

# US Entity (Gongos) Privacy Statement

Last updated February 10<sup>th</sup>, 2020

Gongos, Inc. (“Gongos”, the “Company,” “we,” “our,” or “us”) respects the privacy of the individuals who visit our site, use our apps, and participate in our communities/panels/surveys. This Privacy Policy has an effective date of February 10, 2020 and outlines the information we collect and how we use that information. This Policy also tells you how to review the accuracy of your Personally Identifiable Information (PII) submitted to us and how you can request that we delete or update your PII.

We routinely review and enhance our privacy and security practices to protect your privacy.

## Information we may gather

The only PII actively collected by Gongos is that which is voluntarily provided by you on our site. Gongos may also receive PII from third parties (including the sponsoring client) to help us conduct market/social/opinion research. We are not responsible for the privacy policies or practices of these third parties and recommend that you carefully read the privacy policies of each site you visit.

In addition, Gongos collects information from community/panel members during and after registration with a community, including, without limitation, during participation in a survey and in connection with the receipt and redemption of rewards and incentives. When you sign up, register, join, participate in, or opt-in to a survey, community/panel, or a focus group/in-person event/clinic, you will be asked to provide certain contact and demographic information, including, without limitation, your name, address(es), telephone number(s) (including home, cell, and/or business telephone numbers), email address(es), date of birth, and occupation/education, and racial and gender information (“Personally Identifiable Information or PII”). In addition, during and subsequent to the registration process, you may be asked to voluntarily provide or disclose PII that discloses or reveals health and medical conditions, sexual orientation or sexual life, political opinions/views, race/ethnic origin, religious and philosophical beliefs and trade-union membership {“Sensitive Data”}. We use Sensitive Data to target community/panel activities to you.

Your participation in any Gongos activity is voluntary and may be discontinued at any time. All rewards or incentives paid to you are a result of your voluntary research participation and you are not an employee, contractor or agent of Gongos, and have no authority to act on behalf of Gongos.

**Permitted Disclosures:** Gongos may disclose PII, Sensitive Data, and other information collected through Gongos' services to third parties (including the sponsoring client) in any of the following circumstances:

1. With your consent.
2. Pursuant to applicable law or regulation or in response to a subpoena or an order of a court or government agency.
3. To establish, exercise, or defend against legal claims of an individual or Gongos, including in order to protect the safety of an individual or to protect Gongos' rights and/or property.
4. To a parent, subsidiary, or affiliate of Gongos: (i) in the event of a reorganization or restructuring, or (ii) for use and processing in accordance with this Privacy Policy.
5. To authorized agents and/or subcontractors of Gongos who are providing services, including, without limitation, data append services, data validation services, fraud detection and/or prevention services, database-matching services, coding services, data segmentation services, and reward, incentive, and sweepstakes related services and/or
6. In connection with a change of ownership or control, including, without limitation, a merger or an acquisition of any or all of Gongos' business assets, provided that the party receiving or acquiring PII, Sensitive Data or other information agrees to use, protect, and maintain the security, integrity, and confidentiality of PII, Sensitive Data and other information collected through Gongos' services in accordance with this Privacy Policy. Additionally, with respect to the PII, Sensitive Data or other information of community/panel members:
7. To partners of Gongos who offer incentives for use of Gongos' services, solely for the partners' use in connection with their incentive program and its terms of use, including, without limitation, the crediting of member accounts maintained by the partners for individuals who use or participate in Gongos' services.
8. Between various communities/panels if you sign up for more than one community/panel.
9. To a Gongos client, in connection with your participation in or completion of a survey, for limited market research-related uses including, without limitation, modeling, validation, fraud detection and/or prevention, data append, database segmentation, and reward, incentive, or sweepstakes redemption, fulfillment, and/or entry.

## Ways we may use your information

information is used solely for research purposes. We will never try to sell you anything; we are only interested in your opinions. When you complete a survey, your responses are analyzed in aggregate with all other respondents' information and reported not individually, but only in the aggregate. Our research clients do not receive non-aggregated PII of those participating in our surveys/communities/panels,

nor do we identify participants to our clients, without your express permission, except for Media Clips, as defined below.

When sharing your opinions, you may choose to provide us with your images, videos, and/or audio files (“Media Clips”). Media Clips may be given to the company sponsoring the research. Due to the nature of Media Clips, we may not be able to effectively combine your opinions with others in an anonymous way. Therefore, you waive any right to inspect or approve the use of your likeness/voice in subsequent reports/findings related to the study.

