

# Privacy Policy

Revised and effective December 3rd, 2020

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At Precision Sample, we respect the privacy rights of our users and recognize the importance of protecting your personal data. Our Privacy Policy is designed to help you understand what information we collect and how we use and share that information.

As used in this Privacy Policy, “**Precision Sample**,” “**us**” and “**we**” means Precision Sample, LLC and its affiliates. This Privacy Policy applies to the collection of personal data that relates to identified or identifiable individual (“**personal data**”) on any of Precision Sample’s websites where this policy is posted (e.g. www.precisionsample.com and all sites listed [here](#), including any mobile or localized versions and subdomains, the “**Website**” or “**Site**”) and our Platform. The Website and Platform are collectively referred to herein as the “**Services**.“

This Privacy Policy is incorporated into our Terms of Use. Any capitalized terms not defined in this Privacy Policy will have the definition provided in the Terms of Use or under applicable law.

## 1. Description of Services

We provide clients of Precision Sample (“**Clients**”) with access to our survey and survey participant selection platform and related products, applications and services (each as offered or updated in the future, the “**Platform**”). Our Clients may develop and conduct market research or other similar questionnaires or Surveys offered to users of our Platform and hosted on the Client’s website or services (“**Client Surveys**”), or we may conduct surveys on behalf of our Clients directly through our Platform or on one of our Sites (“**PS Surveys**”). The PS Surveys and the Client Surveys will be referred to collectively as the “**Surveys**”.

Our Platform allows users who have registered for our Services to take Surveys. To be eligible for take Surveys, users must provide certain personal data and complete their user profile. For certain Surveys, we may ask users to complete an additional profiling questionnaire before those users are eligible to the Survey. Users that are selected to participate in a Survey will provide certain information, including personal data, as part of their response to Survey. See below for more information about how we process personal data in connection with the practices.

## 2. Scope of this Policy

Precision Sample is the owner and controller of all Registration Data, Profile Data, and Survey Data (each as defined herein) that is collected through a PS Survey. Our Clients are the owners and controllers of any Survey Data collected through any Client Surveys on any third-party website, and these Client Surveys are governed by the Client’s privacy policy. However, in connection with our support for Client Surveys, we may process certain personal data on behalf of, and share it with the relevant Client, our service providers, and for certain non-commercial purposes, each as described further below.

**Note:** when you complete a Client Survey, you are directing the disclosure of your data to a third party. You or Precision Sample may be compensated in connection with that transfer, however, this transfer may not be deemed a “sale” under applicable law. Precision Sample does not control how Clients process Client Survey Data and Clients may sell personal data processed in connection with a Client Survey.

If you have questions regarding a Client's processing of your personal data or to exercise your rights in any personal data controller by our Client, you may be required to contact the Client directly with your request. We will cooperate with you or our Clients as necessary to assist you in the exercise of the rights you may have under applicable law in respect of personal data we may control. If you have any requests or inquiries specifically directed towards Precision Sample, please contact us using the information in the [contact us](#) section below.

### 3. Information we Collect

We may process the following categories of personal data (note, specific Personal Data elements listed in each category are only examples and may change):

<i>Identity Data:</i>	Personal Data relating to an individual's identity or representing that individual, such as your name, username, unique ID, etc.
<i>Contact Data:</i>	Personal Data used to contact an individual, e.g. email address(es) or phone number(s).
<i>Commercial Data:</i>	Information about the Services we provide to you and about transactions you make with us or other companies, e.g. Survey participation records, financial remittance, etc.
<i>Device/Network Data:</i>	Personal Data relating to your device, browser, or application e.g. IP addresses, MAC addresses, application ID/AdID/IDFA, identifiers from cookies, session navigation history and similar browsing metadata, and other data generated through applications and browsers, including cookies and similar technologies.
<i>Financial Data:</i>	Information such as bank account details, payment card information, and information from credit reference agencies, including similar data defined in Cal Civ Code § 1798.80(e).
<i>Health Data:</i>	Information about your health (for example when you provide information relating to a health condition in connection with a Survey Data or as part of your Profile Data).
<i>Inference Data:</i>	Personal Data inferred about personal characteristics and preferences, such as demographics, interests, behavioral patterns, psychological trends, predispositions, or behavior.
<i>Biographical Data:</i>	Data relating to professional and employment history, qualifications, and similar biographic information.
<i>User Content:</i>	Unstructured/free-form data that may include any category of Personal Data, e.g. data that you give us in free text fields such as Survey Data, Profile Data, including any other Personal Data which you may provide through or in connection with our Services.
<i>Protected Category Data:</i>	Characteristics of protected classifications under California or federal law, e.g. race, national origin, religion, gender, or sexual orientation.
<i>Special Category Data:</i>	Personal Data subject to GDPR and similar laws revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation

