

SmartLab Privacy Notice

Effective Date: November 1, 2020

Last Reviewed On: December 1, 2025

SmartLab adopts this Privacy Notice (“Notice”) in accordance with applicable data protection laws. This Notice applies to consumers visiting SmartLab at www.SmartLabpanel.com (the “**Site**”), any other online service that posts a link to this Notice, and personal information otherwise collected from you by SmartLab. This Notice will provide you with information regarding how we collect, use, and disclose information about you, including the choices we offer with respect to that information. This Notice also serves as our notice at collection under applicable State Law.

This Notice incorporates the requirements and definitions of the California Consumer Privacy Act, as amended by the California Privacy Rights Act (“**CPRA**”) (together, the “**CCPA**”), Chapter 603A of the Nevada Revised Statutes, the Virginia Consumer Data Protection Act, the Colorado Privacy Act, the Connecticut Personal Data Privacy and Online Monitoring Act, the Utah Consumer Privacy Act, and all laws and regulations implementing, supplementing, or amending them (“**State Law**”).

Not Applicable to Workforce: This Notice does not apply to our job applicants, current employees, former employees, or independent contractors (“**Workforce Members**”). For information on our privacy practices for Workforce Members, see our [Workforce Privacy Notice](#).

This is a pdf document and can be printed.

1. About SmartLab

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. (“**Bellomy**”), and can be found at www.SmartLabpanel.com (the “**Site**”).

2. Personal Information Collection and Disclosure

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 Credit Reporting Act, the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act, and the Driver’s Privacy Protection Act of 1994.

The description of our data practices in this Notice covers the 12 months prior to the date this Notice was

last updated (“**Reporting Period**”) and will be updated at least annually. Our data practices may differ between updates; however, if they are materially different from this Notice, we will provide supplemental pre-collection notice of the current practices. Otherwise, this Notice serves as our notice at collection. In particular, SmartLab has collected and/or disclosed the following categories of Personal Information from its consumers within the Reporting Period:

Category of Personal Information	Examples of Personal Information Collected	Categories of Recipients & Disclosure Purposes
Contact Information	Name, email address, phone number, mailing address	<ul style="list-style-type: none"> • Service Providers: panel management, email delivery, incentive fulfillment • Clients: <i>only with explicit consent</i> (e.g., follow-up interviews) • Purpose: account administration, study invitations, incentive delivery
Demographic Information	Age, gender, race/ethnicity, education, income range, household composition	<ul style="list-style-type: none"> • Clients: provided only in aggregated or de-identified form for research insights • Service Providers: data hosting, analytics • Purpose: ensure representative samples and accurate analysis
Survey Responses & Research Data	Opinions, behaviors, preferences, feedback, open-ended text, files (e.g., video, images) uploaded as part of a study	<ul style="list-style-type: none"> • Clients: research results in de-identified or aggregated form • Service Providers: survey platforms, analytics tools • Purpose: support research studies, generate insights
Account & Panel Information	Username, password (hashed/encrypted), communication preferences, incentive history, participation records	<ul style="list-style-type: none"> • Service Providers: panel management platforms, secure hosting • Purpose: authenticate users, prevent fraud, manage participation and incentives
Sensitive Personal Information (With Consent)	Health-related responses, demographic attributes (e.g., race/ethnicity), or other sensitive data provided voluntarily	<ul style="list-style-type: none"> • Clients: de-identified or aggregated results unless explicit consent is provided for identity disclosure • Service Providers: secure processing and storage • Purpose: support studies that require sensitive attributes, ensure lawful processing
Technical & Device Information	IP address, browser type, device identifiers, approximate geolocation, cookie/session data	<ul style="list-style-type: none"> • Service Providers: hosting, fraud detection, quality assurance • Purpose: secure the platform, detect bots or duplicate accounts, improve functionality
Usage & Interaction Data	Pages visited, survey completion behavior, time spent, click paths	<ul style="list-style-type: none"> • Service Providers: analytics, fraud prevention • Purpose: improve site performance, validate response quality, detect fraudulent activity
Incentive & Payment Information	Gift card email address, tax/reward eligibility data (if applicable)	<ul style="list-style-type: none"> • Service Providers: incentive fulfillment vendors • Clients: <i>only if required for incentive processing and with participant consent</i> • Purpose: deliver incentives, verify eligibility, comply with tax or accounting requirements
Legal or Security-Related Information	Information related to fraud prevention, duplicate accounts, misuse, or security logs	<ul style="list-style-type: none"> • Service Providers: security and monitoring vendors • Legal Authorities: where required by law • Purpose: prevent fraud, protect the panel, comply with legal obligations

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.
- **From other consumers.** For example, other members of your household may provide us information about you or other users may refer us to you.
- **Automatically.** For example, from cookies and other technologies.

