

## **SMG Services Global Privacy Notice**

**Effective Date:** February 2022

We conduct market research on behalf of our corporate customer brands (“**Clients**”) to help them analyse and measure consumer preferences about their goods and services. As a result, any information we collect through or as part of the research process, including Personal Data, we do so on behalf of the Client that is sponsoring the research. We are providing this Privacy Notice to explain how we process Personal Data in connection with the market research process. You should also consult with the Privacy Notice of the Client that is sponsoring the research, which you can find on the Client’s own website.

This Privacy Notice applies to this website and other websites, services, and applications, including mobile applications, on which this Privacy Notice is posted, linked or referenced (collectively, the “**SMG Services**”).

The SMG Services are owned and/or operated by Service Management Group, LLC, Service Management Group Limited, Service Management Group GK, and their respective affiliates (collectively, “**SMG**”, “**we**”, “**our**” or “**us**”).

**REVIEW THIS PRIVACY NOTICE CAREFULLY.** Personal Data will be collected and processed as described in this Privacy Notice.

If you have not done so, review the SMG Terms of Service, which sets forth the terms governing your use of the SMG Services.

**IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY NOTICE OR TERMS OF SERVICE, DO NOT USE ANY OF THE SMG SERVICES.**

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### **1. CHANGES TO THIS PRIVACY NOTICE**

We will update this Privacy Notice from time to time when we make changes impacting the Privacy Notice, such as adding new services and applications, improving our services, and

addressing changes in technologies and laws. The Effective Date of this Privacy Notice, which is set forth at the top of this webpage, reflects the date the Privacy Notice was last updated. SMG will provide notice to you if these changes are material, and where required by applicable law, we will obtain your consent. This notice will be provided by posting notice of the changes on our website or through our applications.

## 2. CATEGORIES OF PERSONAL DATA PROCESSED BY SMG

When we use the term “Personal Data” in this Privacy Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to you. It does not include aggregated or deidentified information that is maintained in a form that is not reasonably capable of being associated with or linked to you.

SMG conducts market research on behalf of companies who wish to better understand consumer preferences about their goods and services. These companies are our “**Clients**.” We conduct surveys on behalf of our Clients (collectively, “**Surveys**”) and use that information to derive consumer insights, such as where, when and how often consumers visit retail locations and their experiences during those visits. When you take a Survey or use SMG Services, we collect Personal Data that you voluntarily provide to us.

The Personal Data we collect includes: (1) contact data (such as e-mail address, telephone number, and employer); (2) demographic data (such as gender, date of birth, and zip code); (3) your responses on Surveys to the extent the information identifies you or is linked to you as an individually identifiable person; and (4) information relating to your use of SMG Services (“**Usage Data**”).

Usage Data we collect includes: (1) IP address; (2) domain server; (3) type of device(s) used to access the SMG Services; (4) statistics and information associated with the interaction between your browser or device, such as device model, carrier/network, battery life information to optimize location sampling based upon remaining battery life, and basic usage statistics about your device; (5) real-time GPS or other geolocation data when you allow us to receive information through the location (or similar) settings on your device; (6) referring webpage or other source through which you accessed the SMG Services. When you take Surveys online, we collect multiple unique attributes about your device for purposes of detecting and preventing fraud.

## 3. HOW WE COLLECT INFORMATION AND PURPOSES OF PROCESSING

We collect and process information you provide to us and from your use of SMG Services. The information we collect and how we process it depends on how you access and use SMG Services.

**From You.** We collect information from you when you:

- **Complete a Survey:** We collect the information you submit in Survey responses about your consumer experiences and preferences. We may combine information received in your Survey responses with information we receive from our Clients, such as information about your involvement in our Clients’ loyalty programs, to better understand your consumer experiences. We also may combine information received in your Survey responses with information received in Survey responses from other users to better understand overall consumer experiences. When you complete a Survey, the information you choose to provide us will be used in reports and other analyses of consumer experiences and preferences for our Clients or for any other uses we disclose to you at the time the information is collected. If you do not wish to

have your information used in reports, analyses or as otherwise disclosed to you, you may choose not to complete a Survey.

