

This privacy policy will explain how our organization uses the personal data we may collect from you when you use our website(s) or one of our subdomain website(s) (“MindspotResearch.com”, “*.MindspotResearch.com”)

Topics:

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What data do we collect?

Mindspot Inc. collects the following data:

- Personal identification information, PII (Name, email address, phone number, etc.)
- Non-PII (What company or IP is accessing or using our website for marketing and sales purposes.)

How do we collect your data?

You directly provide Mindspot Inc. with most of the data we collect. We collect data and process data when you:

- Register online or place an order information for any of our products or services.

- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser's cookies.

Mindspot Inc. may also receive your data indirectly from the following sources:

- 3rd Party Vendors (Sample Group Providers)

How will we use your data?

Mindspot Inc. collects your data so that we can:

- Process your order, manage your account.
- Email you with special offers on other products and services we think you might like.

How do we store your data?

If Mindspot Inc. keeps your data, we securely store your data at our secure server located on the Microsoft Azure Platform. Data that is secured is encrypted and anonymized in compliance with ISO27001 Standards.

Mindspot Inc. will keep your PII for 12 Months. Once this time period has expired, we will delete your data by filtering out inactive clients and users on a monthly basis.

Marketing

Mindspot Inc. is a Market Research Company and would like to send you information about products and services of ours that we think you might like.

If you have agreed to receive marketing, you may always opt out at a later date. You have the right at any time to stop Mindspot Inc. from contacting you for marketing purposes or giving your data to other members of the Mindspot Inc. If you no longer wish to be contacted for marketing purposes, **please click here**, or email optout@mindspotresearch.com. Please keep in mind that you will not receive any further emails from Mindspot Inc, including a confirmation email, unless you choose to opt in at a later time.

What are your data protection rights?

Mindspot Inc. would like to make sure you are fully aware of all of your data protection rights.

Every user is entitled to the following:

1. *The right to access* - You have the right to request Mindspot Inc. for copies of your personal data. We may charge you a small fee for this service.

2. *The right to rectification* - You have the right to request that Mindspot Inc. correct any information you believe is inaccurate. You also have the right to request Mindspot Inc. to complete information you believe is incomplete.
3. *The right to erasure* - You have the right to request that Mindspot Inc. erase your personal data, under certain conditions.
4. *The right to restrict processing* - You have the right to request that Mindspot Inc. restrict the processing of your personal data, under certain conditions.
5. *The right to object to processing* - You have the right to object to Mindspot Inc.'s processing of your personal data, under certain conditions.
6. *The right to data portability* - You have the right to request that Mindspot Inc. transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at us-privacy@mindsportresearch.com or Call us at 407-730-4603 or write to us at; Mindspot Inc., 20 South Main Street, Suite 230, Winter Garden FL, 34787.

What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology. For further information, visit <http://www.allaboutcookies.org>.

How do we use cookies?

Mindspot Inc. uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** - Mindspot Inc. uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** - Mindspot Inc. uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Mindspot Inc. sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Privacy policies of other websites

The Mindspot Inc. website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Changes to our privacy policy

Mindspot Inc. keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 25 MAY 2019.

How to contact us

If you have any questions about Mindspot Inc.'s privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: us-privacy@mindspotresearch.com

Call us: +1 407.466.3803

Or write to us at: Mindspot Inc., 20 South Main Street, Suite 230, Winter Garden FL, 34787.

EU-U.S./Swiss-U.S. Privacy Shield Framework

Mindspot Inc., ("MINDSPOT," "Mindspot Research", "we," "our," and "us"), the U.S. member firm complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data (as defined below) from European Union member countries and Switzerland. MINDSPOT has certified that it adheres to the Privacy Shield Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement, and Liability. If there is any conflict between the

policies in this MINDSPOT (U.S.) Privacy Shield Policy (“Privacy Shield Policy”) and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

Definitions

“Data Subject” means the individual to whom any given Personal Data covered by this Privacy Shield Policy refers.

