

Responesta Panel Privacy Notice

Last updated 6th March 2023

Participants from California, Virginia, Connecticut, Colorado and Utah, click [here](#) for more information about your rights under your state's laws.

Who are we?

We are European Survey Team ("**We**" "**Our**" "**Us**" or "**ERT**"). This website <https://www.responesta.com/> is operated by European Research Team Ltd. (registered in Bulgaria with company number 206873942 and registered address at Obelya 2, Block 277, Entrance 1, Floor 8, office 46, Sofia, Bulgaria). ERT is an online data collection agency focused on providing high-quality market research data to its clients who are in various business sectors, including other market research agencies and other global and corporate clients of all sizes. We also build and maintain large online consumer panels, providing real-time digital consumer insights to our clients via our market research surveys and analytics platforms.

The ERT company with whom you registered with as a Member is the controller and responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO at support@responesta.com.

This privacy notice does not apply where you have agreed to participate in surveys administered by third parties. In these situations, ERT is not the sponsor of the survey and the technologies/media of those surveys and the survey results or survey data are and will be controlled by the sponsor of those surveys. Please refer to the relevant sponsor's privacy policy to learn more about those sponsor's privacy practices.

What is our Privacy Commitment to you?

We respect your privacy and are committed to protecting your personal data. This privacy notice describes how we collect, use, share and secure personal data you provide on [responesta.com](https://www.responesta.com/) (our "**site**") and/or via our Mobile app when you become a member and participate in surveys and/or research studies ("**surveys**") that we conduct for, and on behalf of our clients. It also explains your privacy rights and how laws that are applicable to you may protect you and is intended to supplement other notices and privacy policies and not to override them.

The registration, use of and access to your Membership and use of our systems and media ("**Services**") is subject to this privacy notice.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

Frequently asked questions:

[Who are we?](#)

[What is our Privacy Commitment to you?](#)

[What personal data do we collect about you?](#)

[How do we use your personal data?](#)

[Who do we share your personal data with?](#)

[Do we transfer your personal data to other countries?](#)

[What other ways can you become a member of our influencers panel? – Our mobile app](#)

[What cookies do we use on our site?](#)

[What other tracking technologies do we use for surveys you participate in and for other purposes?](#)

[What is our winner's policy and privacy guarantee?](#)

[What security measures do we undertake to protect your personal data?](#)

[What are our data retention and destruction policies?](#)

[Business Transfers](#)

[Links](#)

[Children's privacy](#)

[Your rights](#)

- How do you access your information; use the member services area and/or update, correct or delete your information?
- How do you terminate your influencers panel membership?
- Data Retention
- How do you ask a question or make a complaint?
- Your other rights
- Your rights in the EEA

[Changes to the privacy notice and your duty to inform us of changes](#)

[Privacy contact details](#)

What personal data do we collect about you?

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (i.e. anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- A. Identity data** – name (includes first, last, maiden and married names), date of birth, marital status, gender, panellist id and username.
- B. Contact data** – postal address, email address and telephone number.
- C. Special categories of personal data** – ethnic/racial origin, health, genetics, political opinion, religion, sexual orientation and sex life.
- D. Demographic/Profile data** – interests, preferences, feedback and survey responses and including, but not limited to, age, marital status, gender, birthday, household size, income, education and employment status.
- E. Technical data** includes internet protocol (IP) addresses, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- F. Pseudonymised data** are identifiable data as unique identifiers e.g. panellist ID's or Technical data are used, however direct identifiers, such as name and Contact data are removed.

Panel Members

When you agree to become a member of our influencers panel ("**Member**"), you are able to participate in our surveys. We will ask you to complete the registration form via responesta.com (our "**site**") or via links displayed on our partners' websites and you may also register to be a Member via our mobile app.

Non-members of our Panel

If you are not a Member of our panel ("**non-member**"), but take a survey with us and provide us with your personal data, the only personal data we may preserve about you is your email address, gender, age information, full or partial zip/postal code, machine ID and IP address. We do this so we may:

- contact you if you have won a prize or are entitled to an incentive, in which case, we will collect and maintain such personal data, to the extent required by any applicable law or regulation (e.g. for tax reasons, if applicable);
- to match you against the survey you are taking;
- and improve the user experience

We will not contact you for any other reason.

Visitors of our Website

You can visit our website without telling us who you are or revealing any information about yourself. In order to measure the number of visits, average time spent on the site, pages viewed, as well as whether you have agreed to (or refused) our site's cookie policy, we collect IP address, user agent, OS information, date and time of the visit, pages viewed.