Information Submitted to SmartLab

SmartLab collects account information submitted by its users, including Personal Information, such as name and email address, to identify users and send notifications related to the use of the Site. SmartLab also collects user-submitted Personal Information, such as gender, age, activities, location, etc., and any other information you voluntarily provide in response to questions.

We may collect Personal Information about other members of your household, if you voluntarily provide it. This information may include, but is not limited to, the age and gender of the other household members. We use this information to determine if certain activities are relevant to you based on the composition of your household.

We may offer you the opportunity to refer-a-friend, which allows you to invite one or more friends to join SmartLab. This process will ask you to provide an email address for the individuals you wish to refer. An email message with a registration link may be sent to the referee from SmartLab on your behalf. Emails submitted via refer-a-friend opportunities will be used only by Bellomy for research invitations. Referrer's first name and/or SmartLab username may be disclosed to their referees, but no additional information will be shared. By providing third-party Personal Information to us, you represent and warrant that you are authorized to disclose such Personal Information.

We do not collect Personal Information from individuals under 13 years of age without verifiable parental consent by a parent or guardian.

Sale or Sharing by SmartLab

SmartLab does not sell, rent, share, trade, or give away any of your Personal Information except as set forth herein 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, as described in the chart above.

During the Reporting Period, SmartLab has not sold Personal Information for monetary value. Under the various State Laws that may be applicable to you, there are broad and differing concepts of "selling" Personal Information for which an opt-out is required. California also has an opt-out from "sharing" for cross-context behavioral advertising (use of Personal Information from different businesses or services to target advertisements). You may also opt out of "targeted advertising" (defined differently but also addressing tracking, profiling, and targeting of advertisements). As a result, we may "sell" or "share" your Personal Information, as these terms apply under the CCPA. During the Reporting Period, SmartLab did not "sell" or "share" Personal Information as those terms are defined under the CCPA/CPRA. SmartLab

does not use Personal Information for cross-context behavioral advertising.

We do not have actual knowledge that we sell or share the Personal Information of individuals under 16 years of age.

If we desire to share your Personal Information with any other parties, we will obtain your express consent to such disclosure.

3. Use of Personal Information Obtained by SmartLab

We use the Personal Information we collect for various purposes. One of the primary purposes for which we collect your Personal Information is to conduct research through your participation in SmartLab. We may also use your Personal Information to send you email communications, to administer the Site, products, services, sweepstakes, contests, and similar promotions, to invite you to participate in research activities, and to obtain your insight for Bellomy, its parents, subsidiaries, and affiliates and their products and services. We may also use your Personal Information as otherwise permitted by law.

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

- To fulfill the reason you provided the information. For example, reporting your survey responses.
- To provide, support, personalize, and develop the 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 Site and enhance your SmartLab experience.
- To help maintain the safety, security, and integrity of the Site, products and services, databases and other technology assets, and business.
- For general administration of our Site.
- For testing, research, analysis, and product development, including to develop and improve the 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.

If you are a member of a particular SmartLab research panel ("**SmartLab Panel**"), SmartLab may use or disclose the Personal Information we collect for one or more of the following purposes:

- SmartLab will use some of the information, including Personal Information, posted on our Site for content. When a contribution is posted, that information becomes part of the SmartLab 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 Site.
- Username and optional profile picture will be used by SmartLab to show new members or examples of members on various pages throughout the Site. Profile information as well as

username and optional profile picture are displayed to members of SmartLab.

- Profile information, including first name and photos, are displayed to people belonging to the SmartLab Panel.
- We may also use a user’s email address to send periodic information about changes or updates to the SmartLab Site or, where you opt-in, to send periodic newsletters, blogs, or other promotional emails. You can opt out of promotional emails at any time by clicking “unsubscribe” at the bottom of any such email. SmartLab does not send spam.

