



GENERAL WEBSITE PRIVACY POLICY

Last Updated: January 24, 2019

1. Description of CLARITAS' Business.

CLARITAS, LLC ("CLARITAS" and any reference to "CLARITAS" or "us" or "we" or "our" shall include CLARITAS' parents, affiliates, and subsidiaries) provides sampling solutions, market research, advertising measurement, online audience targeting and campaign onboarding, and technology for survey research, and providing clients with access to consumer and business-to-business respondents and derived data via internet, telephone (both fixed/landline and wireless/mobile), postal and multi-mode methodologies. CLARITAS serves a vast array of for-profit and not-for profit businesses, universities and governmental agencies and departments.

This Privacy Policy describes the types of information we collect, how we collect information, how we use the information, how we share or disclose the information, how we store the information, and your choices regarding the use and processing of the information. Your use of CLARITAS' website, your use of CLARITAS' services, and your disclosure of PII to CLARITAS are completely voluntarily, therefore the collection, processing, transfer, and storage of your PII as set forth in this Privacy Policy is with your consent.

This privacy policy does not apply to the collection, processing, storage, transfer, and/or disposal of information collected in connection with the survey panels or communities operated by or on behalf of CLARITAS.

2. What type of information do we collect?

We collect the following information:

- i. Personally identifiable information ("PII") which includes, without limitation, first and last names, email address, telephone number(s) (e.g., home, mobile, and business numbers), residential address, latitude/longitude, cookie (if personal info included), and postal zip code.
- ii. Business contact information, including, without limitation, company name, job title, and department (if explicitly asked in a survey).



- iii. Information on your employer or the company you represent (if explicitly asked in a survey).
- iv. Information collected through automated means, includes, without limitation, IP address, browser type, operating system, referring URLs, resettable device id (RDID), information on actions or activities taken or engaged in on a website, and dates and times of website visits. Birth date

3. How we collect information.

- i. Information submitted or provided by you:
 - a. Through or in connection with CLARITAS' corporate website(s), including, without limitation, www.mybestsegments.com, www.claritas.com ;
 - b. Through or in connection with business meetings with actual or potential customers or clients;
 - c. Through or in connection with promotions, meetings, events, and/or trade or industry shows or conferences sponsored by, hosted by, or attended by CLARITAS and/or CLARITAS' employees, representatives, and/or agents; and
 - d. Through telephone calls, email communications, and/or other forms of communication with you.
 - e. Through inquiries, from requests for bids or quotes from CLARITAS, and from orders for CLARITAS' services.

ii. Information collected from third parties

CLARITAS may collect information, including, without limitation, PII and business contact information, from third parties, including, without limitation, information service bureaus, data brokers, social media platforms, and/or industry conference or event organizers or sponsors. We may use the information collected from such third parties for various purposes, including, without limitation, sending you emails or other communications as described herein. In the event you receive such communications you will have the opportunity to opt-out of receiving communications from us.

The information we collect automatically is statistical data and may also include personal information, or we may maintain it or associate it with personal information we collect in

other ways or receive from third parties. It helps us to improve our services and our Website and to deliver a better and more personalized service, including by enabling us to:

Estimate our audience size and usage patterns.

- Correlate information about your preferences, allowing us to customize our Website according to your individual interests.
- Collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).
- Recognize you when you return to our Website.

iii. Information collected through automated means:

- a. *CLARITAS Cookies*. Cookies are small files that store certain data on a device or computer. CLARITAS may use session and persistent cookies for several purposes including, without limitation, to enable you to use and transverse a website and quality control. Session cookies expire when you close your browser. Persistent cookies remain on your device or computer indefinitely until deleted. A user may disable and/or delete cookies via the user's browser or otherwise, however, this may limit your use of a website, and/or decrease the functionality available to the user in connection with a website.
- b. *Third Party Cookies*. CLARITAS uses third parties to provide services and certain functionality to CLARITAS. CLARITAS uses contracts with such third parties to control their use of cookies and to limit their use of cookies to the limited purposes set forth in the contracts.
- c. *Log Files*. CLARITAS' websites may automatically gather and store certain information in log files, including, without limitation, data available from your web browser, including, without limitation, IP Address, browser type, internet service provider, referring/exiting pages, operating system, date/time stamp and click stream data.
- d. *Web Beacons*. Pages of our Website, third party partners and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- e. *Cookie Notice*: CLARITAS values your privacy. Below please find a list of the cookies set or deployed by CLARITAS and/or its service providers, partners, and/or subcontractors. For certain cookies no opt-out mechanism is provided.

