

# iPerceptions

## Description

With iPerceptions, you can customize every aspect of your research, from survey triggers to the invitation design to asking questions the way you want to ask them.

Our proprietary APIs seamlessly inject visitors' insights into your existing systems, boosting your organization's efficiency and ROI.

## PRIVACY POLICY

Last Updated: May 26, 2016.

### PREAMBLE

PLEASE READ THIS PRIVACY POLICY CAREFULLY. CAPITALIZED WORDS OR EXPRESSIONS SHALL HAVE THE MEANING ASCRIBED TO THEM IN THIS PRIVACY POLICY. IPERCEPTIONS® (“We”, “Us” or “Our”) IS COMMITTED TO PROTECTING THE PRIVACY AND SECURITY OF ITS USERS BY MAINTAINING THE HIGHEST STANDARDS OF CONFIDENTIALITY AND SECURITY FOR ALL DATA COLLECTED FROM RESPONDENTS AS WELL AS SITE VISITORS, SUBSCRIBERS AND OTHERS USERS (“USERS”). BY USING, VISITING OR OTHERWISE ACCESSING THE WEBSITE OR THE SERVICES IN ANY WAY (INCLUDING BY RESPONDING TO SURVEYS OR OTHER COMMUNICATIONS RECEIVED FROM OTHER USERS OF THE WEBSITE AND/OR THE SERVICES, BY VIEWING, DOWNLOADING OR UPLOADING ANY CONTENT OR MATERIAL MADE AVAILABLE VIA THE WEBSITE OR THE SERVICES OR BY BROWSING), YOU EXPRESSLY CONSENT TO THE COLLECTION, USE, DISCLOSURE AND PROCESSING OF INFORMATION, INCLUDING YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE TERMS OF THIS PRIVACY POLICY THAT YOU HEREBY ACKNOWLEDGE TO HAVE READ AND ACCEPTED. YOU MAY OPT OUT AT ANY TIME IN THE MANNER DESCRIBED IN THIS PRIVACY POLICY, OR CHOOSE NOT TO PROVIDE AN ANSWER TO ANY GIVEN SURVEY QUESTION, IF ANY.

iPerceptions complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as administered by the United States Department of Commerce with respect to such Information that it receives about individuals located in the EU and Switzerland. iPerceptions has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view our certification, please visit <http://www.export.gov/safeharbor>.

To contact iPerceptions regarding this privacy policy or the Safe Harbor program, you may reach iPerceptions using the contact information provided at the bottom of this policy.

## **1. DEFINITIONS**

Whenever used in this Privacy Policy, the following terms have the meaning ascribed to them below and all other terms not defined in this Section 1 shall have the meaning ascribed to them in this Privacy Policy:

“Cookies” are software methods and protocols used for storing data in a web browser. For the purpose of this document, Cookies refers to both HTTP Cookies as defined by the IETF and the local and session storage methods of the Web Storage specification as defined by the World Wide Web consortium.

“Customer” means iperceptions’ customer to whom iperceptions licenses the Services.

“iPerceptions” means iperceptions, Inc., located at 3575 Boulevard St-Laurent Suite 310 Montreal, Québec H2X 2T7 Canada or any other successor location.

“Privacy Policy” shall mean this privacy policy which may be changed in accordance with its terms, as updated from time to time.

“Respondents” means survey respondents or other participants who interact with the Services as a result of such respondents’ or participants’ relationship with a Customer.

“Services” means any products and services provided to Customers by iperceptions or by any of its agent, reseller or partner.

“Terms of Use” means the current online Terms of Use issued by iperceptions which may be changed in accordance with its terms, a copy of which can be found at the URL location provided below (or any successor URL thereof) or any other location iperceptions may make available to you, which is incorporated herein by reference and which you, on your behalf and on behalf of the other Users, if any, hereby acknowledge having read and accepted in its entirety:

<https://www.iperceptions.com/en/legal/terms-of-use>

“Website” means iperceptions.com and any other website made available to you and your Users and operated by iperceptions or by its authorized third party hosting entity acting on behalf of iperceptions, and any and all sub-domains thereof.