### 4. How we collect and use personal data

#### A. Registration

We collect Identity Data, Biographical Data, or Contact Data from you when you register to use the Platform ("Registration Data"). This personal data is used primarily to create and maintain your account on our Service and communicate with you regarding that account and for important information regarding our Service. Where allowed by law, Registration Data may be used in connection with marketing communications.

#### B. When you create a Profile

If you wish to participate in Surveys through our Platform, we will require that you complete a profile with personal data that is used match you with Surveys based on your background, demographics, etc. ("Profile Data"). Profile

Data may include Contact Data, Biographical Data, User Content, Identity Data, or other categories of personal data requested on the profile page or related forms. You may generally choose what Profile Data to provide. In some cases, when you are selected for a Survey, we may ask for additional Profile Data if the Client requires additional specific information to determine a user's suitability or for the Survey or further refine the User's profile as appropriate in connection with the Survey. At the Client's direction and subject to your rights under applicable law, we may also augment your Profile Data with additional information obtained from third party commercial sources. **If you choose to provide it, your Profile Data may include "Protected Category Data" or "Special Category Data" or other sensitive information as defined under applicable law.**

**Note:** Users may choose not to include certain categories of Personal Data as part of their profile. If you do not wish for us to collect any category of personal data, do not provide it as part of your profile. You may not receive as many offers to participate in Surveys if your profile does not include information sufficient to place you in Surveys with specific criteria.

#### C. Survey Completion

You may submit various types of personal data into the Services for when you complete a Survey ("Survey Data"). Survey Data may include any information requested in a Survey, including Identity Data; Contact Data; Commercial Data; Health Data; Inference Data; Biographical Data; User Content or other information you may choose to provide. **If you choose to provide it, your Survey Data may include "Protected Category Data" or "Special Category Data" or other sensitive information as defined under applicable law.** In addition, we may collect Device/Network Data as necessary to administer and track the Survey.

**Note:** Users may choose not to provide certain categories of Personal Data in connection with a Survey. If you do not wish to provide any category of Personal Data, do not submit the Survey or answer any questions that request personal data. However, you may not receive compensation or credit for completion if you do not provide all information required by a Survey.

If you will receive compensation for participation in a Survey, we will also collect Financial Data and Commercial Data such as financial account information, contacts, bank details, billing and mailing addresses, and other payment-related information. This information is used to track and process payments you may be entitled to receive in connection with Survey completion.

#### D. Correspondence and Communications

We collect personal data about you when you provide contact information to us via email, mail, sign up forms, other contact forms available through the Services. This personal data typically includes Identity Data and Contact Data, as well as any User Content you provide through these forms or in the communication. For example, we may use personal data collected during registration to send you direct mailings, or contact you by telephone, SMS, or email about our various Surveys and other opportunities we feel may be of interest to you. We may also automatically collect Device/Network Data in connection with our tracking of emails opens and similar statistics.

#### E. Automatic Collection

We automatically collect Device/Network Data relating to how you interact with the Services, such as the IP address from which you access the Services, date and time, information about your browser, operating system and computer or device, pages viewed, and items clicked. We may also collect location information, including location information automatically provided by your computer or device or inferred by your IP address. We use cookies and similar technologies (including those operated by third parties) to collect some of this information.

