

# SNAP SURVEYS PRIVACY POLICY AND FAIR PROCESSING AND PRIVACY NOTICE

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**Note: Latest version via online links below:**

**[Privacy Policy – Snap Surveys](#)**

Snap Surveys Limited and Snap Surveys NH, Inc. (“Snap Surveys”, or “we” or “us”) are committed to respecting your privacy and protecting your personal information. Our privacy policy describes how we capture and use the personal information that we gather about visitors to this website and users of our products and services. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

Note: if you are a resident of the State of California, please also refer to our Supplemental Privacy Policy for California Residents, available [here](#), which provides further information and describes additional rights arising under the California Consumer Privacy Act (“CCPA”).

Snap Surveys provides products and services which enable our customers to create and administer surveys. We may host our customers’ surveys on our servers and collect the responses to those surveys on their behalf. Our customers may also upload contact information of potential survey respondents to invite them to participate in a survey. We refer to this contact information and responses as “Survey Data”. Our customers remain data controllers of this Survey Data and we process it solely in accordance with our agreement with our customers (for example, our Software License and Services Agreement).

Snap Surveys acts as data controller in relation to all personal information other than Survey Data. If you are a survey respondent, the data controller of the Survey Data is our customer who invited you to participate in the survey. For all other information, your data controller is Snap Surveys Limited if you are located outside of North or South America, and Snap Surveys NH, Inc. if you are located within North or South America.

If you have any questions, comments or complaints regarding our privacy policy or practices, please contact us at one of the following addresses:

- **UK address:** Attn: Data Protection Officer, Snap Surveys Limited, 5 Mead Court, Cooper Road, Thornbury, Bristol BS35 3UW, UK
- **US address:** Attn: Data Protection Officer, Snap Surveys, NH, Inc., One New Hampshire Ave Suite 125, Portsmouth, NH 03801, USA

or at [dpo@snapsurveys.com](mailto:dpo@snapsurveys.com).

In addition, you may contact our representative in the EU: EU Business Partners, 10 Ashe Street, Clonakilty, Co. Cork, P85 E403, Ireland

Point of Contact: Flor McCarthy, email: [info@eubusinesspartners.com](mailto:info@eubusinesspartners.com)

Our privacy practices differ depending on whether you fall into one of two categories, so we have created different policies for each of these, accessible from the links below:

**Summary: Privacy policy if you use our products and services, or visit our website (other than as a survey respondent)**

Our [full privacy policy](#) is below. In summary:

- Your Survey Data is your information. We will only process it to provide our products and services to you.
- For all other information, we will only use the information that you provide to us or that we collect about you as described in this privacy policy, including to provide our products and services, to respond to your enquiries and to protect and improve our products, services and website.
- We may use your information to send you marketing communications. You can ask us to stop doing this at any time. You have other rights in relation to your personal information, such as the rights to access, amend or request the deletion of personal information that we hold about you, or in some cases to object to our use of it.
- We only share your information in limited circumstances, as we describe below.
- We apply high standards of security to all information that we hold, in line with our ISO 27001:2013 certification, which provides independent confirmation that our information security policies and procedures follow industry best practice.

**Summary: Privacy policy if you are a survey respondent**

Our [full privacy policy](#) is below. In summary:

- We collect the Survey Data on behalf of our customers and the data controller of the Survey Data is our customer who invited you to participate in the survey.

- Our customers determine how they design their surveys, what information they will collect and what they will use it for. You should review their privacy information to understand how your information will be used. In the majority of cases, you should contact our customer if you have any questions about their survey, or to exercise your rights in relation to the Survey Data.
- We provide our customers with a range of options as to where their Survey Data will be hosted, so please contact them for details for that survey.
- We collect very limited information about you ourselves (as described in our full policy below) and we are the data controller of this information. We will only use it for limited purposes including protecting the security of our services and to respond to you if you contact us directly. We will not use your contact information for marketing.
- We apply high standards of security to all information that we hold, in line with our ISO 27001:2013 certification, which provides independent confirmation that our information security policies and procedures follow industry best practice.

