

Privacy Policy

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Who We Are and What We Do

Brookmark Research Services, LLC (“Brookmark”) is a full-service market research agency that conducts both qualitative and quantitative studies among consumers and businesses.

Our Commitment to Privacy

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. Brookmark has also taken steps to comply with applicable requirements of the EUs General Data Protection Regulations (“GDPR”).

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 data we collect from our clients and their data subjects in connection with our services. If you have any questions about this Privacy Policy, please send us an email at privacy@brookmark.com, or contact us by mail at 3 Bessom Street, Suite 328, Marblehead, Massachusetts 01945.

About Market Research Surveys

Brookmark conducts market research to gather and analyze information from various audiences including consumers, customers/potential customers, business owners and other stakeholders. The topics or purpose of the research is varied but examples include evaluating reactions to products and services, evaluating new concepts, measuring satisfaction with products and services and measuring general awareness of brands.

The Personal Information We Typically Collect About You in Our Surveys

It is important to understand that one of the many goals of market research is to capture the opinions of a representative portion of a specific population. As a result, Brookmark collects what is defined as personal data or personally identifiable information under an applicable law (“personal information”). This typically relates to demographic information and includes questions regarding age, gender, ethnicity, income, marital status, education level, email address, etc.

Personal information may also be provided by sources who have assured Brookmark that each applicable individual has explicitly consented to being disclosed to Brookmark. These sources include:

- Clients who engage Brookmark to conduct research on their behalf
- Suppliers / list providers / panel owners who manage lists as part of their core business

Unless you have provided specific consent to do otherwise, Brookmark will protect the anonymity of your responses to surveys, participation in focus groups or in-depth interviews or any other means of collecting feedback from you. In fact, in most cases, Brookmark collects only anonymized information and cannot identify you or connect your survey responses and other feedback to you personally.

Data Collection Methods

The following are ways Brookmark either collects or receives personal information about you:

- Data provided by clients or companies you may have a relationship with
- Data provided by industry suppliers, list providers or panel owners
- Data provided by focus group facilities
- Data provided by other third parties
- Data provided by you, the data subject, while participating in a survey including online surveys, telephone interviews, mall intercepts, etc.

Information We Typically Collect When You Start Our Surveys

As you navigate our surveys, we may use automatic data collection technologies to collect certain information about your computer, mobile device or other device that you use to access the survey. This information may include IP address, geolocation information, unique device identifiers, browser type, browser language and other transactional information.

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.

Information We Never Ask for in Our Surveys

Brookmark will never ask you for any of the following information:

- Driver's license number or any state issued ID numbers
- Social security number or any government issued ID numbers
- Bank account information
- Credit card numbers

Information We May Collect When You Visit Brookmark.com

As a general matter, you can browse the Brookmark website without submitting your personal information to us. Brookmark also collects personal information when you submit information to us via the "Contact Us" page on our 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, and cellphone numbers. Contact information is generally used for purposes of conducting business. We will treat this information as confidential personal information.

We also collect and store certain other information regarding our users' use of the Website so that third parties may provide us with reports and analysis regarding usage and browsing patterns of the Website.

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.

When you interact with any Brookmark page or account on a social media platform, such as Facebook, Twitter, Google+, LinkedIn, Tumblr, YouTube, or Pinterest, we may also collect the personal information you make available to us on that page or through that account, including your account ID or "handle".

Other than as set forth in this Privacy Policy, Brookmark will give you notice when personal information about you might be shared by us with third parties, and you will have the opportunity to instruct us not to share the information.

How We Use Your Information

Brookmark is a marketing research company. Brookmark uses personal information (collected as described in this Privacy Policy) to provide marketing research and analysis services to its clients. The research and analysis Brookmark delivers does not identify survey participants individually.

If your personal information is provided to Brookmark via a client or customer of that client, we will only use it for purposes of conducting market research for that client. The survey results will be provided to the client in a way that will protect your anonymity unless you have explicitly given permission or have explicitly requested that Brookmark shares your individual survey results, your identify and/or your contact information. We will not use any information to sell you any goods or services and we will not provide your information to other parties to directly sell you goods or services.

If your personal information is provided to Brookmark via a list, panel or sample company, we will only use it for purposes of conducting market research. We will not use any information to sell you any goods or services and we will not provide your information to other parties to directly sell you goods or services. As previously stated, Brookmark will only work with list, panel or sample companies that have received consent from individuals (i.e., data subjects) who have agreed to participate in market research.

If your information is provided to Brookmark directly from you, the data subject, we will only use it for purposes of conducting market research or the specific purpose for which you provided the information (such as to comply with your request to contact you). We will not use any information to sell you any goods or services and we will not provide your information to other parties to directly sell you goods or services. Your survey responses will be provided to the client in a way that will protect your anonymity unless you have explicitly given permission or have explicitly requested that Brookmark shares your individual survey results, your identify and/or your contact information.