How do we use your personal data?

In the table below, we have set out a more detailed explanation of the ways in which we use your personal data. Where we use any third parties for modelling, analytical or data matching purposes, please be assured that such parties are not allowed to use your personal data for any reason, other than the reasons we state in the table and we enter into contracts with those third parties to ensure your data is kept secure, confidential and erased in accordance with our data retention and destruction policies as set out in our Panellist Privacy Notice.

In many countries, we are required by law to explain the legal bases we rely on when we process your personal data. These legal bases are listed as follows and we may use more than one lawful basis when processing your personal data for different purposes.

Consent – In certain cases, we collect and process your personal data with your consent e.g. when you participate in surveys, we will ask you if you wish to participate.

Contractual obligations – In some circumstances, we need to process your personal data to comply with a contractual obligation e.g. when we use your personal data to send you your rewards.

Legal compliance –we may need to collect and process your personal data where the processing is necessary for compliance with a legal obligation to which we are subject or to respond to lawful requests by public authorities.

Legitimate interest – means the interest of our business in conducting and managing our business to enable

us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

| Activity | Purpose | Type of data |
|--|---|--|
| Your Membership | <p>To register and process your application to be a Member</p> <hr/> <p>To manage our relationship with you, which will include:</p> <ul style="list-style-type: none"> • Processing and delivering your points or rewards, exchange your points for vouchers/coupons and entering you in for prize draws/sweepstakes, including sharing your personal data with trusted third-party vendors to provide you with incentives on our behalf; • Notifying you about changes to our terms or privacy policy; • Asking you to leave a review or inviting you to take a survey; or • For any other reason connected with your Membership. | <p>(a) Identity data (b) Contact data (e) Technical Data (f) Pseudonymised data (panellist ID)</p> <hr/> <p>(a) Identity data (b) Contact data (d) Demographic/Profile data (e) Technical data (f) Pseudonymised data (panellist ID)</p> |
| Market research surveys | <ul style="list-style-type: none"> • We will ask you to participate in and provide feedback via surveys, including you telling us about your preferences and consumer needs. This may also include analysing your behaviour in different ways and for different purposes, but only provided such uses are for market research. • We may with your consent via a survey ask you to disclose certain Special Categories of Personal data, but only if relevant to that survey and as may be allowed under applicable law. | <p>(a) Identity data (b) Contact data (c) Special Categories of Personal Data (d) Demographic/Profile data (e) Technical data (f) Pseudonymised data (panellist ID)</p> |
| Scientific research/Safety monitoring (Pharmacovigilance Adverse Events Reporting) | <p>We may ask you to participate in surveys for clients who are from a variety of types of organisations such as public health organisations, commercial or charity organisations or academics from universities, etc and may be conducted using a variety of methods.</p> | <p>(a) Identity data (b) Contact data (c) Special Categories of personal data (health, e.g. disease, condition, treatment, consumer products and adverse events. (d) Demographic/Profile data</p> |

