

Appendix C: NORC's AmeriSpeak Privacy Statement

AmeriSpeak Members have been invited to take part in a major national research project. Members may complete surveys to provide feedback and opinions on a range of social, political, lifestyle, marketing, and other questions, and may contribute other types of data along with other Panel members. Panel members receive certain benefits from NORC in exchange for participating in surveys.

OUR PRIVACY COMMITMENT TO OUR PANEL MEMBERS

NORC respects the privacy of every Panel member and utilizes a high standard of privacy protection measures in compliance with applicable laws and regulations. This Privacy Statement outlines the information NORC will collect and how we will use that information you provide as a member of NORC's AmeriSpeak. This Statement will also tell you how you can verify the accuracy of your personally identifiable information (PII) submitted to NORC and how you can request that we delete or update your PII.

We've developed our privacy policy from industry guidelines and standards, and local, national, and international laws and requirements. All privacy practices and methods described in this policy apply only insofar as permitted by the applicable standards, laws and requirements.

Thank you for placing your trust in NORC.

About NORC at the University of Chicago

NORC at the University of Chicago is an independent, nonprofit research organization that has been affiliated with the University for more than fifty years. Headquartered in downtown Chicago, Illinois, NORC collaborates with government agencies, foundations, education institutions, nonprofit organizations, and businesses to provide data and analysis that support informed decision making in key areas including health, education, crime, justice, energy, security, the environment, and marketing and business strategies.

This Privacy Policy sets forth the collection, use and disclosure of personal data or personally identifiable information ("PII") and other information by NORC in connection with NORC's Services (as defined herein). NORC'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 and/or apps 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 NORC's Services is subject to NORC's AmeriSpeak [Terms and Conditions](#). Your use of NORC's Services is completely voluntary and therefore NORC's processing of your PII in connection with the Services and this Privacy Policy is with your consent. NORC 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 the Council of American Survey Organizations (CASRO). For clarification, except for Panels that have a separate privacy policy, this Privacy Policy applies to all of NORC's survey research panels. All references to "us" or "we" refer to NORC.

All PII is stored on servers located in the United States, which servers are owned and maintained by NORC.

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 (your “Member PIN”), reward, loyalty, or incentive account numbers and Sensitive Data (as defined herein).

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

1. INFORMATION YOU SUBMIT

NORC 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 and for analysis by researchers.

2. INFORMATION COLLECTED THROUGH AUTOMATED MEANS.

NORC 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 NORC’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:

Cookies.

NORC’s Use of Cookies Generally.

Cookies are small files that store certain data on a device or computer. NORC 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.

NORC may use third parties to provide services and certain functionality to NORC, including, without limitation, panelist fraud detection services. NORC may use 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.

Log Files. NORC'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.

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 NORC's Services. Watermarking is used for quality control and validation purposes and fraud detection and/or prevention purposes. NORC may engage in watermarking activities directly or through a third party vendor.

3. INFORMATION COLLECTED FROM THIRD PARTIES

NORC may obtain PII and demographic information from third parties, including, without limitation, information services bureaus, other sample suppliers and/or social media platforms. NORC 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. NORC'S USE OF INFORMATION

In addition to other purposes set forth in this Privacy Policy, NORC uses information collected through NORC'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 NORC's reward and incentive programs and fulfill your requests for rewards and incentives; (vii) to facilitate your entry into NORC's sweepstakes and promotions and communicate with you regarding such entries; (viii) to update NORC'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 NORC's Services?

NORC and/or NORC'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.

Does NORC share Personally Identifiable Information (PII) and survey responses collected through NORC's Services with third parties?

With respect to information collected through NORC's Services, NORC will provide survey data and responses to NORC clients with no PII disclosed by NORC. If you voluntarily disclose PII in connection with your survey responses, and NORC collects the survey responses, NORC will transfer the survey responses, and the voluntarily disclosed PII to NORC's client. In addition, NORC may share geographic and/or demographic data NORC collects from you during enrollment or through certain profile questions NORC 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).

Generally, disclosures of PII by NORC to a third party are made pursuant to a written agreement between NORC and the third party, which, among other things, limits use of the PII. NORC 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 NORC, which, among other things, limits use of the PII.

