



Ethnoscapes Global

General Privacy Policy

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Ethnoscaples Global

General Privacy Policy

1. About us: "We," "Ethnoscaples Global," are responsible for the processing of personal data that we collect from or about "You." For example, we collect your personal data during your participation in a market research activity, or during a business relationship.

We are members of the American Marketing Association, American Anthropological Association, and the National Association for the Practice of Anthropology. We follow their codes of conduct for research and we are also adherents to the ICC/ESOMAR International Code of Marketing and Social Research Practice (<http://www.esomar.org>)

2. What are personal data? Personal data is information that directly or indirectly identifies you as an individual. By "indirectly," we mean information that could identify you when combined with other types of information (ex. your name, postal address, email address, phone number, or a unique device identifier).

3. Use of personal data: We will use your personal data for the purposes as described below. We do not collect and process more or other types of personal data than are necessary to fulfill the respective purposes. We will only use personal data as set forth in this privacy policy, unless you have specifically provided your consent to another use of your personal data. If we intend to use your personal data that we process with your consent for purposes other than communicated in such consent, we will inform you in advance and, in cases where the processing is based on your consent, use your personal data for a different purpose only with your permission.

A. Registration data and direct communication: For many services we collect your personal contact information: name, postal address, phone number and email address ("Registration Data"). We use your Registration Data to communicate with you about our services and let you know about our policies and terms. We also use your Registration Data as well as the content of our communication to respond to you when you contact us.

B. Participation in Research: If you choose to participate in a market research project, we will, in addition to the Registration Data, collect relevant personal data:

- Online, via phone, or face to face
- By way of automated data collection by hardware or software web-tracking and audience measurement means such as tracking applications, browser add-ons, TV meters and special internet routers (data regarding your use of the Internet, streaming and social media platforms and other (online) media channels, as well as your digital devices in general)



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- Through your active participation on an application or device we will analyze and evaluate this market research data, aggregate the data with the data of other participants and use the data for market research purposes.

C. Legal obligations and legal defense: We may be required to use and retain personal data for legal and compliance reasons, such as the prevention, detection, or investigation of a crime, loss prevention, fraud or any other abuse of our services and IT systems. We may also use your personal data to meet our internal and external audit requirements, information security purposes, or to protect or enforce our rights, privacy, safety, or property, or those of other persons.

D. Data Retention: Unless you object to our processing of your personal data and/or demand erasure of your personal data (described under "your rights"), the following retention periods apply for the following categories of personal data:

Contact details used as part of the participation in research are stored for the duration of the project and for a period of one year thereafter, following which the personal data is securely deleted.

4. Collection of personal data from other sources: We may sometimes collect personal data about you from sources other than you. For example, this may be the case if you have registered with a market research panel provider as a participant, and we are working with this provider to source participants in our research. The panel provider will then, subject to its privacy policy and your respective consent to its practices, transfer your personal data to us so that we are able to contact you. If the panel provider has not already informed you about the transfer of your personal data to us, then we will do so when we first contact you and provide you with all information that is shared with us. We will do so upon the first contact.

We may also collect personal data regarding the exposure of participants in market research projects to advertisement and relevant media content from other sources such as advertising networks, social media platforms and website and mobile app publishers. If we do so, we obtain the participants' prior consent to the data collection and inform them about the sources from which we collect personal data about them. We use such secondary data to enrich the data that we collect from participants during their participation in market research in order to provide better insights to our customers.

If we collect personal data about you from other sources, then we either make sure that the source has already informed you in advance about the transfer, or we will notify you upon the first contact that we have received your personal data and provide you with all information required by law.



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5. How we share personal data: We will disclose your personal data only for the purposes and to those third parties, as described below. Ethnoscaples Global will take appropriate steps to ensure that your personal data are processed, secured, and transferred according to applicable law.

