

SMG Services Global Privacy Policy

Effective from: March 2018

This Privacy Policy applies to SMG's processing of Personal Data collected through this website and other websites, services and applications, including mobile applications, on which this privacy policy is posted, linked or referenced to (collectively, the "**SMG Services**"). 'Personal Data' is information relating to an identified or identifiable natural person. The SMG Services are owned and/or operated by Service Management Group, LLC, Service Management Group Limited, Service Management Group GK and their respective affiliates (collectively, '**SMG**,' 'we' or 'us'). This Privacy Policy addresses how we collect and process your Personal Data.

REVIEW THIS PRIVACY NOTICE CAREFULLY. Your Personal Data will be collected and processed as described in this Privacy Policy.

If you have not already done so, please review SMG Terms of Service, which sets forth the terms governing your use of our websites, applications, services and mobile applications ('SMG Services').

IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY OR TERMS OF SERVICE, DO NOT USE ANY OF THE SMG SERVICES.

- 1. CHANGES TO PRIVACY POLICY**
- 2. CATEGORIES OF Personal Data PROCESSED BY SMG**
- 3. HOW WE COLLECT INFORMATION AND PURPOSES OF PROCESSING**
- 4. LEGAL GROUNDS FOR PROCESSING**
- 5. HOW WE USE AND SHARE Personal Data**
- 6. RETENTION AND DISPOSAL OF Personal Data**
- 7. YOUR RIGHTS AND CHOICES CONCERNING Personal Data PROCESSING**
- 8. CONSEQUENCES OF NOT PROVIDING Personal Data**
- 9. COOKIES POLICY**
- 10. MANAGING YOUR ACCOUNT INFORMATION**
- 11. CHILDREN'S PRIVACY**
- 12. LINKS TO THIRD PARTY SERVICES**
- 13. INFORMATION SECURITY**
- 14. GEOGRAPHIC CONSIDERATIONS AND CROSS-BORDER TRANSFERS OF Personal Data**
- 15. HOW TO CONTACT US**
- 16. DATA CONTROLLER AND DATA PROTECTION OFFICER**

1. CHANGES TO THIS PRIVACY POLICY

We will update this Privacy Policy from time to time when we make changes which have an impact on the Privacy Policy, such as adding new services and applications, improving our services and addressing changes in technologies and laws. The date on which this Privacy Policy comes into effect, which is set forth at the top of this webpage, reflects the date the Privacy Policy was last updated. SMG will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. This notice will be provided by posting a notification of the changes on our website or through our applications.

2. CATEGORIES OF Personal Data PROCESSED BY SMG

SMG conducts market research on behalf of companies who wish to better understand consumer preferences about their goods and services. These companies are our **'Clients'**. We conduct surveys on behalf of our Clients (collectively, **'Surveys'**) and use that information to derive consumer insights, such as where, when and how often consumers visit retail locations and their experiences during the visits. When you take a Survey or use SMG Services, we collect Personal Data which you provide to us voluntarily.

The Personal Data we collect includes: (1) contact data (such as e-mail address, telephone number and employer); (2) demographic data (such as gender, date of birth and post code); (3) your responses on surveys to the extent the information identifies you or is linked to you as an individually identifiable person; and (4) information relating to your use of SMG Services ('Usage Data').

Usage Data we collect includes: (1) IP address; (2) domain server; (3) type of device(s) used to access the Services; (4) statistics and information associated with the interaction between your browser or device, such as device model, carrier/network, battery life information to optimise location sampling based upon remaining battery life and basic usage statistics about your device; (5) real-time GPS or other geolocation data when you allow us to receive information through the location (or similar) settings on your device; (6) referring webpage or other source through which you accessed the Services. When you take Surveys online we collect multiple unique attributes about your device for the purposes of detecting and preventing fraud.

3. HOW WE COLLECT INFORMATION AND PURPOSES OF PROCESSING

We collect and process information you provide to us and from your use of SMG Services. The information we collect and how we process it depends on how you access and use SMG Services.