| | | |
|---|---|--|
| Mobile Device surveys and usage | <p>We use a mobile app, which may in the future with your permission, include location-based geo fencing. If you agree to download and use our mobile application on your mobile phone, tablet or pc (device), we collect the following information:</p> <ul style="list-style-type: none"> • for administering the site, tracking users' movements around the site and the Internet. We use mobile analytics software to allow us to better understand the functionality of our mobile app on your device. This software may record information such as how often you use the app, the events that occur within the app, aggregated usage, performance data, and where the app was downloaded from; • for quality checking, fraud or other legal reasons we refer to in this privacy notice; • Technical data and Demographic/Profile data are collected when you sign up to use our Mobile app and via the surveys you undertake. We use this data for data matching and enriching purposes and in ad-effectiveness campaigns for our clients; • to gather demographic information about our user base as a whole, including for example, more generally for analysing trends of marketing research studies. Our clients may combine those information with those of others to produce "aggregated" reports. They may also create scientific reports based upon modelled information. "Modelled information" is data developed based upon demographic and behavioural characteristics (like your gender, age, and preferences) to predict what people with similar or matching characteristics would watch or buy. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. | <p>(d) Demographic/Profile data (e) Technical data (collected automatically - system and performance information on the type of device you use, operating system version, device identifier and hardware usage statistics such as CPU and app version and Geo-location) (f) Pseudonymised data</p> |
| Profiling | <p>We may use your Demographic/Profile data for profiling purposes and (if you previously gave us your ethnicity/racial profile), we may also use those information for profiling purposes, provided this is permitted under local law. This means we will match you with appropriate surveys to see if you qualify for particular surveys. Your birth date is automatically updated so that we may ensure we select individuals, based on their age as may be required for the relevant survey.</p> | <p>(c) Special Categories of personal data (Ethnicity/Racial profile) (d) Demographic/Profile data</p> |
| Data matching and enrichment | <p>We may from time to time share some of your personal data with select and trusted third party processors. Those parties may append analytics or demographics data they previously collected about you, which may be public sources (e.g. property ownership) and/or or private sources (e.g. subscriber lists or retail purchases, with whom you have an account). We will only share your Identity and Contact data with your prior consent, which may be as part of a survey, or an invitation to participate in such programs.</p> <p>We may also use your Pseudonymised data and/or Demographic/Profile data to add to existing anonymous data sets or create new ones.</p> <p>We use them so we can enrich the data we hold about you to improve your panel profile, your panel Membership experience and to ensure you are selected for relevant surveys.</p> | <p>(a) Identity data (b) Contact data (d) Demographic/Profile data (e) Technical data (e.g. IP address, ADID's, browser and device information (incl. Mobile Device ID's, App Technical data, usage, performance, data and location data)) (f) Pseudonymised data</p> |
| Ad-Effectiveness campaigns & look-a-likes | <ul style="list-style-type: none"> • To measure ad-effectiveness and/or to create 'look-a-like' groups that have common Demographics/Profile data (or interests). Our clients then find people who are similar to those groups and use that information in a way that reaches new potential consumers and so helps them improve their advertising targeting and their online advertising models. • We may share your unique panellist ID (UID) with our clients, who may write, set or read cookies or use other Technical data about you from multiple locations, including our own servers or systems. If you participate, your UID will be stored or associated with those Technical data to allow us and/or our clients to conduct online ad- | <p>(b) Contact data (email address) (d) Demographic/Profile data (e) Technical data (UID, setting cookies) (f) Pseudonymised data</p> |

| | | |
|-----------------------------------|--|--|
| | <p>effectiveness campaigns, track your visits to websites, use your Demographic/Profile data to create look-a-like segments and/or gain other online insights about you. If you have interacted with the online ad or promotion, our client will send your UID and the specific survey to us and we may provide you with the opportunity to complete the survey.</p> <p>We will not transfer any Identity or Contact data to our clients unless we have first received your consent and no third parties may contact you or use your data for any other purpose.</p> | |
| Ad exposure and measurement | <p>We may match your personal data against our clients or trusted partners information to determine if you use any of their products or services and/or if you have been exposed to any of their advertisements. This helps our clients understand more about consumers behaviour when ads are displayed to them.</p> <p>We will not transfer any Identity or Contact data to third parties unless we have first received your consent and no third parties may contact you or use your data for any other purpose.</p> | <p>(a) Identity data (UID) (b) Contact data (email address) (d) Demographic/Profile data (e) Technical data (f) Pseudonymised data</p> |
| Legal/public authority disclosure | <p>Though we make every effort to preserve your privacy, we may be required to disclose your personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements; or to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, to protect your safety or the safety of others, to investigate fraud or breaches of our site terms, or to respond to a government request.</p> | <p>(a) Identity data (b) Contact data (d) Demographic/Profile data (e) Technical data (f) Pseudonymised data</p> |
| Fraudulent and quality checking | <p>We use multiple Technology data for quality control, validation, and fraud detection and prevention purposes, including assisting us in ensuring the integrity of survey results.</p> | <p>(e) Technical data (f) Pseudonymised data</p> |
| Advertising and promotions | <p>We may use prize winner's data for advertising and to promote our site and activity.</p> | <p>(a) Identity data (name, biographical data, photo)</p> |

Who do we share your personal data with?

Any of our group members found at <https://www.responesta.com> may access or use your personal data for the purposes set out in table above and/or to carry out our regular business activities, such as to provide, maintain and personalise our sites and services, to communicate with you, and to accomplish our legitimate business purposes, pursuant to contractual safeguards.

In general, responses we collect from you via our surveys are provided to our clients either in anonymised and aggregated form or in pseudonymised form. If we provide the results in anonymised and aggregated form, the results include information about groups of individuals and not on an individual level. If we provide the results in pseudonymised form, the results will be on an individual basis, using unique identifiers, such as your assigned panellist ID, but will not include your Identity data or Contact data.

