

# SHG Privacy Notice

Last Updated: January 2023

Universal Survey Center, Inc., d/b/a Survey Healthcare Global (SHG), has adopted this Privacy Notice ("Notice") to establish and maintain an adequate level of Personal Data privacy protection. This Notice applies to the processing of Personal Data that SHG obtains from its Customers or individual respondents that are not member of the OpinionSite Community.

If you are a member of the OpinionSite Community and you would like to access the Privacy Notice, please click here:

OpinionSite Health: <https://healthcare.opinionsite.com/>

OpinionSite Consumer: <http://consumer.opinionsite.com/>

## Privacy Notice for EEA, UK and Swiss Residents

### 1. Controller of the Persona Data:

Universal Survey Center, Inc., d/b/a Survey Healthcare Global  
140 Sherman Street, 5th Floor  
Fairfield, CT 06824

**UK Data Protection Representative:** Antonio Tropea, Managing Director - Europe, Survey Healthcare Limited, Citypoint Building, 9th Fl, 1 Ropemaker Street, London EC2Y 9HT, United Kingdom.  
[UKDataProtectionRepresentative@surveyhealthcareglobal.com](mailto:UKDataProtectionRepresentative@surveyhealthcareglobal.com).

**EU Data Protection Representative:** Fabio Musumeci, Privacy and Compliance Director, Survey Healthcare Globus: [EUDataProtectionRepresentative@surveyhealthcareglobal.com](mailto:EUDataProtectionRepresentative@surveyhealthcareglobal.com).

**DPO contact:** [privacy@surveyhealthcareglobal.com](mailto:privacy@surveyhealthcareglobal.com)

### 2. SCOPE

This Notice applies to the processing of Personal Data that SHG transfers to and stores in the United States.

We're committed helping you understand how we manage and protect the information we collect. We take privacy seriously and have taken many steps to help safeguard the information we collect from you.

### 3. PERSONAL DATA THAT WE COLLECT

SHG provides research solutions to its Client, which are predominantly business customers, and individuals that may purchase products or participate in market research activities.

- 3.1. **General Data:** SHG collects Personal Data from Clients and individuals when they purchase our products, supply research support services, register with our website, request information from us and participate to market research activities.
- 3.2. **Communication Data:** We may process information contained in or relating to any communication that you send to us or that we send to you. The communication data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.
- 3.3. **Usage data:** SHG may process data about your use of our website and services. The usage data may include your IP address, geographical location, browser type, version and language, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. We may also collect and process data on the websites you visited

before our sites that may be logged automatically if you are redirected to our site from our advertising campaigns. The source of the usage data is our analytics tracking system, marketing automation platform or other marketing technologies.

3.4. **Market Research data:** SHG might also collect personal data and anonymized and/or pseudonymized data produced by individuals' participation in market research activities.

3.5. **Information collected:** The Personal Data that we collect may vary based on your interaction with SHG. As a general matter, SHG collects the following types of Personal Data:

3.5.1. **Data collected from Companies and business entities:**

Category of data
Company name and contact person's name Work email address Work mailing address, Work telephone number Title Billing/bank details Tax Identification Number,

3.5.2. **Data collected from individuals:**

Category	Examples	Collected
A. Personal data	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, Social Security number, or other similar identifiers, telephone number, employment	Yes
B. Special categories of personal data ART. 9 GDPR	Age (40 years or older), race, color, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, biometric data.	Yes
C. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website.	Yes
D. Geolocation data.	Physical location or movements.	Yes

E. Sensory data.	Audio, visual, or similar information.	Yes
F. Professional or employment-related information.	Occupation, Employer Information.	Yes

#### 4. PURPOSES OF DATA PROCESSING

SHG processes Personal Data that it collects directly from its clients or individuals and indirectly in its role as a service provider for the following business purposes:

- 4.1. **Operations:** maintaining and supporting our products as well as delivering and providing the requested products/services;
- 4.2. **Contractual;** complying with contractual obligations related thereto (including managing transactions, reporting, invoices and other operations related to providing/receiving services to/from clients and individuals). This may include data included in Category A;
- 4.3. **Market Research:** Allowing individuals to participate to market research surveys and interviews and related activities. Report back to clients results in an anonymized and aggregated form.
- 4.4. **Publications:** In certain occasions and strictly in accordance with your express instructions, we may process your personal data for the purposes of publishing such data on our website and elsewhere through our services.
- 4.5. **Relationships and communications:** Processing contact data for the purposes of managing our relationships and communicating with you (excluding communicating for the purposes of direct marketing) by email and/or telephone.
- 4.6. **Direct marketing:** Processing contact data for the purposes of creating, targeting and sending direct marketing communications by email and making contact by telephone for marketing-related purposes. We do this to promote our business and communicate marketing messages and offers to our website visitors.
- 4.7. **Research and analysis:** Processing usage data for the purposes of researching and analyzing the use of our website, for example monitoring, supporting, improving and securing our website, services and business generally. SHG has a legitimate interest in maintaining security conditions on our websites to prevent malware, or other types of attacks. Security is essential to protect the personal data of customers and visitors.
- 4.8. **Record keeping:** Processing your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records in servers located in the United States. We do this to ensure that we have access to all the information we need to run our business properly and efficiently in accordance with this Notice.
- 4.9. **Legal compliance and vital interests:** Processing your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.
- 4.10. **Legal: Required by Law:** for other business-related purposes permitted or required under applicable local law and regulation for example satisfying governmental reporting, tax, crime investigation and national security; and (7) as otherwise required by law. This may include data included in Category A;
- 4.11. **In general** as requested by data subjects;

#### 5. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

SHG uses the below legal bases for processing your data in relation with the above identified purposes:

Legal Base	Purposes
Your Consent	Market research, Publications, Record keeping, In general
Execution of a contract to which you or your company is party or in order to take preliminary steps at your request prior to entering into a contract	Operations Contractual Relationships and communications Direct marketing
Comply with a legal obligation to which the SHG is subject	Legal compliance and vital interests Required by Law
Legitimate interest	Operations Relationships and communications Direct marketing Research and analysis Record keeping

## 6. SPECIAL CATEGORY OF PERSONAL DATA OR SENSITIVE DATA

6.1. SHG might process certain categories of data that can be considered very sensitive. This data may be collected when individuals participate in market research activities carried out by SHG directly or on behalf of their clients. We are committed to handling this data with extreme care and only few authorized people have access to it. Such data might include: information about your health, your ethnic origin, biometric data, trade union membership, etc. Where we process special categories of personal data, “Sensitive Personal Data,” we will always obtain your explicit consent to those activities unless:

- 6.1.1. Consent is not required by law;
- 6.1.2. To protect your vital interests where you are incapable of giving your consent;
- 6.1.3. For the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity;
- 6.1.4. Processing is necessary for reasons of public interest in the area of public health as required by the local law.

6.2. Where this is allowed by law, you may have the right to withdraw that consent at any time.

## 7. AUTOMATED DECISIONS

- 7.1. We reserve the right to make automated decisions, including using machine learning algorithms about website visitors in order to optimize and provide better experience when navigating our websites. Only digital data as specified in section VIII are included in this processing.
- 7.2. We might analyze your participation in our surveys with the purpose to enrich the profiling data we hold about yourself. The profiling data that we have collected might be used for making manual or automated decisions that involve your participation to market research activities. As results of this processing, we will be able to send you market research activities within your sphere of expertise and interest.
- 7.3. You may contact us if you would like any clarifications about the automated decisions.

## 8. DIGITAL DATA

- 8.1. **Cookies:** SHG may set and use cookies to enhance your user experience on the sites, such as retaining your personal settings and preferences. You may set your browser to prevent or reject cookies, or you may manually delete any cookies set. If you reject the cookies on the sites, you may still be able to use the sites, but they shall be limited to certain minimal functionality. From time to time SHG may use third-party tracking utilities that use session ID cookies that track site usability and assist SHG in improving user experience. This Privacy Notice does not cover the use of cookies by our third party providers as we do not have access or control over these cookies. We may collect information on our sites or in our emails using

web beacons and or tracking pixels (electronic images). We may use beacons to count visits, understand usage and campaign effectiveness and to tell if an email has been opened and acted upon.

8.2. You can review the cookies used by SHG's website here: <<HYPERLINK TO COOKIES SECTION>>:

8.3. **Configuration Panel:** You can configure the Cookie by using the configuration panel popping up when you visit our website.