From you. We collect information from you when you:

- **Complete a Survey:** We collect the information you submit in Survey responses about your consumer experiences and preferences. We may combine information received in your Survey responses with information we receive from our Clients, such as information about your involvement in our Clients' loyalty programmes in order to better understand your consumer experiences. We may also combine information received in your Survey responses with information received in Survey responses from other users in order to better understand the overall consumer experiences. When you complete a Survey the information you choose to provide to us will be used in reports and other analyses of consumer experiences and preferences for our Clients or for any other uses we disclose to you at the time the information is collected. If you do not wish to have your information used in reports, analyses or as otherwise disclosed to you, you may choose not to complete a Survey.
- **Use SMG Services.** We automatically collect Usage Data when you interact with the SMG Services through the use of cookies and other data collection tools. We use this Usage Data in order to facilitate communications between your device and our systems, deliver Surveys, ensure Survey integrity, detect and prevent fraud, conduct market research, administer and improve our website and applications and to analyse the usage of and to improve and enhance SMG Services. To learn more about how and why we use cookies and similar data collection tools please see the 'Cookie Policy' section of this Privacy Policy.
- **Submit your Personal Data while using SMG Services:** When you submit your Personal Data in connection with using SMG Services, such as when contacting us for

assistance or information or providing comments about your experiences with one of our Clients, we collect and analyse the information you submit. When you provide comments to SMG the information you provide contributes to the services we provide to our Clients and to our overall market research. With your permission, your comments may be posted on TrumpetRatings.com and/or on our Clients' websites. When such information is posted in a public forum, such as TrumpetRatings.com or other websites accessible to the general public, such information becomes public information. What you have written may be seen and/or collected by third parties and be used by others in ways we are unable to control or predict.

- **Access SMG Services through Social Media Credentials:** SMG may offer you the opportunity to use social networking services (collectively, '**Social Media**') in order to access certain SMG Services. When you choose to access SMG Services through Social Media login credentials, SMG may, depending on your privacy settings, have access to information that you have provided to the Social Media platform, such as your name, e-mail address, profile photo, posts, comments and other information associated with your Social Media account. We may use this information for any purposes described in this Privacy Policy and for any additional purposes of which you were advised at the time the information was collected. If you do not want your Social Media information to be shared with SMG by a Social Media provider, you should not use your Social Media accounts to access SMG Services.

From our Clients. For some of our products and services, our Clients may send us information about your interactions with their brands, products and services, which may include information relating to any loyalty programmes in which you are enrolled and information about your transactions with our Clients. We may combine this information with other information we collect in order to enhance the market research we conduct and services we provide for our Clients.

4. LEGAL GROUNDS FOR PROCESSING

- 4.1. We process your contact data, demographic data and responses to Surveys when you complete a Survey or use SMG Services. We process such Personal Data based on our Clients' legitimate interests in obtaining feedback from their customers in order to help them improve their products and services for the benefit of their customers and their businesses and based on SMG's legitimate interests in enhancing SMG's products, services and market research and in responding to users' requests for assistance or information.
- 4.2. We process your Usage Data when you complete a Survey or use SMG Services. We process this Usage Data based on your election to continue into the Survey, confirming your consent to SMG's use of cookies and other data collection technologies. You may withdraw your consent by contacting our Data Protection Officer by e-mail at privacyofficer@smg.com or by writing to Data Protection Officer, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108, USA.
- 4.3. We may also process information you have provided to Social Media platforms, depending on your privacy settings, when you use social networking services in conjunction with SMG services. We process such information based on your consent, which you provide in your privacy settings to the social networking service. You may withdraw your consent by changing your privacy settings to no longer allow us access to your Social Media data.
- 4.4. We process information received from our Clients concerning your interactions with their brands, products and services. We process such information based on SMG's

and SMG's Clients' legitimate interests, including improving and enhancing SMG's and our Clients' products and services and enhancing SMG's market research.

5. HOW WE USE AND SHARE Personal Data

How we use and share information that we collect or that you provide to us depends on how you use or access the SMG Services. Where required by law, SMG will comply with your request that we cease providing Personal Data to third parties.