## **2. PRIVACY POLICIES OF THIRD PARTIES**

Privacy statements of third parties (including, the Customers’), including security practices, may apply to your information or when you respond to a survey. iPerceptions encourages you to read those privacy statements before providing your information.

## **3. INFORMATION COLLECTION & USE**

### **3.1. Information Provided by You as User**

You may be asked on any Website how you heard about iperceptions or to provide contact information in exchange for access to white papers or other downloadable content on our Website. iPerceptions may use this information for sales and marketing purposes, to

respond to your inquiry, or correspond with you if necessary. We may also collect name, email addresses, mailing address, and phone number.

### **3.2. Information Provided by Respondents**

If you are a Respondent, iPerceptions may collect and store information from you on behalf of the Customer whose survey you have responded to. The survey responses are owned and managed by the Customer. The Customer is responsible for the survey data. If you have any question, you may contact the Customer directly as iPerceptions is not responsible for the content of the survey you have responded to or your responses to it. Customers may have their own privacy policies that detail how said Customers handle your personal information or other information. iPerceptions encourages you to read carefully any such policy and learn about the privacy practices of those third parties. As between you and iPerceptions, your submission of personal information is voluntary and optional. You may opt out of responding at any time. However, if you do respond, you consent to its provision to iPerceptions for the purpose of delivering the Services to our Customer.

### **3.3. Automatically Collected Information**

iPerceptions gathers certain information automatically and stores it in log files. This information includes internet protocol (IP) addresses, the IP addresses of Respondents, browser type, internet service provider (ISP), mobile carrier, mobile device, operating system, referring/exit pages, the URLs of sites from which a User arrives or leaves a website, date/time stamp, and clickstream data. iPerceptions uses this information to analyze trends, to monitor the effectiveness of marketing efforts, including which websites refer the most people to iPerceptions, to deliver iPerceptions or third party advertising to Users, to administer the Website, to understand users' movements around the Website, and to improve the quality of the Services and Website performance, to aid solving technical problems, and to gather demographic information about iPerceptions' User base as a whole (The IP addresses are analyzed in the aggregate). We do not link this automatically collected data to other information we collect about you, except where you have chosen to provide it. iPerceptions uses Cookies and other technologies to help personalize and improve the User's online experience and the overall quality of the Services. Cookies cannot be used to run programs or deliver viruses to your computer or device. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you. iPerceptions may use a third-party tracking service that uses images, scripts, page tags (also known as web beacons) and other tracking technologies to track non-personal information about visitors to our Website in the aggregate. This data includes user statistics. iPerceptions will not request, access or otherwise track any location based information from your mobile device. In the course of serving advertisements or optimizing the Services to Users, iPerceptions may allow authorized third parties to place or recognize a unique cookie on your browser for the enhancement of your User experience by providing more relevant advertising.

### **3.4. Information From Third Parties**

iPerceptions may collect your personal information from third parties when you authorize those third parties to share your information with iPerceptions.

### **3.5. Information Related to Data Collected for our Customers**

iPerceptions collects information under the direction of its Customers, and has no direct

relationship with the individuals whose personal data it processes. If you are a customer of one of our Customers and would no longer like to be contacted by one of our Customers that use the Services, please contact the Customer that you interact with directly. Because iPerceptions is acting as the Customer's agent, if you choose to opt-out of future emails, the opt-out will be Customer-specific, and does not apply to other emails sent by iPerceptions. Information collected in response to an email is handled in the same manner as other website visitor data, as described in this Privacy Statement. iPerceptions may transfer personal information to companies that help iPerceptions provide the Services. Transfers to subsequent third parties are covered by this Privacy Policy and the service agreements with our Customers. In certain instances, iPerceptions' surveys include sweepstakes incentives. When a survey includes a sweepstakes incentive, entry in the sweepstakes is entirely optional. Survey responses may be submitted without entering the sweepstakes. Please refer to the specific sweepstakes rules for further detail. In all cases, any contact information collected by iPerceptions, including but not limited to name, email address, mailing address, and telephone number, is only used to manage the sweepstakes, subject to the sweepstakes rules and the terms of the Customer's privacy policy.

