



the olinger group

get smart.

## Privacy Policy

Revised as of March 2021

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### TOG Research Corporation (D/B/A The Olinger Group) – Background

The Olinger Group (hereafter as “we” “our”) is a market research company that conducts our research studies through the use of telephone, online, mobile, or in-person data collection.

We believe in and respect your privacy and the sanctity of the information you may provide to us. As members of the Insights Association, we adhere to the [Code of Standards](#), including strict privacy regulations in market research, set forth by the Insights Association. Additionally, we have received ISO 27001 certification, meaning that we follow rigorous business practices and procedures for data security.

This privacy policy is intended to explain our policy for collecting, storing, using, and sharing personal information collected during participation in our studies. Additionally, the policy will disclose how you, as a study participant, may find out about your personal information on file, how to correct or change it, and how to opt-out of any panels that you have opted-in to.

This policy applies the following means of collecting personal information:

- Information collected during participation in one of our studies
- Information collected from filling out a request for contact (“Get in Touch”) on our website [www.olingergroup.com](http://www.olingergroup.com)

**NOTE: If you are under the age of 13, you may not use any of our services, our site, or participate in any surveys.**

We may occasionally make changes or additions to this policy. We will update the policy as necessary at our discretion. These changes will be placed in the policy and will apply to all collection, use, and sharing of personal information after the changes are made. We will notify the public of major changes via a prominent announcement on our website, and on the top of our policy. Additionally, we will contact panel members through email (previously provided to us) for substantial changes. We will use personally identifiable information in accordance with the privacy policy under which the information was collected.

### Information for EU and Swiss Citizens

The Olinger Group complies with the EU-US and Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce, regarding the collection, use, and retention of personal information transferred from the European Union and the United

Kingdom and/or Switzerland, as applicable to the United States in reliance on Privacy Shield. The Olinger Group has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to review our certification, please visit <https://www.privacyshield.gov/>. The Federal Trade Commission (FTC) has jurisdiction over The Olinger Group's compliance with the Privacy Shield.

The Olinger Group has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

### **Information for California Residents**

If you are a California resident, starting January 1, 2020, you have a right to notice of our collection of consumer personal information, as defined in the California Consumer Privacy Act of 2018, Civil Code §1798.100 et seq. (CCPA). This Notice is to provide you with information regarding our collection of consumer personal information. All terms are used in this Notice as defined in the CCPA or applicable regulations thereunder.

Subject to certain exceptions and limitations, personal information is any information that directly or indirectly identifies, describes, relates to, is capable of being associated with, or can reasonably link to a particular consumer or household. For individuals within the State of California, you instead have the right:

- To request from The Olinger Group access to your Personal Information that The Olinger Group collects, uses, discloses, or sells (if applicable) about you
- To request that The Olinger Group deletes Personal Information about you
- To opt-out of the sale of Personal Information, if applicable
- To non-discriminatory treatment for exercise of any of your data protection rights
- In case of request from The Olinger Group for access to your Personal Information, for such information to be portable, if possible, in a readily usable format that allows you to transmit this information to another recipient without hindrance.

### **What personal information do we collect in our surveys?**

**We collect the following types of information and limit our collection to what is relevant for our research purposes:**

#### **A. Personal Information:**

Personal Information pertains to any information that is identifiable to you. This may include your name, phone number, mailing address, email address, and demographic information.

#### **B. Log Files**

Like many websites, we collect log files. Log files include information that is gathered from your web browser. This information includes internet protocol (IP) address,

operating system, browser type, internet service provider (ISP), date and time stamp, and completion times. We aggregate this information to analyze current trends, track changes, and ensure technological compatibility. This information is never stored with personally identifiable information beyond any one survey.

**C. Cookies:**

We use cookies only in certain surveys. Cookies are mainly used in password-protected surveys. We use persistent cookies, small files that are stored on a participant's browser for the convenience of our participants. We do not use Session ID cookies.

The only purpose of these cookies is to allow a participant to reenter an already begun survey at the point where they left off, rather than start over.

**D. Other Information:**

We do not collect any other user information without explanation and consent from the participant.

**How do we collect personally identifiable information?**

We only collect participant information in our surveys through voluntary and lawful ways. The nature of the use of the information, which is never identified with the survey answers, will always be clearly displayed before asking for the information. We take reasonable steps to ensure that personal data is reliable for its intended use, accurate, complete, and current.

We may receive personally identifiable information from a client. This information has been previously volunteered by the participant and is only used for survey invitations and for determining appropriate questions to ask within a survey. This information will never be associated with the participant's answers and will never be returned to the client with any identifying information. Agreements between us and our clients ensure that personally identifiable information is not shared with the clients or outside parties, and will never be used for any purpose (including sales transfers) without the person's consent.

**How do we use personally identifiable information?**

Use and purpose of collecting personally identifiable information will be revealed at the time consent is received for collecting the information.

One of the most frequent reasons for collecting personally identifiable information is to distribute incentives or rewards for a survey. This information is only used to contact the winner or distribute earned incentives. It is removed from the survey data at that time and destroyed.

Information such as email address may be collected for opting into participation in a panel or future surveys. In this case, the participant has consented to our contacting them via email for future survey opportunities. Email addresses may be used as a unique identifier or password for security purposes, but only when legally available from a responsible source or in opt-in cases.