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. You will have a choice as to whether or not we use your Personal Information in this different manner. However, if you have opted out of all communication with the SmartLab Panel, or deleted/deactivated your account, then you will not be contacted, nor will your Personal Information be used in this new manner.

4. Personal Information of Children

The SmartLab Panel is designed to appeal to a broad audience but is directed at persons aged 18 years of age or older. If you believe that your child under the age of 13 has provided Personal Information via the SmartLab Panel, please contact us at privacy@bellomy.com and we will delete any such Personal Information of the minor.

5. Your State Data Privacy Rights

If you are a resident of California, Colorado, Connecticut, Nevada, Utah, or Virginia, you may have certain rights under the applicable State Law, including the following:

<p>Right to Know and Request Disclosure (<i>California Residents Only</i>)</p>	<p>The right to request that we disclose certain information to you about our collection and use of your Personal Information, including:</p> <ul style="list-style-type: none">• The categories of Personal Information we collected about you;• The categories of sources from which your Personal Information is collected;• Our business or commercial purpose for collecting or selling your Personal Information;• The categories of third parties to whom we disclose your Personal Information; and• The specific pieces of Personal Information we collected about you. <p>In connection with any Personal Information we may sell, share, or otherwise disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none">• The categories of Personal Information about you that we sold or shared and the categories of third parties to whom the Personal Information was sold or shared; and• The categories of Personal Information we disclosed about you and the categories of third parties to whom the Personal Information was disclosed. <p>We are not required to:</p> <ul style="list-style-type: none">• Retain any Personal Information that was collected for a single one-time transaction if, in the ordinary course of business, that Personal Information is not retained.• Re-identify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered Personal Information; or• Provide the Personal information to you more than twice in a 12-month
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	period.
Right to Confirm	The right to confirm whether or not we are processing your Personal Information.
Right to Access	<p>The right to access your Personal Information, subject to exceptions set out in the applicable State Law. Examples of such exceptions include:</p> <ul style="list-style-type: none"> • Information that is aggregated or de-identified; • Information that is part of a formal dispute resolution process; • Information that is about another individual that would reveal their Personal Information or confidential commercial function; and • Information that is prohibitively expensive to provide.
Right to Delete	<p>The right to request that we delete any of your Personal Information that we collected from or about you and retained, subject to certain exceptions. Upon receipt of a verifiable request from you, we will delete, and direct third parties to whom we have disclosed your Personal Information to delete, your Personal Information from our records, subject to exceptions allowable under the applicable State Law. Such exceptions include:</p> <ul style="list-style-type: none"> • Notification of third parties to delete is impossible or involves disproportionate effort; • Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities; • Debug products to identify and repair errors that impair existing intended functionality; • Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us • Comply with an existing legal obligation; or • Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.
Right to Correct	The right to request that we correct any of your Personal Information that is inaccurate. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate Personal Information.
Right to Obtain a Copy	The right to obtain a copy of the Personal Information that you have provided to us in a portable, readily usable format that can be easily transferred to third parties.
Right to Opt Out	<p>The right to opt out of the following uses of your Personal Information:</p> <ul style="list-style-type: none"> • Sale; • Sharing for targeted behavioral advertising; and • Profiling. <p>We will act upon requests to opt out no later than 15 days from the date we receive the request. We may deny your request to opt out if we have a good-faith, reasonable, and documented belief that the request is fraudulent or for any other reason allowable under the applicable State Law. Once you exercise your right to opt out, we will wait at least 12 months before asking you to reauthorize Personal Information sales if permitted by the applicable State Law. However, you may change your mind and opt back in at any time.</p> <p>Please note that we do not sell your Personal Information.</p> <p>Nevada residents may also submit verified requests to opt out of the sale of covered information under Nevada Revised Statutes Chapter 603A.</p>
Right to Limit the Use of Sensitive Personal Information	The right to (a) direct us to limit the use of Sensitive Personal Information that we may collect about you as described above in "Personal Information Collection and Disclosure," and (b) to know if your Sensitive Personal Information is used or disclosed to a third party, for additional, specified purposes. The right to limit allows