### **3.6. Other General Uses**

We may provide your personal information to companies that provide services to help us with our business activities. These companies are authorized to use your personal information only as necessary to provide these services to us.

iPerceptions may use your information to provide Services to Customers, to establish or maintain business relationships or provide them feedback. iPerceptions compiles data collected from its online surveys to produce benchmark reports for Customers as well as media and other interested parties. The information provided by Respondents on Customers' online surveys is compiled and aggregated to create generic profiles of users of the websites being studied. Open-ended responses are compiled and reported as is. iPerceptions study process does not require iPerceptions to know nor to report the identity of any individual Respondent personally. Customers have the ability to export, share, or publish data from their surveys. iPerceptions provides various features to export, share, or publish your survey questions, responses, and results in summary or detailed format. iPerceptions may also use Customer information, including online survey questions and Respondents' responses, as well as aggregated data iPerceptions collects through survey results and transactional and performance data related to use of the Services to help analysis and to help iPerceptions provide and improve the Services.

### **3.7. Cookies and other Tracking Technologies**

iPerceptions and our partners, marketing partners, third party service providers, technology service providers, affiliates, or analytics or service providers, use technologies such as cookies, beacons, tags, and scripts, to analyze trends, administer the website, tracking users' movements around the website, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis.

We use cookies for internal purposes to help us to provide you with a better user experience. The cookies help us understand how a website is used by visitors. From this information we can improve the way the site works and presents content to you. Users can

control the use of cookies at the individual browser level. If you reject cookies, you may still use our services, but your ability to use some features or areas of our services may be limited.

We use Local Shared Objects, such as HTML5, to store content information and preferences. Third parties with whom we partner to provide certain features on our website or to display advertising based upon your web browsing activity also use HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5.

We partner with a third party to either display advertising on our Web site or to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by [clicking here](#). Please note this does not opt you out of being served ads. You will continue to receive generic ads.

#### **4. INFORMATION DISCLOSURE**

iperceptions may transfer your personal information to third parties only in the ways that are described in this privacy policy, except in the following limited circumstances:

- 1) information you expressly consent to be shared;
- 2) when relating to anonymized information (individuals cannot be identified by it);
- 3) when you decide to make the information indexable by search engines, to share or to distribute the information to people or otherwise to make it available to the public;
- 4) to share the information iperceptions collects on Customers' behalf with the Customer iperceptions has collected the information on behalf of;
- 5) to satisfy any applicable law, regulation, legal process or enforceable governmental request within or outside your country of residence when iperceptions has a good faith belief that the law requires it;
- 6) to enforce this Privacy Policy, the Terms of Use, or a service agreement, including investigation of potential violations thereof;
- 7) to detect, prevent, or otherwise address fraud, security or technical issues, or protect the operations or Users;
- 8) to protect the rights, property or safety of iperceptions, the Users, the public, or others;
- 9) in connection with an acquisition, merger, change in control, debt financing, reorganization, sale of assets, bankruptcy or other change of iperceptions' corporate structure or status; or
- 10) sweepstakes administrators, as necessary in connection with the performance of requested services or solutions, or as otherwise appropriate in connection with a legitimate need.

#### **5. ACCESSING, CHANGING OR DELETING YOUR INFORMATION**

You need to contact the Customer if you want to access, update, or delete your survey responses. iPerceptions cannot provide you with this access since survey responses are the Customer's information. In other situations, iperceptions will endeavor to fulfill requests to correct, update or delete your information unless such information is required to be retained by law, for legitimate business, technical or security purposes (such as storage in

backup media created as part of our routine system backup procedures, or if jeopardizing the privacy of others) or, as provided in this Privacy Policy. iPerceptions will retain personal data it processes on behalf of its Customers for as long as needed to provide Services to Customers. iPerceptions will retain this personal information as necessary to comply with its legal obligations, resolve disputes, and enforce its agreements. If requested to remove data, we will respond within a reasonable timeframe.