A. External service providers: Where necessary, we will commission other companies and individuals to perform certain tasks contributing to our services on our behalf within the framework of data processing agreements. We may, for example, provide personal data to agents, contractors or partners for hosting our databases and applications, for data processing services, or to send you information that you requested, or to call-centers for the purpose of provision of support services or interviewing in the course of market research projects. We will only share with or make accessible such data to external service providers to the extent required for the respective purpose. This data may not be used by them for any other purposes. Ethnoscaples Global's external service providers are contractually bound to respect the confidentiality of your personal data.

B. Business transfers: In connection with any reorganization, restructuring, merger or sale, or other transfer of assets (collectively "Business Transfer"), we will transfer data, including personal data, in a reasonable scale and as necessary for the Business Transfer, and provided that the receiving party agrees to respect your personal data in a manner that is consistent with applicable data protection laws. We will continue to ensure the confidentiality of any personal data and give affected users notice before personal data become subject to a different privacy policy.

C. Public bodies: We will only disclose your personal data to public bodies where this is required by law. Ethnoscaples Global will for example respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence.

6. International transfers of personal data: Under specific circumstances, it will also be necessary for Ethnoscaples Global to transfer your personal data to countries outside the United States, so called "third countries." Such third country transfers may refer to all processing activities describes under Sec. 3 of this Privacy Policy. This Privacy Policy shall apply even if we transfer personal data to third countries, in which a different level of data protection applies than in your country of residence.

7. Processing of personal data of children: Ethnoscaples Global will not collect or process personal data of children under 16 years except with parental consent, pursuant to applicable local law. If we become aware that personal data from a child were inadvertently collected, we will delete such data without undue delay.



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8. Processing of sensitive data: We may, in certain cases, process special categories of personal data concerning you ("sensitive data"). Sensitive data refer to personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for uniquely identifying a natural person, health or a natural person's sex life or sexual orientation. We may, for example, process sensitive data that you manifestly have made public. We may also process sensitive data as necessary for the establishment, exercise or defense of legal claims. We may also process your sensitive data if you have freely given your prior, express and separate consent in a specific context for a specific purpose, such as during your participation in a market research activity.

9. Security: Ethnoscaples Global takes data security seriously. We apply an appropriate level of security and have therefore implemented reasonable physical, electronic, and administrative procedures to safeguard the data we collect from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed. Our information security policies and procedures are closely aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements. Access to your personal data is granted only to those personnel, service providers or Ethnoscaples Global affiliates with a business need-to-know or who require it to perform their duties.

In the event of a data breach containing personal data, Ethnoscaples Global will follow all applicable data breach notification laws.

10. Your legal rights: As a research subject, you have specific legal rights relating to the personal data we collect from you. This applies to all processing activities stipulated under Section 3 of this Privacy Policy. Ethnoscaples Global will respect your individual rights and will respectfully address your concerns.

The following list contains information on your legal rights which arise from applicable data protection laws:

- **Right to withdraw consent:** Where the processing of personal data is based on your consent you may withdraw this consent at any moment by following the procedures described in the respective consent form. We ensure that consent can be withdrawn by the same means as it was given – e.g., electronically. As a participant in a market research project, please note that by withdrawing consent you typically end your participation in the respective project and will no longer be eligible for any rewards or incentives that Ethnoscaples Global may eventually offer to participants.
- **Right to rectification:** You may obtain from us rectification of personal data concerning you. We make reasonable efforts to keep personal data in our possession or control which are used on an ongoing basis, accurate, complete, current and relevant, based on the most recent information available to us. In appropriate cases, we provide self-service internet portals where users have the possibility to review and rectify their personal data.