8.4. **Trend Analyses:** SHG may use IP addresses to analyze trends, administer the Sites, track your movement within the Sites, and gather broad demographic information for aggregate use.

8.5. **Links to other sites:** our sites include links to other websites whose privacy practices may differ from SHG's. If you submit personal data to any of those sites, your information is governed by the privacy statements of those third-party sites.

8.6. **Managing cookies:** Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

<https://support.google.com/chrome/answer/95647> (Chrome);

<https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop> (Firefox);

<https://help.opera.com/en/latest/security-and-privacy/> (Opera);

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

<https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari);

<https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy> (Edge).

## 9. CHOICE WITH RESPECT TO USES AND DISCLOSURES OF PERSONAL DATA

9.1. SHG recognizes that individuals have the right to limit the use and disclosure of their Personal Data, and we are committed to respecting those rights. We offer individuals the opportunity to opt out of disclosures of Personal Data to a third party or the use of Personal Data for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by the individual. We will comply with the GDPR with respect to disclosures of Sensitive Data including, when applicable, obtaining the explicit consent (i.e., opt in consent) of an individual prior to disclosing Sensitive Data to a third party or using Sensitive Data for purposes other than those for which it was originally collected or subsequently authorized by the individual.

## 10. DISCLOSURE/TRANSFER OF INFORMATION FOR A BUSINESS PURPOSE

10.1. SHG may disclose your Personal Information to a third party for a business purpose. We do this by entering into a contract that describes the purpose and requires the recipient to both keep that Personal Data confidential and not use it for any purpose except performing the contract. Furthermore, third parties must comply with the GDPR and agree to provide adequate protections that are no less protective than those set out in this Notice.

10.2. **Disclosure:** We may disclose your Personal Information for a business purpose to the following categories of third parties:

10.2.1. Our affiliates and subsidiaries

10.2.2. Our clients or their agents

10.2.3. Service Providers and consultants

10.2.4. Professional services organizations, such as auditors and law firms

10.2.5. Our business partners

10.2.6. Internet service providers

10.2.7. Government entities

10.2.8. Operating systems and platforms

10.2.9. Survey hosting providers

- 10.2.10. Validation providers
- 10.2.11. Rewards fulfillment providers
- 10.2.12. SMS and video conference service providers
- 10.2.13. Customer and panel support services
- 10.2.14. Credit card processor
- 10.2.15. Tax authorities
- 10.3. **Purposes of disclosure:** SHG may disclose your personal information for the below purposes:
  - 10.3.1. Survey reporting
  - 10.3.2. Email services
  - 10.3.3. Authentication of medical licenses
  - 10.3.4. Identity verification of the panel members
  - 10.3.5. Offering and providing customer support
  - 10.3.6. Internal marketing campaigns for communicating new offers to our clients
  - 10.3.7. Internal marketing campaigns for improving and facilitating participation of Panel Members in market research activities
  - 10.3.8. Internal marketing engagement e.g. newsletters
  - 10.3.9. Honorarium processing and fulfillment
  - 10.3.10. Auditing purposes and governmental reporting
  - 10.3.11. Tax reporting
  - 10.3.12. Allowing participation in market research activities
  - 10.3.13. For complying with your requests or contract obligation we have with you
- 10.4. **Disclosures due to acquisition or merge:** We may share your information in connection with a merger, sale of company assets, financing or acquisition of all or a portion of our business to another company, if any. In this event, SHG will notify you before information about you is transferred and becomes subject to a different privacy policy.
- 10.5. **Anonymous information:** We may also share aggregated or anonymous information that does not directly identify you. SHG may share anonymized aggregated demographic information with SHG partners.
- 10.6. **Other forms of disclosures:** SHG also may disclose your personal data for other purposes or to other third parties when you have consented to or requested such disclosure or under the following circumstances:
  - 10.6.1. We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
  - 10.6.2. We believe it is necessary to share information in order to investigate or prevent fraud, or to take action regarding illegal activities, situations involving potential threats to the physical safety of any person, or as otherwise required by law.
  - 10.6.3. We transfer information about you if SHG is acquired by or merged with another company. In this event, SHG will notify you before information about you is transferred and becomes subject to a different privacy notice.
  - 10.6.4. In response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- 10.7. **Third party compliance:** Such third parties must agree to use such Personal Data only for the purposes for which they have been engaged by SHG and they must either:
  - 10.7.1. comply with the GDPR, the Privacy Shield principles, or another mechanism permitted by the applicable European data protection law(s) for transfers and processing of Personal Data; or
  - 10.7.2. agree to provide adequate protections for the Personal Data that are no less protective than those set out in this Notice.
- 10.8. **Liability:** SHG is potentially liable in cases of onward transfers of Personal Data to third parties, such as when third parties that act as agents on our behalf process Personal Data in a manner inconsistent with applicable data protection regulations.