- **Use SMG Services.** We automatically collect Usage Data when you interact with the SMG Services through the use of cookies and other data collection tools. We use this Usage Data to facilitate communications between your device and our systems, deliver Surveys, ensure Survey integrity, detect and prevent fraud, conduct market research, administer and improve our website and applications, and analyze usage of and improve and enhance SMG Services. To learn more about how and why we use cookies and similar data collection tools, see the “Cookie Policy” section of this Privacy Notice.
- **Submit Your Personal Data While Using SMG Services:** When you submit your Personal Data in connection with using SMG Services, such as contacting us for assistance or information or providing comments about your experiences with one of our Clients, we collect and analyze the information you submit. When you provide comments to SMG, the information you provide contributes to the services we provide to our Clients and to our overall market research. With your permission, your comments may be posted on [TrumpetRatings.com](https://TrumpetRatings.com) and/or on our Clients’ websites. When such information is posted in a public forum, such as [TrumpetRatings.com](https://TrumpetRatings.com) or other websites accessible to the general public, such information becomes public information. What you have written may be seen and/or collected by third parties and be used by others in ways we are unable to control or predict.
- **Access SMG Services through Social Media Credentials:** SMG may offer you the opportunity to use social networking services (collectively, “**Social Media**”) to access certain SMG Services. When you choose to access SMG Services through Social Media login credentials, SMG may, depending on your privacy settings, have access to information that you have provided to the Social Media platform, such as your name, email address, profile photo, posts, comments and other information associated with your Social Media account. We may use this information for any purposes described in this Privacy Notice and for any additional purposes of which you were advised at the time the information was collected. If you do not want your Social Media information to be shared with SMG by a Social Media provider, you should not use your Social Media accounts to access SMG Services.

**From our Clients.** For some of our products and services, our Clients may send us information about your interactions with their brands, products, and services, which may include information relating to any loyalty programs in which you are enrolled and information about your transactions with our Clients. We may combine this information with other information we collect to enhance the market research we conduct and services we provide for our Clients.

#### **4. LEGAL GROUNDS FOR PROCESSING**

- 4.1.** We process your contact data, demographic data, and responses on Surveys when you complete a Survey or use SMG Services. We process such Personal Data based on our Clients’ legitimate interests in obtaining feedback from their customers to help them improve their products and services for the benefit of their customers and their businesses and based on SMG’s legitimate interests in enhancing SMG’s products, services and market research and in responding to users’ requests for assistance or information.
- 4.2.** We process your Usage Data when you complete a Survey or use SMG Services. We process this Usage Data based on your election to continue into the Survey,

confirming your consent to SMG's use of cookies and other data collection technologies. You may withdraw your consent by contacting our Privacy Lead by email at [privacyofficer@smg.com](mailto:privacyofficer@smg.com) or by writing to Privacy Lead, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108.

- 4.3. We may also process information you have provided to Social Media platforms, depending on your privacy settings, when you use social networking services in conjunction with SMG Services. We process such information based on your consent, which you provide in your privacy settings to the social networking service. You may withdraw your consent by changing your privacy settings to no longer allow us access to your Social Media data.
- 4.4. We process information received from our Clients concerning your interactions with their brands, products and services. We process such information based on SMG's and SMG's Clients' legitimate interests, including improving and enhancing SMG's and our Clients' products and services and enhancing SMG's market research.

## 5. HOW WE USE AND SHARE PERSONAL DATA

How we use and share information that we collect or that you provide to us depends on how you use or access the SMG Services. Where required by law, SMG will comply with your request that we cease providing Personal Data to third parties.