** Analytics and Customization – Data Collection

Name:	Purpose	Consent
Google Analytics (_utma)	Analytics/measurement Optimization Ad targeting	No opt-out provided
Google Analytics (_utmb)	Analytics/measurement Optimization Ad targeting	No opt-out provided
Google Analytics (_utmc)	Session Cookie – Analytics/measurement Optimization Ad targeting	No opt-out provided
Google Analytics (_utmz)	Analytics/measurement Optimization Ad targeting	No opt-out provided
Barometric Identity Cookie	Analytics/measurement Optimization Ad targeting	Opt-out available

CLARITAS’ Do Not Track Notice.

Do Not Track (“DNT”) is a preference in your browser that you can set to notify websites that you visit that you do not want the websites to collect certain information about you. CLARITAS does not respond to DNT signals. If you object to CLARITAS’ practice with regards to DNT signals, you are free not to visit CLARITAS’ website.

4. How We Use the Information that We Collect.

We may use information, including, without limitation, PII and business contact information, to:

- i. Provide, administer, and communicate with you about CLARITAS’ products, promotions, services, events (e.g., webinars, etc.), newsletters, and industry expertise/knowledge (e.g., whitepapers, articles, etc.);

- ii. Create, supplement, and update CLARITAS' directories and records for actual and/or potential suppliers, customers, and/or clients;
- iii. Protect against and prevent fraud, claims, liabilities, and to manage risk exposure;
- iv. Respond to inquiries and requests;
- v. Operate, evaluate, conduct, and improve CLARITAS' business (including, without limitation, to conduct and complete transactions for CLARITAS' products and/or services, to improve CLARITAS' current products and/or services, to develop new products and/or services, etc.);
- vi. Process and manage opt-out or unsubscribe requests;
- vii. Comply with applicable laws, regulations, codes, and industry standards and practices;
- viii. Conduct marketing and market research activities including, without limitation, (a) contacting you to participate in customer satisfaction surveys or questionnaires via telephone, email, or otherwise, (b) creation of target audiences for advertisers, (c) direct mail or direct email advertising to you, (d) soliciting your opinions or feedback on CLARITAS' business activities, including, without limitation, current and future products and services;
- ix. Create and send targeted communications to you regarding you or your company's transactions with CLARITAS and/or the profile for your company;
- x. Respond to a subpoena or an order of a court or government agency;
- xi. Establish, exercise, or defend legal claims, including, without limitation, in order to protect the safety of an individual or to protect CLARITAS' rights and/or property; and
- xii. Evaluate your interest in employment and contact you regarding possible employment opportunities with CLARITAS and/or any company within the CLARITAS group of companies.

In addition to the above, CLARITAS may use information collected or received by CLARITAS as otherwise set forth in this Privacy Policy.

In the event that you provide CLARITAS with any feedback, suggestions, and/or comments regarding CLARITAS' business activities, including, without limitation, regarding current and/or future products and/or services, CLARITAS may use, apply, and implement such feedback, suggestions, and/or comments, at CLARITAS' discretion, and without notice to you, without any consent or approval from you, without any compensation to you, and/or without any attribution or credit to you, and you hereby irrevocably assign and transfer to CLARITAS all right, title, and interest in and/or to any such feedback, suggestions, and/or comments.

5. How do we share your information?

CLARITAS does not sell your personal information and does not disclose your information, except as described in this Privacy Policy or as otherwise consented to by you.