#### F. Cookies and Similar Technologies

We may collect Device/Network Data, Identity Data, and certain Inference Data in connection with the use of Cookies and Similar Technologies. We typically use cookies and similar technologies on our Site in the following ways (see our Cookie Policy for additional details):

- for “essential” or “functional” purposes, such as to enable various features of the Services such as remembering passwords, or staying logged in during your session;
- for “analytics” purposes, consistent with our legitimate interests in how our Services are used or performs, how users engage with and navigate our Services, what websites users visit before visiting our Site, how often they visit our Site, and other similar information;
- for social media integration e.g. via third-party social media cookies, or when you share information using a social media sharing button or “like” button on our Site or you link your account or engage with our content on or through a social networking website such as Facebook or Twitter;
- for the purpose of displaying advertisements via retargeting or other advertising platforms to those users who have visited our Site; and
- if you are a registered user and consent to the use to our web-browsing Survey feature, we may use additional **“Survey Cookies”** that are used so that we, or our partners, may contact you regarding your opinion on certain things you see or do on the Internet. **Note:** These tracking cookies contain personal data, including a unique user ID that is linked to your registration information, and these cookies track certain sites you may visit, the advertisements you see, and whether you click on certain content.

Some of these technologies can be used by us and/or our third-party partners to identify you across platforms, devices, sites, and services. Further, Clients may use additional cookies or other technologies as part of the Client Services that are not covered by this Privacy Policy.

#### G. Other Information.

We may collect other personal data from you that is not specifically listed here. We may use any such personal data in accordance with this Privacy Policy or as otherwise permitted by you.

### 5. Business and Commercial Purposes of Processing

We use your information for the following business and commercial purposes:

#### A. Providing the Services

We may use personal data we collect as we believe necessary or appropriate to operate, maintain, administer and improve the Services and conduct the Surveys, analyze and report results, and other appropriate processing. We may also use data you provide us to respond to your inquiries and otherwise deliver customer service or and to process any payments to you.

Any Registration Data, Profile Data and Survey Data you choose to provide will be used as necessary to provide the Services and may be analyzed or transferred subject to your contract with us, and our contract with our Clients. You may choose to change any Registration or Profile Data that is part of your user account, however, once you have completed a Survey, the terms of your contract may result in the sale of that data and affect your rights in that data.

#### B. Creating Aggregate Data

We will use Survey Data and Profile Data to create reports comprised of Aggregated Data that we will provide to our Clients, and we may otherwise use responses in accordance with standard market research industry practices and guidelines. We may also process information from Cookies and Similar Technologies, and other personal data collected through our Sites to analyze how our Services are used or perform, and other related matters.

### C. Communicating with You

We may also use your contact data to communicate with you regarding your account, for example, by sending you Service announcements, technical notices, updates, security alerts, and support and administrative messages. Consistent with our legitimate interests in direct marketing to our users, we may also use personal data we collect to communicate directly with you, including by sending you newsletters, promotions or information about new products and services from Precision Sample. Your opt-out options for promotional communications are described below.

### D. Profiling/Personalization

We may use personal data we collect to personalize the Services, including to greet you by name, provide better Survey recommendations to you, tailor communications to your interests, and use the information to guide overall improvements to our products and the Services. We may also create and augment user profiles with include information such as Inference Data or certain Aggregate Data in order to better tailor the Surveys, assess Survey eligibility, and to augment your Survey responses.

### E. Improving the Services

We may use personal data we collect as we believe necessary or appropriate to analyze trends, administer or optimize the Services, monitor usage or traffic patterns (including to track users' use of the Services) and gather certain Inference Data about our user base as a whole.

### F. Advertising

We do not sell or use personal data collected during Surveys for direct marketing or other advertising purposes. However, we may use personal data we collect from our Sites to deliver you advertising, including by serving and managing ads on the Services or on third party sites and to tailor ads based on your interests and browsing history. Please see below for additional information on how to manage the ads you see.

**Note:** we do not control how our Client use Survey data that we provide to them.

### G. Security and Fraud Prevention

We may use personal data we collect as we believe necessary or appropriate to control unauthorized use or abuse of the Services and our other products and services, or otherwise detect, investigate or prevent activities that may violate our policies; in connection with the monitoring and analysis of our IT systems to ensure the security of information, networks, and connected systems.