- **Communicating with You.** Your Personal Data will be used, as needed, to manage our relationship and communicate with you by mail, telephone, e-mail, mobile alerts, and SMS text messaging. Unless a Survey respondent expressly requests communication, SMG will not contact a Survey respondent other than necessary to verify the integrity of a Survey, to deliver Surveys, to provide rewards or benefits earned as a result of taking a Survey, or to provide customer service. Although SMG does not use your Personal Data for direct marketing purposes, you should review the Privacy Notice of the Client for which we are collecting your Personal Data to determine if such Client does so. We may share your Personal Data with service providers that assist us in managing our relationship with you.
- **Performing Services You Request.** We may use and share your Personal Data in order to perform services you request or functions you initiate, such as when you post information and materials on message boards, forums, or on our Social Media pages. In addition, when you give us permission, we may disclose your Personal Data in order to identify you to anyone to whom you send communications through the SMG Services. Further, we may use and share your Personal Data with third parties in order to provide rewards and fulfill benefits you have requested and earned by taking Surveys. If you elect to participate in a sweepstakes or other promotion, we send your information to third party administrators of those promotions, so they can answer your questions or contact you about a prize you won or other issues related to the promotion.
- **Analyzing Use of and Improving SMG Services.** We use Personal Data collected from cookies and other data collection tools for usage analytics, fraud detection, and performance improvement for the SMG Services. We may use third party website analytics services to analyze how individuals use SMG Services, including, to record mouse clicks, mouse movements, scrolling activity, and text that you type into free-form text boxes. We use information collected from these third-party services to help us better understand how our users find and use SMG Services, to enhance our services, and to improve your user experience.

- **Sharing Data with Other Service Providers.** We may share your information, including your Personal Data, with other service providers we use to perform the functions for which we engage them, such as hosting, data storage, and security. We may also share your Personal Data as needed to operate other related SMG services, such as ratings and reviews websites that we operate.
- **Fulfilling Agreements and Sharing Data with Clients.** If you access SMG Services to take a Survey regarding your consumer experience with one of our Clients, or to take a Survey regarding your experience as an employee of one of our Clients, we share the Personal Data we collect from you about and relating to your Survey responses with that Client. We also may use this Personal Data to derive market research insights and provide consumer behavior analytics and business intelligence to our Clients. For information concerning how the Client for which we are collecting your Personal Data uses, protects and otherwise processes Personal Data, read such Client's privacy policy. We and our Clients also may combine different types of information, including Personal Data collected from or about you by us, our Client or third-party sources. SMG may use the combined information for any of the purposes described in this Privacy Notice, and our Clients may use the combined information for any purposes described in their privacy policies.
- **Complying with Legal Obligations and Enforcing Legal Rights.** We may also share the information we collect from you, as needed, to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance, and corporate governance functions. We will disclose Personal Data as we deem necessary to respond to a subpoena, binding order of a data protection authority or judge, legal process, governmental request or any other legal or regulatory obligation, in each case this may be an entity outside your country of residence. We may also share Personal Data as required to pursue available remedies or limit damages we may sustain.
- **Transferring Data in Connection with Corporate Changes.** We may transfer information about you, including Personal Data, in connection with any actual or impending reorganization, merger, sale, joint venture, assignment, transfer, acquisition or other change of ownership or control by or of SMG or any affiliated company (in each case whether in whole or in part), including, without limitation, in connection with any bankruptcy or similar proceeding. Any such entity to which we transfer Personal Data will be required to provide you with notice of any purposes of processing not compatible with the purposes set forth in this Privacy Notice, as well as any privacy practices that are materially different than the practices set forth in this Privacy Notice. Where required by law, such entity also will be required to obtain your consent.
- **Using Personal Data for Other Business Purposes.** We also use your Personal Data for other legitimate business purposes, such as product and service development and administration of SMG Services.

## 6. RETENTION AND DISPOSAL OF PERSONAL DATA

We will retain your Personal Data in our records for no longer than is necessary for the purposes for which it was originally collected. When such information is no longer needed for the purposes for which it was originally collected, we will securely delete all of your electronic Personal Data, and securely shred any hard copy Personal Data, except for what is needed to comply with our legal obligations.

## 7. YOUR RIGHTS AND CHOICES CONCERNING PERSONAL DATA PROCESSING

You may discontinue participating in Surveys at any time by no longer accessing the SMG Services.

If you reside in a location with laws or regulations granting you rights to request specific actions relating to your Personal Data, you will have the specific rights granted to you by such law[s] or regulation[s], which may include the right to request access to and rectification (e.g., amendment or supplementation) or erasure of your Personal Data, the right to transfer your data (i.e., data portability), restriction of processing of your Personal Data, as well as the right to object to processing of your Personal Data, the right to withdraw your consent, the right to cancel your account, and the right to lodge a complaint with a supervisory authority (“**Data Subject Rights**”). All requests will be handled in accordance with the parameters set forth in applicable laws and regulations.