### **Privacy policy if you use our products and services, or visit our website (other than as a survey respondent)**

This policy applies to all personal information for which we are the data controller. As you are the data controller for your Survey Data, different principles often apply to it and where relevant we include a note on Survey Data at the end of each section.

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#### **1. The information we collect about you**

We collect information about you when you provide it to us, when you use our products, services and website, and when other sources provide it to us, as follows:

**Account information:** where you subscribe to our products or services, or create an account with us, we collect information from you such as your name and email address, username, phone number, address and organization. We also ask for and collect personal information such as an

email address and name from any individual that you authorize to use our products or services.

**Billing information:** where you need to make a payment to us for our products or services, we collect your billing details, including a billing address and financial and payment information.

**Information that you provide to us:** we collect the information that you give to us, for example when you:

- contact us by phone, email, online chat or otherwise.
- fill in forms on our website.
- register to use our website.
- sign up for our newsletters and promotions.
- respond to a survey run by ourselves (e.g. to get feedback on our own services and training courses).
- register or attend one of our events or training courses.
- participate in forums on our website.
- contact us for customer support.

**Technical information:** we collect information relating to your interaction with our products, services and website, including the type of browser and/or device used, operating system, files viewed, date/time stamp, referrer page and IP address.

**Usage information:** we may collect information about your usage of our products and services, including the version of any of our software that you are using and the number of users of that software. We also collect information about your use of our website including which webpages you view, the services you view or search for, your referring and exit pages, the length of visits to certain pages and the times and dates of these actions.

**Cookies:** we use cookies to distinguish you from other users of our products, services and website. This helps us to improve our website's performance and your experience of using our website. You can control the use of cookies at the individual browser level. Some of those cookies are necessary for the use of our services. If you reject cookies, you can still use our website, but your ability to use some features or areas of our website may be limited. For more information on the cookies we use and the purposes for which we use them see '[Cookies used by Snap Surveys](#)'.

**Web beacons:** when we send you emails, we may include a web beacon to allow us to determine the number of people who open our emails and information such as when and how many times the email was viewed, whether any links were clicked on, whether the email was forwarded, your geographic location and browser and device type. This helps us to measure the effectiveness of our email campaigns. When you click on a

link in an email, we may record this individual response to customize our offerings to you. Web beacons can be refused when delivered via email. If you do not wish to receive web beacons via email, you will need to disable HTML images or refuse HTML emails via your email software, but please note that this is likely to reduce the functionality of such emails.

**Social media features and widgets:** our website includes 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 website. 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 website. Your interactions with these features are governed by the privacy policy of the company providing them.

**Third party services:** if you choose to enable or connect to a third party application or service in conjunction with our products and services, that third party service may make certain information about you available to us, for example your name and email address in order to authenticate you. You should check your privacy settings on these third party services to understand and control the information provided to us through these services.

**Information from other users:** other users of our products or services may provide us with information about you. For example, when another individual authorizes you to use our products and services, they will provide us with your name and email address, or an individual in your organization may provide us with your contact information if they designate you as the billing or technical contact on your organization's account.

**Survey Data:** if you are a customer using our survey products and services you may upload contact information of potential survey respondents to our products and services and we may collect your survey response data for you. You remain the data controller of this Survey Data and we process it solely in accordance with the agreement between us.

## **2. How we use your information**

We use the information that we hold about you in the following ways. For each of these, we have identified our [legal basis](#) for processing your information in that way.

This section does not relate to your Survey Data – we process this only in accordance with your instructions and our agreement with you.

**Providing our products and services:** we use your information to provide you with the products and services which you have subscribed to or requested. This may include providing you with customer support and with the benefits of any autoupdate feature associated with the relevant product or service. This processing is necessary to perform our contract with you for these products and services.

**To collect payment:** we use your information to collect fees due to us for your use of our products and services, in accordance with our legitimate interests of collecting revenue.

**Responding to enquiries:** we will use your contact information and any information that you send to us to respond to your questions, requests for information or complaints. Depending on the nature of your enquiry, we may do this on the basis of performing our contract with you, our legal obligations, or our legitimate interests of providing you with the best service and understanding how we can improve our products and services based on your experience.

