

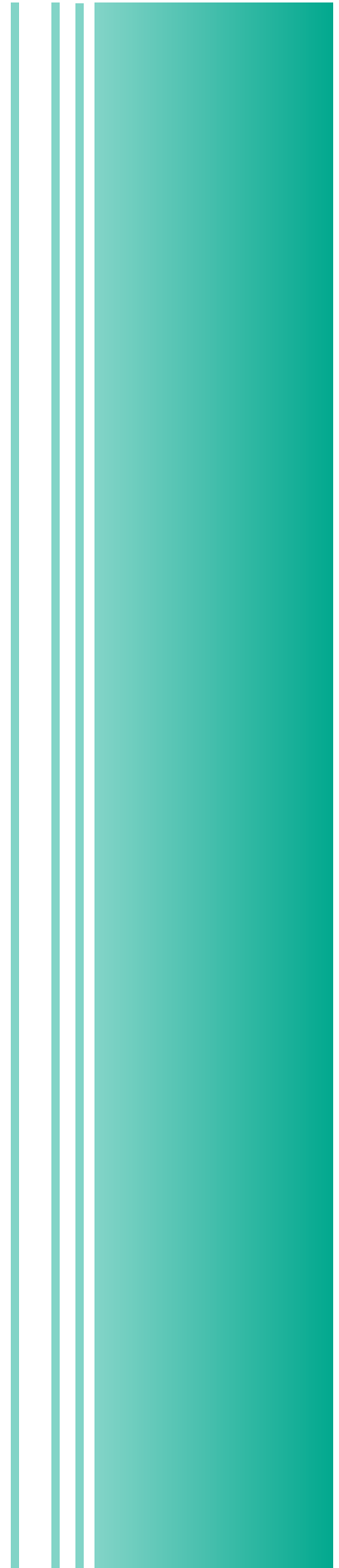


Privacy Policy – SmartLab

Version 2021-2022

Bellomy Research, Inc.
175 Sunnynoll Court
Winston Salem, NC 27106
(336) 721-1140

CONFIDENTIAL AND PROPRIETARY



Privacy Policy – SmartLab

Effective Date: November 1, 2020

Last Reviewed On: February 28, 2022

SmartLab adopts this Privacy Policy in accordance with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Privacy Policy.

SmartLab reserves the right to update this Privacy Policy at any time, please check back often for updates.

About SmartLab

SmartLab does not sell email addresses or send spam.

SmartLab is a place where people like you can connect to share experiences and discuss consumer products and shopping experiences.

SmartLab is a division of and hosted by Bellomy Research, Inc.

Information Collected/Tracked by SmartLab

SmartLab collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“Personal Information”).

Personal Information does not include:

- Publicly available information from government records;
- Deidentified or aggregated consumer information;
- Health or medical information covered by Health Insurance Portability and Accountability Act and the California Confidentiality of Medical Information Act; or
- Personal Information covered by various privacy laws, including the Fair Creditor Reporting Act, the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act, and the Driver’s Privacy Protection Act of 1994.

In particular, SmartLab has collected the following categories of Personal Information from its consumers within the past 12 months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.	NO
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

SmartLab obtains the categories of Personal Information set forth above from the following sources:

- Directly from you. For example, from forms and surveys you complete or products and services you purchase.

Use of Personal Information Obtained by SmartLab

SmartLab may use or disclose the Personal Information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information.
- To provide, support, personalize, and develop the SmartLab web site, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, incentive cash out requests and prevent transactional fraud.
- To provide you with support and respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize the SmartLab site and enhance your SmartLab experience.
- To help maintain the safety, security, and integrity of the SmartLab site, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve the SmartLab site, and our client's products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our consumers is among the assets transferred.

And:

- SmartLab will use some of the information posted on our site for content. When a contribution is posted, then that information becomes part of the Panel and may be used on other areas of the site. This is how SmartLab builds its content and allows other users to learn from the user who posted the information. This is the nature of the SmartLab site.
- User names and photos will be used by SmartLab to show new members or examples of members on various pages throughout the site.
- Profile information, including first name and photos, are displayed to people belonging to the Panel.
- Panel members can communicate with each other through our messaging service, without disclosing email addresses.
- We may also use a user's email address to send periodic newsletters or information about changes or updates to the SmartLab site.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you with notice.

Sharing of the Personal Information We Collect/Track

SmartLab does not sell, rent, share, trade or give away any of your Personal Information unless required by law or for the protection of your membership.