## 11. TRANSFER PERSONAL DATA OUTSIDE THE EEA, UK AND SWITZERLAND

- 11.1. The third parties as described in paragraph X might be based in US or in countries other than EEA, UK and

Switzerland. In these instances, SHG imposes strict contractual obligations and executes Standard Contractual Clauses with third parties to maintain a level of protection that is equal to the GDPR requirements.

11.2. In other instances, we may ask your consent to allow us to transfer your personal data into another country. In doing so we will provide you with full information about the transfer.

11.3. You may contact our DPO if you would like to know more about our international transfer assessment and/or copy of the transfer mechanism that we use for sharing your Personal Data outside your country of residence.

## 12. ANTI-SPAM

12.1. SHG maintains a strict “No-Spam” policy, which means that SHG does not intend to sell, rent or otherwise give your email address to a third-party without your consent.

## 13. DATA INTEGRITY, PURPOSE LIMITATION AND RETENTION

13.1. SHG will not process Personal Data in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by you. To that end, SHG will take reasonable steps to ensure that your Personal Data is reliable for its intended use, accurate, complete, and current. SHG uses reasonable efforts to maintain the accuracy and integrity of your Personal Data and to update it as appropriate.

13.2. **We retain your personal data as follow:**

13.2.1. **Contact data** will be retained for a minimum period of 2 years following the date of the most recent contact between you and us, or until an updating information request or removal request is made by you;

13.2.2. **Communication data** will be retained for a minimum period of 2 years following the date of the communication in question or until a removal request is made by you;

13.2.3. **Usage data** will be retained for a minimum period of 2 years or until a removal request is made by you following the date of collection;

13.2.4. **In general** we do not retain your personal data for more than 2 years since your last engagement/interaction with the Company;

13.3. We may retain your information as necessary (including a longer period) to comply with our legal obligations, resolve disputes and enforce our agreements.

## 14. PERSONNEL ACCESS OF PERSONAL DATA

14.1. Personnel from SHG may access and use your personal data only if they are authorized to do so and only for the purpose for which they are authorized.

## 15. DATA SECURITY

15.1. SHG has implemented physical and technical safeguards to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alternation, or destruction. For example, electronically stored Personal Data is stored on a secure network with firewall protection, and access to SHG's electronic information systems requires user authentication via password or similar means. SHG also employs access restrictions, such as limiting the scope of employees who have access to Customer Personal Data. Further, SHG uses secure encryption technology to protect certain categories of personal data.

15.2. Despite these precautions, no data security safeguards guarantee 100% security all of the time.

## 16. YOUR RIGHTS

16.1. **Right of Access** You have the right to obtain confirmation about whether your personal data is included in our databases. Upon request, SHG will provide an individual access to your personal data within the time frame dictated by the applicable data protection regulations. SHG will allow you to know what Personal Data is included in our databases and to ensure that such Personal Data is accurate and relevant for the purposes for which SHG collected the Personal Data. You may also request a copy of your data in a

commonly used and machine-readable form.

