

Privacy Policy
Effective May, 2018

Brookmark Research Services, LLC (“Brookmark”) recognizes the importance of the privacy of our clients and the people who complete the surveys we prepare on their behalf (such people, the “data subjects”), and take steps to protect their privacy. This Privacy Policy describes the information that Brookmark gathers, uses and discloses from the contacts we have with you and your data subjects, such as by survey, mail, email, telephone, Internet, mobile applications, and otherwise and your choices about how we may disclose the information. This Privacy Policy applies only to our clients and their data subjects, not our employees, consultants, suppliers, vendors, or others. If you have any questions about this Privacy Policy, please send us an email at privacy@brookmark.com, call us at (866) 240-4878, or contact us by mail at 3 Bessom Street, Suite 328, Marblehead, Massachusetts 01945.

Non-Personally Identifiable Information

Brookmark collects non-personally identifiable information about data subjects in the United States through web-based surveys that it prepares. The type of non-personally identifiable information Brookmark collects is determined by the nature of the research clients have retained us to perform and the data subjects’ responses. Additionally, Brookmark collects survey-neutral non-personally identifiable information from data subjects that reside in the United States through our surveys, including their Internet Protocol (IP) address, the type of web browser they use, the type of mobile device they use, and their referring website; Brookmark does not collect that information from non-U.S. residents.

Brookmark may collect non-personally identifiable information through the use of cookies. A cookie is a file that a website installs on your hard drive or mobile device so the site can identify you while you are using it or when you return to the website. Similarly, a mobile application may use a unique device identifier to identify your mobile devices. Cookies and unique device identifiers may remain on your computers or mobile devices after you cease using the website or mobile application. You may decline to accept cookies by modifying your web browser settings, and you may be able to disable unique device identifiers. If you choose so, however, you may be unable to use all functions of websites and mobile applications, or the websites and mobile applications may operate less efficiently.

Personally Identifiable Information – United States Residents

In the event a client provides us with personally identifiable information about the data subjects of a survey who reside in the United States, Brookmark will use that information to distribute surveys to the data subjects in the United States and collect information from them that may also be personally identifiable information. The nature of that information depends on the nature of the research you, as a client, have retained Brookmark to perform.

Brookmark also collects personally identifiable information from clients when you submit information to us via the “Contact Us” page on its website. Similarly, Brookmark retains information sent to us via other means, such as email, mail, and telephone. This information frequently includes names, addresses, emails, telephone numbers, cellphone numbers, credit and

debit card numbers, product and services preferences, purchasing history, etc. Financial information is generally used to bill you for products or services you purchase. Contact information is generally used to send you products or provide you with services that you purchase, send you information about products or services, and for billing or collection purposes. Brookmark also may gather and store other personal information that you provide to us (such as a social security numbers, tax identification numbers, dates of birth, work affiliations, etc.) for specific purposes that we communicate with you about (such as obtaining a credit report or credit card).

If you give us your email or address, we may send you emails, notices, or other information. If at any time you do not wish to receive emails, notices, or other information from us, please see the “How to remove your name from our mailing, sharing or email list” section below.

Personally Identifiable Information – Non-United States Residents

Brookmark does not collect personal identifiable information or personal data (as defined by the GDPR) from clients or data subjects who do not reside in the United States.

Disclosures of Personally Identifiable Information

Unless required by law or expressly or impliedly authorized or consented to by a client or data subject, Brookmark will disclose personally identifiable information about a data subject only as follows.

Brookmark is a marketing research company. Brookmark uses all personally identifiable information it collects to provide marketing analysis services to its clients, which may include the disclosure of personally identifiable information to clients.

Brookmark may employ others to perform certain functions. Examples include operating and maintaining our website, taking orders, delivering products or services, sending mail and email, maintaining client lists and other records, analyzing data, providing marketing consultation and other assistance, distributing surveys, processing credit and debit card payments, and providing customer service. Brookmark will provide personally identifiable information to such other companies and individuals to the extent it is necessary or appropriate for them to perform the functions that we retain them to perform.

Brookmark may release personally identifiable information when we believe that it is necessary or appropriate to comply with applicable laws, regulations, legal processes, governmental requests, or contractual obligations, to address insurance, audit, or security matters, or for any other purpose that we have a good faith belief the disclosure is required, authorized or appropriate. We also may release such information to enforce or apply this Privacy Policy or other agreements, or to protect the rights, property, or safety of Brookmark, you, other clients, data subjects, employees, or others. We also may release such information if you or a data subject expressly or impliedly authorize or consent to the release or disclosure of the information.

As Brookmark continues to develop its business, we might sell or buy subsidiaries or other business units, sell the stock or substantially all of the assets of Brookmark, or apply for or

secure funding or financing. In such transactions, personally identifiable information may be disclosed and (in the case of a sale) it is generally one of the transferred assets.

Other than as set forth above, Brookmark will give you notice when information about you might go to third parties, and you will have the opportunity to instruct us not to share the information.

How to Remove your Name from Our Mailing, Sharing or Email List

To not receive future communications from us, not receive further communications from us, and have us not share your information with third parties, you can do any of the following:

1. Send us an email at privacy@brookmark.com, call us at (866) 240-4878, or contact us by mail at 3 Bessom Street, Suite 328, Marblehead, Massachusetts 01945, and instruct us to remove you from our mailing, sharing or email lists. You may also use this email, telephone number, and address to request that we correct any information we have about you.
2. If available, use the “opt out” or “unsubscribe” option included in an email that you receive from Brookmark.

Children’s Privacy

Brookmark does not sell products or services to children or minors, and we do not want to collect or store personally identifiable information about children or minors. If you are under 18 years old, you may complete Brookmark’s surveys, use Brookmark’s website and purchase products or services from us only with the direct involvement of a parent or guardian. If you are under 13 years old, do not send Brookmark any personally identifiable information about yourself, including your name, address, email, telephone number, or cellphone number. In the event Brookmark learns that we have collected personally identifiable information about a person who is younger than 13 years old, we will endeavor to delete the information as soon as possible. If you know Brookmark has collected personally identifiable information about any person who is younger than 13 years old, please inform us by contacting Brookmark as provided below.

External Links

If any part of the Brookmark’s website links you to other websites or mobile applications, those websites and mobile applications do not operate under this Privacy Policy. Brookmark recommends that you examine the privacy statements posted on those other websites and mobile applications to understand their procedures for collecting, using, and disclosing personal information.

Information Security

Brookmark has implemented physical, managerial, administrative and technical security measures to protect the personally identifiable information it collects, including against loss, theft, fraud, and unauthorized access, use, copying and disclosure. If you give Brookmark your credit or debit card number, we will handle such information in accordance with the Payment Card Industry Data Security Standard (PCI DSS). If Brookmark becomes aware that a breach or potential breach of security has occurred involving your personally identifiable information, we

will take prompt action to investigate the situation, remediate to the extent remediation is necessary, appropriate, effective or otherwise required by law, and notify you about any breach of your personally identifiable information that has occurred if required to do so by applicable law.

How To Contact Us

If you have any questions or concerns about the privacy or security of your information, you may send us an email at privacy@brookmark.com, call us at (866) 240-4878, or contact us by mail at 3 Bessom Street, Suite 328, Marblehead, Massachusetts 01945.

Changes to this Privacy Policy

Brookmark may change or update this Privacy Policy in the future, with or without notice.