

Consumer Insight Privacy Policy

This Version: Effective February 23, 2022

The Privacy Policy describes how Adaptos Ltd, Trading As Consumer Insight (collectively “Ci”, “We”, “us, or “our”) processes Personal Data in the context of online panel surveys, (the “Service”). In particular, it describes the types of Personal Data we collect in connection with the Service, the purposes for which we collect that Personal Data, the other parties with whom we may share it, and the measures we take to protect the security of the data. It also tells you about your rights and choices with respect to your Personal Data, and how you can contact us to update your contact information or ask questions about our privacy practices.

This Privacy Policy does not apply to the processing of your Personal Data in the context of survey respondents provided to Ci by third parties e.g. online panel providers. In these situations, Ci has the role of sponsor of the survey and the survey instrument, and the survey results or survey data are and will be controlled by the sponsor of the survey. The panel provider will be responsible for data held about individuals and how it is administered outside the specific individual survey environment that Ci is hosting. Please refer to the relevant panel provider’s privacy policy to learn more about that panel provider’s privacy practices.

1. Personal Data That May Be Collected About You

We collect Personal Data in various ways described below. For the purpose of this Privacy Policy, “Personal Data” means any information relating to an identified or identifiable individual. Where applicable, we indicate whether and why you must provide us with your Personal Data, as well as the consequences of failing to do so. If you do not provide Personal Data when requested, you may not be able to benefit from the Service if that information is necessary to provide you with the Service or if we are legally required to collect it.

- **a. Personal Data Provided by You**
- We collect Personal Data you provide in the context of a survey, when you participate in a survey or in connection with the receipt and redemption of rewards and incentives which are provided by and regulated by the respective panel/sample provider. Such information includes a unique panelist/respondent identification number we assign to you when you start a survey, and that provided to us by the panel/sample provider for their own means of tracking survey participation and rewards or incentives.
- We also collect the responses you provide when completing the survey. In this context, you may choose to provide sensitive Personal Data about you, such as Personal Data 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. Where required by law, we obtain your explicit consent to the processing of your sensitive Personal Data. We may also collect content that you submit, upload or transmit when using the Service, such as photos and videos, and again your explicit permission will be sought if we collect this type of content.

- **b. Personal Data Obtained Via Automated Means**

- When you use the Service, we may collect certain information by automated means, such as cookies and similar technologies. Cookies are small files that store certain data on a device. Cookies create a unique ID that is associated with your browser. Session cookies expire when you close your browser, whereas persistent cookies remain on your device until deleted or once they reach a defined expiration date.
- The information we collect via cookies and similar technologies may include information about your device and its capabilities, including, the device type and operating system, other applications on your device, network and Internet service provider, time zone, network status, browser type, referring/exiting pages, operating system, date/time stamp, click stream data, and unique identification numbers such as your device IP address, device unique identification number, Media Access Control (MAC) address, or browser identifier. We may also use digital fingerprinting and watermarking technologies to collect the above information.
- Information collected via digital fingerprinting and watermarking technologies may also be used for quality control, validation, and fraud detection and prevention purposes.

- **c. Personal Data Provided by Third Parties**

- We may obtain Personal Data, behavioural and/or demographic information from third parties, such as online panel / sample providers, data management platforms, ad networks, information service bureaus, and sample suppliers. This collection may include, but is not limited to, age, gender, geography, location, presence of children, mobile ad IDs, purchase history, advertising exposures, look-a-like segments.

2. How We May Use Your Personal Data

We may use the Personal Data we obtain from or about you for a variety of purposes, including:

- To offer you the opportunity to participate in research activities, including to participate in surveys administered by Ci or by third parties (whether as a panel member or a non-panel member), or use websites and mobile applications associated with panels or surveys.

- To administer, manage, fulfill, facilitate entry into, and communicate to panel providers and or respondents about their reward, incentive programs and other promotions, including sweepstakes offered in connection with panel membership and/or the completion of surveys.
- To assess the effectiveness of advertising and for audience measurement, and to assist in the creation, development, and implementation of advertisements, websites, marketing plans, and other brand campaigns.
- To update Ci's records, perform data analyses for Ci purposes or for our clients.
- To provide a better survey experience, including quality control, validation, tracking of completed surveys or other completed actions
- To ensure safety and security and to detect and prevent fraud
- To comply with our legal obligations, including, without limitation, tax obligations, or otherwise enforce or protect our rights.
- As otherwise permitted pursuant to this Privacy Policy or as otherwise authorized by you

If you are located in the European Economic Area, we may collect and use your Personal Data when:

- You consented to the use of your Personal Data. For example, to process Personal Data deemed sensitive pursuant to applicable law.
- Necessary to provide you with products and services, or to respond to your inquiries.
- We are required or authorized by applicable law to use your Personal Data.
- We, or a third party, have a legitimate interest in using your Personal Data, such as to ensure and improve the safety, security, and performance of our products and services, to anonymize Personal Data and carry out data analyses.

