

## **Kantar Shopcom Privacy Policy**

This Privacy Policy contains information about how Kantar Shopcom, a WPP Group company and its affiliates (collectively, "Kantar Shopcom" or "We") process and use data and information relating to people who use Shopcom.com (the "Site"). It covers only data collected through the Site and not any other data (such as data collected through webpages to which the Site links or information that We acquire from third parties or that We collect offline).

This Privacy Policy is intended to comply with US-EU Safe Harbor Privacy Principles promulgated by the U.S. Department of Commerce (the "EU Safe Harbor"). For more information about the EU Safe Harbor, please visit the Department's website.

### **1. What We Collect**

Through the Site, we receive data that you and other users actively submit as well as information that We receive from other sources that we track:

*Actively Submitted Data – Information that You Give Us:* When you request information, subscribe to a mailing list or for a service, respond to an online survey or otherwise actively send us data, we usually collect data such as your name, e-mail address(es), mailing address(es), telephone number(s), and certain information related to the business you represent such as number of employees and industry type. You can opt out of providing such information by not entering it when asked and, if such information is required in order to allow us to respond to your inquiry, you will receive a notice advising you of this. In each such instance, you will know what data we collect through the Site, because you actively submit it.

*Passively Tracked Data – Information that We Get from Your Use of Our Services:* When you visit the Site, we also passively track information on your computer and Internet connection, such as the IP address of your computer and/or Internet service provider, the date and time you access the Site, the Internet address of websites from which you link to our Site, the computer technology you are using and your movements and preferences on our Site. We use technology that many other websites employ, including, without limitation, "cookies" or small data files stored on your computer's hard drive, to collect such information. In some instances, we also use cookies to collect information in connection with future visits from that website, to recognize you as a previous visitor, or to track your activity on our Site. If you follow a link to the Site from an affiliate or promotion, we store information about your arrival from that affiliate or promotion in a session cookie. You do not need to have cookies turned on to visit our Site. You can refuse cookies by turning them off on your browser. But, if you want to access webpages that require registration, you need to accept a mandatory session cookie, which you can delete after you leave the Site.

*Combinations:* Unless you also actively submit personal information such as your name or address, passively tracked data does not typically allow us to identify you personally (even

though it can theoretically be done, we do not have the means or an interest to find out who you are, unless you identify yourself voluntarily through an active submission of data). To the extent permitted by applicable law, we reserve the right to combine passively tracked data with personal data that you actively submit.

## **2. How We Use Data and Information that We Collect**

We collect *passively tracked data* primarily for purposes of administering, protecting and improving our Site and our systems, to better understand the preferences of our Site visitors, to identify server problems, to compile aggregated statistics about site usage, and to help personalize your experience on our Site. We collect *actively submitted data* primarily for two purposes: Firstly, for the purpose for which you originally sent us the data (e.g., to provide information to you or sign you up for a free trial); and secondly, for purposes of contacting you to further discuss your interest in our company, the services We provide and ways We can improve them to provide information on services, promotions and events. You can opt out of receiving marketing emails as set forth in Section 4 below.

## **3. What We Disclose to Third Parties**

We reserve the right to disclose data that does not personally identify you without your consent. We also reserve the right to disclose data that personally identifies you without your consent under the following circumstances: (a) the disclosure is required by law or mandatory professional standards; (b) the disclosure is reasonably related to the sale or other disposition of all or part of our business; (c) the information in question is publicly available; (d) the disclosure is reasonably necessary for the establishment of legal claims; or (e) the disclosure is to a Kantar Shopcom affiliate or to persons or entities providing services on our behalf (each, a "Transferee") where the Transferee (i) is subject to legal requirements providing an adequate level of privacy protection (ii) has agreed in writing to provide an adequate level of privacy protection or (iii) subscribes to the principles embodied in the EU Safe Harbor.

In all other instances, we will notify you and give you the opportunity to opt-out as set forth in Section 4 below.

## **4. Your Right to Opt-Out**

Whenever you have the right to opt-out as set forth in this Privacy Policy, you may do so by contacting Meredith Earley, Executive Assistant at Kantar Shopcom at 203.834.4730. Please note that our affiliates and other data recipients have their own data privacy policies, which may differ from ours and you would have to contact them separately with respect to opt-out requests.

## **5. Access**

If you wish to review your personal data, you may contact Meredith Earley, Executive Assistant at Kantar Shopcom at 203.834.4730. In general, we will honor such requests, but we reserve

the right to deny such request under the circumstances set forth in "FAQ 8: Access" as issued by the U.S. Department of Commerce ("FAQ 8"). We also reserve the right to charge a fee, provided it is not excessive.

Once you have access to your personal data, you may amend or delete any information that is inaccurate; provided, however, that We reserve the right to prohibit changes under the circumstances described in FAQ 8.

## **6. Security**

Transmissions of data or information over the Internet are never 100% secure or error-free. However, we take reasonable steps to protect your personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

## **7. Enforcement**

*How Can You Contact Us?* If you have questions or concerns regarding this Privacy Policy, you should first contact us by email at [Shopcom@Kantar.com](mailto:Shopcom@Kantar.com). You can also write to Kantar Shopcom at 372 Danbury Rd, Suite 100, Wilton, CT 94403 Attention: Meredith Earley. Kantar Shopcom will respond to questions and concerns within 30 days of receiving them.

*Cooperation with European Data Protection Authorities.* With respect to any dispute involving personal data originating in the European Union that cannot be resolved through our internal processes, We will cooperate with competent European Data Protection Authorities and comply with the advice of such authorities. In the event that We or such authorities determine that We did not comply with this policy, We will take appropriate steps to address any adverse effects and to promote future compliance.

## **8. Effective Date; Amendments**

This Privacy Policy is effective as of March 1, 2012. We reserve the right to change, modify, add or remove portions of this Policy from time-to-time and in our sole discretion, but will alert you that changes have been made by indicating on the Policy the date it was last updated. When you visit the Site, you are accepting the current version of this Policy as posted on the Site at that time. We recommend that users revisit this Policy on occasion to learn of any changes.