### H. Compliance

We may use personal data we collect as we believe necessary or appropriate in connection with legal requirements, to prevent or respond to a crime, to investigate violations of our Terms of Use, or protect our rights, privacy, safety or property, and/or that of you or others, and to protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

### I. Consent

We may use personal data we collect in the manner described to you at the time of collection or otherwise in accordance with your consent.

## **6. With whom do you Share my Information?**

Personal data we collect may be disclosed to a variety of parties, depending upon the purpose for which the information was provided and the context in which it was provided. The following describes how we may share the personal data we receive through our Services.

### **A. Clients**

Pursuant to our contract with the Client, and your contract with us to provide the Survey Data for compensation, we may share Survey Data and related Profile Data with the Client who requested that we host the Survey. In some circumstances, we may share personal data with commercial data suppliers so that we can obtain additional information relevant to a Survey, to better validate your Survey responses, so that we may share additional Aggregated Data with our Clients, or for other business purposes. Any Registration Data, and Survey Data may be shared with Clients for the purpose of Survey validation, except that this data will be identified by a randomly-generated ID number, and we will not share your name or other Registration Data with Clients. If you are a registered user who has consented to the installation of our web-browsing based Survey Cookie, we may share a randomly generated user ID and the information contained in or collected from the use of the tracking cookie with our Client.

### **B. Service Providers**

We may share your personal data with service providers who provide certain services or process data on our behalf in connection with our general business operations, product/service improvements, to enable certain features, and in connection with our other legitimate business interests.

### **C. Affiliates**

We may share your personal data with any of our current or future affiliated entities, subsidiaries, and parent companies in order to streamline certain business operations, improve personalization, and develop products and services that better meet the interests and needs of our customers, and provide you with information we believe will be of interest to you.

### **D. Marketers**

We may share certain personal data collected on our Site with current or future affiliated entities and trusted third parties for marketing, advertising, or other commercial purposes, and we may allow third parties (such as Facebook, ad exchanges, data management platforms, or ad servers) to operate on our Site and process data for behavioral advertising.

### **E. Partners**

We may share your personal data with business or marketing partners in connection with promotions, events, products, and services that are promoted, managed, supported, or otherwise undertaken with that third party. If appropriate, these parties may engage in direct marketing or behavioral advertising.

### **F. Corporate Events**

Your personal data may be processed in the event that we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, personal data may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

### **G. Legal Disclosures**

In limited circumstances, we may, without notice or your consent, access and disclose your personal data, any communications sent or received by you, and any other information that we may have about you to the extent we

believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use, or in the vital interests of us or any person.

**Note:** Some disclosures may be made to governments that do not ensure the same degree of protection of your personal data as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your personal data to such parties.

#### H. Aggregated Information

We may also share aggregated or anonymized information with third parties for other purposes. Such information does not identify you individually, but may include usage, viewing and technical information such as the types of Services our customers and users generally use, the configuration of their computers, and performance metrics related to the use of Services which we collected through our technology. If we are required under applicable law to treat such information as personal data, then we will only disclose it as described above. Otherwise we may disclose such information for any reason.

### 7. How is my Personal Data Protected?

We use reasonable security measures to protect all personal data collected during registration and submitted through Surveys on our Site. We implement and regularly review various physical, procedural and technological safeguards that we believe will keep your personal data secure.

### 8. How Long do you Retain my Personal Data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

### 9. Your Controls and Choices

#### A. Opt-Outs.

We may provide you with the opportunity to “opt-out” of having your personal data used for certain purposes when we ask for this information. If you decide to opt-out, we may not be able to provide certain features of the Services to you.

**Note:** you may not be able to opt out of providing information to Clients once you have submitted a Survey and are eligible for payment.

#### B. Communication Preferences.

We may contact you via email, postal mail, telephone or SMS. However, all emails you receive from our affiliates and our partners will come from the affiliate or Precision Sample. Opting out of any email from our affiliates or one of our partners will stop all emails being sent by that affiliate or our partners. If you no longer wish to receive our newsletter and promotional communications, you may opt-out of receiving them by following the instructions included on such communications or on the Services. Please note, however, that you may be unable to opt-out of certain service-related communications and notifications.

