

California Residents

1. Controller of the Persona Data:

Universal Survey Center, Inc., d/b/a Survey Healthcare Global (SHG)

140 Sherman Street, 5th Floor

Fairfield, CT 06824

SHG Data Protection Contact & DPO: privacy@surveyhealthcareglobal.com

2. SCOPE

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

We're committed to 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

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

3.2. **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 in market research activities.

3.3. **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.

3.4. **Usage data:** We 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 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.

3.5. **Market Research data:** we might also collect Personal Information and anonymized and/or pseudonymized data produced by individuals' participation to market research activities.

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

Data collected from individuals in accordance with CPRA:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, Social Security number, or other similar identifiers.	Yes

<p>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e)).</p>	<p>A name, signature, Social Security number, address, telephone number, employment, or medical information., Some personal information included in this category may overlap with other categories.</p>	<p>Yes</p>
<p>C. Protected classification characteristics under California or federal law.</p>	<p>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.</p>	<p>Yes</p>
<p>D. Commercial information</p>	<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<p>No</p>
<p>E. Biometric information</p>	<p>individual’s physiological, biological, or behavioral characteristics, including an individual’s deoxyribonucleic acid (DNA), that can be used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.</p>	<p>No</p>
<p>F. Internet or other similar network activity.</p>	<p>Browsing history, search history, information on a consumer’s interaction with a website.</p>	<p>Yes</p>
<p>G. Geolocation data.</p>	<p>Physical location or movements.</p>	<p>Yes</p>
<p>H. Sensory data.</p>	<p>Audio, visual, or similar information.</p>	<p>Yes</p>
<p>I. Professional or employment-related information.</p>	<p>Occupation, Employer Information.</p>	<p>Yes</p>

J. Education information	Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)	No
K. Profiling	Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No
L. Sensitive Personal Information	<p>Personal information that reveals:</p> <p>A consumer's social security, driver's license, state identification card, or passport number.</p> <p>A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.</p> <p>A consumer's precise geolocation.</p> <p>A consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership.</p> <p>The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.</p> <p>A consumer's genetic data.</p> <p>(A) The processing of biometric information for the purpose of uniquely identifying a consumer.</p> <p>(B) Personal information collected and analyzed concerning a consumer's health.</p> <p>(C) Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.</p>	Yes

4. **PURPOSES OF DATA PROCESSING**

- 4.1. InCrowd 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:
- 4.2. **Operations:** maintaining and supporting our products as well as delivering and providing the requested products/services;
- 4.3. **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

- 4.4. **Market Research:** Allowing individuals to participate in market research surveys and interviews and related activities. We report back to clients the results in an anonymized and aggregated form.
- 4.5. **Publications:** In certain occasions and strictly in accordance with your express instructions, we may process your Personal Information for the purposes of publishing such data on our website and elsewhere through our services.
- 4.6. **Relationships and communications:** Processing contact data for the purposes of managing our relationships and communicating with you by email and/or telephone.
- 4.7. **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 improve and facilitate your participation in market research activities.
- 4.8. **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.
- 4.9. **Record keeping:** Processing your Personal Information 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.
- 4.10. **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 the clients and individuals;

5. SENSITIVE PERSONAL INFORMATION

- 5.1. SHG might process certain categories of data that under the CPRA is 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, etc. Where we process Sensitive Personal Information data, we will always obtain your explicit consent to those activities unless:
 - 5.2. Consent is not required by law;
 - 5.3. To protect your vital interests where you are incapable of giving your consent;
 - 5.4. For the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity;
 - 5.5. Processing is necessary for reasons of public interest in the area of public health as required by the local law.

6. AUTOMATED DECISIONS

- 6.1. We reserve the right to make automated decisions, including using machine learning algorithms about and website visitors in order to optimize the products and services offered and/or delivered. You may contact us if you would like any clarifications about the automated decisions.
- 6.2. We might analyze your participation in our surveys with the purpose of enriching 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 a result of this processing, we will be able to send you market research activities within your sphere of expertise and interest.
- 6.3. You have the right to opt-out from automated decisions at any time. However, be advised that if you exercise this right, it may affect our ability to offer you survey opportunities and to maintain your membership in our network.
- 6.4. You may contact us if you would like any clarifications about the automated decisions.