3. How We Share Your Personal Data

We may disclose the Personal Data we collect about you as described below or otherwise disclosed to you at the time the data is collected, including with:

- Our service providers who perform services and process Personal Data on our behalf. Examples of our service providers include our cloud storage providers, survey data collection platform, online panel/sample providers. We may also share Personal Data with data brokers and data aggregators acting under our instructions and on our behalf to add to enrich our database for the development of audience insights and/or look-alike models, analytics, and marketing intelligence. We require these service providers by contract to only process Personal Data in accordance with our instructions and as necessary to perform services on our behalf or comply with legal requirements. We also require them to have safeguards designed to protect the security and confidentiality of the Personal Data they process on our behalf.

- Our clients and/or online panel/sample providers for market research-related purposes (including for the creation and validation of models, fraud detection and prevention, data market segmentation and database matching, and reward, incentive, or sweepstakes redemption, fulfillment and/or entry), to enable them to develop marketing campaigns, audience insights, look-alike models and/or to market third party's products/services to you, and for the purposes of identifying respondents for re-contact surveys or communications.
- With a third party in connection with any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
- As otherwise permitted pursuant to this Policy or (i) if we are required to disclose Personal Data about you by law or legal process, (ii) in response to a request from a court, law enforcement authorities, or government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity.

We may allow a client to collect Personal Data directly from you. You are free to provide them with your Personal Data. In these situations, we enter into a written agreement with our clients to, among other things, limit their use of the Personal Data.

4. Your Rights and Choices

Subject to applicable law, you may have the right to:

- Opt out of certain collection and use of your Personal Data when we provide the Service. You will be given this option during the course of a survey.
- Opt out of the collection and use of certain information, which we collect about you by automated means. You will be given this option at the initiation of a survey hosted by Ci.
- Request access to and receive information about the Personal Data we maintain about you, to update and correct inaccuracies in your Personal Data, to restrict or to object to the processing of your Personal Data, to have the information anonymized or deleted, as appropriate.
- Withdraw any consent you previously provided regarding the processing of your Personal Data, at any time and free of charge. We will apply your preferences going forward and this will not affect the lawfulness of the processing before your consent withdrawal.

Those rights may be limited in some circumstances by local law requirements.

You can stop all collection of Personal Data and other information by us by terminating your participation in all surveys, and all online panels that you are registered with. Specific instructions for this remain under the control of the respective online panel/sample provider who you should contact directly.

If you would like to exercise your rights described above, please contact us as specified in the “How to Contact Us” section below.

5. Data Security and Data Retention

We maintain appropriate technical, administrative, and physical safeguards to protect Personal Data and other information disclosed or collected by us against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We review, monitor, and evaluate our privacy practices and protection systems on a regular basis. Despite the safeguards we implement, transmissions over the Internet or a mobile network are not totally secure, and therefore we cannot guarantee the security of online transmissions. We are not responsible for any errors by individuals in submitting Personal Data to us.

We also take measures to delete your Personal Data or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it, unless we are required by law to keep this information for a longer period. When determining the retention period, we take into account various criteria, such as the type of services requested by or provided to you, the nature and length of our relationship with you, possible re-enrolment with our services, the impact on the services we provide to you if we delete some information from or about you, mandatory retention periods provided by law and the statute of limitations.

6. Data Transfers

Your Personal Data may be transferred to recipients in countries other than the country where you are located. These countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your Personal Data to other countries, we will protect that information as described in this Privacy Policy or as disclosed to you at the time of the collection.

If you are located in the European Economic Area or Switzerland, we comply with applicable legal requirements providing adequate safeguards for the transfer of Personal Data to third countries.

7. No Children

The Service is not designed for, or intended for use by, any individual under the age of 16. We do not knowingly collect Personal Data from children under the age of 16, and if we became aware that we have inadvertently collected Personal Data from a child under the age of 16, we will undertake reasonable commercial efforts to delete such Personal Data.

8. Updates to This Privacy Policy

This Global Privacy Notice may be updated periodically to reflect changes in our Personal Data practices. We will post a prominent notice on our website to notify you of any significant changes to our Privacy Notice and indicate at the top of the Notice when it was most recently updated. If we update our Privacy Notice, in certain circumstances, we may seek your consent.

9. How to Contact Us

If you have any questions or comments regarding our privacy practices or this Privacy Policy or if you would like to opt out of certain uses of your Personal Data, exercise your rights in relation to the Personal Data we hold about you or make a complaint about our privacy practice, please feel free to contact Consumer Insight (Ci) as described below.

- **Adaptos Limited, Trading as Consumer Insight:** write to us at hello@consumer-insight.co.uk or to Consumer Insight, 6 Charles Court, Budbrooke, Warwick, Warwickshire, CV34 5LZ Attention: Data Protection Officer.