## **6. CHILDREN**

iPerceptions' surveys and Website are not designed or intended for use by children under 13 and iPerceptions does not intentionally or knowingly collect data from children under 13 or allow them to register, although the sites we survey may offer children's services for purchase by adults. If you are under 18, you should not participate in surveys or use any Website unless a parent or guardian is present. Children under 13 may not submit any information to iPerceptions, and if iPerceptions discovers that it has inadvertently gathered any such information for a child under 13 or such child has created an account, iPerceptions will take steps to delete any such information and close that account as soon as possible. Children over 13 should only provide iPerceptions with information if they have explicit permission from a parent or legal guardian. If your child has submitted information, and you wish to review, change and/or delete such information as well as refuse to allow any further collection or use of the child's information, or if you have reason to believe that this has occurred involving a child under 13, please contact iPerceptions (See [Contact Us](#) Section).

## **7. BLOGS, FORUMS, TESTIMONIALS, SOCIAL MEDIA WIDGETS**

1) If any Website offers publicly accessible blogs or community forums, you should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your information from our blog or community forum, contact iPerceptions (See [Contact Us](#) section).

2) iPerceptions post testimonials on the Website that you may submit to iPerceptions from time to time. iPerceptions always request permission to post your testimonial on the Website, and iPerceptions may use your information to contact you for the purpose of requesting such permission.

3) The Website and some surveys include social media features, such as the Facebook Like button and Widgets, such as the Share this button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

## **9. SECURITY STATEMENT**

1) iPerceptions takes the security of the data collected very seriously however the Internet, not being a secured environment or any system being completely foolproof, iPerceptions does not warrant that information may not be accessed, copied, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards despite the security protections iPerceptions undertakes. iPerceptions uses secure server hosting locations with 24x7 security and monitoring, firewall protection, controlled access and encryption technology to protect your data. The secrecy of your password is your responsibility.

2) iPerceptions offers the use of a secure server. All supplied sensitive/credit information is

transmitted via Secure Socket Layer (SSL) technology and then encrypted into our PCI Compliant Payment gateway providers' database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential. After a transaction, information such as credit cards numbers is not stored on our servers.

3) iPerceptions takes reasonable security measures to protect against loss and misuse, as well as unauthorized access, alteration, disclosure or destruction of personal information. These measures include internal reviews of our data collection, storage and processing practices and security practices.

4) iPerceptions restricts access to personal information to iPerceptions employees, contractors and agents who need to know that information in order to operate, develop or improve the Services. iPerceptions takes reasonable efforts to ensure all parties comply with confidentiality obligations.

## **9. CHANGES**

iPerceptions reserves the right to modify this Privacy Policy at any time, so please check for change notices on a regular basis. If iPerceptions decides to change its Privacy Policy in a material way, iPerceptions will notify you by means of a change notice on its Website so that you may access and review the changes to this document in advance of your continued use of the Services or iPerceptions may, in its sole option, notify you by email of those changes before the change becoming effective. If you object to any changes, you may cancel, deactivate your account, if any, or not respond to a survey. If you do not cancel, deactivate your account, if any, or if you respond to a survey, and by continuing to use the Services after notice of change has published on a Website or has been sent to you, you will be considered as having expressly consented to the changed terms or practices.

## **10. OPTING OUT OF COMMUNICATIONS**

If you wish to subscribe to our newsletter(s) or other commercial electronic material, we will use your name and email address to send those communications to you. Except as expressly provided otherwise in this Privacy Policy, you and other Users have the right to opt out from receiving future communications in accordance with this Section, including for no longer receiving email invitations to take surveys which are sent by iPerceptions on behalf of Customers, you can contact us (see Contact Us Section 15), or follow the unsubscribe instructions included in each promotional email, if any, sent to you by selecting the opt-out link in the email.

## **11. LINKS TO OTHER WEBSITE**

The Website may contain links to other websites that are not owned or controlled by iPerceptions. Please be aware that iPerceptions cannot control the activities of third parties and iPerceptions doesn't accept any responsibility for the privacy practices of such other websites and such third parties may not adhere to the same privacy policies. iPerceptions encourages you to be aware when you leave the Website and to read the privacy policies of each and every website that collects personally identifiable information.