**Third party services:** where you choose to enable or connect to a third party application or service we use the information provided about you by that application or service to enable it to work in conjunction with our products or services.

**To protect our business, products, services and website:** we will use your information in accordance with our legitimate interests of administering and maintaining our systems and ensuring network and information security, for example to prevent unauthorized access to our networks, to investigate faults, to control the abuse of our products or services, to prevent denial of service attacks and to monitor system usage and server load.

**To develop, test and improve our products, services and website:** we will use your information about how you use our products, services and website to improve the user experience for our users, for example to ensure we are offering appropriate features, supporting appropriate browsers and devices and to ensure our website content is presented in the most effective manner. We do this on the basis of your consent to our use of cookies and in accordance with our legitimate interests of developing our existing products, services and website, understanding how we can continue to improve them, and creating new products and services.

**Monitoring and enforcing our rights:** we may use your information to ensure that you are using our products and services in accordance with the terms on which they are supplied, and to enforce those terms, our website terms of use, or other relevant agreements that we have with

you, in accordance with our legitimate interests of being able to enforce our rights.

**Legal requests:** we may need to use your information to comply with a legal obligation such as to respond to a court order or a request from a supervisory authority or government, or to prevent fraud.

**Notifications:** we will use your information to send you communications which are required by law or to notify you of changes to our terms or this privacy policy, or changes (permanent or temporary) to our products or services. Such messages will not include any promotional content. Depending on the nature of the communication we may do this on the basis of performing our contract with you or complying with our legal obligations.

**Surveys and feedback requests:** we may use your information to invite you to participate in surveys run by us on our own behalf, for example to invite your feedback on our products, services and website. These communications will not contain any promotional content and will be sent on the basis of our legitimate interests of improving our products, services and website. However, if you would prefer not to receive such communications, please contact us at [privacy@snapsurveys.com](mailto:privacy@snapsurveys.com).

**Marketing:** we may use your information to provide you with information about our products and services, offers and events that we consider may be of interest to you. This information will relate to our own products and services only, and we will not provide your information to third parties for marketing purposes. We send these communications either on the basis of your consent (where you have specifically consented to receiving such communications) or in accordance with our legitimate interests of growing our business.

**You may stop receiving marketing communications from us at any time.** To withdraw your consent or to opt-out of receiving marketing communications, you may contact us at [privacy@snapsurveys.com](mailto:privacy@snapsurveys.com) or follow the unsubscribe instructions contained in the communication itself.

**Legal basis for processing (EEA and UK only):** where your data is processed by Snap Surveys Limited or if you are an individual from the EEA or the UK, we must have a legal basis for collecting and using your information when we act as data controller. This will be one of the following:

- a. where we require the information to perform a contract with you (e.g. to deliver the services that you have requested);
- b. where we have your consent to do so, and in this case you have the right to withdraw or refuse to give your consent at any time. This

- will not however affect the lawfulness of any processing based on your consent before you withdraw it;
- c. where the processing is necessary for our legitimate interests (and those legitimate interests are not overridden by your interests or fundamental rights and freedoms); or
  - d. where we need to comply with a legal or regulatory obligation.

If you have any questions about or require further information concerning the legal basis on which we collect and use your information, including regarding our legitimate interests, please contact us.

### **3. Who we share your information with**

We will only disclose your information in the circumstances below:

**Our service providers:** we may disclose your information to our third party service providers. In each case we have agreements in place with the service provider to ensure that they provide appropriate protection for your information and to ensure that they are only permitted to use your information in accordance with our instructions and as necessary to provide the relevant service to us.

For example, we engage third parties to provide the following services:

- hosting our online survey services and our website.
- sending our customer communications.
- providing our online chat services.
- provide analytics information.
- manage credit card processing.

**Professional advisers:** we may need to disclose your information to our professional advisers, including our lawyers, bankers, auditors and insurers.

**Compliance with legal obligations and enforcement of our rights:** we may also have to disclose your information if this is reasonably required to:

- comply with any applicable law, regulation or legal process or to respond to a request from a government or a regulatory body.
- enforce our agreements, policies and website terms of use.
- protect the security or integrity of our products and services.