If you want to exercise your Data Subject Rights in respect of Surveys you may have taken with us, you will need to contact the Client company that sponsored (and is identified on) the Survey to make that request. The Client company that sponsored the Survey is the data controller in respect of the Survey data, rather than SMG. Applicable laws generally provide that Data Subject Rights requests are to be made to the data controller.

To make Data Subject Rights requests for any SMG Services other than Surveys, contact our Privacy Lead by email at [privacyofficer@smg.com](mailto:privacyofficer@smg.com) or by writing to Privacy Lead, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108.

## 8. CONSEQUENCES OF NOT PROVIDING PERSONAL DATA

Although participation in our Surveys is voluntary, you may not qualify for certain incentives, rewards, or benefits if you do not provide all information requested by a Survey.

## 9. COOKIES POLICY

### 9.1. What Are Cookies

SMG and our service providers use small text files called cookies. “**Cookies**” are small computer files sent to or accessed from your web browser or the hard drive of your computer, mobile device or tablet that contains information about your computer, such as a user ID, user settings, browsing history, and activities conducted while using the SMG Services. A Cookie typically contains the domain name (internet location) from which the Cookie originated, the “lifetime” of the Cookie (i.e., when it expires), and a randomly generated unique number or identifier. Cookies may be linked to Personal Data.

### 9.2. How We Use Cookies and Data Collection Tools

Cookies help us improve SMG Services by tracking your navigation habits and customizing your experience with SMG Services. This enables us to analyze technical and navigational information about SMG Services and helps us to detect and prevent fraud.

We also use Cookies and other Data Collection Tools (such as web beacons and server logs), which we collectively refer to as “**Data Collection Tools**,” to help improve your experience with SMG Services – for example, by remembering you when you come back to visit us and making the content you see more relevant to you.

SMG Services also may use Data Collection Tools to collect information from the device you use to access SMG Services, such as your operating system type, browser type, domain, and

other system settings, as well as the language your system uses and the country and time zone in which your device is located.

### **9.3. Your Control of Cookies**

Web browsers allow some control of most Cookies through browser settings. Some web browsers (including mobile web browsers) provide settings that allow you to reject Cookies or to alert you when a Cookie is placed on your computer, tablet or mobile device. You may be able to reject mobile device identifiers by activating the appropriate setting on your mobile device. Although you are not required to accept SMG's Cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through SMG Services. In addition, if you reside in a jurisdiction that requires us to obtain your consent to use cookies on our websites and/or applications, you will have an opportunity to manage your cookie preferences on those websites and/or applications; except for certain cookies that are required to enable the core functionality of such websites and applications, which you cannot choose to disable.

## **10. MANAGING YOUR ACCOUNT INFORMATION**

You can visit the account section of the applicable SMG Service to manage and correct factual inaccuracies in the information we have about you. If you have questions about how to access or correct your Personal Data, contact our Privacy Lead by email at [privacyofficer@smg.com](mailto:privacyofficer@smg.com) or by writing to Privacy Lead, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108.

## **11. CHILDREN'S PRIVACY**

SMG Services are intended for general audiences and are not directed to children who are under the age at which they may provide consent for the processing of their Personal Data in any jurisdiction where we operate. We do not knowingly collect Personal Data from such persons. If you become aware that a child under the age at which [s]he may legally provide consent to the processing of his/her Personal Data has provided us with Personal Data without parental consent, contact our Privacy Lead by email at [privacyofficer@smg.com](mailto:privacyofficer@smg.com) or by writing to Privacy Lead, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108. If we become aware that a child under the age at which [s]he may provide consent to Personal Data processing in his or her jurisdiction has provided us with Personal Data without parental consent, we take steps to remove such information and terminate the child's account as soon as possible.

## **12. LINKS TO THIRD PARTY SERVICES**

SMG Services may contain links to third party websites and services ("**Third Party Services**") with which SMG has no affiliation. A link to any Third Party Service does not mean we endorse it, nor the quality or accuracy of information presented on it. If you decide to visit a Third Party Service, you are subject to its privacy practices and not the privacy practices set forth in this Privacy Notice.

