



Strategex, Inc. Privacy Policy

Last Updated: August 2, 2018

Strategex, Inc. (“Strategex”) is committed to protecting the privacy of information we collect from our clients, research participants, and visitors to our corporate and survey websites (the “Websites”). This Privacy Policy applies to all client and personal data that we collect or use in the course of conducting our business and covers all client information and research participant data housed at any Strategex facility or stored on the Strategex network.

By accessing or browsing our Websites, participating in any of our research surveys or interviews, contacting us on social media, or otherwise actively or passively providing your data to us, you confirm that you have read and understood the entirety of this policy.

We reserve the right to modify, alter, or otherwise update this policy at any time and without prior notice. We will take commercially reasonable efforts to notify you of material changes that have been made by posting a notice on our website or through other means designed to make you aware of the changes. You remain responsible, however, for checking this privacy policy from time to time for changes.

What information might Strategex collect about me?

Most of the information we collect about you (only a small subset of which may be “personal data” or “personally identifiable information” as defined under applicable law) is information you voluntarily disclose to us in connection with our research studies. Data collected as part of our studies most often includes respondent demographic data and respondent-supplied opinions.

Research participation is completely voluntary and participants always have the opportunity to decline involvement or to “opt out” of the research after agreeing to participate, as clearly identified in each survey or interview.

How does Strategex collect information about me?

The primary way in which we collect information is through market research activities, including:

Phone Interviews: Our clients provide us with the means to directly contact research participants – most often customers of our clients – including name, email address, phone number, and mailing address. Clients may provide other demographic information about research participants such as job title or location. Strategex then schedules and conducts one-on-one telephone interviews. Prior to conducting the interview, consent is secured and research participants have the option to withdraw consent at any point. Participants may have their data collected and processed anonymously. Interviews are not recorded, but thorough notes are taken and a contemporaneous transcript is created. Speech-to-text technology may also be used, which automatically creates a transcript of the interview without a digital recording.

Online Surveys: Self-administered online survey activity may or may not be conducted on an anonymized basis through the use of randomly assigned identifier codes, so the identity of

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research participants may be known to us or to the client commissioning the study. Additionally, in connection with our online survey activities, we employ software to identify certain systems-related information about respondents, including IP address, device and browser type, and geographic location, in order to detect fraudulent activity, to protect the integrity of the research, and to optimize the survey experience.

Other Market Research Activities: Some of our studies take the form of focus groups or other in-person interviews, which may involve repeated interaction over a defined period of time; in those cases, we would typically have personal data about you (including a means to contact you), but other participants in the study would not have access to this information with the exception of information that you voluntarily share. As to some studies, we may also collect video or audio responses with your permission.

Market Research Incentives: If a project involves an incentive or a sweepstakes, we may ask for your name and telephone number or email address to notify you if you are a winner. There is never an obligation to provide this information to participate in the survey but if you do not provide it, you may not be able to participate in the incentive program.

Other ways we might collect information about you include:

Social Media: If you choose to use social media (Twitter, YouTube, LinkedIn, or our blog) in order to contact us or find out about our services, we may collect your public-facing profile data, data relating to your interactions with us, and any data you post on message boards which are relevant to our business.

Visiting our Website: We may collect certain information regarding visitors to our Websites, including IP address, device and browser type, and behavior while on the Websites (e.g., which links were clicked on). We may do so using cookies. See Section “Does Strategex Use Cookies” for more information. Also, when visiting certain of our Websites, you are provided the option to sign up for our newsletter and mailing list, and if you do, we collect the information you supply. If you wish to be removed from Strategex’s email list, please email us at compliance@strategex.com.

Other Marketing Activities: We may receive information about you by participating in or sponsoring industry webinars, online platforms, conferences, and other events.

What is the legal basis for Strategex to collect this information about me?

Our legal basis for collection and processing of respondent-supplied personal data is consent; we do not collect personal data without the affirmative consent of the research participant. Consent can be withdrawn at any time.

As to certain studies, we may obtain information about you (which in some cases may be “personal data” or “personally identifiable information” as defined under applicable law) from our clients, third party vendors, or partners for use in connection with the studies. In those cases, our legal basis for the processing of the information is our legitimate interest to perform our obligations under our contract with the client commissioning the research study in question.

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If you are a client or work for a client, we likely have collected various contact, business, and in some cases financial information about you in the course of administering our relationship with you or your employer. In those cases, our legal basis for the collection and processing of the information is our legitimate interest to perform our obligations under our contract with you or the company for which you work.

Does Strategex collect information from minors?

No, Strategex does not collect, use, or disclose information from children under the age of eighteen. If you are under the age of 13 you are not authorized to use our Website or otherwise participate in any services or activities offered by us.

What does Strategex do with the information that is collected about me?

Depending on how we obtain your personal data (as described above), we may either be considered a “controller” or a “processor” under applicable law as to that data. If we are the processor, we will process the data in accordance with the instructions provided to us by the controller of that data.

Regarding data collected as part of our research activities, we collect data in, and in connection with, our studies for research purposes only, and our use of that information is limited to that purpose. Research participant information and answers are not used by Strategex as an aid for sales. In many cases, this information is shared with the client commissioning the study pursuant to our contract with that client. In some cases, we may need to share personal data with third parties for ancillary services in support of a research project.