- 16.2. **Right of Rectification:** You may review your own Personal Data stored in the databases and correct, update, modify, or delete any data that is incorrect or incomplete.
- 16.3. **Right of Erasure:** You may request to have the personal information that we have about you to be deleted from our servers. SHG will take reasonable steps, including technical measures, to comply with your request. In some circumstances your request might be rejected if it falls under one of the categories included in ART. 17.3:
  - 16.3.1. exercising the right of freedom of expression and information
  - 16.3.2. for compliance with a legal obligation
  - 16.3.3. for reasons of public interest in the area of public health
  - 16.3.4. archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
  - 16.3.5. establishment, exercise or defense of legal claims
- 16.4. **Objection:** You may object, at any time, to your Personal Data being processed for a specific purpose.
- 16.5. **Restriction of Processing:** You may restrict processing of your Personal Data for certain reasons, such as, for example if you consider your Personal Data collected by us to be inaccurate or you have objected to the processing and the existence of legitimate grounds for processing is still under consideration.
- 16.6. **Data Portability:** You may request the Personal Data you provided to us in a commonly used and machine-readable form.
- 16.7. **Right to Withdraw Consent:** You have the right to withdraw your consent at any time, without affecting the lawfulness of our processing based on such consent before it was withdrawn, including processing related to existing contracts for our Services.
- 16.8. **Right to complain to a supervisory authority:** you might lodge a complaint about our processing of your personal data with your local Data Protection Authority; SHG will collaborate with the authority to resolve it.
- 16.9. **Limitations:** these rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting [https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices\\_en](https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices_en) and <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

## 17. HOW TO EXERCISE YOUR RIGHTS

- 17.1. You can exercise your rights by filling out the form found at <https://preferences.surveyhealthcareglobal.com/privacy>. You may also submit a request at [shgprivacyrequest@surveyhealthcareglobal.com](mailto:shgprivacyrequest@surveyhealthcareglobal.com), via postal mail at SHG, Attn: Privacy Department, 140 Sherman Street, 5th Floor, Fairfield, CT 06824 USA

## 18. RESPONSE TIMING AND FORMAT

- 18.1. We endeavor to respond to a verifiable request within 30 days of its receipt. If we require more time (up to two extra months), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a verifiable request, if applicable.
- 18.2. We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.
- 18.3. **Request that we can't process:** We cannot respond to your request or provide you with Personal Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you. Making a verifiable request does not require you to create an account with us. We will only use Personal Information provided in a verifiable request to verify your identity or authority to make the request.
- 18.4. SHG will track each of the following and will provide notice to the appropriate parties under law and contract when either of the following circumstances arise:
  - 18.4.1. legally binding request for disclosure of the Personal Data by a law enforcement authority unless



prohibited by law or regulation; or  
18.4.2. requests received from the Data Subject.

## 19. NOTIFICATION

19.1. SHG notifies Clients and individuals about its adherence to GDPR and other applicable data protection regulations, as well as the Privacy Shield principles, through its publicly posted website privacy notice, available in the below webpages: <https://www.surveyhealthcareglobal.com/>

## 20. RESPONSIBILITIES AND MANAGEMENT

SHG has designated the Privacy Department to oversee its information security program, including its compliance with the Privacy Shield program. The Privacy Department shall review and approve any material changes to this program as necessary. Any questions, concerns, or comments regarding this Notice also may be directed to [privacy@surveyhealthcareglobal.com](mailto:privacy@surveyhealthcareglobal.com).

## 21. ENFORCEMENT AND DISPUTE RESOLUTION

- 21.1. We commit to resolving individuals' complaints related to our privacy practices or our collection, or use, or disclosure of Personal Data. An individual may file a privacy complaint by contacting our DPO at [privacy@surveyhealthcareglobal.com](mailto:privacy@surveyhealthcareglobal.com). Further, individuals with questions or concerns about the use or disclosure of their Personal Data should contact us as outlined in Section 17.
- 21.2. If an individual's complaint cannot be satisfied through our internal complaint process, the individual may bring a complaint before the INSIGHTS ASSOCIATION PRIVACY SHIELD PROGRAM, a non-profit alternative dispute resolution provider located in the United States and operated by the Insights Association. The INSIGHTS ASSOCIATION PRIVACY SHIELD PROGRAM is designed to handle eligible complaints brought by Swiss and EU citizens about Privacy Shield Principles. If you have any complaints regarding our compliance with the Privacy Shield Framework you should first contact us (as provided above). If contacting us does not resolve your complaint or you do not receive timely acknowledgement of your complaint, please visit the INSIGHTS ASSOCIATION PRIVACY SHIELD PROGRAM website at <https://www.insightsassociation.org/Resources/Privacy-Shield/Information-for-EU-Swiss-Citizens-to-file-a-complaint> for more information and to file a complaint. We will cooperate with the independent dispute resolution mechanism to resolve any complaint that is not resolved through our internal processes.
- 21.3. The above does not preclude your right to contact your local Data Protection Authority. We will collaborate with the DPA to find a solution to resolve the complaint.