- **Communicating with you.** Your Personal Data will be used, as needed, to manage our relationship and communicate with you by mail, telephone, e-mail, mobile alerts and SMS text messaging. Unless a survey respondent expressly requests communication, SMG will not contact a survey respondent other than the necessary contact to verify the integrity of a survey, to deliver Surveys, to provide rewards or benefits earned as a result of taking a survey or to provide customer service. Although SMG does not use your Personal Data for direct marketing purposes, you should review the Privacy Policy of the client for which we are collecting your Personal Data in order to determine if such client does so. We may share your Personal Data with service providers that assist us in managing our relationship with you.
- **Performing Services you request.** We may use and share your Personal Data in order to perform services you request or functions you initiate, such as when you post information and materials on message boards, forums, or on our Social Media pages. In addition, when you give us permission, we may disclose your Personal Data in order to identify you to anyone to whom you send communications through the SMG Services. Furthermore, we may use and share your Personal Data with third parties in order to provide rewards and fulfil benefits you have requested and earned by taking Surveys. If you elect to participate in a sweepstakes or other promotion, we send your information to third party administrators of those promotions, so that they can answer your questions or contact you about a prize you have won or other issues related to the promotion.
- **Analysing use of and improving SMG Services.** We use Personal Data collected from cookies and other data collection tools for usage analytics, fraud detection and performance improvement for the SMG Services. We may use third party website analytics services in order to analyse how individuals use SMG Services, including, to record mouse clicks, mouse movements, scrolling activity and text that you type into free-form text boxes. We use information collected from these third-party services in order to help us to better understand how our users find and use SMG Services, to enhance our services and to improve your user experience.
- **Sharing data with other service providers.** We may share your information, including your Personal Data, with other service providers we use to perform the functions for which we engage them, such as hosting, data storage and security. We may also share your Personal Data as needed in order to operate other related SMG services, such as the rating and review websites that we operate.
- **Sharing data with clients.** If you access SMG Services in order to take a Survey regarding your consumer experience with one of our Clients, we share the Personal Data we collect from you about and relating to your Survey responses with that Client. We also may use this Personal Data in order to derive market research insights and provide consumer behaviour analytics and business intelligence to our Clients. For information concerning how the Client for which we are collecting your Personal Data uses, protects and otherwise processes Personal Data please read such Client's privacy policy. We and our Clients may also combine different types of information,

including Personal Data collected from or about you by us, our Client or third-party sources. SMG may use the combined information for any of the purposes described in this Privacy Policy and our Clients may use the combined information for any purposes described in their privacy policies.

- **Complying with legal obligations and enforcing legal rights.** We may also share the information we collect from you, as needed, to enforce our rights, protect our property or protect the rights, property and safety of others or as needed to support external auditing, compliance and corporate governance functions. We will disclose Personal Data as we deem necessary in order to respond to a subpoena, binding order of a data protection authority or judge, legal process, governmental request or any other legal or regulatory obligation, in each case this may be an entity outside of your country of residence. We may also share Personal Data as required to pursue available remedies or limit damages we may sustain.
- **Transferring data in connection with corporate changes.** We may transfer information about you, including your Personal Data, in connection with any actual or impending reorganisation, merger, sale, joint venture, assignment, transfer, acquisition or other change of ownership or control by or of SMG or any affiliated company (in each case whether in whole or in part), including but not limited to, connection with any bankruptcy or similar proceeding. Any such entity to which we transfer Personal Data will be required to provide you with notice of any purposes of processing not compatible with the purposes set forth in this Privacy Policy, as well as any privacy practices that are materially different than the practices set forth in this Privacy Policy. Where required by law, such entity also will be required to obtain your consent.
- **Using Personal Data for other business purposes.** We also use your Personal Data for other legitimate business purposes, such as product and service development and administration of SMG Services.

6. RETENTION AND DISPOSAL OF Personal Data

We will retain your Personal Data in our records for no longer than is necessary for the purposes for which it was originally collected. When such information is no longer needed for the purposes for which it was originally collected, we will securely delete all of your electronic Personal Data and securely shred any hard copy Personal Data, except for what is needed to comply with our legal obligations.

7. YOUR RIGHTS AND CHOICES CONCERNING Personal Data PROCESSING

You may discontinue participating in Surveys at any time by no longer accessing the SMG Services.