#### C. Cookies and Similar Technologies.

As noted above and in our Cookie Policy, our Site may use cookies, web beacons and similar tracking technologies. These technologies are widely used for security, to learn about and improve upon how users navigate a website, to enable certain features, or to deliver relevant advertising content to you on the web. To learn more about cookies and similar tracking technologies, and how they can affect your privacy, visit [allaboutcookies.org](http://www.allaboutcookies.org). Our Site does not respond to your browser's do-not-track request.

If you wish to take steps to opt-out of tracking by certain online advertisers, you can visit the Digital Advertising Alliance's opt-out page at <http://www.aboutads.info/choices>. To learn more about, or to opt-out of Google's analytic and marketing services, visit [Google Analytics Terms of Use](#), the [Google Privacy Policy](#), or [Google Analytics Opt-out](#).

#### D. Accessing and Updating Your Personal data

When you use the Services, we make good faith efforts to provide you with access to your personal data upon your request and either provide you the means to correct this information if it is inaccurate, or to delete such information at your request if it is not otherwise required to be retained by law or for legitimate business purposes. To do so, please contact us at [support@opinionetwork.com](mailto:support@opinionetwork.com) with your name and the information requested to be accessed, corrected or removed, or if you are a registered user of the Platform, sign in to your account, go to your profile, and make the desired changes. If you cease using the Platform or we terminate your access to the Platform in accordance with your Customer Agreement, you may no longer have the ability to access or update your information.

We may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort (for instance, requests concerning information residing on backup tapes), jeopardize the privacy of others, would be extremely impractical, or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. We may also retain your information as necessary to support the Services, comply with our legal obligations, for audit purposes or resolve disputes.

You may have additional rights regarding the access, deletion, or processing of your personal data. Please see below for more information about your rights and choices under California law, or in the UK, Switzerland, and the EU/EEA.

### 10. Children

The Services are not intended for use by individuals under the age of 18 and Precision Sample does not knowingly collect or solicit personal data from children under the age of 13. In some countries we may allow users between the age of 13-18 to register for the services, in our sole discretion. Precision Sample reserves the right to refuse the collection of information from minors for any reason.

If you are under the age of 18, you may not attempt to register for the Services or send any information about yourself to Precision Sample. In the event that we confirm that we have collected personal data from children without verification of parental consent, we will delete that information promptly. If you are a parent or legal guardian of a child and believe that we might have any information from or about such child, please contact us at [support@opinionetwork.com](mailto:support@opinionetwork.com)

### 11. Your California Privacy Rights and Disclosures

#### A. Your California Privacy Rights

Under the California Consumer Privacy Act ("CCPA") and other California laws, California residents may have the following rights in addition to those set forth in the Rights & Choices section above, subject to your submission of an appropriately-verified request (see below for verification requirements):

<i>Right to Know</i>	You may request the any of following, for the 12-month period preceding your request: (1) the categories of Personal Data we have collected about you, or that we have sold, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Data was collected; (3) the business or commercial purpose for which we collected or sold your Personal Data; (4) the categories of third parties to whom we have sold your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you.
<i>Right to Delete</i>	You have the right to delete certain Personal Data that we hold about you, subject to exceptions under applicable law.
<i>Right to Non-Discrimination</i>	You have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.
<i>Direct Marketing</i>	You may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.
<i>Opt-Out of Sale</i>	If we engage in a “sale” of data as defined by applicable law, you have the right to opt-out of that sale.

#### B. Submission of Requests

You may submit requests, as follows (see below for summary of required verification information):

<i>Opt-Out of Sale</i>	To opt-out of the sale of your personal data (to the extent we do so) you may click <a href="#">here</a> , or send us an email to <a href="mailto:support@opinionnetwork.com">support@opinionnetwork.com</a> .
<i>Right to Know</i>	You may send an email to <a href="mailto:support@opinionnetwork.com">support@opinionnetwork.com</a> to request access to or a copy of your personal data. We may require you to provide your email address, phone number and address we have on file for you along with your desire to know what personal data we hold about you. Additional information about our processing of categories of personal data is available in the chart below.
<i>Right to Delete</i>	You may send an email to <a href="mailto:support@opinionnetwork.com">support@opinionnetwork.com</a> to request to have your data deleted. We may request information necessary to verify your identity, and access to your email, in order to fulfill your deletion request. Certain information may be deleted through your user account.
<i>Direct Marketing</i>	You may request a list of any relevant direct marketing disclosures via email to our privacy team at <a href="mailto:support@opinionnetwork.com">support@opinionnetwork.com</a> .