Identity data or Contact data about you would only be provided to our clients in specific surveys for the purposes of research and we would never provide such data to our clients unless we have first received your consent and confirmed with them that their use is in accordance with applicable law and market research codes of practice.

From time to time we may engage third parties to issue you with cheques or processing the delivery of your rewards and /or other third parties for the purposes of those parties providing us or our clients with services

such as; data processing or analytics services or to append data they previously collected about you. Such third parties are not allowed to use your personal data for any other reason and we enter into contracts with those third parties to ensure your personal data is kept secure and erased in accordance with our data retention and destruction policies.

From time to time, Responesta may use third-party software for email list management and email distribution or may use third party list management providers to match our Members to members of other lists or panels, or to validate the accuracy of personal data you provide. These companies are authorised to use your personal data only as necessary to provide these services to us, pursuant to written instructions. In such cases, these companies must abide by our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose.

Though we make every effort to preserve your privacy, we may be required to disclose your personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose your personal information as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, to protect your safety or the safety of others, to investigate fraud or breaches of our site terms, or to respond to a government request.

Please see the table above for more on these uses.

Do we transfer your personal data to other countries?

ERT is a global company and your personal data is transferred to other members of the ERT and our trusted service providers, who are located in countries other than where you live. Please be aware that laws in other countries may differ from the laws applicable in your own country of residence.

If you reside in the EEA, to comply with the General Data Protection Regulation (GDPR), ERT has put in place adequate safeguards to protect your data and your rights, including standard data protection clauses for the transfer of personal data to third parties in non-adequate countries as decreed by the European Commission. However we always seek to ensure that your personal data receives the same level of protection as it would had it stayed within the EU, including seeking to ensure that it is kept secure and used only in accordance with our instructions and for the agreed purpose(s).

What other ways can you become a member of our influencers panel? – Our mobile app

Mobile Applications

You may choose to become a Member by using our mobile application (app). When you download and use our mobile app, we automatically collect system and performance information on the type of device you use, operating system version, device identifier and hardware usage statistics such as CPU, RAM, storage, and app version. We will use the information we collect via our mobile app in accordance with the terms of this privacy notice and the provisions set out below.

We send you push notifications from time-to-time in order to notify you about surveys and ask you if you would like to participate in certain marketing research studies in accordance with this privacy notice. If you no longer wish to receive these types of communications, you may turn them off at the device level. To

ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information

SMS

We may make available a service either directly or through third parties by which you can receive messages on your wireless device via short message service ("**SMS Service**")

Your provider's standard data and messaging rates apply to all SMS correspondence. All charges are billed by and payable to your mobile service provider. You represent that you are the owner or authorized user of the wireless device on which messages will be received and that you are authorized to approve the applicable charges. Personal data obtained from you in connection with this SMS Service may include your Identity data and Contact data, your provider's name, and the date, time, and content of your messages. The use of this information will be in accordance with this privacy notice. If fees are charged to your wireless account invoice, we may be required to provide your carrier with your Identity data and Contact data in connection therewith. Your wireless carrier and other service providers may also collect data about your wireless device usage, and their practices are governed by their own policies. You acknowledge and agree that the SMS Service is provided via wireless systems which use radios (and other means) to transmit communications over complex networks. We will not be liable for any delays in the receipt of any SMS messages, as delivery is subject to effective transmission from your network operator. SMS message services are provided on an as-is basis. We do not guarantee that your use of the SMS Service will be private or secure, and we are not liable to you for any lack of privacy or security you may experience. You are fully responsible for taking precautions and providing security measures best suited for your situation and intended use of the SMS Service. You can opt out from this service at any time by going to the Settings in your personal account.

Single Sign-ON

You can log in to our site using sign-in services such as Facebook Connect, Google Identity or an Open ID provider. These services will authenticate your identity and provide you with the option of becoming a Member. Services like Facebook Connect give you the option to post information about your activities on this site to your profile page to share with others within your network.

Referral

If you choose to use our referral service to tell a friend about our site, you may pass your unique referral link to your friend and if your friend becomes a Member, we will provide you with points as a reward.

What cookies do we use on our site?

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. Our site uses cookies to distinguish you from other users of our site, and estimates visits and click throughs for specific campaigns.

For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy at: <https://responesta.com/public/docs/CookiesPolicy.pdf>.

What other Tracking Technologies do we use for surveys you participate in and for other purposes?