However, SmartLab may share profile information and aggregate usage information in a non-personally identifiable manner with third parties. Additionally, when we disclose Personal Information for a business purpose, we enter into a contract that describes the purpose and requires the recipient both keep that Personal Information confidential and not use it for any purpose except performing the contract.

We share your Personal Information with the following categories of third parties:

- Clients, to the extent necessary to fulfill our business purpose as a service provider.
- Service providers to execute research study surveys and distribute incentive rewards.

In the preceding 12 months, SmartLab has disclosed the following categories of Personal Information for a business purpose:

- Category A: Identifiers.
- Category K: Inferences drawn from other personal information.

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Service providers.
- Clients may receive inferences drawn from survey responses

In the preceding 12 months, SmartLab has not sold personal information.

Your Rights and Decisions Under the CCPA

Access to Specific Information and Data Portability Rights

You have the right to request that SmartLab disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request).
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - Sales, identifying the Personal Information categories that each category of recipient purchased; and
 - Disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law

5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code Section 1546 et. seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights above, please submit a verifiable consumer request to us by either:

- Calling us at 800.443.7344; or
- Emailing us at privacy@bellomy.com

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, complete the form located here ([link](#)) and submit it to Privacy @bellomy.com.

You may only make a verifiable consumer request for access or data portability two times within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative, which may include:
 - Name first, middle initial, last
 - Street address
 - City, state, zip
 - Phone area code, number, extension
 - Email address
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to Personal Information associated with that specific account.

We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will attempt to respond to verifiable consumer requests within 45 days of our receipt of such requests. If we require more time, we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

California consumers have the right to direct companies that are subject to the CCPA to not sell your Personal Information at any time if those companies sell Personal Information (the "right to opt-out"). However, we do not sell Personal Information.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you with a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA. Any CCPA-permitted financial incentive we offer will reasonably relate to your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time. You will have an opportunity to review any incentive terms prior to opting into participation.

Links

This site may contain links to other web sites. Please be aware that SmartLab is not responsible for the privacy practices of other web sites, including advertising or ecommerce partners. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every web site that collects personal information. This privacy statement applies solely to information collected by this web site.

Use of Cookies

Cookies are pieces of data stored on the user's computer tied to information about the user. We use session ID cookies and persistent cookies. For the session ID cookie, once users close the browser, the cookie simply terminates. A persistent cookie is a text file stored on the user's hard drive for an extended period of time. Persistent cookies can be removed by following Internet browser help file directions. Cookies are used to manage sessions on our site. Users must enable cookies to use our site. Also, users may optionally use a cookie to remember their password in order to automatically log in to our site. We do not and will not use cookies to collect private information from any user which they did not intentionally submit to us. It is the user's choice to enable cookies on their browser.

Correcting/Updating or Removing Information

SmartLab users can modify any of their Personal Information at any time by logging into their account and accessing features such as Edit Profile. If you need help with your password or cannot access your profile for editing please contact SmartLab@bellomyonline.com for help.

Changes in Our Privacy Policy

If we change our privacy policy, we will post the changes here on our web site for our users. **Your continued use of our web site following the posting of changes constitutes your acceptance of such changes.** If we use personally identifiable information in a manner different from that stated at the time of collection we will notify users via email or by placing a prominent notice on our site. If at any time a user wants more information on the Privacy Policy or how their information is being used they can contact SmartLab@bellomyonline.com.

Conversations, Forums, Comments and Chat Rooms

Always use caution when posting on the forums or other areas of our site and other sites. Please keep in mind that whenever you voluntarily disclose Personal Information online for example on forums, through conversations, or in chat areas—this information will be seen and possibly used by others. Be careful about where you post information that is personal or sensitive in nature.

Security

Your SmartLab account is password-protected. This web site takes every precaution to protect our users' information and treats this very seriously. We use industry standard measures to protect your information that is stored within our database. We limit the access to your information to those employees who need access to perform their job function such as our customer service personnel or database update maintenance. If you have any questions about the security at our website, please email us at SmartLab@bellomyonline.com.

Opting-out

Users who no longer wish to participate in the SmartLab Panel can opt-out by sending an email to SmartLab@bellomyonline.com with the word “Unsubscribe” in the subject line.

Contacting SmartLab

If you have any questions or comments about this Privacy Policy, the practices of SmartLab, your dealings with this web site, your rights and decisions under the CCPA, or if you have any other feedback, please feel free to contact us at:

- Email: SmartLab@bellomyonline.com
- Phone: 800.443.7344
- Postal Address: 175 Sunnynoll Court Winston-Salem, NC 27106