NORC will disclose PII collected through NORC'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 NORC, including in order to protect the safety of an individual or to protect NORC'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 NORC: (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 NORC and/or of NORC'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. In connection with a change of ownership or control, including, without limitation, a merger or an acquisition of any or all of NORC'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.
8. To partners of NORC who offer incentives for use of NORC'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 NORC's Services.
9. As otherwise permitted pursuant to this Privacy Policy.

Additionally, anonymized member identification numbers (Member PINs) 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, sweep-stakes 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.

How can I opt out of certain data collection and/or use?

Participation in all survey data collections is voluntary, and you may choose not to answer any questions you don't wish to answer.

There are multiple opt-out options for users of NORC's Services. Panel members may opt-out by: (i) following the instructions set forth in your membership account at www.amerispeak.org; (ii) calling NORC AmeriSpeak Panel Support Team toll-free at (888) 326-9424; (iii) sending a letter by U.S. mail to NORC as set forth below. Similarly, to delete all information collected from you by NORC please contact NORC as set forth below

NORC Panel Operations Department
ATTN: Legal Department
55 E. Monroe Street, 20th Floor
Chicago, IL 60603

How long does NORC keep my PII and other information?

NORC may retain PII and other information relating to your use of the Services to the extent required or permitted by law.

How can I access the PII and other information collected about me?

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 NORC collect data from minors?

Yes. NORC does collect data from minors (defined as persons under the age of 18 years old) following **consent from parents or legal guardians**. NORC's policy regarding data collected from minors is more restrictive than our overall Privacy Policy to provide further protection to minors and is discussed below.

NORC believes it is important to protect the online privacy of minors. Accordingly, NORC adheres to Applicable Laws and Codes pertaining to the protection of minor's privacy, including, without limitation, the Children's Online Privacy Protection Act of 1998 in the United States (as amended). NORC carefully considers both privacy issues and parental concerns in connection with surveys involving individuals under the age of eighteen (18). For example, in the United States, NORC does not knowingly collect PII from anyone under the age of 18 without first obtaining parental consent or determining emancipated minor status. **Any content in this section of NORC's Privacy Policy and NORC's compliance with the Certificate of Confidentiality (discussed below) that is more restrictive or contradicts any other section of this Privacy Policy shall supersede and control to the extent that it applies to data collected from minors.**

To further protect the privacy of individuals under 18 in our panel, NORC has received a Certificate of Confidentiality from the National Institute for Children's Health and Human Development, a department within the National Institute of Health (NIH). NORC can use this Certificate to legally refuse to disclose information that may identify you or your minor child in any federal, state, or local civil, criminal, administrative, legislative, or other proceedings, for example, if there is a court subpoena. NORC will use the Certificate to resist any demands for information that would identify you, except as explained below.

The Certificate of Confidentiality does not prevent disclosure to state or local authorities of child abuse and neglect, or threats to self-harm or to harm others.

What security is available for the PII and other information collected through the Services?

NORC maintains appropriate technical, administrative and physical safeguards to protect PII and other information disclosed or collected by NORC. NORC 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 NORC does not guarantee the security of transmissions. Please be apprised all Internet-based communication is subject to the remote likelihood of tampering from an outside source. NORC is not responsible for any errors by individuals in submitting PII to NORC.

Who can I contact with questions or complaints about this Privacy Policy?

Questions or Complaints Generally.

If you have any questions or complaints regarding NORC's privacy practices and/or this Privacy Policy or want to communicate an opt-out request to NORC, or want to exercise your rights to access, review, correct, delete or object to the processing of PII, please contact us via email at info@AmeriSpeak.org or telephone NORC toll-free at (800) 860-1178. You may also send a letter by U.S. Mail to:

Privacy Compliance Office
55 East Monroe Street, 20th Floor
Chicago, IL 60603

If you have any questions or concerns about your rights as a research participant, you can contact NORC Institutional Review Board at baker-april@norc.org.

We value the opinions and feedback of Panel Members to help improve our service. If your participation in AmeriSpeak comes to an end, we may choose to send you a brief, voluntary exit survey regarding your experience.

CHANGES TO THIS PRIVACY STATEMENT

We may update this privacy statement to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this AmeriSpeak Website prior to the change becoming effective. If your account does not include an email address for you, we will send to you the updated Privacy Statement by U.S. Mail. We encourage you to periodically review the AmeriSpeak Website for the latest information on our privacy practices.