## 22. CHANGES TO THIS NOTICE

- 22.1. SHG will maintain, monitor, test, and upgrade information security policies, practices, and systems to assist in protecting the Personal Data that it collects. SHG personnel will receive training, as applicable, to effectively implement this Notice. Please refer to Section VIII for a discussion of the steps that SHG has undertaken to protect Personal Data.
- 22.2. This Notice may be amended from time to time, consistent with the Privacy Shield Principles and applicable data protection and privacy laws and principles. We will notify Customers if we make changes that materially affect the way we handle Personal Data previously collected, and we will allow them to choose whether their Personal Data may be used in any materially different manner.

## 23. DEFINITIONS

Capitalized terms in this Privacy Notice have the following meanings:

- 23.1. "**Customer**" means a prospective, current, or former partner, vendor, supplier, customer, or client of SHG. The term also shall include any individual agent, employee, representative, customer, or client of an SHG Customer where SHG has obtained his or her Personal Data from such Customer as part of its business relationship with the Customer.

- 23.2. **"Data Subject"** means an identified or identifiable natural living person in the European Union. An identifiable person is one who can be identified, directly or indirectly, by reference to a name, or to one or more factors unique to his or her personal physical, psychological, mental, economic, cultural or social characteristics.
- 23.3. **"Employee"** means an employee (whether temporary, permanent, part-time, or contract), former employee, independent contractor, or job applicant of SHG.
- 23.4. **"Europe"** or **"European"** refers to a country in the European Economic Area.
- 23.5. **"Personal Data"** as defined under Regulation (EU) 2016/679, the General Data Protection Regulation means any and all data (regardless of format) that (i) identifies or can be used to identify, contact or locate a natural person, or (ii) pertains in any way to an identified natural person. Personal Data includes obvious identifiers (such as names, addresses, email addresses, phone numbers and identification numbers) as well as biometric data, "personal data" (as defined in the GDPR), and any and all information about an individual's computer or mobile device or technology usage, including (for example and without limitation) IP address, MAC address, unique device identifiers, unique identifiers set in cookies, and any information passively captured about a person's online activities, browsing, application or hotspot usage or device location.
- 23.6. **"Sensitive Data"** is a subset of **Personal Data** which due to its nature has been classified by law as deserving additional privacy and security protections. Sensitive Personal Data consists of: (i) all government-issued identification numbers, (ii) all financial account numbers (including payment card information and health insurance numbers), (iii) individual medical records, genetic and biometric information, (iv) user account credentials, such as usernames, passwords, security questions/answers and other password recovery data, (v) data elements that constitute Special Categories of Data under the GDPR, namely EEA Personal Data 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, and (vi) any other Personal Data designated by SHG as Sensitive Personal Data.

## Privacy Shield Notice

### 1. PRIVACY SHIELD FRAMEWORK

- 1.1. SHG remains certified with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the US Department of Commerce. Our Privacy Shield certification is available [here](#).
- 1.2. SHG complies with the General Data Protection Regulation (GDPR), the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the US Department of Commerce when processing personal data of European Union and Swiss Citizens.
- 1.3. As part of the decision of the European Court of Justice (C-311/18 Schrems II) SHG transfers personal data to US via other compliance mechanisms in accordance with Chapter V of the GDPR including the Standard Contractual Clauses issued by the European Commission on the 4<sup>th</sup> of June 2021.
- 1.4. If there is any conflict between the terms in this privacy notice and the GDPR or the Privacy Shield Privacy Principles, the GDPR and the Privacy Shield Privacy Principles shall govern. SHG acknowledges that as a participant in the Privacy Shield Framework we are under the enforcement authority of the Federal Trade Commission.
- 1.5. Individual resident in the European union and Switzerland may resolve their controversy as describe in paragraph XXI of the Privacy Notice for EEA, UK and Swiss residents.
- 1.6. If you would like to learn more why SHG remains Privacy Shield certified, please visit the Insights Association webpage about Privacy Shield Program:  
<https://www.insightsassociation.org/Resources/Privacy-Shield>.
- 1.7. You can also learn more about the Privacy Shield program, by visiting <https://www.privacyshield.gov/>.