7. DIGITAL FINGERPRINT

- 7.1. **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.
- 7.2. SHG uses cookies for the following purposes: Check table at the end
- 7.3. **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.
- 7.4. **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.
- 7.5. **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).

8. CHOICE WITH RESPECT TO USES AND DISCLOSURES OF PERSONAL INFORMATION

- 8.1. SHG recognizes that individuals have the right to limit the use and disclosure of their Personal Information, and we are committed to respecting those rights. We apply a strict policy with respect to disclosures of Sensitive Personal Information including, when applicable, obtaining the explicit consent (i.e., opt in consent) of an individual prior to disclosing Sensitive Personal Information to a third party or using Sensitive Personal Information for purposes other than those for which it was originally collected or subsequently authorized by the individual.

9. SALE OR SHARE OF INFORMATION FOR A BUSINESS PURPOSE

- 9.1. SHG has not shared or disclosed any categories of Personal Information for a business purpose in the last 12 months.

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 Information confidential and not use it for any purpose except in performing the contract or as required by the law. Furthermore, service providers must comply with any privacy state of federal law and agree to provide adequate protections that are no less protective than those set out in this Notice.
- 10.2. SHG may have disclosed the following categories of Personal Information for a business purpose in the last 12 months. Please see the table included in section III for more information about the categories of personal information:
 - 10.2.1. Category A: Identifiers
 - 10.2.2. Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e)).

- 10.2.3. Category C: Protected classification characteristics under California or federal law.
- 10.2.4. Category F: Internet or other similar network activity.
- 10.2.5. Category G: Geolocation data.
- 10.2.6. Category H: Sensory data.
- 10.2.7. Category I: Professional or employment-related information.
- 10.3. **Disclosure:** We may have disclosed your Personal Information for a business purpose to the following categories of third parties:
 - 10.3.1. Our affiliates and subsidiaries
 - 10.3.2. Service Providers and consultants
 - 10.3.3. Professional services organizations, such as auditors and law firms
 - 10.3.4. Our business partners
 - 10.3.5. Internet service providers
 - 10.3.6. Government entities
 - 10.3.7. Operating systems and platforms
 - 10.3.8. Survey hosting providers
 - 10.3.9. Validation providers
 - 10.3.10. Rewards fulfillment providers
 - 10.3.11. SMS and video conference service providers
 - 10.3.12. Customer and panel support services
 - 10.3.13. Credit card processor
 - 10.3.14. Tax authorities
- 10.4. **Purposes of disclosure:** We may have disclosed your Personal Information for the below purposes:
 - 10.4.1. Survey reporting
 - 10.4.2. Email services
 - 10.4.3. Authentication of medical licenses
 - 10.4.4. Identity verification of the panel members
 - 10.4.5. Offering and providing customer support
 - 10.4.6. Internal marketing campaigns for communicating new offers to our clients
 - 10.4.7. Internal marketing campaigns for improving and facilitating participation of Panel Members in market research activities
 - 10.4.8. Internal marketing engagement e.g. newsletters
 - 10.4.9. Honorarium processing and fulfillment
 - 10.4.10. Auditing purposes and governmental reporting
 - 10.4.11. Tax reporting
 - 10.4.12. Allowing participation in market research activities
 - 10.4.13. For complying with your requests or contract obligation we have with you
- 10.5. **Other forms of disclosures:** SHG also may disclose your Personal Information for other purposes or to other third parties when you have consented to or requested such disclosure or under the following circumstances:
 - 10.5.1. We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
 - 10.5.2. 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.
 - 10.5.3. 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.
 - 10.5.4. In response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- 10.6. **Deidentified 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.