	<p>the limitation of the use of Sensitive Personal Information only for purposes necessary to:</p> <ul style="list-style-type: none"> • Perform the requested services or provide the requested goods; • Help ensure the security and integrity of the use of your Personal Information; • Perform services on behalf of our business, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders, payments, or returns, or verifying customer information; and • Undertaking activities to verify the quality of, maintain, and/or improve our services or systems.
Right to Non-Discrimination	<p>The right to not be retaliated or discriminated against because you have exercised your data privacy rights. This means that we cannot, among other things:</p> <ul style="list-style-type: none"> • Deny goods or services to you; • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; • Provide a different level or quality of goods or services to you; or • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>We may, however, charge a different price or rate or provide a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to our business by your Personal Information. We may also offer loyalty, rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection, sale, or retention of Personal Information. Any permitted financial incentive we offer will 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. For more information on financial incentives, see "Notice of Financial Incentive" below</p>

6. Exercising Your State Data Privacy Rights

To exercise the rights set forth above, email us at privacy@bellomy.com or contact us via telephone at 800.443.7344. We may request specific information from you to help us confirm your identity and rights, and to comply with your request. Any Personal Information we collect from you to verify your identity in connection with a request will be used solely for the purposes of verification. To verify a request, we will need you to provide:

- Enough information to identify you, which may include name, address, telephone number, and/or email address;
- Proof of your identity and address;
- A description of what right you want to exercise and the information to which your request related; and
- If your request is submitted on your behalf by an authorized representative, you will need to provide proof of the representative's authority to act on your behalf in a writing signed by you.

If we are unable to verify your request, we may deny the request or ask for additional information that is reasonably necessary to authenticate your identity in connection with the request.

The applicable State Law may allow or require us to refuse to provide you with access to some or all of the Personal Information that we hold about you, or we may have destroyed, erased, or made your Personal Information anonymous in accordance with our record retention obligations and practices. If we

cannot provide you with access to your Personal Information, we will inform you of the reasons why, subject to any legal or regulatory restrictions. For California residents, we will provide access to your Personal Information, subject to exceptions set out in the CCPA, such as information that is aggregated or de-identified.

Depending on your state of residence, you may be limited in the number of requests you are able to make within a 12-month period.

We will confirm receipt of your request within 10 calendar days and provide a substantive response within 45 calendar days. If we require more time we will inform you of the reason and extension period permitted under the applicable State Law. If we cannot fulfill your request, we will provide you an explanation for it. If you have an account with us, we will deliver the written notice or explanation to that account. If you do not have an account with us, we will deliver by mail or electronically, at your option.

Depending on your state of residence, you may have a right to appeal our refusal to take action in response to your request. If you have the right to appeal and would like to exercise that right, email us at privacy@bellomy.com or contact us via telephone at 800.443.7344. We will notify you of any action taken or not taken in response to the appeal, along with a written explanation, within 45 calendar days. If we deny your appeal, we will provide an online mechanism by which you can contact your state Attorney General or enforcement agency to submit a complaint.

7. Notice of Financial Incentive

We are providing you with this Notice of Financial Incentive to explain the material terms of financial incentives, as defined by the CCPA, we are offering, so that you may make an informed decision on whether to participate.

We may offer points, discounts, sweepstake entries, and similar incentives in exchange for your participation in surveys conducted through SmartLab. The points may be redeemed for gift cards and cash. This means we provide you with redeemable points, discounts, sweepstake entries, and similar incentives in exchange for your opinions on brands, products, and shopping experiences. These incentives are reasonably related to the value of your Personal Information that you are providing to us. Our good faith estimate of the value of your Personal Information is the value of the points, discounts, sweepstake entries, and similar incentives offered to you. You may withdraw from a financial incentive program at any time without penalty.

8. Retention

We will retain the Personal Information we collect for as long as necessary to fulfill the purposes for which we collected it, or as long as is necessary to comply with our legal obligations, resolve disputes, and enforce our agreements, whichever is longer. If you wish to request that we no longer use your Personal Information, please email us at privacy@bellomy.com or contact us via telephone at 800.443.7344.

9. Links

The Site may contain links to other websites. Please be aware that SmartLab is not responsible for the privacy practices of other websites, including advertising or ecommerce partners. We encourage our users to be aware when they leave our Site and to read the privacy notices of each and every website that collects Personal Information.