## **12. LEGAL DISCLAIMER**

When requested by legal authorities to disclose personally identifiable information, iPerceptions will inform the court of various factors justifying confidentiality and respondent anonymity. However, iPerceptions may be required by law to disclose personally identifiable

information where judicial or other governmental subpoenas, warrants, or orders are properly issued. Individuals' unsubscribe option in no way limits iPerceptions' use, disclosure or distribution of personally-identifiable information to the extent such use, disclosure or distribution is required by law, court order or other valid legal process. iPerceptions will communicate with the affected client as soon as possible, unless prohibited by law or court order. If iPerceptions completes a merger, acquisition, or sale of all or substantially all of its assets, you will be notified via a prominent notice on our website of any change in uses of your personal information, and choices you may have regarding your personal information. We may also disclose your personal information to any other third party with your prior consent.

### **13. GENERAL PROVISIONS**

Any notice provided to iPerceptions pursuant to this Privacy Policy should be sent to iPerceptions, Inc. 606 Rue Cathcart, #1007, Montreal, QC, Canada, H3B 1K9, Attention: General Counsel.

iPerceptions may, at its sole option, provide you with notices, including those regarding changes to this Privacy Policy, by email, regular mail, text message, postings on or within any of the Website.

### **14. CONTACT US**

If you have questions related to this Privacy Policy, please email us at: [info@iperceptions.com](mailto:info@iperceptions.com), or write or send your fax at:

iPerceptions Inc.  
606 Rue Cathcart, #1007  
Montreal, QC  
Canada  
H3B 1K9

Fax: 514-484-2600

Attention: Chief Information Officer.

### **INFORMATION SECURITY**

iPerceptions offers its solution in a SaaS model as an annual subscription with a web-based security login. The portal application, as well as all data at rest, are hosted in a SSAE16-certified Tier-1 Data Center located in Canada. A global network of cloud-based points of presence is also used for collecting transient data such as collection and clickstream data.

To ensure business remains uninterrupted, we operate under a 99.5% SLA availability commitment. Average monthly availability of 99.9% for the period including 2014, 2015 and 2016. Production systems are configured for high-availability and scalability with active 24/7 monitoring. We have a dedicated Online Operations Team that can be reached 24/7 through



the Technical Emergency Hotline. The also company maintains a Business Continuity Plan (BCP).

Customer data is one of the most valuable assets our clients have. That is why our top priority is delivering a comprehensive, high-performance solution with a focus on keeping our customers' data safe, their interactions secure, and their businesses protected.

### **Compliance and Certifications**

- [CSA Cloud Control Matrix](#) for planning and alignment of security controls
- [SSAE 16/ISAE 3402 SOC-1](#) Tier-III data centers
- [EU/EEA & Switzerland Safe Harbor](#) self-certification through the U.S. Department of Commerce

### **Governance**

iPerceptions operations are governed by a formal Governance Risk and Compliance (GRC) Information Security program, with documented Information Security and Privacy policies. Our security guidance is aligned with the Cloud Controls Matrix v3.0 (CCM) and Consensus Assessments Initiative Questionnaire v1.1 (CAI) of the [Cloud Security Alliance](#).

Cloud Security Alliance (CSA) is a not-for-profit organization with a mission to promote the use of best practices for providing security assurance within Cloud Computing. CCM is publicly accessible material that documents the security controls provided for cloud computing offerings. We have completed the Consensus Assessment Initiative Questionnaire, based on the results of our due diligence self-assessment. The completed questionnaire can be made available for review upon request.

### **Policies**

We have Information Security policies in place that cover the following areas: Compliance, User Training, Personnel Screening, Code of Conduct, Logical Access, Network Security, Incident Response Handling, Information Systems Development and Maintenance, Information Governance, Information Exchange, Encryption Management, Audits & Reviews and Hosting Security. Information Security policies are formally acknowledged by employees and suppliers and training is provided twice a year. Regular assessment reviews of our suppliers' Information Security posture are conducted and documented.

### **Physical security**

iPerceptions virtual and physical servers are hosted at Tier I, SSAE-16, or ISO 27001 compliant facilities. Our facilities feature 24-hour manned security, biometric access control, video surveillance, and physical locks. The co-location facilities are powered by redundant power, each with UPS and backup generators. All systems, networked devices, and circuits are constantly monitored by both iPerceptions and the co-location providers. The latest compliance reports can be made available for review upon request.