## **13. EMPLOYEES AND OTHER PERSONNEL**

This Privacy Notice does not cover our privacy practices relating to job applicants, employees or persons for whom we only have their information because of an employment relationship with SMG. We maintain a separate policy for such processing that we make available to the relevant data subjects through other means.



## **14. INFORMATION SECURITY**

SMG has an information security program that implements technical, physical, and organizational measures designed to assist in maintaining the security and confidentiality of Personal Data; safeguarding against anticipated threats to the confidentiality, integrity and availability of Personal Data; and protecting your Personal Data against loss, misuse, unauthorized alteration or destruction, and unauthorized access or disclosure.

However, whenever Personal Data is processed, there is a risk that such data could be lost, misused, modified, hacked, breached, and/or otherwise accessed by an unauthorized third party. No system or online transmission of data is completely secure. In addition to the technical, physical, and organizational measures that SMG has in place to protect your Personal Data, you should use appropriate security measures to protect your Personal Data. If you believe that your SMG account or any information you provided to us is no longer secure, notify our Privacy Lead immediately by email at [privacyofficer@smg.com](mailto:privacyofficer@smg.com) or by calling 1-800-764-0439 and asking to speak with SMG's Privacy Lead.

## **15. GEOGRAPHIC CONSIDERATIONS AND CROSS-BORDER TRANSFERS OF PERSONAL DATA**

SMG controls and operates SMG Services from the United States of America. SMG may transfer, store and process your Personal Data in the United States, the United Kingdom, Japan, or another location in Asia or in the European Economic Area ("EEA"). Note that data protection and privacy laws of the country to which your Personal Data is transferred may not be as comprehensive as the laws in your country. For example, Personal Data transferred to the United States may be subject to lawful access requests by federal and state authorities in the United States.

If you are accessing our SMG Services from the European Economic Area ("EEA"), your Personal Data will be processed outside of the EEA. In the event of such a transfer, we ensure that: (i) the Personal Data is transferred to countries recognized as offering an equivalent level of protection; or (ii) the transfer is made pursuant to appropriate safeguards, such as standard contractual clauses adopted by the European Commission.

If you are accessing our SMG Services from the United Kingdom ("UK") your Personal Data will be processed outside of the UK. In the event of such a transfer, we ensure that: (i) the Personal Data is transferred to countries recognized as offering an equivalent level of protection; or (ii) the transfer is made pursuant to appropriate safeguards, such as standard contractual clauses adopted by the Information Commissioner's Office.

If you wish to enquire further about these safeguards, please contact our Privacy Lead by email at [privacyofficer@smg.com](mailto:privacyofficer@smg.com) or by writing to Privacy Lead, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108.

This English-language Privacy Notice is SMG's official statement of its privacy practices relating to SMG Services. In case of any inconsistency between this English-language Privacy Notice and any translation into another language, this English-language document prevails.

## **16. REGION-SPECIFIC DISCLOSURES**

We may choose or be required by law to provide different or additional disclosures relating to the processing of Personal Data about residents of certain countries, regions or states. Please refer below for disclosures that may be applicable to you:



- If you are a resident of the State of California in the United States, please see Exhibit 1 for additional California-specific privacy disclosures.
- If you are a resident of the State of Nevada in the United States, Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. To submit such a request, please contact us at [privacyofficer@smg.com](mailto:privacyofficer@smg.com) or at one of our mailing addresses in the “How to Contact Us” section below.
- If you are a resident of Japan, your Personal Data will not be transferred, in connection with impending reorganization, merger, sale, joint venture, assignment, transfer, acquisition or other change of ownership or control by or of SMG or any affiliated company. Such transfer is only allowed after the actual corporate change happens.

## 17. HOW TO CONTACT US

If you have questions about privacy, need assistance with accessing or updating your Personal Data or have complaints relating to the processing of your Personal Data, contact our Privacy Lead by email at [privacyofficer@smg.com](mailto:privacyofficer@smg.com).

