

SURVEY PRIVACY POLICY

Last modified: 17 July 2024

1. WELCOME

- 1.1 This privacy policy sets out how we collect, store, transfer, share and use information that identifies or is associated with you (your "**personal information**") when you access and respond to the questions on the survey page on which this privacy policy is displayed (the "**Survey**").
- 1.2 The Survey is operated by SMG for the corporate customer brand that invited you to complete the Survey and whose name and brand are displayed on the Survey (the "**Brand Partner**").
- 1.3 When we refer to "**Users**", "**you**" or "**your**" in this privacy policy, we refer to individuals who access and complete all or part of the Survey.
- 1.4 Please read this privacy policy carefully before completing the Survey. If you have any questions about this privacy policy or how we use your personal information, please contact us using the contact details set out in paragraph 5 below.

2. WHO WE ARE

- 2.1 SMG conducts market research for corporate customer brands to help them analyse and measure consumer preferences about their goods and services. We have affiliates around the world and so, depending on where the relevant Brand Partner is located, a different company may be collecting your personal information:
 - (a) If the Brand Partner is located in North America, Central America or South America, the Survey is operated by Service Management Group, LLC;
 - (b) If the Brand Partner is located in Europe, the United Kingdom or the Middle East, the Survey is operated by Service Management Group Limited;
 - (c) If the Brand Partner is located in Asia or Oceania, the Survey is operated by Service Management Group GK.
- 2.2 Each of the above companies is referred to in this privacy policy as "**SMG**", "**we**", "**us**" or "**our**".
- 2.3 Each of the SMG companies above will use your personal information as set out in this privacy policy. However, if you have any questions about which SMG company has collected your personal information, please contact us using the details set out in paragraph 5 below.

3. WHAT THIS PRIVACY POLICY COVERS

- 3.1 The comments, opinions and other feedback that you provide when you complete the Survey (your "**Survey Responses**") and any information we collect about your transactions with the Brand Partner ("**Transaction Information**"), are predominantly collected by us on behalf of the Brand Partner as a "processor" or "service provider".
- 3.2 We also use your Survey Responses to improve our products and services as detailed further in paragraphs 6.1 and 6.2 below. In addition, we collect certain information automatically about how you use the Survey in order to operate and provide the Survey, and to identify and prevent fraud by detecting multiple attempts to complete the Survey by the same person.
- 3.3 This privacy policy sets out how we use the personal information contained in your Survey Responses to improve our products and services and how we use personal information about how you use the Survey.

4. WHO IS RESPONSIBLE FOR YOUR PERSONAL INFORMATION

- 4.1 The Brand Partner is a controller of any personal information contained in the Survey Responses that you provide when you complete the Survey and any Transaction Information that you or the Brand Partner provide to us, which means that the Brand Partner is responsible for how that personal information is used for purposes that are determined by the Brand Partner. If you would like to know more about how the Brand Partner uses the Survey Responses and Transaction Information that we collect about you on their behalf, please refer to the relevant Brand Partner's privacy notice.
- 4.2 If you are accessing the Survey from outside the US, when we use the Survey Responses to improve our products and services, and when we collect and use personal information about how you use the Survey for purposes described in this privacy policy, we determine those purposes and are an independent controller in respect of the use of your personal information for these purposes. This means that, when we use your personal information in these ways, we determine and are responsible for how that personal information is used.
- 4.3 If you are accessing the Survey from the US, we have contractually committed ourselves both to: (a) use the Survey Responses and Transaction Information as a processor or service provider on behalf of and under the instruction of the relevant Brand Partner; and to (b) collect and use personal information about how you use the Survey in the same processor or service provider role. We process the Survey Responses to create information that cannot be used to infer information about, or otherwise be linked to, a particular individual or household. We commit to maintain and use the information in deidentified form and will not attempt to reidentify the information, except in instances where necessary for determining that the deidentification process used by us satisfies the requirements under applicable law.

5. HOW TO CONTACT US

If you would like to contact us, you can email us at privacyofficer@smg.com. If you are in the European Economic Area, you can also contact our appointed EU representative, Data Protection Representative Limited:

- (a) by email to datarequest@datarep.com, quoting "Service Management Group, LLC" in the subject line; or
- (b) by completing the form at <https://www.datarep.com/data-request/>.

Please specify in your request that it relates to the SMG Survey Page and please include the name of the Brand Partner to which the Survey relates.