#### C. Verification of Requests

All rights requests must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Data. We may require that you provide the email address we have on file for you (and verify that you can access that email account) as well as an address, phone number, or other data we have on file, in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf. We may require you to submit rights requests directly with Clients on whose behalf we operated a given Survey.

## D. Data Processing

### Categories of Personal Data Disclosed for Business Purposes

For purposes of the CCPA, we may disclose to Service Providers for “business purposes” the following categories of Personal Data: Identity Data; Contact Data; Commercial Data; Device/Network Data; Financial Data; Health Data; Inference Data; Biographical Data; User Content; Protected Category Data; Special Category Data.

### Categories of Personal Data Sold

For purposes of the CCPA, we may “sell” Device/Network Data, Identity Data, Commercial Data, and Inference Data, and Contact Data in connection with your use of Survey Cookies.

### Right to Know

Category of Data	Category of Sources	Business and Commercial Purposes	Category of Recipients
<i>Identity Data</i>	Registration; Profiles; Surveys; Communications; Automatic Collection; Cookies/Similar Tech	Providing the Services; Creating Aggregate Data; Communicating with You; Profiling/Personalization; Improving the Services; Advertising; Security and Fraud Prevention; Compliance; Consent	Clients; Service Providers; Affiliates; Marketers; Partners; Corporate Events; Legal Disclosures
<i>Contact Data</i>	Registration; Profiles; Surveys; Communications; Cookies/Similar Tech	Providing the Services; Creating Aggregate Data; Communicating with You; Profiling/Personalization; Improving the Services; Advertising; Security and Fraud Prevention; Compliance; Consent	Service Providers; Affiliates; Marketers; Partners; Corporate Events; Legal Disclosures
<i>Commercial Data</i>	Surveys; Automatic Collection; Cookies/Similar Tech	Providing the Services; Creating Aggregate Data; Communicating with You; Profiling/Personalization; Improving the Services; Advertising; Security and Fraud Prevention; Compliance; Consent	Clients; Service Providers; Affiliates; Marketers; Partners; Corporate Events; Legal Disclosures
<i>Device/Network Data</i>	Surveys; Communications; Automatic Collection; Cookies/Similar Tech	Providing the Services; Creating Aggregate Data; Communicating with You; Profiling/Personalization; Improving the Services; Advertising; Security and Fraud Prevention; Compliance; Consent	Clients; Service Providers; Affiliates; Marketers; Partners; Corporate Events; Legal Disclosures
<i>Financial Data</i>	Registration; Surveys	Providing the Services; Creating Aggregate Data; Communicating with You; Profiling/Personalization; Improving the Services; Advertising; Security and Fraud Prevention; Compliance; Consent	Service Providers; Affiliates; Partners; Corporate Events; Legal Disclosures

<i>Inference Data</i>	Profiles; Surveys; Automatic Collection; Cookies/Similar Tech	Providing the Services; Creating Aggregate Data; Communicating with You; Profiling/Personalization; Improving the Services; Advertising; Security and Fraud Prevention; Compliance; Consent	Clients; Service Providers; Affiliates; Marketers; Partners; Corporate Events; Legal Disclosures
<i>Biographical Data</i>	Registration; Profiles; Surveys	Providing the Services; Creating Aggregate Data; Communicating with You; Profiling/Personalization; Improving the Services; Advertising; Security and Fraud Prevention; Compliance; Consent	Clients; Service Providers; Affiliates; Marketers; Partners; Corporate Events; Legal Disclosures
<i>Protected Category Data</i>	Profiles; Surveys	Providing the Services; Creating Aggregate Data; Communicating with You; Profiling/Personalization; Improving the Services; Advertising; Security and Fraud Prevention; Compliance; Consent	Clients; Service Providers; Affiliates; Marketers; Partners; Corporate Events; Legal Disclosures
<i>Special Category Data</i>	Profiles; Surveys	Providing the Services; Creating Aggregate Data; Communicating with You; Security and Fraud Prevention; Compliance; Consent	Clients; Service Providers; Affiliates; Partners; Corporate Events; Legal Disclosures
<i>User Content</i>	Registration; Profiles; Surveys; Communications	Providing the Services; Creating Aggregate Data; Communicating with You; Profiling/Personalization; Improving the Services; Advertising; Security and Fraud Prevention; Compliance; Consent	Clients; Service Providers; Affiliates; Marketers; Partners; Corporate Events; Legal Disclosures