If you reside in a location with laws or regulations granting you rights to request specific actions relating to your Personal Data, you will have the specific rights granted to you by such law[s] or regulation[s] which may include the right to request access to and rectification (e.g., amendment or supplementation) or erasure of your Personal Data, the right to transfer your data (i.e. data portability), restriction of processing of your Personal Data, as well as the right to object to the processing of your Personal Data, the right to withdraw your consent, the right to cancel your account and the right to lodge a complaint with a supervisory authority. All such requests will be handled in accordance with the parameters set forth in applicable laws and regulations.

If you reside in the European Union, you have the right under the General Data Protection Regulation to request from SMG access to and rectification or erasure of your Personal

Data, data portability, restriction of processing of your Personal Data, the right to object to the processing of your Personal Data, the right to withdraw your consent and the right to lodge a complaint with a supervisory authority. If you reside outside of the European Union you also may have certain data subject rights under your local laws.

In order to make such a request please contact our Data Protection Officer by e-mail at privacyofficer@smg.com or by writing to Data Protection Officer, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108, USA.

8. CONSEQUENCES OF NOT PROVIDING Personal Data

Although participation in our Surveys is voluntary, you may not qualify for certain incentives, rewards or benefits if you do not provide all the information requested by a Survey.

9. COOKIES POLICY

9.1. What are Cookies

SMG and our service providers use small text files called Cookies. ‘**Cookies**’ are small computer files sent to or accessed from your web browser or your computer's, mobile device's or tablet's hard drive that contain information about your computer, such as a user ID, user settings, browsing history and activities conducted while using the Services. A Cookie typically contains the domain name (internet location) from which the Cookie originated, the “lifetime” of the Cookie (i.e. when it expires) and a randomly generated unique number or identifier. Cookies may be linked to Personal Data.

9.2. How we use Cookies and Data Collection Tools

Cookies help us to improve SMG Services by tracking your navigation habits and customising your experience with SMG Services. This enables us to analyse technical and navigational information about SMG Services and helps us to detect and prevent fraud.

We also use Cookies and other Data Collection Tools (such as web beacons and server logs), which we collectively refer to as ‘**Data Collection Tools**’, in order to help improve your experience with SMG Services – for example, by remembering you when you come back to visit us and making the content you see more relevant to you.

SMG Services may also use Data Collection Tools in order to collect information from the device you use to access SMG Services, such as your operating system type, browser type, domain and other system settings, as well as the language your system uses and the country and time zone in which your device is located.

9.3. Your control of Cookies

Web browsers allow some control of most Cookies through browser settings. Some web browsers (including mobile web browsers) provide settings that allow you to reject Cookies or to alert you when a Cookie is placed on your computer, tablet or mobile device. You may be able to reject mobile device identifiers by activating the appropriate setting on your mobile device. Although you are not required to accept SMG's Cookies or mobile device identifiers, if you block or reject them you may not have access to all the features available through SMG Services. In addition, if you reside in a jurisdiction that requires us to obtain your consent to use Cookies on our websites and/or applications, you will have an opportunity to manage your Cookie preferences on those websites and/or applications; except that certain Cookies are required in order to enable the core functionality of such websites and applications and you cannot choose to disable those Cookies.

10. MANAGING YOUR ACCOUNT INFORMATION

You can visit the account section of the applicable SMG Service in order to manage and correct factual inaccuracies in the information we have about you. If you have questions about how to access or correct your Personal Data please contact our Data Protection Officer by e-mail at privacyofficer@smg.com or by writing to Data Protection Officer, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108 USA.

11. CHILDREN'S PRIVACY

SMG Services are intended for general audiences and are not directed at children who are under the age at which they may provide consent for the processing of their Personal Data in any jurisdiction where we operate. We do not knowingly collect Personal Data from such persons. If you become aware that a child under the age at which [s]he may legally provide consent to the processing of his/her Personal Data has provided us with Personal Data without parental consent please contact our Data Protection Officer by e-mail at privacyofficer@smg.com or by writing to Data Protection Officer, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108, USA. If we become aware that a child under the age at which [s]he may provide consent to Personal Data processing in his or her jurisdiction has provided us with Personal Data without parental consent, we will take steps to remove such information and to terminate the child's account as soon as possible.