As to client data we collect, we do not use the information for any purpose other than to fulfill our obligations to clients. We keep client information secure and prevent the use and disclosure of it by our employees or any third parties.

Insofar as we have only operations in the United States but conduct research globally, any data we collect and process in connection with our business activity may be transferred between or among two or more countries (including from the EU to the US), either within Strategex or between Strategex and a client or other third party described above.

Information we collect regarding visitors to our Websites, as well as visitors to our social media pages, is used for improvement and maintenance of our Websites and the preparation of reports or compilation of statistics in order to improve our Websites and the general suite of services we offer. Information supplied on Websites in connection with newsletters and mailing lists will remain confidential and will be used solely by Strategex for its own marketing activities.

We do not rent, sell, or give personal data to any third party for the purpose of directly marketing any products or services.

Under certain circumstances, we may be required to release personal data in response to a legal request from public authorities including to meet national security or law enforcement requirements.

In all cases, Strategex will take reasonable steps to ensure the personal data is accurate, complete, current and relevant and being used only for the intended purposes. We will not process personal data in

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a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the individual.

Does Strategex share information collected about me with other parties?

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information (PII). This does not include third parties providing services on our behalf - such as companies that host our website (Qualtrics, WordPress, etc.), help us analyze site data (Google Analytics and Google AdWords), provide marketing or analytic assistance (Salesforce, MailChimp, etc.) so long as those parties agree to keep this information confidential.

When required by law or law enforcement - including at the request of governmental authorities, in response to a subpoena or complaint, to verify or enforce compliance with our policies if we believe disclosure is necessary to limit our legal liability or to protect or enforce the rights, interests, or safety of the Websites, our users, or others.

We may sell, transfer, or otherwise disclose user information, including PII, in connection with a corporate merger, consolidation, the sale of substantially all assets or of a business group, or other fundamental corporate change.

How long will Strategex keep the information it collects about me?

The length of time we retain personal data depends on the purposes for which we collect and use it and/or as required to comply with applicable laws.

What rights do I have over the information collected about me?

You have the right to request the following as to any personal data Strategex has about you:

- that we provide access to any personal data we hold about you;
- that we update any of your personal data which is out of date or incorrect;
- where our basis for processing your personal data is consent, that your consent to further processing be withdrawn;
- where we received your personal data from a third party, inquire where the data originated;
- that we delete any personal data which we are holding about you;
- restrict the way that we process your personal data;
- prevent the processing of your personal data for direct-marketing purposes;
- that we provide, or not provide, your personal data to a third-party provider of services;
- that we provide you with a copy of any personal data which we hold about you;

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or that we consider any valid objections which you have to our use of your personal data.

Under applicable law, certain personal data may be exempt from such requests in certain circumstances. If you would like further information about these rights or would like to exercise any of them, please email us at compliance@strategex.com

How does Strategex keep secure the information it collects about me?

We maintain physical, electronic, and procedural security measures to help safeguard client and personal data which are consistent with industry standards and practice and in compliance with applicable law. This includes employee training, continuous risk assessment, implementation of risk treatments, audits, etc. We will take reasonable precaution, consistent with industry standards and practice, to protect personal data from loss, misuse, unauthorized access, disclosure, alteration, and destruction.

What will Strategex do in the event of a data breach?

In the event of a data breach, Strategex will notify the appropriate supervising authorities within seventy-two hours. If necessary, individuals impacted by the breach will be notified as well.

Does Strategex use 'cookies'?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

In order to better understand our users, their behavior and to serve them relevant ads about our products we may employ Google Analytics Cookies, and third-party cookies (such as the DoubleClick cookie). We also use Salesforce and MailChimp to facilitate our email marketing. Both of these providers may track your activity on the site.

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

To opt out of being tracked by Google Analytics across all websites:
<http://tools.google.com/dlpage/gaoptout>

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since browser is different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some features will be disabled. It will affect the user experience that make our site more efficient and may not function properly.

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Does Strategex include links to third-party websites?

Yes, be aware that when you are on this Website or viewing an e-mail from us, you could be directed to other web pages or online content through links that take you outside our service and are beyond our control. These other web sites may set their own cookies, collect data, and/or have their own privacy policies. This Privacy Policy only covers information collected by Strategex, and we encourage you to review the privacy policy of any other web site you visit.

How can I contact the Strategex Data Protection Officer?

Strategex, Inc.

Data Protection Officer

20 South Clark Street

Suite 2400

Chicago, Illinois 60603

United States of America

01-312-551-0505

compliance@strategex.com

Do Not Track

We do not track users over time and across third party websites to provide targeted advertising and therefore do not respond to “do not track” signals. Third parties that have content embedded within the service such as a social feature may set cookies on a user’s browser and/or obtain information about the fact that a web browser visited a specific location from a certain IP address. Third parties cannot collect any other personally identifiable information from the service unless you provide it to them directly.

Your California Privacy Rights

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. We do not share your personally identifiable information with third parties for the third parties’ direct marketing purposes unless you provide us with consent to do so.

Last Update

This Privacy Policy was last updated on August 2, 2018.

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