## 12. International Transfers

We operate in and use service providers located in the United States. If you are located outside the U.S., your personal data may be transferred to the U.S.

## 13. Additional Information for European Users

### A. Controller

In connection with the Services, Precision Sample, LLC is the controller of your personal data for purposes of European data protection legislation. We are a processor in connection with the Client Services. You can contact us at [support@opinionetwork.com](mailto:support@opinionetwork.com). See the end of this policy document for further contact details.

## B. Legal bases for processing

We only use your personal data as permitted by law. We are required to inform you of the legal bases of our processing of your personal data, which are described in the table below. If you have questions about the legal basis of how we process your personal data, contact us at [support@opinionetwork.com](mailto:support@opinionetwork.com).

Processing purpose	Legal Basis
Use: <b>Providing the Services</b>  Disclosure: <u>Clients</u> <u>Service Providers</u>	Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for the Services. This may include processing that is in connection with operations that are necessary to provide the Services themselves. <ul style="list-style-type: none"> <li>• Survey Data may be processed and shared by contract, and any information you provide in a Survey may be shared as necessary under that contract.</li> <li>• Registration Data and Profile Data may be used as necessary to fulfil your contract with us to provide you with access to the Platform.</li> </ul>
Use: <u>Creating Aggregate Data</u> <u>Communicating with You</u> <u>Profiling/Personalization</u> <u>Advertising</u> <u>Improving the Services</u> <u>Advertising</u> <b>We do not sell</b> or use personal data collected during Surveys for direct marketing or other advertising purposes. However, we may use personal data we collect from our Sites to deliver you advertising, including by serving and managing ads on the Services or on third party sites and to tailor ads based on your interests and browsing history. Please see below for additional information on how to manage the ads you see. <b>Note:</b> we do not control how our Client use Survey data that we provide to them.	These processing activities constitute our legitimate interests. For example, our legitimate interests include: <ul style="list-style-type: none"> <li>• Direct Marketing</li> <li>• Advertising to visitors to our Site</li> <li>• Personalization and customization of the Services for individual users</li> <li>• In connection with the monitoring of our systems, networks, devices and premises for physical and information security (e.g. logging, vulnerability scanning, etc.)</li> <li>• Content review and removal of inappropriate content</li> <li>• Disclosing information to service providers that provide services on our behalf</li> <li>• Disclosures to partners and affiliates in order to customize the services and gain insights into our users use of the Services</li> <li>• Disclosures to and use by media firms that users may interact with as part of the Services</li> </ul>
Security and Fraud Prevention <u>Cookies and Similar Technologies</u>  Disclosure: <u>Service Providers</u> <u>Affiliates</u> <u>Partners</u> <u>Clients</u> <u>Corporate Events</u>	We balance any potential impact on you when we process your personal data for our legitimate interests. You may object to this processing as permitted by law.