We may share information, including, without limitation, PII and business contact information, as follows:

- i. Within the CLARITAS group of companies (with CLARITAS' parents, subsidiaries, and affiliates) and the directors, managers, officers, employees, consultants, and agents of these companies, subject to the terms of this Privacy Policy or as otherwise disclosed to you at the time of the collection of your information or as subsequently consented to by you.
- ii. To service providers who are performing services on our behalf, whether engaged directly by CLARITAS or engaged by a third party, including, without limitation, companies providing email delivery services, fraud detection and prevention services, event coordination and management, etc. The service providers are authorized to use and disclose the information only as necessary to perform and provide the services for which they were engaged and subject to the terms set forth in this Privacy Policy. Information provided outside of CLARITAS will be de-identified with the exception of email addresses.
- iii. We may disclose information about you: (i) if we are required to do so pursuant to applicable laws or legal or court process; or (ii) when we believe disclosure is necessary to prevent harm or financial loss, or in connection with an investigation of actual or suspected fraud or illegal activity.
- iv. We reserve the right to transfer information about you in the event of a merger, acquisition, sale or other transaction involving CLARITAS. In addition, we may transfer your information in the event of a change of control event. Following a transfer covered by this Sub-Section (iv) you may contact the entity to whom your information was transferred, with any inquiries concerning the processing of your information.

6. Where is Information Stored?

Information, including, without limitation, PII and business contact information, is stored on servers and systems located in the United States, which servers are licensed, owned, and/or maintained by or on behalf of CLARITAS. Your information is stored encrypted at rest and will be used in de-identified form for all but a few critical business processes.

7. What Security Measures Has CLARITAS Implemented?

CLARITAS maintains appropriate technical, administrative and physical safeguards to protect information, including, without limitation, PII, received or collected by CLARITAS. CLARITAS reviews, monitors and evaluates its privacy practices and protection systems on a regular basis.

Notwithstanding the foregoing, transmissions over the Internet and/or a mobile network are not one hundred percent (100%) secure and CLARITAS does not guarantee the absolute security of such transmissions. CLARITAS is not responsible for any errors by individuals in submitting PII to CLARITAS.

8. How can I opt-out?

You may opt-out by:

- (a) clicking on the unsubscribe link contained in any e-mail communication received from CLARITAS;
or
- (b) contacting us as set forth below.

9. How Can You Access Your Information?

You may access information we collect from or about you in order to review, edit, or delete such information, or you may exercise your right to opt-out from communications from CLARITAS, by:

Sending an email request to myinfo@claritas.com;

- Sending an email request to opt-out@claritas.com ;
- Sending a request via regular mail, postage pre-paid to:

CLARITAS, LLC
53 Brown Rd.
Ithaca, NY 14850
Attention: Legal Department

10. Children's Privacy.

CLARITAS believes it is important to protect the online privacy of children. Accordingly, CLARITAS adheres to applicable laws and codes pertaining to the protection of children's privacy, including, without limitation, the *Children's Online Privacy Protection Act* of 1998 in the United States (as amended). CLARITAS does not knowingly collect PII from anyone under the age thresholds prescribed by applicable laws and codes for the collection of PII from individuals without parental consent. If CLARITAS became aware that it inadvertently collected PII from anyone under such age thresholds, CLARITAS would promptly delete such PII.

11. How Long Does CLARITAS Retain My Information?

CLARITAS will retain PII and other information about you for such period of time as may be required or permissible by law.

12. Who can I contact with questions or complaints about this Privacy Policy?

Questions or Complaints Generally.

If you have any questions or complaints regarding CLARITAS' privacy practices and/or this Privacy Policy or want to communicate an opt-out request to CLARITAS, or want to exercise your rights to access, review, correct, delete or object to the processing of PII, please contact us:

via email at privacy@claritas.com

or

via mail at:

Legal Department
CLARITAS, LLC
53 Brown Rd, Ithaca, NY 14850 USA
email: privacy@claritas.com

13. Links To Other Websites.

CLARITAS' website(s) may contain or provide links to other websites for your convenience and information. These websites may operate independently from CLARITAS. Linked sites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not owned or controlled by CLARITAS, CLARITAS is not liable or responsible for the websites' content, any use of the websites, or the privacy practices of the owners of the websites.