6. INFORMATION WE COLLECT AND HOW WE USE IT

6.1 Your Survey Responses

We will collect your Survey Responses primarily to provide the relevant Brand Partner with feedback and statistics about customer experiences; however, we will also use them as follows:

How we use this personal information	Legal basis we rely on
We create aggregated and anonymized statistics from Survey Responses and use that information for our own market research and benchmarking across multiple Brand Partners.	The processing is necessary for our legitimate interests, namely developing and promoting our products and services.
We create aggregated and anonymized statistics from Survey Responses and use them, together with non-personal information received from the Brand Partner (such as aggregated sales and revenue information), to develop and improve our financial linkage models which we use to analyze and make predictions for all of our Brand Partners about the impact of customer experience on transactional spend and revenue.	The processing is necessary for our legitimate interests, namely improving our products and services and developing new features and functionalities of our products and services.

6.2 Comments and feedback you provide when responding to the Survey

When you complete the Survey, in addition to responding to specific questions you may be asked to provide comments and feedback in free text about your experience with the Brand Partner. We collect those comments, opinions and other feedback primarily to pass these on to the Brand Partner; however, we will also use them as follows:

How we use this personal information	Legal basis we rely on
We anonymize your comments and use this information to train our artificial intelligence models to identify sentiment, such as whether the feedback is positive, negative or neutral and what the sentiment relates to (such as facilities, staff or product range).	The processing is necessary for our legitimate interests, namely improving our products and services and developing new features and functionalities of our products and services.

6.3 Information about how you access and use the Survey

We collect information about how you access and use the Survey and the device you use to do so. For example, we collect the IP address from which you access the Survey, the time you access the Survey and how long you use it for. Your IP address may also indicate your approximate location.

How we use this personal information	Legal basis we rely on
We use this information to present the Survey to you on your device, such as ensuring that the Survey recognizes you as you navigate between pages on the Survey so you do not need to enter your information again.	The processing is necessary for our legitimate interests, namely to provide the Survey to you.
We use this information to identify multiple attempts to complete the Survey from the same device in order to detect and prevent fraudulent use of the Survey.	The processing is necessary for our legitimate interests, namely identifying and preventing fraud.
We use this information to ensure that the Survey does not get overloaded.	The processing is necessary for our legitimate interests, namely load balancing.

7. HOW WE COLLECT YOUR PERSONAL INFORMATION

- 7.1 We collect Survey Responses directly from you when you complete the Survey.
- 7.2 We collect personal information about how you access and use the Survey using cookies and similar technologies. Cookies are pieces of code that we transfer to your computer's hard disk to store or collect information.
- 7.3 The cookies we use are necessary to operate the Survey. We use the following cookies to operate the Survey:

Cookie	Type of cookie	Technical function	Duration
TS cookies (<i>appear as "TS" followed by a unique string of numbers and letters</i>)	Strictly necessary: functionality	Allow the Survey to remember users as they navigate through the Survey, so they do not need to enter their information again (" Session Management ").	Session
BIGipServermcd		Monitor Survey traffic to ensure that the Survey does not get overloaded with too many users or requests at the same time.	Session
SN		Identify the server used to host the Survey, to allow you to connect to the Survey.	24 hours
ASP.NET_SessionId		Storage of the session ID, to enable Session Management	Session
CCID		Identify the Survey directory to allow you to connect to the Survey.	24 hours
LID		Identify and remember Survey language, so that the Survey is presented to you in your language.	24 hours
T	Strictly necessary: security	Detect and prevent fraud by detecting and preventing multiple attempts to complete the Survey.	Session
DF_Placed		Detect and prevent fraud by detecting multiple attempts to complete the Survey.	Session
AspxAutoDetectCookieSupport	Strictly necessary: security / functionality	Identifies whether the user's browser supports cookies.	Session

8. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

8.1 Survey Responses and information about your transaction(s) with the Brand Partner

We will keep your Survey Responses and Transaction Information in accordance with the retention periods specified by the relevant Brand Partner, which is usually for the duration of the relevant survey campaign, but in any event for no longer than our engagement with that Brand Partner. When we use Survey Responses for our own purposes, we deidentify,

anonymise and aggregate the information so that it cannot be linked to you or used to infer information about you.

8.2 Information about how you access and use the Survey

We will keep the personal information about how you use and access the Survey for the duration of the Survey campaign, in order to identify multiple attempts to complete the Survey from your device. We will delete this information when the Brand Partner finishes the relevant Survey campaign.