- Right to restriction: You may obtain from us restriction of processing of your personal data, if:
 - You contest the accuracy of your personal data for the period we need to verify the accuracy
 - The processing is unlawful, and you request the restriction of processing rather than erasure of your personal data
 - We no longer need your personal data, but you require them for the establishment, exercise or defense of legal claims, or – you object to the processing while we verify whether our legitimate grounds override yours.
- Right to access: You may ask us about personal data that we hold about you, including information as to which categories of personal data we have in our possession or control, what they are being used for, where we collected them (if not from you directly), and to whom they have been disclosed, if applicable. You may obtain from us one copy, free of charge, of personal data we hold about you. We reserve the right to charge a reasonable fee for each further copy you may request.
- Right to portability: At your request, we will transfer your personal data to another controller, where technically feasible, provided that the processing is based on your consent or necessary for the performance of a contract. Rather than receiving a copy of your personal data, you may request that we transfer the data to another controller specified by you, directly.
- Right to erasure: You may obtain from us erasure of your personal data, where:
 - The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
 - You have a right to object to further processing of your personal data (see below) and execute this right to object to the processing
 - The processing is based on your consent, you withdraw your consent, and there is no other legal ground for the processing
 - The personal data have been unlawfully processed; unless the processing is necessary:
 - for compliance with a legal obligation which requires processing from us,
 - for statutory data retention requirements,
 - for the establishment, exercise or defense of legal claims.
- Right to object: You may object – at any time – to the processing of your personal data due to your situation, provided that the processing is not based on your consent but on our legitimate interests or those of a third party. In this event we shall no longer process your personal data, unless we can demonstrate compelling legitimate grounds and an overriding interest for the processing or for the establishment, exercise or defense of legal claims. If you object to the processing, please specify whether you wish the erasure of your personal data or the restriction of its processing by us.
- Right to lodge a complaint: In the case of an alleged infringement of applicable privacy laws, you may lodge a complaint with the data protection supervisory authority in the country you live in or where the alleged infringement occurred.



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Please note:

- Time period: We will try to fulfill your request within 30 days. However, the period may be extended due to specific reasons relating to the specific legal right or the complexity of your request.
- Restriction of access: In certain situations, we may not be able to give you access to all or some of your personal data due to statutory provisions. If we deny your request for access, we will advise you of the reason for the refusal.
- No identification: In some cases, we may not be able to look up your personal data due to the identifiers you provide in your request. Two examples of personal data which we cannot look up when you provide your name and email address are:
 - Data collected through browser-cookies, unless you gave your consent to the use of cookies for market research purposes as a member of an Ethnoscapex Global online panel and are still a member of that panel at the time of your request
 - Data collected from public social media sites, provided you have posted your comment under a nickname which is not known to us

In such cases, where we cannot identify you as a data subject, we are not able to comply with your request to execute your legal rights as described in this section, unless you provide additional information enabling your identification.

- Exercise your legal rights: To exercise your legal rights, please contact our privacy contact in writing or text form, e.g. by email or letter. For contact information please refer to the end of this Privacy Policy.

11. Retention of your personal data: In general, we will delete the personal data we collected from you if they are no longer necessary to achieve the purposes for which they were originally collected. However, we may be required to store your personal data for a longer period due to statutory provisions.

In addition, we will not delete all your personal data if you requested from us to refrain from re-contacting you in the future. For this purpose, Ethnoscapex Global keeps records which contain information on people who do not want to be re-contacted in the future (e.g., by means of bulk emailing or recruiting campaigns for market research projects). We qualify your request as consent to store your personal data for such record keeping unless you instruct us otherwise.

12. Changes to this Privacy Policy: We reserve the right, at our discretion, to modify our privacy practices and update and make changes to this privacy policy at any time. For this reason, we encourage you to refer to this privacy policy on an ongoing basis. This privacy policy is current as of the "last revised" date which appears at the top of this page. We will treat your personal data in a manner



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consistent with the privacy policy under which they were collected, unless we have your consent to treat them differently.

We will also keep prior versions of this Privacy Policy in an archive for your review.

13. Contact information:

Benjamin Willett, President

Ethnoscapes Global LLC

811 3rd Street South

Stillwater, MN 55082

Ben.willett@ethnoglobal.com

651-383-2007

Place of registration: Minnesota, United States

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