10.7. **Liability:** SHG is potentially liable in cases of onward transfers of Personal Information to service providers, that, acting as agents on our behalf, process Personal Information in a manner inconsistent with applicable data protection regulations.

11. DISCLOSURE/TRANSFER OF PERSONAL INFORMATION OUTSIDE US

11.1. The Service providers as described in paragraph 10 might be based in US or in other countries. In these instances, SHG imposes strict contractual obligations with third parties to maintain a level of protection that is equal to the state or federal law and in line with the terms of this Notice.

11.2. In other instances, we may ask your consent to allow us to transfer your Personal Information 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 Information 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 Information 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 Information is reliable for its intended use, accurate, complete, and current. SHG uses reasonable efforts to maintain the accuracy and integrity of your Personal Information and to update it as appropriate.

13.2. We retain your Personal Information 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. **Market research data** obtained during your participation in market research activities will be kept up to 5 years.

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

14. PERSONNEL ACCESS OF PERSONAL INFORMATION

14.1. Personnel from SHG may access and use your Personal Information 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 Information from loss, misuse, and unauthorized access, disclosure, alternation, or destruction. For example, electronically stored Personal Information 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 Information. 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 AND CHOICES

Pursuant to the CPRA and subject to certain exceptions and limitations, California residents may contact us to exercise their rights with respect to certain Personal Information that we hold about them. To the extent these rights may apply to you, they are described below.

- 16.1. **Right to Know and Access your Personal Information Collected or Disclosed.** You have the right to request that we provide you with details about the Personal Information we collect, use and disclose. You can submit your request as described in 17, and we reserve the right to conduct the verification described. In connection with this request, you are entitled to receive the following:
 - 16.1.1. The categories of your Personal Information that we have collected
 - 16.1.2. The categories of sources from which that Personal Information was collected
 - 16.1.3. The business/commercial purpose for the collection or selling or sharing personal information
 - 16.1.4. The categories of third parties to whom we disclose Personal Information
 - 16.1.5. The specific pieces of Personal Information we have collected about you (subject to some exceptions)
- 16.2. If we have disclosed, sold or shared (as those words are defined in the CCPA and CPRA) Personal Information to third parties, you are also entitled to receive:
 - 16.2.1. The categories of Personal Information that we have collected about you.
 - 16.2.2. The categories of Personal Information that we have sold or shared about you and the categories of third parties to whom the personal information was sold or shared, by category or categories of Personal Information for each category of third parties to whom the Personal Information was sold or shared.
 - 16.2.3. The categories of Personal Information that we have disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.
- 16.3. **Right to Delete Personal Information.** You have the right to request deletion of the Personal Information we have collected about you (subject to some exceptions). You can submit your request as described in 17, and we reserve the right to conduct the verification described.
- 16.4. We may deny your deletion request if retaining the information is necessary for us or our service providers to:
 - 16.4.1. Complete the transaction for which we collected the Personal Information, provide a service that you requested, or take actions reasonably anticipated within the context of our ongoing business relationship with you.
 - 16.4.2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - 16.4.3. Debug products to identify and repair errors that impair existing intended functionality.
 - 16.4.4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
 - 16.4.5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code 1546 seq.).
 - 16.4.6. Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
 - 16.4.7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
 - 16.4.8. Comply with a legal obligation.
- 16.5. **Right to Correct Inaccurate Personal Information.** You may request the correction of inaccurate Personal Information processed by SHG, and update or modify any Personal Data that is incorrect or incomplete. You may also notify us by using the contacts in section 17 to correct any inaccurate personal information we have about you.

- 16.6. **Right to No Retaliation following the Exercise of a Consumer's Privacy Rights.** We will not discriminate against you for exercising any of your CCPA/CPRA rights. Unless permitted by the law, we will not:
- 16.6.1. Deny you use of our services.
 - 16.6.2. Provide you a different level or quality of services.
 - 16.6.3. Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services
 - 16.6.4. Retaliating against an employee, applicant for employment, or independent contractor for exercising their rights under this title.
- 16.7. **Right to Limit Use and Disclosure of Sensitive Personal Information.** You have the right to limit the use and disclosure of your Sensitive Personal Information to that use which is necessary to perform our services.