### 2. RENEWAL

- 2.1. SHG will renew its Privacy Shield certification annually, unless it subsequently determines that it no longer needs such certification or if it employs a different adequacy mechanism.
- 2.2. Prior to the re-certification, SHG will conduct an in-house verification to ensure that its attestations and assertions with regard to its treatment of Personal Data are accurate and that the company has appropriately implemented these practices. Specifically, as part of the verification process, SHG will undertake the following:
  - 2.2.1. Review this Notice to ensure that it accurately describe the practices regarding the collection of Customer Personal Data.
  - 2.2.2. Ensure that this Notice informs about SHG's participation in the Privacy Shield program and where to obtain a copy of additional information (e.g., a copy of this Notice).
  - 2.2.3. Ensure that this Notice continues to comply with the Privacy Shield principles and GDPR.
  - 2.2.4. Confirm that data subjects are made aware of the process for addressing complaints and any independent dispute resolution process (SHG may do so through its publicly posted website, its Privacy Notice and/or its Terms of Use).
  - 2.2.5. Review its processes and procedures for training Employees about SHG's participation in the Privacy Shield program and the appropriate handling of Customer Personal Data.
- 2.3. SHG will prepare an internal verification statement on an annual basis.

#### Cookie table

InCrowd: <https://incrowdnow.com>

Cookie	duration	Domain	Category	Description	Level of intrusion	InCrowd or third parties	Privacy Policy
bscookie	2 years	.www.linkedin.com	Security	Used for remembering that a logged in user is verified by two factor authentication.	Minimally intrusive	LinkedIn	<a href="https://www.linkedin.com/legal/cookie-policy">https://www.linkedin.com/legal/cookie-policy</a>
bito	1 year 1 month	.bidr.io	Advertisement	This cookie is set by bidr.io for advertisement purposes.	moderately intrusive	Beeswax.io	<a href="https://www.beeswax.com/cookies/">https://www.beeswax.com/cookies/</a>
bitolsSecure	1 year 1 month	.bidr.io	Advertisement	This cookie is set by the provider Bidr. The main purpose is targeting and advertising. This cookie is used to serve the user with relevant advertisement based on real time bidding.	Minimally intrusive	Google	<a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>
_ga	2 years	.incrowdnow.com	Analytics	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a	Minimally intrusive	Google	<a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>

				randomly generated number to recognize unique visitors.			
_gid	1 day	.incrowd now.com	Analytics	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously.	Minimally intrusive	Google	<a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>
_gat_UA-21779967-3	1 minute	.incrowd now.com	Analytics	A variation of the _gat cookie set by Google Analytics and Google Tag Manager to allow website owners to track visitor behaviour and measure site performance. The pattern element in the name contains the unique identity number of the account or website it relates to.	Minimally intrusive	Google	<a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>
_gat_UA-21779967-1	1 minute	.incrowd now.com	Analytics	A variation of the _gat cookie set by Google Analytics and Google Tag Manager to allow website owners to track visitor behaviour and measure site performance. The pattern element in the name contains the unique identity number of the account or website it relates to.	Minimally intrusive	Google	<a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>
_hjid	1 year	.incrowd now.com	Analytics	This is a Hotjar cookie that is set when the customer first lands on a page using the Hotjar script.	Minimally intrusive	Hotjar	<a href="https://www.hotjar.com/legal/policies/privacy/">https://www.hotjar.com/legal/policies/privacy/</a>