12. LINKS TO THIRD PARTY SERVICES

SMG Services may contain links to third party websites and services ('**Third Party Services**') with which SMG has no affiliation. A link to any Third Party Service does not mean we endorse it or the quality or accuracy of information presented on it. If you decide to visit a Third Party Service, you are subject to its privacy practices and not the privacy practices set forth in this Privacy Policy.

13. INFORMATION SECURITY

SMG has an information security programme that implements technical, physical, and organisational measures designed to assist in maintaining the security and confidentiality of Personal Data; safeguarding against anticipated threats to the confidentiality, integrity and availability of Personal Data; and protecting your Personal Data against loss, misuse, unauthorised alteration or destruction and unauthorised access or disclosure.

However, whenever Personal Data is processed there is a risk that such data could be lost, misused, modified, hacked, breached and/or otherwise accessed by an unauthorised third party. No system or online transmission of data is completely secure. In addition to the technical, physical and organisational measures that SMG has in place to protect your Personal Data, you should use appropriate security measures to protect your Personal Data. If you believe that your SMG account or any information you have provided us with is no longer secure please notify our Data Protection Officer immediately by e-mail at privacyofficer@smg.com or by calling 1-800-764-0439 and asking to speak with SMG's Data Protection Officer.

14. GEOGRAPHIC CONSIDERATIONS AND CROSS-BORDER TRANSFERS OF Personal Data

SMG controls and operates SMG Services from the United States of America. SMG may transfer, store and process your Personal Data in the United States, the United Kingdom, Japan or another location in Asia or in the European Union. Note that data protection and privacy laws of the country to which your Personal Data is transferred may not be as

comprehensive as the laws in your country. For example, Personal Data transferred to the United States may be subject to lawful access requests by federal and state authorities in the United States.

Any transfers of Personal Data from the European Economic Area ('EEA') to the United States are done pursuant to the EU-US Privacy Shield. SMG participates in and complies with the EU-U.S. Privacy Shield principles regarding the collection, use, sharing and retention of Personal Data from the EEA, as described in our EU-US Privacy Shield certification. View the Privacy Shield list [here](#). Learn more about the Privacy Shield [here](#). SMG is subject to the oversight of the US Federal Trade Commission and will remain responsible for processing of Personal Data in a manner inconsistent with the Privacy Shield Principles by third parties to which SMG has transferred Personal Data unless SMG proves it is not in any way responsible for the event giving rise to the damage. Any and all such transfers of Personal Data outside the EEA shall be in accordance with this Privacy Policy and all applicable laws. If you have a complaint about our Privacy Shield compliance please contact our Data Protection Officer by e-mail at privacyofficer@smg.com or by writing to Data Protection Officer, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108, USA. You can also refer a complaint, free of charge, to our chosen independent dispute resolution body, the American Arbitration Association and in certain circumstances, invoke the Privacy Shield arbitration process.

This English language Privacy Policy is SMG's official statement of its privacy practices relating to SMG Services. In case of any inconsistency between this English language Privacy Policy and any translation into another language, this English language document prevails.

You can also refer a complaint, free of charge, to our chosen independent dispute resolution body, American Arbitration Association (<http://go.adr.org/privacysield.html>), and in certain circumstances, invoke the Privacy Shield arbitration process.

15. HOW TO CONTACT US

If you have questions about privacy, need assistance with accessing or updating your Personal Data or have complaints relating to the processing of your Personal Data please contact our Data Protection Officer by e-mail at privacyofficer@smg.com.

You can also write to us at:

Service Management Group, LLC
FAO: Data Protection Officer
1737 McGee Street
Kansas City, MO 64108, USA

Service Management Group, Ltd.
FAO: Data Protection Officer
38-40 The Maltings
St Albans
Hertfordshire AL1 3HL
UNITED KINGDOM

Service Management Group G.K.
FAO: Data Protection Officer
2-7-16 No. 3 Komoriya Building 9F
Hamamatsu-cho, Minato-ku
Tokyo 1050013, Japan

16. DATA CONTROLLER AND DATA PROTECTION OFFICER

Personal Data collected by SMG is controlled by Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108. You may contact our Data Protection Officer by e-mail at privacyofficer@smg.com or by writing to Data Protection Officer, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108, USA.