17. HOW TO EXERCISE YOUR RIGHTS AND IDENTITY VERIFICATION

- 17.1. You can exercise your rights by filling out the form found at <http://preferences.surveyhealthcareglobal.com/privacy>. You may also submit a request at shgprivacyrequest@surveyhealthcareglobal.com, reach us on toll free number 800-470-8213 or via postal mail at SHG, Attn: Privacy Department, 140 Sherman Street, 5th Floor, Fairfield, CT 06824 USA.
- 17.2. Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable request related to your Personal Information.
- 17.3. As part of this process, we may ask to verify your identity. Your request must:
- 17.3.1. Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative;
 - 17.3.2. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- 17.4. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information 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. RESPONSE TIMING AND FORMAT

- 18.1. We endeavor to respond to a verifiable request within 45 days of its receipt. If we require more time up to 45 more days, for a total of 90 days from the receipt, 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.
- 18.2. Any disclosures we provide will only cover the 12-month period preceding receipt of a verifiable request. The response we provide will also explain the reasons we cannot comply with a verifiable request, if applicable.
- 18.3. 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.

19. RESPONSIBILITIES AND MANAGEMENT

- 19.1. SHG has designated the Privacy and Compliance Department to oversee its information security program, including its compliance with the Privacy Shield program. The Privacy and Compliance 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.

20. CHANGE TO THIS NOTICE

- 20.1. This Notice may be amended from time to time, consistent with applicable data protection and privacy laws and principles. We will notify Members if we make changes that materially affect the way we handle Personal Information previously collected, and we will allow them to choose whether their Personal Information may be used in any materially different manner.

Virginia Residents

1. Controller of the Persona Data:

SHG, Inc
480 Pleasant Street, Suite B100
Watertown, MA 02472
SHG Data Protection Contact & DPO: privacy@surveyhealthcareglobal.com

2. SCOPE

Pursuant to the Virginia Consumer Data Protection Act (CDPA) SHG as adopted this Privacy Notice. We're committed to 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 Clients, 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 in 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:** We 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 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:** we 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 Information that we collect may vary based on your interaction with SHG. As a general matter, SHG collects the following types of Personal Data:

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 any information that is linked or reasonably linkable to an identified or identifiable natural person.	Yes

B. Sensitive data	Data that includes 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. Geolocation data	Yes
C. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website.	Yes
D. Professional or employment-related information.	Occupation, Employer Information.	Yes
E. Profiling	Means any form of automated processing performed on personal data to evaluate, analyze, or predict personal aspects related to an identified or identifiable natural person's economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.	Yes

4. PURPOSES OF DATA PROCESSING

SHG processes Personal Data that it collects directly from individuals registered with the Healthcare Community 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 in market research surveys and interviews and related activities. We 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 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: 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;
- 4.10. **In general** as requested by the clients and individuals;

5. SENSITIVE PERSONAL INFORMATION

- 5.1. SHG might process certain categories of data that under the CDPA is 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, etc. Where we process sensitive personal information data, we will always obtain your explicit consent to those activities unless:
 - 5.1.1. Consent is not required by law;
 - 5.1.2. To protect your vital interests where you are incapable of giving your consent;
 - 5.1.3. For the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity;

6. AUTOMATED DECISIONS

- 6.1. We reserve the right to make automated decisions, including using machine learning algorithms about website visitors in order to optimize the products and services offered and/or delivered. You may contact us if you would like any clarifications about the automated decisions.
- 6.2. We might analyze your participation in our surveys with the purpose of enriching 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 in market research activities. As a result of this processing, we will be able to send you market research activities within your sphere of expertise and interest.
- 6.3. You have the right to opt-out from automated decisions at any time. However, be advised that if you exercise this right, it may affect our ability to offer you survey opportunities and to maintain your membership in our network.
- 6.4. You may contact us if you would like any clarifications about the automated decisions.