_hjFirstSeen	30 minutes	.incrowdnow.com	Analytics	Hotjar sets this cookie to identify a new user's first session. It stores a true/false value, indicating whether it was the first time Hotjar saw this user.	Minimally intrusive	Hotjar	<a href="https://www.hotjar.com/legal/policies/privacy/">https://www.hotjar.com/legal/policies/privacy/</a>
_hjIncludedInPageviewSample	2 minutes	incrowdnow.com	Analytics	Hotjar sets this cookie to know whether a user is included in the data sampling defined by the site's pageview limit.	Minimally intrusive	Hotjar	<a href="https://www.hotjar.com/legal/policies/privacy/">https://www.hotjar.com/legal/policies/privacy/</a>
_hjAbsoluteSessionInProgress	30 minutes	.incrowdnow.com	Analytics	Hotjar sets this cookie to detect the first pageview session of a user. This is a True/False flag set by the cookie.	Minimally intrusive	Hotjar	<a href="https://www.hotjar.com/legal/policies/privacy/">https://www.hotjar.com/legal/policies/privacy/</a>
pardot	past	.pardot.com	Analytics	The pardot cookie is set while the visitor is logged in as a Pardot user. The cookie indicates an active session and is not used for tracking.	Minimally intrusive	Salesforce	<a href="https://help.salesforce.com/s/articleView?id=sf.pardot_basics_cookies.htm&amp;type=5">https://help.salesforce.com/s/articleView?id=sf.pardot_basics_cookies.htm&amp;type=5</a>
wordpress_google_apps_login	session	incrowdnow.com	Functional	This is a functional cookie used for WordPress. This cookie allows the users to login to the site with their Google account.	Minimally intrusive	Google	<a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>
lang	session	.ads.linkedin.com	Preferences	Used to remember a user's language setting to ensure LinkedIn.com displays in the language selected by the user in their settings.	Minimally intrusive	LinkedIn	<a href="https://www.linkedin.com/legal/cookie-policy">https://www.linkedin.com/legal/cookie-policy</a>
bcookie	2 years	.linkedin.com	Security	Browser Identifier cookie to uniquely identify devices accessing LinkedIn to detect abuse on the platform.	Minimally intrusive	LinkedIn	<a href="https://www.linkedin.com/legal/cookie-policy">https://www.linkedin.com/legal/cookie-policy</a>
lidc	1 day	.linkedin.com	Functional	To facilitate data center selection	Minimally intrusive	LinkedIn	<a href="https://www.linkedin.com/legal/cookie-policy">https://www.linkedin.com/legal/cookie-policy</a>
checkForPermission	10 minutes	bidr.io	Necessary	This cookie is set by the provider bidr.io. This cookie is used for determining whether the user has accepted the cookie consent box.	Minimally intrusive	Beeswax.io	<a href="https://www.beeswax.com/cookies/">https://www.beeswax.com/cookies/</a>
UserMatchHistory	1 month	.linkedin.com	Advertising	LinkedIn - Used to track visitors on multiple websites, in order to present relevant	moderately intrusive	LinkedIn	<a href="https://www.linkedin.com/legal/cookie-policy">https://www.linkedin.com/legal/cookie-policy</a>

				advertisement based on the visitor's preferences.			
AnalyticsSync History	1 month	.linkedin.com	Advertisement	Used to store information about the time a sync with the lms_analytics cookie took place for users in the Designated Countries	moderately intrusive	LinkedIn	<a href="https://www.linkedin.com/legal/cookie-policy">https://www.linkedin.com/legal/cookie-policy</a>
slireg	7 days	incrowdn ow.com	Other	No description available.			
li_gc	2 years	.linkedin.com	Other	No description			
sliguid	5 years	incrowdn ow.com	Other	No description available.			
slirequested	5 years	incrowdn ow.com	Other	No description available.			
visitor_id<accountid>-hash	10 years	.pardot.com	Necessary	The visitor hash cookie contains the account ID and stores a unique hash. This cookie is a security measure to make sure that a malicious user can't fake a visitor from Pardot and access corresponding prospect information.	Minimally intrusive	Salesforce	<a href="https://help.salesforce.com/s/articleView?id=sf.pardot_basics_cookies.htm&amp;type=5">https://help.salesforce.com/s/articleView?id=sf.pardot_basics_cookies.htm&amp;type=5</a>
lpv<accountid>	30 minutes	pi.pardot.com	Functional	This LPV cookie is set to keep Pardot from tracking multiple page views on a single asset over a 30-minute session. For example, if a visitor reloads a landing page several times over a 30-minute period, this cookie keeps each reload from being tracked as a page view.	Minimally intrusive	Salesforce	<a href="https://help.salesforce.com/s/articleView?id=sf.pardot_basics_cookies.htm&amp;type=5">https://help.salesforce.com/s/articleView?id=sf.pardot_basics_cookies.htm&amp;type=5</a>
site_identity	2 years 8 months	scout.salesloft.com	Functional	Collect users' information from different websites showing relevant advertisements	moderately intrusive	Salesloft	<a href="https://salesloft.com/privacy-notice/">https://salesloft.com/privacy-notice/</a>