“Personal Data” means any information relating to an individual residing in the European Union and Switzerland that can be used to identify that individual either on its own or in combination with other readily available data.

“Sensitive Personal Data” means Personal Data regarding an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, physical or mental health, or sexual life.

Scope and Responsibility

This Privacy Shield Policy applies to Personal Data transferred from European Union member countries and Switzerland to MINDSPOT’s operations in the U.S. in reliance on the respective Privacy Shield framework and does not apply to Personal Data transferred under Standard Contractual Clauses or any approved derogation from the EU Directive.

At times MINDSPOT may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements

Some types of Personal Data may be subject to other privacy-related requirements and policies. For example:

Some MINDSPOT websites have their own privacy policies.

Personal Data regarding and/or received from a client is also subject to any specific agreement with, or notice to, the client, as well as additional applicable laws and professional standards.

Employee Personal Information is subject to internal human resource policies including the Employee Data Privacy Notice.

MINDSPOT commits to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland in the context of the employment relationship.

All employees of MINDSPOT that have access in the U.S. to Personal Data covered by this Privacy Shield Policy are responsible for conducting themselves in accordance with this Privacy Shield Policy. Adherence by MINDSPOT to this Privacy Shield Policy may be limited to the extent required to meet legal, regulatory, governmental, or national security obligations, but Personal Data covered by this Privacy Shield Policy shall not be collected, used, or disclosed in a manner contrary to this policy without the prior written permission of MINDSPOT’s Chief Privacy Officer.

MINDSPOT employees responsible for engaging third parties to which Personal Data covered by this Privacy Shield Policy will be transferred are responsible for obtaining appropriate assurances that such third parties have an obligation to conduct themselves in accordance with the applicable provisions of this Privacy Shield Principles, including any applicable contractual assurances required by Privacy Shield.

Privacy Shield Principles

MINDSPOT commits to subject to the Privacy Shields' Principles. All Personal Data received by MINDSPOT in the U.S. from European Union member countries and Switzerland in reliance on the respective Privacy Shield framework.

1. Notice

MINDSPOT notifies Data Subjects covered by this Choice Privacy Shield Policy about its data practices regarding Personal Data received by MINDSPOT in the U.S. from European Union member countries and Switzerland in reliance on the respective Privacy Shield framework, including the types of Personal Data it collects about them, the purposes for which it collects and uses such Personal Data, the types of third parties to which it discloses such Personal Data and the purposes for which it does so, the rights of Data Subjects to access their Personal Data, the choices and means that MINDSPOT offers for limiting its use and disclosure of such Personal Data, how MINDSPOT's obligations under the Privacy Shield are enforced, and how Data Subjects can contact MINDSPOT with any inquiries or complaints.

2. Choice

If Personal Data covered by this Privacy Shield Policy is to be used for a new purpose that is materially different from that for which the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party, MINDSPOT will provide Data Subjects with an opportunity to choose whether to have their Personal Data so used or disclosed. Requests to opt out of such uses or disclosures of Personal Data should be sent to: us-privacy@mindspotresearch.com

If Sensitive Personal Data covered by this Privacy Shield Policy is to be used for a new purpose that is different from that for which the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a third party, MINDSPOT will obtain the Data Subject's explicit consent prior to such use or disclosure.

3. Accountability for Onward Transfer

In the event we transfer Personal Data covered by this Privacy Shield Policy to a third party acting as a controller, we will do so consistent with any notice provided to Data Subjects and any consent they have given, and only if the third party has given us contractual assurances that it will (i) process the Personal Data for limited and specified purposes consistent with any consent provided by the Data Subjects, (ii) provide at least the same level of protection as is required by the Privacy Shield Principles and notify us if it makes a determination that it cannot do so; and (iii) cease processing of the Personal Data or take other reasonable and appropriate steps to remediate if it makes such a determination. If MINDSPOT has knowledge that a third party acting as a controller is processing Personal Data covered by this Privacy Shield Policy in a way that is

contrary to the Privacy Shield Principles, MINDSPOT will take reasonable steps to prevent or stop such processing.