**Our group:** Snap Surveys Limited and Snap Surveys NH, Inc may share information with each other. The protections of this privacy policy apply to the information we share in these circumstances.



**Other users within your organization:** where your organization purchases products or services from us covering multiple authorized users and contacts, we may disclose your information to other users within your organization, for example to verify licensing and billing information.

**Forums:** if you use the forums on this website, you should be aware that any personal information you submit there can be read, collected, or used by other users of these forums, and could be used by them to send you unsolicited messages. We are not responsible for the personal information you choose to submit in these forums or for private messages that you send via the forum. To request removal of your personal information from our community forum, contact us at [privacy@snapsurveys.com](mailto:privacy@snapsurveys.com).

You have the option of receiving email notifications each time someone replies to the threads or boards you add to your notify list. If you no longer wish to receive these types of notifications simply login to your forum account and modify your notification settings.

**Survey Data:** our agreement with you specifies the authorized subprocessors to whom we may disclose your Survey Data. We will not disclose your Survey Data to anyone else, unless we are required to do so by law.

#### **4. Links to other websites**

This privacy policy covers our products, services and website. Our website may contain links to and from third party websites. The information practices and the content of such other websites are governed by the privacy policy of that website. If you click on a link to those websites you will leave our website to go to the website that you selected. Please note that we cannot accept responsibility or liability for any use of your personal information by such third parties, and we cannot guarantee that they will adhere to the same privacy practices as us. We encourage you to review the privacy policies of any third party before you submit any personal data to them.

#### **5. Updating your information**

If you wish to update, amend, correct or request deletion of your personal information you may do so by making the change within your account once logged in or by emailing us at [privacy@snapsurveys.com](mailto:privacy@snapsurveys.com). We will respond to your request within one month.

#### **6. Your rights as a data subject**

**Your right to access:** at your request we will provide you with information about whether we hold any of your personal information and provide a copy of this information to you. To request this information please contact

us at [privacy@snapsurveys.com](mailto:privacy@snapsurveys.com). You may update, amend, correct or request deletion of your personal information as described above.

Where your information is processed by Snap Surveys Limited or if you are from the EEA or the UK you may have the right to exercise additional rights available to you, including:

**Right of Erasure:** in certain circumstances you have the right to erasure of personal information held about you, although this may be qualified where e.g. it is necessary for that information to be retained for record keeping purposes or compliance with our obligations. If we are unable to comply with your request, we will explain why.

**Right of Rectification:** you have the right to have your personal information rectified if it is inaccurate or incomplete.

**Right to Object:** you have the right to request that we stop processing your personal information for marketing purposes, and can request that we stop processing your personal information for other purposes based on our legitimate interests. In some cases, we may be able to demonstrate that we have compelling legitimate grounds to continue to process your information.

**Right of Restriction:** you may have the right to request that we restrict the processing of your personal information (e.g. where you believe that the personal information we hold about you is inaccurate or unlawfully held).

**Right to Data Portability:** you may have the right to be provided with your personal information in a structured, machine readable and commonly used format and to request that we transfer the personal information provided by you to another data controller.

You also have the right to **withdraw consent** at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you would like to exercise such rights, please contact us at [privacy@snapsurveys.com](mailto:privacy@snapsurveys.com). To protect your privacy and security, we may take steps to verify your identity before complying with the request.

You also have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. In the UK, this is the Information Commissioner's Office <https://ico.org.uk/>. A list of EU Supervisory Authorities

is available here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

## **7. How long we keep your information**

We will retain your information for as long as your account is active or as needed to provide our products or services or otherwise fulfil the purposes described in this policy, including for the purposes of satisfying any legal, accounting or reporting requirements. If you wish to delete your personal information at any time, please contact us at [privacy@snapsurveys.com](mailto:privacy@snapsurveys.com). If we are unable to comply with that request, for example because we need to retain some or all of your information to comply with a legal obligation, we will let you know and will explain why.

**Survey Data:** you are in control of the management of your Survey Data and can delete it from our online systems or download it to your own systems at any time. Please refer to our contract with you for the specific period for which we retain your Survey Data when we cease providing you with our products and services and for how long your Survey Data remains in our back ups before being permanently deleted.