We may share your unique panellist ID (UID) with our clients, who may write, set or read cookies or use other Technical data about you from multiple locations, including our own servers or systems. If you participate, your UID will be stored or associated with those Technical data to allow us and/or our clients to conduct online ad-effectiveness campaigns, track your visits to websites, use your Demographic/Profile data to create look-a-like segments and/or gain other online insights about you. If you have interacted with the online ad or promotion, our client will send your UID and the specific survey to us and we may provide you with the opportunity to complete the survey.

You may opt-out only by deleting your account on our Website. Please go to your Profile <https://responesta.com/en/my?dialog=profile> scroll down to Danger zone and click "Delete account".

Other Technologies

Server log files:

We may collect IP address, user agent, OS information, date and time of the visit, pages viewed. This Technical data may be combined with other information collected about you for the purposes of improving our services, site functionality and collecting analytical data.

Advertising

We partner with third parties to either display advertising on our site or to manage our advertising on other sites. Our third-party partners may use technologies such as cookies to gather information about your activities on their site and other sites in order to provide you advertising based upon your browsing activities and interests. If you are located in the EEA and wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by disabling cookies entirely (for detailed information please check our cookie policy at: <https://responesta.com/public/docs/CookiesPolicy.pdf>) or by deleting your account on our Website. Please go to your Profile <https://responesta.com/en/my?dialog=profile> scroll down to Danger zone and click "Delete account".

Social Media Widgets and Technologies

Our site includes sign-in services like Facebook Connect, Google Identity or an Open ID provider; notification via Telegram app. These Features may collect your IP address and may set a cookie to enable the Feature to function properly. Your interactions with these Features are governed by the privacy notice of the company providing it.

What is our winner's policy and privacy guarantee?

Members and others who take our surveys are randomly selected to win prizes for participation in surveys, content, games and other promotions. All winners are notified by email or via our site of their winnings. Responesta shall post the usernames of winners on our site and on our own blogs and newsletters. Cash and other prizes awarded to non-members will be awarded directly.

What security measures do we undertake to protect your personal data?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Although we do everything we can to keep your data safe, unfortunately no systems can guarantee they are 100% secure. If you have questions about the security of your personal data, or if you have reason to believe that the personal data that we hold about you is no longer secure, please contact us immediately as described in this Privacy Notice.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator or supervisory authority of a breach where we are legally required to do so.

What are our data retention and destruction policies?

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you are a citizen or resident of the EEA, or we are processing your personal data in the EEA, in some circumstances you can ask us to delete your data: see the section entitled Your legal rights below for further information.

As the results of the surveys and other aggregated or Pseudonymised data are used for research, scientific, historical and/or statistical purposes (whether publicly or privately funded), we and our clients or other third parties may use this information for such purposes in accordance with the terms indefinitely without further notice to you.

Business Transfers

As we continue to develop our business, we might sell or buy additional assets. In such transactions, ERT's right to contact you as a Member and the information you have voluntarily provided in your user profile would generally be one of the transferred business assets. Any merger, sale or transfer of ERT of substantially or all of its business assets (which included our panel), or other fundamental corporate transaction would be to an entity that agreed to comply with all of the material terms of our privacy notice. You will be notified via email and/or a prominent notice will be posted on our site if any transaction may result in any new proposed uses of your personal data which are incompatible with the uses set out in this Privacy Notice and of the choices you may have regarding your personal data.

Links

From time to time we may offer visitors the ability to voluntarily link to other sites. ERT does not review, and is not responsible for, the content or effect of the privacy policies of these sites.

Children's privacy

ERT will not knowingly collect any information from any child under the age of 16 without permission from his/her parents, legal guardian or an adult responsible for the care of the child. The definition of child is being defined by the laws of the country of a participant. If you are a parent or guardian of a child and become aware that your child has provided personal data to us and you are not aware of such processing, please contact us as described in this Privacy Notice and we will take reasonable steps immediately to remove any such information.

Your rights

How do you access your information; use the member services area and/or update, correct or delete your information?

Upon request, ERT will provide you with information about whether we hold any of your personal data. You may access, correct, or terminate your membership by logging into your Member Account. If you want all personal data to be deleted contact us at support@responesta.com. If you cannot update your personal information, you can also contact us at support@responesta.com. By following the appropriate directions, your information should be automatically updated in our database. We will respond to all requests within a reasonable timeframe.

How do you terminate your panel membership?