14. Updates to this Privacy Policy.

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes to CLARITAS' practices and procedures set forth herein. In the event of any updates or changes to this Privacy Policy, CLARITAS will post a prominent notice on CLARITAS' website(s) to notify you of any significant changes.

15. Statement Regarding the EU General Data Protection Regulation (GDPR)

At Claritas, LLC ("Claritas"), we are committed to offering our clients sophisticated products and solutions that are both innovative and legally compliant. As part of this commitment, we have conducted an analysis regarding whether and how the European Union's General Data Protection Regulation (GDPR) may impact our organization. As outlined in greater detail below, based on our review we have determined that Claritas is not subject to the GDPR at this time and therefore is not legally required to comply with the Regulation.

What is the GDPR?

The GDPR is a complex and comprehensive overhaul of European data protection law. The GDPR was designed to harmonize privacy regulation across the EU and to address emerging risks associated with the processing of personal data in an evolving technological landscape. The GDPR applies to a broader array of companies than were subject to the 1995 EU Data Protection Directive, including some companies that have no physical operations in the EU or whose activities were not covered by the 1995 Directive.

Businesses that are subject to the GDPR must adhere to a number of specific requirements, among them heightened data security standards and transparency regarding their processing of EU personal data. EU data subjects have a variety of data protection rights they may exercise under the GDPR, including the right to know how their personal data may be collected, used, disclosed, transferred, shared, and retained, as well as the ability to control these data processing activities under certain circumstances. A company's failure to meet its GDPR obligations could result in regulatory investigations and potentially steep financial penalties.

Does the GDPR apply to Claritas?

At this time, the GDPR does not apply to Claritas or the organization's data collection and processing activities. Broadly speaking, there are three ways a business located in the United States may be subject to the GDPR:

- If the business is "established" in the EU (for example, if it has a physical presence or employees in the EU);
- If the business is not established in the EU, but is processing EU personal data in conjunction with offering goods or services in the EU (whether or not the business is charging money for the goods or services); or
- If the business is processing EU personal data to monitor or track behavior in the EU.

Any given organization must undertake an analysis of their connections to the EU and how the company may process EU personal data to assess their potential compliance obligations under the GDPR. We have completed this analysis and determined that Claritas does not have to comply with the GDPR because:

- Claritas is not established in the European Union. We do not have any offices or employees outside the U.S., nor do we conduct business activities in the EU.

- Claritas does not offer goods or services to individuals or entities in the EU. Our business is focused exclusively on providing our U.S. clients with products and solutions that help them better identify, understand, and target consumers located in the United States. Though our website may be accessible to someone located in the EU who has access to the Internet, we do not market to people in the EU, nor do we target audiences in other countries.
- Claritas does not monitor the behavior of persons in the EU. The data portfolios that serve as the basis for our products and services consist solely of information collected in the U.S. We do not process EU personal data or otherwise track data subjects located in the European Union.

If we were to discover that we had inadvertently obtained EU personal data, we would promptly and securely delete such personal data in accordance with applicable law.

Looking Ahead

Claritas has examined its potential obligations under the GDPR and confirmed that it is not subject to the Regulation. Our organization has always focused exclusively on the U.S. market, and we will continue to offer our U.S.-focused services to our clients. Claritas is aware that the scope of the GDPR may implicate certain organizations in the U.S., including some of our data partners and other entities with which we may do business; however, our operations do not fall within that scope, and we have no plans at this time to expand operations to include the processing of EU personal data.

To help ensure our continued compliance with applicable laws and regulations, we have added training for our employees and are implementing additional monitoring and other procedures that will assist Claritas in identifying potential compliance risks as we continue to develop and grow our business.