10. Technology

Digital Fingerprints

We may use digital fingerprinting technology, also known as “Machine Identification” digital fingerprints, to gather certain information about your computer hardware and software, for example, your IP address, the display settings of your monitor, the type of browser you are using, the type of operating system you are using, etc. We use this information to create a digital “fingerprint.” The data collected in this process and the digital fingerprint created is not tied to any other Personal Information, is stored on secured servers, and is used only to help prevent you from completing the same survey multiple times and for no other purpose.

Log Files

As is true of most websites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and click stream data.

The information in this digital fingerprint, which does not identify individual users, is used to analyze trends, to administer the Site, to track your movements around the Site and to gather demographic information about our user base as a whole.

We do not link this automatically collected data to any other Personal Information, including your email address.

JavaScript

In order to take part in a SmartLab Panel, you understand that you must have JavaScript enabled on your computer. Some of the features in the Community are programmed using JavaScript, and you must have this enabled in order to complete the surveys and participate in the Community.

11. Changes in Our Privacy Notice

We reserve the right to modify or amend this Notice at any time to reflect changes in our Personal Information practices or applicable State Law. Should it be necessary to do so, we will notify you and/or request your express consent, if required, of any material change to this Notice by posting such changes on the Site or by other acceptable means. Each version of the Notice is identified at this notice by its Last Updated date. **Your continued use of this Site following the posting of changes constitutes your acceptance of such changes, unless additional consent is required under applicable State Law.** If you do not agree to the terms of this Notice, please do not use the Site or provide us your Personal Information.

If at any time a user wants more information on this Notice or our Personal Information practices, they can contact privacy@bellomy.com.

12. 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, such as in forums or chat rooms, it will be seen and possibly used by others. Be careful about where you post information that is personal or sensitive in nature.

13. Security

Your SmartLab account is password-protected. This Site takes every precaution to protect our users' Personal Information and treats this very seriously. We use industry standard measures to protect your Personal Information that is stored within our database. We have implemented physical, procedural, and technological security safeguards to protect your Personal Information, including email address, from loss or theft, unauthorized access, disclosure, copying, use or modification.

We limit the access to Personal Information to those employees who need access to perform their job function such as our customer service personnel or database update maintenance. We limit the Personal Information we provide to outside companies to Personal Information we believe is appropriate to enable them to carry out their responsibilities under our contracts. We contractually require that they have information security safeguards, and that the Personal Information provided be used only for the specifically authorized purpose. If you have any questions about the security at our Site, please email us at privacy@bellomy.com.

If you suspect your account may have been compromised, please notify us immediately at privacy@bellomy.com or 800.443.7344.

14. SmartLab Panel Participation

Users who no longer wish to participate in the SmartLab Panel can opt-out by sending an email to moderator@smartlabpanel.com with the word "Unsubscribe" in the subject line or by clicking the opt-out link on any email provided by SmartLab Panel.

15. Testimonial Privacy

If you are chosen as a winner in one of our sweepstakes or judged contests, you may be given the option to provide a testimonial which we may post on the SmartLab Site or include in an email communication to members of SmartLab. Your testimonial, username, and an electronic picture of yourself, if you provide one, will only be included in the newsletter or communication if you provide us with consent. You can request to have your testimonial and Personal Information removed from the Homepage or future email communication by sending an email to privacy@bellomy.com.

16. Not Intended for Use Outside of the U.S.

Our Site is intended for use within the United States, and is not intended to be used in any other territory. The Site may function in countries other than the United States. If you use our Site from outside the United States, you explicitly accept that your Personal Information may be transferred to, stored, and processed in the United States where laws regarding processing of Personal Information may differ from the laws of other countries.

17. Consumers with Disabilities

To request this Notice in an alternative format, please reach out to us at privacy@bellomy.com or via telephone at 800.443.7344.

18. Contacting SmartLab

If you have any questions or comments about this Privacy Notice, the practices of SmartLab, your dealings with this Site, your rights and decisions under an applicable State Law, or if you have any other feedback, please feel free to email us at privacy@bellomy.com, contact us via telephone at 800.443.7344, or contact us via the following postal address:

Bellomy Research, Inc.
Attn: Privacy
175 Sunnynoll Court
Winston-Salem, NC 27106