You can also write to us at:

Service Management Group, LLC  
Attn: Privacy Lead  
1737 McGee Street  
Kansas City, MO 64108  
U.S.A.

Service Management Group, Ltd.  
Attn: Privacy Lead  
38-40 The Maltings  
St Albans  
Hertfordshire AL1 3HL  
UNITED KINGDOM

Service Management Group G.K.  
Attn: Privacy Lead  
2-7-16 No. 3 Komoriya Building 9F  
Hamamatsu-cho, Minato-ku  
Tokyo 1050013  
JAPAN

## 18. DATA CONTROLLER AND PRIVACY LEAD

Personal Data collected by SMG is controlled by Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108, U.S.A, except for Personal Data collected through Surveys, in which case the data controller is the particular Client company identified on the Survey.

You may contact our Privacy Lead by email at [privacyofficer@smg.com](mailto:privacyofficer@smg.com) or by writing to Privacy Lead, Service Management Group, LLC, 1737 McGee Street, Kansas City, MO 64108, U.S.A.

**EXHIBIT 1**  
**SMG Services**  
**California Privacy Notice**

**Effective Date:** February 2022

**SCOPE OF DISCLOSURES**

This California Privacy Notice (the “**CA Notice**”) supplements the SMG Services Global Privacy Policy and applies solely to individual residents of the State of California (“**consumers**” or “**you**”).

This CA Notice provides additional information about how we collect, use, disclose, and otherwise process personal information of individual residents of the State of California, either online or offline, within the scope of the California Consumer Privacy Act of 2018 (“**CCPA**”).

Unless otherwise expressly stated, all terms in this CA Notice have the same meaning as defined in our SMG Services Global Privacy Policy or as otherwise defined in the CCPA.

**PERSONAL INFORMATION DISCLOSURES**

When we use the term “**personal information**” in this CA Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

For the purposes of this CA Notice, personal information does not include:

- Publicly available information from government records.
- Deidentified, aggregated or anonymized information that is maintained in a form that is not capable of being associated with or linked to you.
- Information excluded from the CCPA's scope, such as:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.
- Information relating to our job applicants, employees, contractors and other personnel.

**COLLECTION AND USE OF PERSONAL INFORMATION**

In the last 12 months, we have collected the following categories of personal information from the categories of sources and for the purposes set forth below, which reference the personal information, sources and purposes described in our Global Privacy Policy:

| Category of Personal Information   | Collected |
|--|-----------|
| <b>Identifiers</b> , such as your name, mailing address, email address, zip code, telephone number, or other similar identifiers.  | ✓         |
| <b>California Customer Records</b> (Cal. Civ. Code § 1798.80(e)), such as date of birth, username and password, company name, job title, business email address, and department.   | ✓         |
| <b>Protected Classification Characteristics</b> , such as age and gender.  | ✓         |
| <b>Commercial Information</b> , such as information about products or services purchases, obtained or considered.  | ✓         |
| <b>Biometric Information</b> , such as physiological and behavioral characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as voice prints or fingerprints.   | X         |
| <b>Internet/Network Information</b> , such as your browsing history, log and analytics data, information about the device(s) used to access the services, domain server, search history and information regarding your interaction with our websites or services and other Usage Data. | ✓         |
| <b>Geolocation Data</b> , such as information about your physical location collected from geolocation features on your device, including your IP address.  | ✓         |
| <b>Sensory Information</b> , such as pictures you provide or upload in connection with our services, and the content and audio recordings of phone calls between you and us that we record where permitted by law.   | ✓         |
| <b>Profession/Employment Information</b> , such as current employer.   | ✓         |
| <b>Non-Public Education Information</b> (20 U.S.C. § 1232g, 34 C.F.R. Part 99), such as information about your academic record.  | X         |
| <b>Other Personal Information</b> , such as personal information you provide to us in relation to a Survey, comment, question, request or inquiry, or information provided to us through Social Media networks.  | ✓         |
| <b>Inferences</b> , including information generated from your use of our services reflecting predictions about your preferences,   | ✓         |

|   |  |
|---|--|
| characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes. |  |
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### ***SOURCES OF PERSONAL INFORMATION***

We collect personal information about you from one or more of the following sources:

- Directly from you, including via information we receive about you through Surveys.
- Indirectly from you, such as through information we collect from you in the course of providing services to you or through our Clients.
- Other SMG affiliates.
- Our Clients.
- Service providers.
- Third parties you direct to share information with us.
- Your browser or device.