## **Network security**

Our network is protected by redundant ICSA-certified layer 7 firewalls, best-of-class router technology, regular audits, network and application layer DoS protection and correlated multi-layer threat scanning that monitors for malicious traffic and network attacks. Appropriate logs and automatic alerts are maintained on all network systems. In addition to on-premises DoS protection, we also conduct weekly PCI DSS Requirement 11.2 intrusion vulnerability assessments.

## **Transmission security**

All communications with iperceptions servers are encrypted using industry standard SSL. For email, our product supports Transport Layer Security (TLS), a protocol that encrypts and delivers email securely, mitigating eavesdropping and spoofing between mail servers. VPN connection is only attributed on a needs basis and employees use a VPN with token-based three-factor authentication to connect with our systems. Automated transmission of data files and deliverables are performed through secure FTPS, SFTP or HTTPS.

## **Access control**

All access to data within iperceptions is governed by access rights and authenticated by username and password. Our security architecture ensures need to know segregation of customer data and additional access controls include network IP restrictions. iPerceptions Online Operations Team as well as specific members of our Development Team are the only individuals with access to iperceptions' servers and production databases. Other iperceptions employees do not have access to iperceptions' production servers.

## **Application security**

iPerceptions SaaS platform follows industry best practices on secure credential storage by storing hashed and salted passwords and separately encrypting login fields for email addresses. iPerceptions SaaS platform supports task-based granular access privileges and configurable authentication settings for the duration of session inactivity time-outs, password length, complexity, expiry, limited number of retries and two step login verification. iPerceptions SaaS platform maintains a robust application audit log, to include security events such as user logins or configuration changes.

We contract with on-demand scrubbing providers to help mitigate OWASP threats and application-level Distributed Denial of Service (DDoS) attacks. We also sub-contract manual penetration tests from time to time to third parties as application evolution dictates.

## **Data Security**

Archived data and backups are treated with the same level of care as active data and access to backups and to the restoration process are restricted. We maintain a disposition processes for records and media. Hard copy media, such as paper, are shredded and or destroyed beyond reconstruction. All data storage is properly sanitized before destruction or redeployment.

## **Incident management**

We maintain a process that enforces notification to the affected customer within twenty-four (24) hours of an incident related to the security of information that likely or effectively resulted in wrongful access to data. Security incidents include the following: unauthorized physical access or breach, unauthorized logical access or breach, malware, DoS, breach of confidentiality, systems access by an employee or contractor without appropriate clearance for such access or who otherwise use the systems inappropriately. Clients will be notified of the approximate date and time of the incident, will be provided with a summary of all relevant facts as well as of actions taken to rectify the processes and any negative impact of the incident.

## **Privacy**

iPerceptions privacy policy is published on its website. The policy identifies the information gathered, how it is used, with whom it is shared and the customer's ability to control the dissemination of information. iPerceptions complies with the U.S.-EU Safe Harbour Framework and the U.S.-Swiss Safe Harbour Framework as administered by the United States Department of Commerce.

To deliver its services, iperceptions must collect certain user information, including first/last name, email address and account level passwords for accessing iperceptions SaaS platform. Unless expressly authorized, iperceptions will not disclose this confidential information to any third party or use this information in any manner other than to deliver the agreed upon services. With its users' express consent, iperceptions sends service update messages to its users at the email addresses they provided when requesting the service.

iPerceptions uses cookies and session storage on its customers' visitors browsers as well as on SaaS portal end-users browsers. Cookies and session storage items may at times hold a generated unique number but never contain any personally identifiable information or sensible information such as passwords. Deleting cookies will not be detrimental to the user-experience of visitors, respondents or end-users or the proper working of iperceptions products. We provide detailed and transparent documentation about how cookies and session storage are used.

## **Contact Us**

We welcome any further questions, are happy to provide clarifications when needed and are open to audits by our customers. Please contact Jose Monast, Director of Operations, jose.monast@iperceptions.com, +1 514 484 3600.

## **GDPR**

Last Updated: April 12th, 2018.

