

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 for 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.

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 Mindspot Inc. If you no longer wish to be contacted for marketing purposes, please [click here](#), or email info@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 info@mindspotresearch.com or call us at 407-730-4603 or write to us at; Mindspot Inc., 15155 W. Colonial Dr., # 784208, 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 the 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.

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 15 September 2023.**

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 contact us.

Email us at: info@mindspotresearch.com

Call us: +1 407-730-4603

Or write to us at: Mindspot Inc., 15155 W. Colonial Dr., #784208, Winter Garden FL, 34787.

Mindspot, Inc. complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Mindspot, Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Mindspot, Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>

Definitions

“Data Subject” means the individual to whom any given Personal Data covered by this data privacy framework refers.

“Personal Data” means any information relating to an individual residing in the European Union, the UK, 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 data privacy framework applies to Personal Data transferred from European Union member countries, the UK, and Switzerland to MINDSPOT’s operations in the U.S. in reliance on the respective Data privacy framework and does not apply to Personal Data transferred under Standard Contractual Clauses or any approved derogation from the EU Directive.

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.

All employees of MINDSPOT that have access in the U.S. to Personal Data covered by this data privacy framework are responsible for conducting themselves in accordance with this data privacy framework. Adherence by MINDSPOT to this Data privacy framework may be limited to the extent required to meet legal, regulatory, governmental, or national security obligations, but Personal Data covered by this Data privacy framework 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.

Data privacy framework Principles

MINDSPOT commits to subject to the Data privacy frameworks' Principles. All Personal Data received by MINDSPOT in the U.S. from European Union member countries, the UK, and Switzerland in reliance on the respective Data privacy framework.

1. Notice

MINDSPOT notifies Data Subjects covered by this Choice Data privacy framework about its data practices regarding Personal Data received by MINDSPOT in the U.S. from European Union member countries, the UK, and Switzerland in reliance on the respective Data privacy framework, including the types of Personal Data it collects about them, the purposes for which it collects and uses such Personal Data.

2. Choice

If Personal Data covered by this Data privacy framework is to be used for a new purpose that is materially different from that for which the Personal Data was originally collected. MINDSPOT will provide Data Subjects with an opportunity to choose whether to have their Personal Data used. Requests to opt-out of such uses of Personal Data should be sent to info@mindsportresearch.com

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

3. Accountability for Onward Transfer

With respect to our agents, we will transfer only the Personal Data covered by this Data privacy framework 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 Data privacy framework 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 Data privacy framework 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 Data privacy framework 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 Data privacy framework Principles, we will take reasonable and appropriate steps to stop and remediate unauthorized processing. MINDSPOT remains liable under the Data privacy framework Principles if an agent processes Personal Data covered by this Data privacy framework 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 Data privacy framework 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 Data privacy framework 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 Data privacy framework 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 Data

privacy framework Principles for as long as it retains such Personal Data.

6. Access

Data Subjects whose Personal Data is covered by this Data privacy framework 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 Data privacy framework 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: info@mindspotresearch.com

7. Recourse, Enforcement, and Liability

MINDSPOT's participation in the EU-U.S. Data privacy framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) is subject to investigation and enforcement by the Federal Trade Commission. In compliance with the Data privacy framework 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 Data privacy framework should first contact MINDSPOT at: info@mindspotresearch.com

Under certain conditions detailed in the Data privacy framework, Data Subjects may be able to invoke binding arbitration before the Data privacy framework 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 Data privacy framework Principles, and to remedy any issues arising out of failure to comply with the Data privacy framework 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 Data privacy framework participants.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, **MINDSPOT** commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to **The International Centre for Dispute Resolution-American Arbitration Association (ICDR-AAA)**, an alternative dispute resolution provider based in **the United States**. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit https://go.adr.org/dpf_irm.html for more information or to file a complaint. The services of **The International Centre for Dispute Resolution-American Arbitration Association (ICDR-AAA)** are provided at no cost to you.

8. Changes to this Data privacy framework

This Data privacy framework may be amended from time to time consistent with the requirements of the Data privacy framework. Appropriate notice regarding such amendments will be given.

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