

# U.S. - EU Safe Harbor Privacy Statement

For personal information related to consumer surveys that Service Management Group, Inc. receives from the European Economic Area, including Switzerland, we are committed to handling such personal information in accordance with the Safe Harbor Principles. For more information about the Safe Harbor Principles, please visit the U.S. Department of Commerce's Website at [http://www.export.gov/safeharbor/sh\\_overview.html](http://www.export.gov/safeharbor/sh_overview.html).

Your privacy is very important to us and our clients. We want you to participate in our online survey with complete confidence that your privacy will be respected. This privacy statement explains our online privacy practices and is effective as of July, 2009.

## Information We Collect

When completing our client's customer satisfaction surveys, we will collect information which may include personal information (such as your name or email address), transaction information (such as information from a store receipt), as well as your survey responses.

We also automatically collect information about your computer (IP address and domain), your Internet browser and your operating system (system settings), using standard data collection tools, such as cookies, Web beacons and Web server logs.

**We will not use or disclose your personal information for marketing purposes. We will not, nor will our clients, contact you unless you expressly request communication or if the contact is necessary to verify the integrity of the survey process.**

## Use of Your Personal Information

In general, we use all of the information we collect for:

- Research purposes,
- Fulfillment of incentives, and
- Other everyday business purposes, such as customer service, survey integrity management, and Website management.

We use automatically-collected information for Website management to ensure that our surveys operate properly on all computers and to help detect fraud or other inappropriate survey responses. We use aggregated information that does not identify you or your computer for reporting and analytics.

## Disclosure of Personal Information

We will not disclose your personal information to anyone unless:

- The disclosure is needed for fulfillment of an incentive,
- You request follow-up communication or otherwise expressly consent to the disclosure,
- The disclosure is to a third party that performs services for us – but we forbid our service providers from using your personal information for their own purposes,
- The disclosure is required by law (such as in response to a subpoena) or needed for fraud prevention, survey integrity management, enforcement of legal rights or similar purposes, or
- The disclosure is in connection with a transfer of assets of our business.

Participating in this survey is voluntary. If you have any concerns about the information collection practices, please refrain from completing the survey and contact us at the address below.

## Information Security

We have implemented reasonable technical, physical and administrative safeguards to help protect your personal information against unauthorized access or loss.

## International Transfers

This Website is operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us may be transferred to the United States or other countries in which our businesses are located. We will use reasonable means to protect the personal data we transfer in all locations.

**Privacy Statement Changes**

Should we make any changes to our practices in the future, we will post an updated Privacy Statement. However, we will not apply any changes to previously collected information unless we notify you and give you an opportunity to opt-out.

**Questions**

If you have any questions about this privacy statement or this survey, please contact: SMG Privacy Office, 1737 McGee, Kansas City, MO, 64108