***Please note:*** In addition to the categories of sources identified above, we may collect information from publicly available sources and other third-party information providers in order to supplement the information we have otherwise collected.

### ***PURPOSES FOR COLLECTING PERSONAL INFORMATION***

We may collect, use, disclose personal information about you for one or more of the purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To communicate with you, including via email, text message, push notification and/or telephone calls.
- To operate, maintain, and provide to you the features and functionality of the services.
- To market to you, including through email, direct mail, phone or text message.
- To personalize your experience and to deliver custom content and product and service offerings relevant to your interests, including but not limited to targeted offers and ads through our website, email, Social Media channels, third-party sites, or on other devices you may use.
- To better understand the demographics of our visitors and measure traffic and analytics on our websites and services.
- To provide our products and services to, and fulfill our agreements with, our Clients.
- For our internal business purposes, such as data analysis, market research insight development, customer research, audits, fraud prevention, developing new products and/or features, enhancing the services, and improving the services and identifying usage trends.

- To recognize you and remember your information when you return to our websites and services.
- To help maintain the safety, security, and integrity of the services, technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our products and services.
- To troubleshoot and resolve technical issues.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate, negotiate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SMG's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by SMG about consumers is among the assets transferred or is otherwise relevant to the evaluation, negotiation or conduct of the transaction.

### ***RECIPIENTS OF PERSONAL INFORMATION***

As described in our Global Privacy Policy, we share personal information with the following categories of third parties for the following business purposes.

- **Within SMG:** We may disclose personal information between and among SMG and its current and future parents, affiliates, subsidiaries, and other companies under common control or ownership.
- **Our Clients:** When you provide comments to SMG, the information you provide may contribute to the services we provide to our Clients and to our overall market research. If you choose to provide us with permission, your comments may be posted on third-party websites and/or our clients' websites. If you access SMG's services to take a Survey regarding your customer experience with one of our Clients, we share the personal information we collect from you about and relating to your survey responses with that Client. We also may combine information received in your Survey responses with information received in Survey responses from other users to better understand overall consumer experiences. When you provide comments to SMG, your comments may be posted on TrumpetRatings.com and/or on our Clients' websites.
- **Service providers:** We may share personal information with third-party service providers that perform business or operational services for us or on our behalf, such as website hosting, infrastructure provisioning, IT services, customer service, email delivery services, marketing and advertising services, and other similar services, subject to contractual terms restricting the collection, use and disclosure of your personal information for any other commercial purpose.
- **Online advertising partners:** We also may share personal information with advertising networks or permit these partners to collect information from you directly on our websites to facilitate online advertising, such as search engines and social network advertising providers to serve targeted ads to you or to groups of other users

who share similar traits, such as likely commercial interests and demographics, or third-party platforms.

- **Third parties at your request:** We may share your personal information with third parties whom you authorize to disclose your personal information in connection with products and services we provide to you.
- **Security providers:** We may share your personal information with third-party security providers, for example, to detect, prevent, or otherwise address actual or suspected fraud, harassment, security or technical issues, violations of any law, rule, regulation or the policies of SMG.
- **Business partners:** We may disclose personal information to third parties with whom we partner to provide contests, joint promotional activities or co-branded services, and such disclosure is necessary to fulfill your request.
- **Other third parties:** From time to time, we may disclose your personal information to third parties who use this information to market to you, to perform analytics and conduct research, or for other purposes, in accordance with their own privacy policies and terms.
- **Analytics providers:** We work with third party analytics providers to better understand the demographics of our users and visitors, and to personalize, enhance and improve our services.
- **Social networks:** We may disclose personal information, such as a unique identifier, hashed email address, or information automatically collected through tracking technologies, to social networks for the purpose of displaying personalized advertising and content on those social networks.
- **Law enforcement and third parties pursuant to legal request:** We may disclose personal information as reasonably necessary to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- **Third parties in the context of a corporate transaction:** We may disclose personal information as reasonably necessary to evaluate, negotiate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SMG's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by SMG about consumers is among the assets transferred or is otherwise relevant to the evaluation, negotiation or conduct of the transaction.