You represent and warrant that any Media Clips that you provide contain your own original content or that you have secured all necessary permissions and licenses from any third parties having rights in the content of your Media Clips, including without limitation, any images, likenesses, voices, etc. In the event that a third party claims that Gongos or any of its employees, directors or agents violated its rights in a Media Clip you provide, you shall indemnify and hold Gongos, its employees, directors and agents from any such claims, including any final award or judgment, settlement and reasonable attorneys fees.

We may use the information we automatically receive from your web browser to see which pages you visit within our site, which site you visited before coming to ours, and where you go after you leave. We can then develop statistics that are helpful to understanding how this site is used by our visitors to present the content that visitors are seeking in a format they find most helpful.

We may use your phone number and email address to send you invitations to participate in surveys and to contact you with messages regarding community/panel/survey information and new opportunities. We may use your postal address to mail any survey-related materials, invitations, rewards, prizes and incentives and to assign you to demographic and geographic groups as required by research projects.

We support the rights of those participating in our surveys/communities/panels by limiting the use of their information for legitimate marketing research purposes and are active in supporting the following organizations created to uphold ethical survey research (this support includes making reasonable effort to conform to the organizations’ ethical standards):

- American Association for Public Opinion Research (AAPOR)
- American Marketing Association (AMA)
- Advertising Research Foundation (ARF)
- European Society of Opinion and Marketing Research (ESOMAR)
- The Insights Association
- Mystery Shopping Providers Association (MSPA)

We also strive to conform with the California’s Consumer Privacy Act (CCPA), EU’s General Data Protection Regulation (GDPR), FTC’s Children’s Online Privacy Protection Act (COPPA), the Health Insurance Portability and Accountability Act

(HIPAA), the CAN-SPAM Act, and other privacy regulations and guidelines in the US and other countries.

## Your right to access, update, delete and withdraw consent of your information

We encourage you to update your contact information as it changes. To help you do this, we set up member accounts for all community/panel members. These can only be accessed via a password that you establish. You can also update your information in the following ways:

- By sending an e-mail request to our members' services team at: [privacy@gongos.com](mailto:privacy@gongos.com)
- By visiting your member account via our community web site and following the instructions there.
- By phone at 1-800-899-9590, please ask for Operations.
- By postal mail to Attn: Operations, Gongos, Inc., 150 W. Second Street, Suite 300, Royal Oak, MI 48067

You have the right to choose to withdraw your consent and end your membership in any of our communities/panels. You may also unsubscribe for all future opportunities by clicking on <http://gongos.com/RemoveMe.aspx>. If you choose to end your membership via any of these methods, your community/panelist membership record will be deactivated and you will no longer receive invitations from us, although you may continue to receive some previously-prepared invitations for a few days. We apologize for any such inconvenience.

Our current privacy protection terms will continue to protect non-PII data even after you delete and withdraw consent of your PII data.

European Union citizens wishing to exercise their rights under GDPR may do so by emailing a request to [privacy@gongos.com](mailto:privacy@gongos.com). Please include your name, country of citizenship and desired action (PII deleted, updated or to be provided with a copy of your PII).

Gongos does not "sell" information, as defined by the California Consumer Privacy Act (CCPA).

California citizens have the following personal data rights under the CCPA:

- Right to erasure (1798.05)
- Right to access your information (1798.110)
- Right to request additional information about data collection (1798.110)
- Right to request information sales or disclosures (1798.115)
- Right to not be discriminated against if your rights are exercised (1798.125)

California citizens wishing to exercise their rights may do so by sending a request to [privacy@gongos.com](mailto:privacy@gongos.com) or calling 1-800-899-9590 and asking for Operations. When contacting Gongos to exercise your rights the following information is needed to confirm your identity and process the data request:

- The action being requested (What would you like Gongos to do?)
- Your full name, email address and phone number (used when interacting with Gongos)
- Date of last interaction
- Subject Matter of Study
- Type of Interaction (survey, focus group, etc.)
- If in-person interaction, the geographic location of the session
- If online interaction, the survey link or community URL and Gongos email address
- If acting as an authorized agent on behalf of the consumer, your own name and email address

## Data retention

PII is held the minimum amount of time necessary to perform the contracted market research services. In the event of a situation where it is not possible to remove the PII factors (e.g. video) the data is held in accordance with contractual obligations or seven years, whichever is less.