## **WHAT IS GDPR?**

GDPR (General Data Protection Regulation) is a new set of rules designed to give European citizens more control over what organizations can do with their data.

Under the terms of GDPR, organizations have to ensure that personal data is gathered legally and under strict conditions and protect it from misuse and exploitation.

## **IPERCEPTIONS' COMMITMENT TO GDPR**

Protecting your data has always been one of our top priorities, and that isn't going to change. iPerceptions will be fully compliant to GDPR regulations when they come into effect on May 25th 2018.

Everyone deserves to feel safe when online. As customer experience experts, iPerceptions understands the importance of trust between businesses and their online visitors. Whether you are an end-user, visitor to our website, or a survey participant, we will take all measures to ensure your data is safe with us.

## **HOW IS IPERCEPTIONS GDPR COMPLIANT?**

iPerceptions is fully committed to being GDPR compliant when it comes into effect as of May 25th 2018.

### **1. Processing of PII**

It is important to note that iPerceptions does not by default collect, store, handle or otherwise process Personally Identifiable Information (PII) provided by respondents of iPerceptions surveys or Comment Cards.

However, there are certain ways PII could be processed by iPerceptions as part of its services:

IP Address:

PII is not collected in standard iPerceptions surveys. However, the IP address of respondents may be collected and as per the current interpretation of the GDRP, IP addresses would be considered to be covered data.

Collection of respondents' IP addresses can be disabled by changing a setting in the "Project Info" page for the survey on the iPerceptions Platform.

## **Other PII:**

End-users may also configure the survey to include specific questions for which the answer may include PII (for example a survey could include questions which ask respondents to provide an account number or an e-mail address).

These types of scenarios require explicit survey programming by the end-user, or by iPerceptions on behalf of the client, in the iPerceptions Platform. As such, the end-user retains complete control and responsibility over any collection of PII resulting from its survey programming and should provide iPerceptions with specific processing requirements.

### **Inadvertent PII Collection:**

Certain question types can be programmed for a survey in the iPerceptions Platform to include text fields within which respondents can type their answer (for example, these question types include "Open-Ended Text" and "Request Form Fields"). iPerceptions Comment Cards may also be configured to have questions which include text fields.

These question types make it possible for respondents to potentially provide PII, such as e-mail addresses and account numbers;

The collection of PII can be eliminated by avoiding the use of open-text questions, whenever possible.

Moreover, special logic can be implemented to sanitize certain patterns in the open-ended feedback, such as credit card numbers, flight numbers, etc. Please reach out to your iPerceptions representative to learn more about implementing this logic for your project.

### **iPerceptions Platform End Users:**

iPerceptions Platform end-users are required to provide their name, company name, and e-mail address when first creating their iPerceptions user account, with the e-mail address then being used as the username for their user account.

Internet Protocol (IP) address information is also collected for each end-user session on the iPerceptions Platform.

iPerceptions will collect, store and process this PII in compliance with the GDPR requirements.

## **2. Data Retention**

Part of the GDPR requirements include applying appropriate, secure, and timely deletion policies.

As a policy, iPerceptions retains data collected for a period of three years after which time the data is securely deleted. However, our customers are better placed to determine the adequate retention period for their data and iPerceptions is always available to discuss

implementing a customer-specific retention policy that would better reflect the compliance requirements of the customer. Please communicate with your iperceptions representative to discuss any specific retention requirements.

### **3. Data Access, Correction and Deletion**

In our role as data processor as defined by GDPR, we will take appropriate measures to assist our customers in fulfilling access, deletion, and other requests from individuals.

Upon request, iperceptions can find, modify and permanently delete any data relating to an individual provided the data collected includes data that is identifiable.

iPerceptions will collaborate with its customers to respond to any data access request that may be received from data subjects without undue delay.

### **CONTACT US REGARDING GDPR**

For any questions regarding iperceptions' commitment to the GDPR, or to remove or modify your data, please email us at [privacy@iperceptions.com](mailto:privacy@iperceptions.com). We'll get back to you shortly.

### **iPerceptions Opt-Out**

<http://optout.networkadvertising.org/?c=1#!/>