With respect to our agents, we will transfer only the Personal Data covered by this Privacy Shield Policy needed for an agent to deliver to MINDSPOT the requested product or service. Furthermore, we will (i) permit the agent to process such Personal Data only for limited and specified purposes; (ii) require the agent to provide at least the same level of privacy protection as is required by the Privacy Shield Principles; (iii) take reasonable and appropriate steps to ensure that the agent effectively processes the Personal Data transferred in a manner consistent with MINDSPOT's obligations under the Privacy Shield Principles; and (iv) require the agent to notify MINDSPOT if it makes a determination that it can no longer meet its obligation to provide the same level of protection as is required by the Privacy Shield Principles. Upon receiving notice from an agent that it can no longer meet its obligation to provide the same level of protection as is required by the Privacy Shield Principles, we will take reasonable and appropriate steps to stop and remediate unauthorized processing.

MINDSPOT remains liable under the Privacy Shield Principles if an agent processes Personal Data covered by this Privacy Shield Policy in a manner inconsistent with the Principles, except where MINDSPOT is not responsible for the event giving rise to the damage.

4. Security

MINDSPOT takes reasonable and appropriate measures to protect Personal Data covered by this Privacy Shield Policy from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into due account the risks involved in the processing and the nature of the Personal Data.

5. Data Integrity and Purpose Limitation

MINDSPOT limits the collection of Personal Data covered by this Privacy Shield Policy to information that is relevant for the purposes of processing. MINDSPOT does not process such Personal Data in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the Data Subject.

MINDSPOT takes reasonable steps to ensure that such Personal Data is reliable for its intended use, accurate, complete, and current. MINDSPOT takes reasonable and appropriate measures to comply with the requirement under the Privacy Shield to retain Personal Data in identifiable form only for as long as it serves a purpose of processing, which includes MINDSPOT's obligations to comply with professional standards, MINDSPOT's business purposes and unless a longer retention period is permitted by law, and it adheres to the Privacy Shield Principles for as long as it retains such Personal Data.

6. Access

Data Subjects whose Personal Data is covered by this Privacy Shield Policy have the right to access such Personal Data and to correct, amend, or delete such Personal Data if it is inaccurate or has been processed in violation of the Privacy Shield Principles (except when the burden or expense of providing access, correction, amendment, or deletion would be disproportionate to the risks to the Data Subject's privacy, or where the

rights of persons other than the Data Subject would be violated). Requests for access, correction, amendment, or deletion should be sent to: us-privacy@MindspotResearch.com

7. Recourse, Enforcement, and Liability

MINDSPOT's participation in the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework is subject to investigation and enforcement by the Federal Trade Commission.

In compliance with the Privacy Shield Principles, MINDSPOT commits to resolve complaints about your privacy and our collection or use of your Personal Data. Data Subjects with inquiries or complaints regarding this Privacy Shield Policy should first contact MINDSPOT at: us-privacy@MindspotResearch.com

MINDSPOT has further committed to refer unresolved privacy complaints under the EU-U.S. and Swiss-U.S. Privacy Shield Principles to an independent dispute resolution mechanism, The International Centre for Dispute Resolution-American Arbitration Association (ICDR-AAA), which administers the arbitrations under Annex I, and manages the related arbitral fund. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://www.icdr.org/support> for more information and to file a complaint.

Under certain conditions detailed in the Privacy Shield, Data Subjects may be able to invoke binding arbitration before the Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission.

MINDSPOT agrees to periodically review and verify its compliance with the Privacy Shield Principles, and to remedy any issues arising out of failure to comply with the Privacy Shield Principles. MINDSPOT acknowledges that its failure to provide an annual self-certification to the U.S. Department of Commerce will remove it from the Department's list of Privacy Shield participants.

8. Changes to this Privacy Shield Policy

This Privacy Shield Policy may be amended from time to time consistent with the requirements of the Privacy Shield. Appropriate notice regarding such amendments will be given.

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