7. DIGITAL FINGERPRINT

- 7.1. **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. SHG uses cookies for the following purposes [shown here](#).
- 7.2. **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.
- 7.3. **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.
- 7.4. **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).

8. SALE OF INFORMATION FOR A BUSINESS PURPOSE

8.1. SHG does not sell any categories of Personal Information for a business purpose in accordance with CDPA.

9. TRANSFER OF INFORMATION FOR A BUSINESS PURPOSES

9.1. SHG might transfer personal information for business purposes by entering into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract or as required by the law. Furthermore, service providers must comply with any privacy state of federal law and agree to provide adequate protections that are no less protective than those set out in this Notice.

9.1.1. SHG may transfer the following categories of Personal Information for a business purpose. Please see the table included in section III for more information about the categories of personal information:

- 9.1.1.1. Category A
- 9.1.1.2. Category B
- 9.1.1.3. Category C
- 9.1.1.4. Category D
- 9.1.1.5. Category E

9.2. **Transfer:** We may have transfer your Personal Information for a business purpose to the following categories of third parties:

- 9.2.1. Our affiliates and subsidiaries
- 9.2.2. Service Providers and consultants
- 9.2.3. Professional services organizations, such as auditors and law firms
- 9.2.4. Our business partners
- 9.2.5. Internet service providers
- 9.2.6. Government entities
- 9.2.7. Operating systems and platforms
- 9.2.8. Survey hosting providers
- 9.2.9. Validation providers
- 9.2.10. Rewards fulfillment providers
- 9.2.11. SMS and video conference service providers
- 9.2.12. Customer and panel support services
- 9.2.13. Credit card processor
- 9.2.14. Tax authorities

9.3. **Purposes of disclosure:** We may have disclosed your personal information for the below purposes:

- 9.3.1. Survey reporting
- 9.3.2. Email services
- 9.3.3. Authentication of medical licenses
- 9.3.4. Identity verification of the panel members
- 9.3.5. Offering and providing customer support
- 9.3.6. Internal marketing campaigns for communicating new offers to our clients
- 9.3.7. Internal marketing campaigns for improving and facilitating participation of Panel Members in market research activities
- 9.3.8. Internal marketing engagement e.g. newsletters

- 9.3.9. Honorarium processing and fulfillment
- 9.3.10. Auditing purposes and governmental reporting
- 9.3.11. Tax reporting
- 9.3.12. Allowing participation in market research activities
- 9.3.13. For complying with your requests or contract obligation we have with you
- 9.4. **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:
 - 9.4.1. We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
 - 9.4.2. 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.
 - 9.4.3. 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.
 - 9.4.4. In response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- 9.5. **Deidentified 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.
- 9.6. **Liability:** SHG is potentially liable in cases of onward transfers of Personal Data to service providers , that, acting as agents on our behalf, process Personal Data in a manner inconsistent with applicable data protection regulations.

10. DISCLOSURE/TRANSFER OF PERSONAL DATA OUTSIDE US

- 10.1. The Service providers as described in paragraph 9 might be based in the US or in other countries. In these instances, SHG imposes strict contractual obligations with third parties to maintain a level of protection that is equal to the state or federal law and in line with the terms of this Notice.
- 10.2. 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. ANTI-SPAM

- 11.1. 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.

12. DATA INTEGRITY, PURPOSE LIMITATION AND RETENTION

- 12.1. 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.
- 12.2. **We retain your personal data as follow:**
 - 12.2.1. **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;
 - 12.2.2. **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;
 - 12.2.3. **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;
 - 12.2.4. **Market research data** obtained during your participation in market research activities will be kept for up to 5 years.
 - 12.2.5. We may retain your information as necessary (including a longer period) to comply with our legal obligations, resolve disputes and enforce our agreements.

