River Road

Wilton, Connecticut 06897

USA

E-Mail: [privacyna@Toluna.com](mailto:privacyna@Toluna.com)