## **SMG DOES NOT SELL PERSONAL INFORMATION**

To be clear, in the previous 12 months we have not sold, rented, released, disclosed, disseminated, made available, transferred, or otherwise communicated a consumer's personal information that we collect through the SMG Services to another business or third party for monetary or other valuable consideration. If that changes, we will update this notice.

## YOUR CALIFORNIA PRIVACY RIGHTS

As a California resident, you may be able to exercise the following rights in relation to the personal information about you that we have collected (subject to certain limitations at law):

|   |  |
|---|--|
| <p><b>The Right to Know</b></p>               | <p>You have the right to request any or all of the following information relating to your personal information we have collected and disclosed in the last 12 months, upon verification of your identity:</p> <ul style="list-style-type: none"> <li>• The specific pieces of personal information we have collected about you;</li> <li>• The categories of personal information we have collected about you;</li> <li>• The categories of sources of the personal information;</li> <li>• The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed; and</li> <li>• The business or commercial purposes for collecting the personal information.</li> </ul> |
| <p><b>The Right to Request Deletion</b></p>   | <p>You have the right to request the deletion of personal information we have collected from you, subject to certain exceptions.</p>   |
| <p><b>The Right to Opt Out of Sales</b></p>   | <p>Because SMG does not engage in any information sales as that term is defined under the CCPA, this right does not apply to the SMG Services.</p>   |
| <p><b>The Right to Non-Discrimination</b></p> | <p>You have the right not to receive discriminatory treatment for exercising these rights.</p> <p>However, please note that if the exercise of these rights limits our ability to process personal information (such as in the case of a deletion request), we may no longer be able to provide you our products and services or engage with you in the same manner.</p>   |
| <p><b>“Shine the Light”</b></p>               | <p>California residents that have an established business relationship with us have rights to know how their information is disclosed to third parties for their direct marketing purposes under California’s “Shine the Light” law (Civ. Code § 1798.83).</p>   |

## HOW TO EXERCISE YOUR CALIFORNIA CONSUMER RIGHTS

### *To Exercise Your Right to Know or Right to Deletion*

To exercise your right to know and/or your right to deletion, please submit a request by:

- Emailing [privacyofficer@smg.com](mailto:privacyofficer@smg.com) with the subject line “California Rights Request,”
- Calling 800-764-0439.



We will forward your request to the Client sponsoring your Survey. We may need to verify your identity before processing your request. In order to verify your identity, we generally will require the matching of sufficient information you provide us to the information we maintain about you in our systems. Although we try to limit the personal information collected in connection with a request to exercise the right to know and/or the right to deletion to that personal information identified in your request, certain requests may require us to obtain additional personal information from you. In certain circumstances, we may decline a request to exercise the right to know and/or right to deletion, particularly where we are unable to verify your identity or locate your information in our systems, or as permitted by law. Ultimately, our Client will direct us whether and how to fulfill your request.

### ***Minors Under Age 16***

We do not sell the personal information of consumers we know to be less than 16 years of age. Please contact us at [privacyofficer@smg.com](mailto:privacyofficer@smg.com) to inform us if you, or your minor child, are under the age of 16.

### **FINANCIAL INCENTIVES**

Our Clients may elect to offer financial incentives in exchange for your undertaking a particular Survey. Please review the website privacy policy of the particular Client sponsoring the Survey to review any financial incentive disclosures.

### **UPDATES TO THIS CA NOTICE**

We will update this CA Notice from time to time. When we make changes to this CA Notice, we will change the "**Effective Date**" at the beginning of this CA Notice. All changes shall be effective from the date of publication unless otherwise provided in the notification.

### **CONTACT US**

If you have any questions or requests in connection with this CA Notice or other privacy-related matters, please send an email to [privacyofficer@smg.com](mailto:privacyofficer@smg.com).

Alternatively, inquiries may be addressed to:

Service Management Group, LLC  
Attn: Privacy Lead  
1737 McGee Street  
Kansas City, MO 64108