Processing purpose	Legal Basis
<b>Aggregated Information</b>	
Use: <b>Compliance</b>	Processing is necessary to comply with our legal obligations, for example, tax laws, fraud reporting, etc.
Disclosure: <b>Legal Disclosures</b>	
Use: <b>Cookies and Similar Technologies</b> <b>Consent</b>	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated in the Services or by contacting us at support@opinionetwork.com

#### C. Your rights

European data protection laws give you certain rights regarding your personal data. You may ask us to take the following actions in relation to your personal data that we hold, to the extent required by law, you have the following rights:

- **Opt-out.** Stop sending you direct marketing communications. You may continue to receive Service-related and other non-marketing emails.
- **Access.** Provide you with information about our processing of your personal data and give you access to your personal data.
- **Correct.** Update or correct inaccuracies in your personal data.
- **Delete.** Delete your personal data, (**Note:** Survey Data provided to Clients may not be eligible for deletion due to such data being provided on the basis of contract).
- **Export.** Transfer a machine-readable copy of your personal data to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal data.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal data that impacts your rights.
- **Contact Regulator.** If you would like to submit a complaint about our use of your personal data or response to your requests regarding your personal data, you may contact us at [EMAIL] or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator here.

You can submit these requests by email to support@opinionetwork.com or our postal address provided at the end of the policy. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions.

#### D. Cross-Border Data Transfer

Whenever we transfer your personal data to countries not deemed by the European Commission (or other appropriate local authorities) to provide an adequate level of personal data protection, the transfer will be based on one of the following safeguards recognized as providing adequate protection for personal data, where required by applicable data protection legislation:

- Contracts approved by the European Commission which impose data protection obligations on the parties to the transfer. For further details, see the European Commission Standard Contractual Clauses for the transfer of personal data to third countries.
- For transfers from Switzerland or the UK (unless such program is terminated) the E.U.-U.S. or Swiss-U.S. Privacy Shield Framework.
- The derogations under GDPR Article 49 (or analogous provision in local data protection law), such as where transfers are necessary to fulfil a contract or provide the services you request, or when you provide your consent.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data to third countries.

#### E. EU-U.S. and Swiss-U.S. Privacy Shield

Precision Sample complies with the EU-U.S. and U.S.-Swiss Privacy Shield Frameworks as set forth by the US Department of Commerce (collectively, “**Privacy Shield**”), under the enforcement authority of the Federal Trade Commission (“**FTC**”), regarding the collection, use, and retention of personal data from the UK and Switzerland. We adhere to the Privacy Shield principles of notice, choice, accountability for onward transfer, security, data integrity and purpose limitation, access, and recourse/enforcement/liability. Furthermore, in the event of any onward transfer of your personal data, we require third party recipients of UK/Swiss citizens’ personal data to agree to respect these principles, and we accept liability for these third parties’ processing of UK/Swiss citizens’ data to the extent required by law. If there is any conflict between the policies in this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

We encourage UK/Swiss (and US) users to contact us if you have any concerns about our compliance with this Privacy Policy and the Privacy Shield Framework. Any questions or concerns may be sent to the address or email below. Precision Sample will respond to Privacy Shield complaints from UK/Swiss citizens within 45 days.

If any complaints cannot be resolved between you and Precision Sample, we have has further committed to refer unresolved privacy complaints under the EU-U.S. and U.S.-Swiss Privacy Shield Principles to the INSIGHTS ASSOCIATION PRIVACY SHIELD PROGRAM, a non-profit alternative dispute resolution provider located in the United States and operated by the Insights Association. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.insightsassociation.org/get-support/privacy-shield-program/privacy-shield-eu-swiss-citizens-file-complaint> for more information and to file a complaint. These dispute resolution services are provided at no cost to you. Under certain circumstances, these dispute resolution processes may result in your ability to invoke binding arbitration.

We are subject to the investigatory and enforcement power of the FTC regarding our compliance with the Privacy Shield Framework and this Privacy Policy, and users may direct complaints to the FTC in the event the dispute resolution processes described above is unsatisfactory.

You may view the list of Privacy Shield companies [here](#).

#### 14. Changes to the Privacy Policy

We reserve the right to change our Privacy Policy at any time. If we make changes, we will post them and will indicate on this page the policy’s new effective date. If we make material changes to this policy, we will notify you by email or through notice on the Services.

## 15. Contact Us

Precision Sample welcomes your comments regarding this Privacy Policy. If you have any questions or if you believe that Precision Sample has not adhered to this Privacy Policy, please contact Precision Sample at [support@opinionetwork.com](mailto:support@opinionetwork.com) or at the address below.

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