9. HOW WE SHARE YOUR PERSONAL INFORMATION

9.1 We may share the personal information we collect and use for our own purposes as follows:

Recipients	Why we share your personal information with these recipients	How these recipients will use your personal information
<p>Other SMG companies listed in paragraph 2 above.</p>	<p>We may share the Survey Responses with the SMG companies that carry out the training of our AI and other models.</p> <p>We may share the personal information we collect about how you use the Survey with other SMG companies to prevent multiple attempts to complete the Survey from different locations.</p>	<p>The SMG companies that receive your personal information will use it in same way as described in this privacy policy.</p> <p>The lawful basis we rely on for sharing your personal information with these SMG companies is that it is necessary for our and these companies' legitimate interests, namely administering and operating the Survey and improving our products and services.</p>
<p>Data hosting providers.</p>	<p>We may share the Survey Responses with companies that host data in the cloud on our behalf.</p>	<p>These recipients will use your personal information as processors on our instructions.</p>
<p>Law enforcement, regulators and other parties for legal reasons.</p>	<p>We may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) detect and</p>	<p>These recipients will use your personal information in the performance of their regulatory or law enforcement role.</p> <p>The lawful basis we rely on for sharing personal information with these</p>

	investigate illegal activities and breaches of agreements; and/or (iii) exercise or protect the rights, property, or personal safety of SMG, its users or others.	recipients is that the processing is either necessary to comply with a legal obligation to which we are subject, or is necessary for our legitimate interests, namely enforcing our rights or complying with requests from regulatory authorities.
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9.2 We may also share your Survey Responses with other recipients on the instructions of the Brand Partner. Please refer to the Brand Partner's privacy notice for further information about how the Brand Partner may share (or may instruct us to share) your personal information.

10. INTERNATIONAL TRANSFERS OF YOUR PERSONAL INFORMATION

10.1 We may transfer personal information as described above in paragraph 9. This may mean that your personal information may be transferred to and stored in countries outside the country you are in where we and our third-party service providers have operations.

10.2 If you are in the United Kingdom or the European Economic Area, these international transfers of your personal information will be made pursuant to appropriate safeguards in accordance with applicable law:

Where we may transfer your personal information	Safeguards that apply to that transfer
United States	The transfer is subject to standard contractual clauses approved by the European Commission or the UK Information Commissioner for the transfer of personal information.
Japan	If you are in the EEA, the country is deemed to provide adequate protection for personal information by the European Commission. If you are in the UK, the country is deemed to provide adequate protection for personal information under the UK Data Protection Act 2018.
United Kingdom	The country is deemed by the European Commission to provide adequate protection for personal information.

10.3 We will take appropriate steps to ensure that your personal information is treated securely and in accordance with applicable law and this privacy policy regardless of where it is processed.

10.4 If you wish to enquire further about the safeguards we use, please contact us using the details set out at paragraph 5.

11. YOUR PRIVACY RIGHTS

11.1 You have the following rights in respect of your personal information that we hold:

- (a) **Right of access.** You have the right to obtain:
 - (i) confirmation of whether, and where, we are processing your personal information;
 - (ii) information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods;
 - (iii) information about the categories of recipients with whom we may share your personal information; and
 - (iv) a copy of the personal information we hold about you.
- (b) **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.
- (c) **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- (d) **Right to erasure.** You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- (e) **Right to restriction.** You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.

11.2 **You also have the right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. There may be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case.**

11.3 If you wish to exercise one of these rights, please contact us using the contact details in paragraph 5.

- 11.4 If you reside in the UK, you have the right to make a complaint at any time to the Information Commissioner's Office ("**ICO**"), the UK regulator for data protection issues. You can make a complaint via the ICO's website (<https://ico.org.uk/make-a-complaint/>). This website also provides additional contact details for the ICO.
- 11.5 If you are resident in the EEA, you have the right to make a complaint at any time to the regulator in your jurisdiction. To find out how to contact your local regulator, please visit https://edpb.europa.eu/about-edpb/about-edpb/members_en.

12. SECURITY

We implement appropriate technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect will be stored on our secure servers. Unfortunately, however, no security measures will always be completely effective. We will notify you in accordance with applicable laws if we become aware that your personal information has been compromised.

13. OUR POLICY TOWARDS CHILDREN

The Survey is not directed at persons under 13 and we do not knowingly collect personal information from or about children. If you become aware that we have collected information about your child without your consent, then please contact us using the contact details at paragraph 5 so that we can take steps to remove such information.

14. CHANGES TO THIS POLICY

We may update this privacy policy from time to time and so you should review this page periodically. When we change this privacy policy, we will update the "last modified" date at the top of this privacy policy. Changes to this privacy policy are effective when they are posted on this page.