## Cross border transfers

Gongos strives to conform with the Federal Trade Commission (FTC) Safe Harbor regulations regarding data protection in the European Union.

## Children's Privacy Protection

We believe that it's especially important to protect children's privacy online and encourage parents and guardians to spend time online with their children to participate and monitor their Internet activity.

We strive to comply with all applicable national and international children's privacy regulations, including The Children's Online Privacy Protection Act of 1998. Children who are under 13 years of age are not permitted to become community/panel members without parental consent and we do not knowingly collect any personal information from children under 13 years of age without parental consent. Please note, however, that, as part of the registration process for new community/panel members, we may collect from the new community/panel member the names of each individual in the community/panel members' household, which may include the names of children who are under 13 years of age. Occasionally we may send a survey to a community/panel member who is a parent or guardian of a child under the age of 13 that asks that community/panel member to have his or her child who is under 13 answer the survey. We seek parental consent to such procedure by

sending the survey to the parent or guardian's password-protected email address. The information collected in response to such surveys is not combined with identifying information about the child.

If a community/panel member has provided us with personal information about a child in the community/panel member's household who is under the age of 13, a parent or guardian of that child may contact us at the email address or mailing address listed at the bottom of this Privacy Policy if he or she would like this information deleted from our records. We will use reasonable efforts to delete the child's information from our databases.

## Links

When taking a survey, you may have the opportunity to link to other web sites. We are not responsible for the privacy policies or practices of those sites. We recommend that you carefully read the privacy policies of each site you visit.

## Use of Cookies

Like many other websites, we use cookies to provide a better experience for our members. We limit their use for quality control and validation. Cookies are used temporarily during the time you are actively completing a survey or filling out the registration forms and we do not store or retain your cookie information in any way. No PII is transmitted via these cookies.

## How We Respond To Do Not Track Signals

Gongos does not track survey/community/panel participants across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals.

## Data Security

We take the security of your information seriously. We will not activate a potential registrant's account without confirmation. Once the registration process is completed, the individual is sent an email requesting that he or she confirm his or her registration. The account will not be activated until confirmation is received. Additionally, all community/panel members are required to use their passwords and usernames (email addresses) when registering, updating their contact information, or when accessing "members only" sections of the websites. If you forget your password, you can send a message to our secure system to retrieve it.

Access to your PII is restricted and limited to select Company staff members who have a need to access such information to complete a legitimate business purpose, and access is subject to a strict password policy. Our employees receive training in data privacy and protection.

We will never ask you for information such as credit card or bank account numbers, although we may be required by law to request your social security number when sending you a check for certain cash prizes.

We have security measures in place to prevent the loss, misuse, and alteration of the information under our control.

We employ commercially reasonable technology and internal processes to protect the information our members release to us.

All surveys are screened by Company staff before sending you an invitation to ensure they are proper and appropriate for their intended audiences.

While navigating our site, you may be directed to content or functionality that is hosted by a third-party supplier, not on a Company-owned domain. When information is collected on behalf of Company exclusively, our privacy policy will be referenced on the site and will govern how your information is used. For sites not owned by us, the site owner's privacy policy will be referenced.

If, despite our security measures as described in this policy, we suffer a breach of our security systems and an individual or entity gains unauthorized access to any information stored on our servers, we will immediately investigate such security breach, and will provide prompt notice to any individual whose information was adversely affected.

## Governing Law

This Privacy Policy is governed by the laws of the State of Michigan, without regard to its conflicts of law principles.

## Contacting Us

Please contact us at [privacy@gongos.com](mailto:privacy@gongos.com) with any questions. We respond to most e-mail inquiries by the end of the following business day. You can also contact us by phone at 1-800-899-9590. Please ask for Operations or by postal mail at Attn: Operations, Gongos, Inc., 150 W. Second Street, Suite 300, Royal Oak, MI, 48067

## Changes To This Policy

We will use information in accordance with the privacy policy under which the information was collected. If we are going to use users' PII and Sensitive Data in a manner different from that stated at the time of collection, we will notify users via email. If users have opted out of all communication with the site, or deleted/deactivated their account, then they will not be contacted, nor will their PII or Sensitive Data be used in this new manner. Current community/panel members will be notified of any changes to this privacy policy via e-mail or via a message posted on our website.