## **8. Security of your information**

We take the security of your information extremely seriously and have attained ISO 27001:2013 certification to provide independent confirmation that our information security policies and procedures follow industry best practice.

All information that you provide to us is stored on secure servers. When you enter personal information within the customer login area of the site, we encrypt that information using transport layer security (TLS). Where you use a password to access certain areas of our website and services you are responsible for keeping this password confidential.

Our data centre providers are also ISO27001:2013 certified, and your Survey Data is encrypted on the servers at rest and in transit across the internet.

To learn more about our security practices, please see <https://www.snapsurveys.com/security-measures/>.

## **9. International transfers of information**

Snap Surveys Limited and Snap Surveys NH, Inc. may share information with each other under our Intra Group Data Processing Agreement which incorporates standard contractual clauses.

Your information may also be processed by some of our third party service providers which may operate outside of the EEA or the UK and

therefore in countries which may not provide for the same level of data protection as the EEA. Whenever we transfer your information out of the EEA or the UK, we ensure that a similar degree of protection is afforded to it, for example by putting in place appropriate contractual terms including where relevant standard contractual clauses.

## **10. Changes to our privacy policy**

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will post a notice on the homepage of our website, the login screens for our services, and/or we will send an email notification to our account holders. We will also keep prior versions of this policy in archive for your review.

### **Privacy policy if you are a survey respondent**

#### **Introduction**

Snap Surveys' products and services enable our customers to create and administer surveys. We may host our customers' surveys on our servers and collect the responses to those surveys on their behalf. Our customers may also upload contact information of potential survey respondents to invite them to participate in a survey. We refer to this contact information and responses as "**Survey Data**". Our customers remain data controllers of this Survey Data and we process it solely in accordance with our agreement with our customers. Aside from Survey Data, we are likely to process very limited information about you.

Our customers have total discretion to determine what information they collect, who they invite to participate in a survey, whether they upload respondent information, what the Survey Data will be used for, whether it will be combined with other information and data, who it will be shared with and how long it will be stored. We strongly recommend you read the privacy notices and/or obtain privacy information from our customer who has invited you to participate in the survey to fully understand how your Survey Data will be used.

We offer our customers a range of options as to how they host their surveys, including on servers managed by us in the UK or the US. Our customers may also install our products on their own servers in which case the survey is hosted by our customer and we do not process any Survey Data relating to that survey. The rest of this policy applies only where we host surveys on behalf of our customers or otherwise process Survey Data for them (for example, where we carry out paper surveys for them).

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## 1. The information we collect about you

We collect the following information about you:

**Survey Data:** we collect your survey responses. Our customer may also have uploaded your contact information to enable them to invite you to participate in the survey, and send reminder emails to you. As explained above, we process this Survey Data on our customer's behalf and make no use of it ourselves.

**Technical information:** we collect information relating to your interaction with our software and services, including the type of browser and/or device used, operating system, date/time stamp, referrer page and IP address. We do not link this information to your Survey Data.

**Cookies:** our online survey services use a limited number of cookies (see '[Cookies used by Snap Surveys](#)'). The most relevant one to you is that they will use a cookie to prevent you completing the same survey multiple times, if our customer has enabled this feature.

**Your contact information:** we will collect information from you if you contact us directly, for example in relation to a survey invitation that you have received.

## 2. How we use your information

We use the information that we hold about you in the following ways:

**Survey Data – to provide our products and services:** we hold, store and process your Survey Data solely to provide our products and services to our customers, in accordance with our agreement with them. We only use your Survey Data for our own purposes if required to do so by law.

**Technical information – to protect our services, and for analysis:** we will use your information in accordance with our legitimate interests of administering and maintaining our systems and ensuring network and information security, for example to prevent unauthorized access to our networks, to investigate faults, to control the abuse of our products or services, to prevent denial of service attacks and to monitor system usage and server load. We may also use this information in aggregate form for our legitimate interests of improving our products and services.

**Cookies – to prevent multiple survey completion:** if our customer has enabled this feature, our online survey services will use a cookie to prevent you completing the same survey multiple times.