If you choose to end your membership with Responesta or to require us to cease processing your personal data, you may discontinue your membership by going to your Profile <https://responesta.com/en/my?dialog=profile> scroll down to Danger zone and clicking "Delete account". As an alternative, you may send an email at support@responesta.com requesting to be removed. Each email we receive is read and responded to individually. In most cases it will take 2 to 3 days to process this change, but please allow up to two full weeks for your status to be finalised. Please note that you may continue to receive communications during this short period after changing your preferences while our systems are fully updated.

Data Retention

If you terminate your membership, we will no longer use your personal data to contact you, but in accordance with our backup procedures, we will retain your personal data until your personal data are eventually destroyed in accordance with our data retention and destruction policies and we will continue to employ the security procedures and technologies to keep your personal data safe.

How do you ask a question or make a complaint?

You can direct any questions or complaints about the use or disclosure of your personal data to our Privacy Contact. We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of your personal data within 30 days of receiving your complaint.

If you are based in the EEA and have an unresolved privacy or data use concern that we have not addressed satisfactorily, then please refer to your rights to make a complaint under the paragraph below entitled [make a complaint at any time to a data protection regulator].

Your other rights

You may:

- request access to your personal data and we may conduct ID checks before we can respond to your request.
- have your personal data erased, corrected or restricted if it is inaccurate or requires updating. You may also have the right under certain circumstances to request deletion of your personal data; however, this is not always possible due to legal requirements and other obligations and factors. You

can update your account information via your Account or by contacting us at the address given below.

- object to the processing your personal data if we are not using your personal data for the purposes set out in this privacy policy.

Your rights in the EEA

If you are in the EEA, you additionally will have the right to:

- have your personal data transferred to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- make a complaint at any time to a data protection regulator. A list of National Data Protection Authorities can be found here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html.

We would, however, appreciate the chance to deal with your concerns before you approach the data protection regulator so please contact us in the first instance.

- in case we asked you for your consent to process personal data we hold about you, you can withdraw your consent at any time, without affecting the lawfulness of processing based on consent before the withdrawal.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on the date at the top of this privacy policy.

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we do decide to change our privacy notice, we will post those changes to this privacy statement on the homepage, or other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page prior to the change becoming effective.

It is important that the personal data we hold about you is accurate and current. Please keep your Account details updated if your personal data changes during your relationship with us.

Rights of the participants from California, Virginia, Connecticut, Colorado, and Utah.

There are certain rights that the residents of those state have under their state laws including CCPA, the California Consumer Protection Act of 2018. Being a resident of one of the above states, you can request that we: (1) provide certain personal information that we have collected about them during the past 12 months, along with related information described below, or (2) delete certain personal information that we have collected from them. "Personal information" is information that identifies, relates to, or could reasonably be linked with a particular resident or household. This information is referred to in this Notice as "Personal Data."

You have the right to request that we disclose to you the following information covering the 12-month period prior to your request ("Access Request"):

- a. The categories of Personal Data we collected about you and the categories of sources from which we collected the Personal Data;
- b. The business or commercial purpose for collecting Personal Data about you;
- c. The categories of third parties to whom we disclosed Personal Data about you, and the categories of Personal Data disclosed;
- d. The specific pieces of Personal Data we collected about you; and
- e. Delete Personal Data we collected from you ("Deletion Request").

You have the right to opt out of the sale of their information by businesses that sell Personal Data. The "sale" is defined as the disclosure of Personal Data for monetary or other valuable consideration.

We inform you of your right to opt out of the sale of your personal information. The Responesta Privacy Policy describes what personal information is collected, how it is utilized, and the privacy controls and rights

afforded to you for the management of your personal information, including your explicit consent for participation in a specific research project and also your privacy settings within your Responesta account. We may deny your request to opt out if we determine your request to be unsubstantiated. We may retain a portion of your personal information, e.g., to provide you with the goods or services from redeeming your points, to the extent permitted by applicable law.

If you are a registered member of Responesta panel, reside in the state of California, Virginia, Connecticut, Colorado or Utah and would like to opt out of the sale of your personal information with third parties, please send us an email to support@responesta.com with the subject Do Not Sell My Personal Information. In addition, you have the right to be free from discrimination by a business for exercising your rights.

Privacy contact details

You may contact us by writing to:

The Data Protection Officer

European Research Team Ltd.

Obelya 2, Block 277, Entrance 1, Floor 8, office 46

Sofia 1326

Bulgaria