Brookmark may employ others to perform certain functions. Examples include operating and maintaining our website, sending mail and email, maintaining client lists and other records, analyzing data, providing marketing consultation and other assistance, distributing surveys, fulfilling incentives for participating in surveys and providing customer service. Brookmark will provide personal 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, in each case pursuant to a written agreement that includes data privacy and protection measures appropriate for the circumstances.

Brookmark may disclose personal 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 disclose such information if you or a data subject expressly or, where permitted, impliedly authorize or consent to such disclosure of the information, and in each such case our disclosure will be limited to the purpose for which such authorization or consent was given.

GDPR

If you live in the European Union or an adjacent country to which GDPR applies, you may have additional rights under GDPR, depending on the nature of the personal information and our use of that information under this Privacy Policy and, if applicable, our agreement with the applicable client. These rights may include the right to access and correct your personal information, to request the erasure or transfer of your personal information, and to object to or restrict the processing of your personal information. If the processing of your personal information is based on your consent, you have the right to withdraw your consent at any time.

How To Inquire About Your Personal Information

If you have any questions or concerns about our GDPR policies and/or the privacy or security of your information, or if you wish to exercise your rights relating to your personal information, you may send us an email at privacy@brookmark.com, or contact us by mail at 3 Bessom Street, Suite 328, Marblehead, Massachusetts 01945. If your personal information has been provided to us by a third party, such as your employer or other party with which you have an agreement that relates to that party's collection and use of your personal information, please note that our use of your information may be determined by our agreement with that third party. Accordingly, where that is the case, please direct your inquiry to that third party. If we receive a request from a client or other source of personal information relating to an inquiry by an individual data subject or a supervisory authority, we will respond promptly and in accordance with applicable law.

Justifying the Use of Your Personal Information

The use of your personal information under GDPR requires that there be a "legal basis" for each use.

Where Brookmark receives your personal information from a client or a customer of that client, or from a list, panel or sample company, Brookmark's use of your contact information and demographic information is based on the need for such information in order to perform Brookmark's obligations under the contract between Brookmark and that client, customer or other company. Brookmark, in turn, relies on that client, customer or other company to have properly addressed GDPR requirements with individual data subjects, whether through contracts or appropriate consent. Again, in most such cases, Brookmark does not actually receive personal information that can be associated with you by us.

Where Brookmark itself collects additional personal information about data subjects whose contact or demographic information has been provided initially by a client or a customer of that client, or from a list, panel or sample company, Brookmark's use of such information is based on Brookmark's legitimate interest in preventing fraud, and in analyzing and improving Brookmark's services. As described above, this type of information is generally limited to IP address, device identifiers, and other technical information and is used by Brookmark only as described in this Privacy Policy.

Where you choose to provide other personal information directly to Brookmark, such as your email address, Brookmark's use of such information is necessary to fulfill the purpose for which you provided the information. For example, if you ask Brookmark to send you information and you provide your email address, Brookmark will use your email address to respond to your request. Brookmark also has a legitimate interest in using such information for the purposes described above.

California Residents

California residents may have additional rights under the California law, including the California Consumer Privacy Act (the "CCPA"). If you are a California resident, you have the right to request and obtain from us once per year, free of charge, a list of third parties to whom we have disclosed your personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. We do not share personal information for direct marketing purposes. Note that CCPA does not currently apply to us, although it may apply to our clients or their customers, or to a list, panel or sample company from which we may have received your personal information. In any case, we do not sell personal information, and our role for CCPA purposes is that of a service provider. For more information about CCPA, please refer to the following: <https://oag.ca.gov/privacy/ccpa>.

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

To not receive future communications from us, and, where applicable, to have us not share your information with third parties, you can do either of the following:

1. Send us an email at privacy@brookmark.com, 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 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 personal 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 personal information about yourself, including your name, address, email, telephone number, or cellphone number. In the event Brookmark learns that we have collected personal 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 personal 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 are not under Brookmark's control and 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 personal information it collects, including against loss, theft, fraud, and unauthorized access, use, copying and disclosure. If Brookmark becomes aware that a breach or potential breach of security has occurred involving your personal 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 or the appropriate third party about any breach affecting your personal information that has occurred if required to do so by applicable law.

Data Retention Policy

Our data retention policy varies by client. Brookmark will only store data as long as it is necessary to successfully complete the requirements of a research project. We retain personal information we collect when we have an ongoing legitimate business need to do so. When there is no longer a legitimate business reason to process/retain your personal information we will either delete it or in some cases anonymize it.

International Data Transfer

If you are participating in one of our research studies or visiting our website, please be aware that your personal information may be transferred to, stored in and/or processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country. Specifically, our data servers are located in the United States and the EU, and our third-party service providers (including Amazon Web Services ("AWS")) and partners operate around the world. This means that when we collect your personal information, we may process it in any of these countries. If you send us personal information directly, you acknowledge and consent to such transfer and processing. We enter into appropriate

written contracts with our clients and service providers in connection with cross-border transfers and processing of personal information.

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, or contact us by mail at 3 Bessom Street, Suite 328, Marblehead, Massachusetts 01945.

Changes To Privacy Notice

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