Personally identifiable information may be collected to verify the participant is in fact who they say they are. This is applicable if we possess some information prior to the survey, possibly from a client list, or from opting in to providing information in a previous survey.

If personally identifiable information is supplied to us by a client, we may provide a list of those who have completed, started but not finished, or have not started surveys, without identification of any survey answers. Additionally, this information may be displayed at

the aggregate level in association with survey results. This would not be done in such a way as to disclose any other personally identifiable information or allow anyone to match answers to participants.

Other reasons for collecting personally identifiable information include use in the aggregate. For example, collecting zip plus four or street address information to retrieve census information about a particular geographic area.

**Will we ever share, sell, or disclose any personally identifiable information? No.**

We will never share personally identifiable information without your permission and we acknowledge our potential liability under the Privacy Shield Framework in cases of onward transfer. We will never sell any personally identifiable information to anyone.

If personally identifiable information was provided by a client, we may allow the client to know who took the survey. This generally only applies when the client is dispersing survey invitations. This includes information that is not attached to survey responses, and is simply the information that was already provided to us from the client. As the participant has already given consent to the client to obtain this information, we are respecting participant privacy.

We may use a third party to invite survey participants or to award prizes to contest winners. Third party vendors may include online community management software, such as Higher Logic, that use electronic methods (e.g., email) to invite participants and/or inform contest award winners. However, these intermediaries may not use users' personally identifiable information for any other purpose.

We may be required to disclose personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

**What safeguards do we take to protect personally identifiable information?**

We implement numerous restraints and safeguards to protect user privacy. These include technological, organizational, and physical security measures. These restraints protect user information from being obtained, viewed or used by unauthorized persons. We maintain a secure password-protected server with limited and monitored access. Passwords are changed frequently for a higher level of security. Only a few employees – those who need access - are allowed to view personally identifiable information. Additionally, personally identifiable information is dissociated with survey responses whenever possible. This information is deleted when possible as well; for example after a contest has taken place.

Survey information is password protected. Additionally, special software must be used to view survey results.

We are HIPPA compliant. This is most relevant for protected personal health information but applies when very sensitive personal information is collected, particularly health care information. Following HIPPA guidelines means that we take very strict precautions to protect sensitive personally identifiable information. Even higher precautions, such as encrypted email and closed-loop mail systems are in place for this level of sensitive information.

**What about external links connected to our surveys?**

If external links are associated with our surveys, we are not responsible for these external sources. This privacy policy only applies to material and information owned by us. We encourage users to check other's privacy statements before supplying personally identifiable information to other websites.

### **How can a user opt-out of our services?**

Users may choose to opt-out at any time. Surveys are voluntary and the user may complete them at his or her discretion. Additionally, providing any personally identifiable information, including for contests, is voluntary. However, to be eligible for a prize, the user must provide their contact information.

A user may opt-out of one of our panels at anytime by emailing [surveysupport@olinger.com](mailto:surveysupport@olinger.com).

### **Accessing personal information we hold about you**

You have the right to access the personally identifiable information we hold about you. To correct, update, or delete information, please contact us at [surveysupport@olinger.com](mailto:surveysupport@olinger.com) or at the contact information below.

### **Confidentiality and Legal Issues**

We take the utmost precaution in guarding personally identifiable information. Due to the insecurity of the internet and the transferring of information over the internet, networks, servers, hardware, or software that is not owned and operated by The Olinger Group, we cannot guarantee absolute security of information provided. Furthermore, in certain legal circumstances, where required by law, we may disclose personally identifiable information to comply with a court order, judicial proceeding, or legal process served to us.

### **How can one contact us?**

To contact us about any information, including this privacy policy, please use the following information:

**The Olinger Group**  
**1215 Prytania Street, Suite 401**  
**New Orleans, LA 70130**  
**Phone: 504-208-4300**  
**Email: [surveysupport@olinger.com](mailto:surveysupport@olinger.com)**

### **Privacy Shield Complaints**

In compliance with the EU-US and Swiss-US Privacy Shield Principles, The Olinger Group commits to resolve complaints about your privacy and our collection or use of your personal information. European Union and Swiss individuals with inquiries or complaints regarding this privacy policy should first contact The Olinger Group at:

**The Olinger Group**  
**Attention: Compliance**  
**1215 Prytania Street, Suite 401**  
**New Orleans, LA 70130**

**Phone: 504-208-4300**

**Email: [surveysupport@olingergroup.com](mailto:surveysupport@olingergroup.com)**

The Olinger Group has further committed to refer unresolved privacy complaints under the EU-US and Swiss-US Privacy Shield Principles to the INSIGHTS ASSOCIATION PRIVACY SHIELD PROGRAM, a non-profit alternative dispute resolution provider located in the United States and operated by the Insights Association. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.insightsassociation.org/get-support/privacy-shield-program/privacy-shield-eu-swiss-citizens-file-complaint> for more information and to file a complaint. These dispute resolution services are provided at no cost to you.

Under certain limited conditions, individuals may invoke binding arbitration before the Privacy Shield Arbitration Panel.

If you are a California resident, you may submit a CCPA request to opt out of the sale of your Personal Information after January 1, 2020. Submit your request to The Olinger Group at:

**The Olinger Group**

**Attention: Compliance**

**1215 Prytania Street, Suite 401**

**New Orleans, LA 70130**

**Phone: 504-208-4300**

**Email: [surveysupport@olingergroup.com](mailto:surveysupport@olingergroup.com)**