**Your contact information – to respond to your enquiry:** we will only use your contact information where you contact us directly, in order to respond to your enquiry. This is in accordance with our legitimate interests of providing customer service. In many cases (for example where you wish to exercise your rights as a data subject) this is likely to involve referring you to our customer for them to respond to you directly.

We will not use any information that we hold about you for **marketing purposes**.

### **3. Who we share your information with**

**Survey Data:** unless we are required to do so by law, we will not disclose your Survey Data to any third parties other than our customers and our subprocessors (such as our affiliates and our hosting providers) that have been authorized by our customer in our agreement with them.

**Your contact information:** where you contact us directly we may, if appropriate, refer your enquiry to our customer.

### **4. Your rights as a data subject**

**Your right to access:** at your request we will provide you with information about whether we hold any of your personal information (other than your Survey Data) and provide a copy of this information to you. To request this information please contact us at [privacy@snapsurveys.com](mailto:privacy@snapsurveys.com). You may also request that we update, amend, correct or delete your personal information.

If you wish to access, correct, or delete your Survey Data, opt out of any use or disclosure of your Survey Data or exercise any of the other rights described below in relation to your Survey Data, you will need to contact our customer directly. Where necessary, we will provide assistance to our customers to deal with your request.

Where we are the data controller, you may have the right to exercise the following additional rights:

**Right of Erasure:** in certain circumstances you have the right to erasure of personal information held about you, although this may be qualified where e.g. it is necessary for that information to be retained for record keeping purposes or compliance with our obligations.

**Right to Object:** you may have the right to object to our processing of your personal data for purposes based on our legitimate interests. In

some cases, we may be able to demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

**Right of Restriction:** you may have to right to request that we restrict the processing of your personal data (e.g. where you believe that the personal data we hold about you is inaccurate or unlawfully held).

**Right to Data Portability:** you may have the right to be provided with your personal data in a structured, machine readable and commonly used format and to request that we transfer the personal information provided by you to another data controller.

If you would like to exercise such rights, please contact us at [privacy@snapsurveys.com](mailto:privacy@snapsurveys.com). To protect your privacy and security, we may take steps to verify your identity before complying with the request.

You also have the right to **withdraw consent** at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

You also have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority. In the UK, this is the Information Commissioner's Office <https://ico.org.uk/>. A list of EU Supervisory Authorities is available here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

## **5. How long we keep your information**

**Survey Data:** our customers determine how long they store your Survey Data in our products and services, so if you have any questions about this please ask them directly.

Aside from Survey Data we are likely to hold only very limited information about you. We typically retain technical information for no longer than 6 months from the date we collect it and will retain your contact information for no longer than a year after we have resolved your enquiry (unless we have a specific reason to retain it for longer, for example to comply with a legal requirement).

## **6. Security of your information**

We take the security of your information extremely seriously and have attained ISO 27001:2013 certification to provide independent confirmation that our information security policies and procedures follow industry best practice.



All information that you provide to us is stored on secure servers. Our data centre providers are also ISO27001:2013 certified, and our customers' Survey Data is encrypted on the servers at rest and in transit across the internet.

To learn more about our security practices, please see <https://www.snapsurveys.com/security-measures/>.

## **7. International transfers of information**

Snap Surveys Limited and Snap Surveys NH, Inc may share information with each other under our Intra Group Data Processing Agreement which incorporates standard contractual clauses.

Your information may also be processed by some of our third party service providers which may operate outside of the EEA or the UK and therefore in countries which may not provide for the same level of data protection as the EEA. Whenever we transfer your information out of the EEA or the UK, we ensure that a similar degree of protection is afforded to it, for example by putting in place appropriate contractual terms including where relevant standard contractual clauses.

In relation to Survey Data, we offer our customers a number of options in terms of where their surveys may be hosted, including servers managed by us in the UK or the US, or on their own servers. To find out where a survey is hosted, please contact the customer that invited you to participate in it. Where we host the survey we will only transfer the Survey Data to our customer and to our approved subprocessors in accordance with the agreement with our customer.

## **8. Changes to our privacy policy**

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will post a notice on the homepage of our website and the login screens for our services. We will also keep prior versions of this policy in an archive for your review.

Last updated 29 March 2022.