13. PERSONNEL ACCESS OF PERSONAL DATA

13.1. 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.

14. DATA SECURITY

14.1. SHG has implemented physical and technical safeguards to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alteration, 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.

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

15. YOUR RIGHTS AND CHOICES

15.1. Pursuant to the Virginia Consumer Data Protection Act (CDPA) and subject to certain exceptions and limitations, Virginia residents may contact us to exercise their rights with respect to certain Personal Information that we hold about them. To the extent these rights may apply to you, they are described below.

15.2. **Right to Know and Access:** You have the right to obtain confirmation about whether your Personal Data is being processed by SHG and to access it.

15.3. **Right to Correct Inaccuracies:** You may correct inaccuracies of your Personal Data, taking into account the nature of the personal data and the purposes of the processing. You may ask us to review your own Personal Data processed by us and correct, update, modify, or delete any data that is incorrect or incomplete.

15.4. **Right to Deletion:** You may request to have your Personal Data and the Personal Data obtained about you deleted.

15.5. **Right to Obtain a Copy:** You may request a copy of your Personal Data previously provided to SHG in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the Personal Data to another controller without hindrance, as the processing is carried out by automated means.

15.6. **Right to Opt-out:** You have the right to request to opt-out the processing of your Personal Data from:

15.6.1. Targeted advertisement

15.6.2. Sale of personal data

15.6.3. Profiling in furtherance of decisions that produce legal or similar effects concerning you

15.7. **Right to Avoid Discrimination:** SHG will not discriminate against you for exercising any of your consumer rights, including denying goods or services, charging different prices or rates for goods or services, or providing a different level of quality of goods and services to you. Even if SHG does not process your personal information for the above purposes, you still have the opportunity to submit a request to opt-out.

16. IDENTIFICATION OF THE DATA SUBJECT

16.1. We cannot respond to your request or provide you with Personal Information if we cannot authenticate your request using commercially reasonable efforts; we will make the necessary steps to verify your identity and the request. 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.

17. HOW TO EXERCISE YOUR RIGHTS

17.1. You can exercise your rights by filling out the form found at <http://preferences.surveyhealthcareglobal.com/privacy..> You may also submit a request at shgprivacyrequest@surveyhealthcareglobal.com, reach us on toll free number 800-470-8213, or via postal mail at SHG, Attn: Compliance Department, 480 Pleasant Street, Suite B100, Watertown, MA 02472 USA

18. RESPONSE TIMING AND FORMAT

- 18.1. We endeavor to respond to a verifiable rights request within 45 days of its receipt. If we require more time, up to 45 more days, for a total of 90 days from the receipt of your initial request, due to the complexity/number of your requests, 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.
- 18.2. If we determine that we can't comply with your request, we will explain the reasons for declining to take actions and instruction for how to appeal our decision.
- 18.3. 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.

19. PROCESS TO APPEAL THE CONTROLLER'S DECISIONS

- 19.1. Within 15 days of the notification of our decision, you have the right to appeal an SHG's refusal to take action on a request by contacting our Data Protection Officer via email at Privacy@apollointelligence.net or via postal mail at SHG, Attn: DPO, 480 Pleasant Street, Suite B100, Watertown, MA 02472 USA. Within 60 days of the receipt of your appeal, SHG will inform you about any action taken or not taken and provide written explanation of the reasons for the decision.
- 19.2. If we reject your appeal, you have the right to contact the Virginia Attorney General: <https://www.oag.state.va.us/>.

20. RESPONSIBILITIES AND MANAGEMENT

- 20.1. SHG has designated the Privacy and Compliance Department to oversee its information security program, including its compliance with the Privacy Shield program. The Privacy and Compliance 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.

21. CHANGE TO THIS NOTICE

- 21.1. This Notice may be amended from time to time, consistent with applicable data protection and privacy laws and principles. We will notify Members if we make changes that materially affect the way we handle Personal Information previously collected, and we will allow them to choose whether their Personal Information may be used in any materially different manner.