

EFFECTIVE: October 28th, 2020

# Privacy Statement

## 1. Introduction

This Privacy Statement applies to all the products, services, websites and apps offered by Eighty Twenty One Inc. and their affiliates (collectively “Polaris I/O”) except where otherwise noted. We refer to those products, services, websites and apps collectively as the “services” in this policy. Unless otherwise noted in your contract, our services are provided by Polaris I/O.

References to "data" in this Privacy Statement will refer to whatever data you use our services to collect, whether it be survey responses, data collected in a form, or data inserted on a site hosted by us – it's all your data! Reference to personal information or just information, means information about you personally that we collect or for which we act as custodian.

## 2. Information we collect

### 2.1 Who are “you”?

We refer to “you” a lot in this Privacy Statement. To better understand what information is most relevant to you, see the following useful definitions.

- **Clients** - You hold an account within a Polaris I/O service and you either directly create surveys, forms, applications, or questionnaires or you are collaborating on, commenting on, or reviewing surveys, forms, applications, or questionnaires within an account.
- **Respondents** - You have received a survey, form, application, or questionnaire powered by a Polaris I/O service.
- **Visitor** - You are just visiting one of our websites because you are Curious or you have heard about us from our marketing and sales channels!

### 2.2 Information we collect about you.

- Contact Information (for example name or email address).  
You might provide us with your contact information, whether through use of our services, a form on our website, an interaction with our sales or customer support team, or a response to one of Polaris I/O's own surveys.
- Usage information.  
We collect usage information about you whenever you interact with our websites and

services. This includes which webpages you visit, what you click on, when you perform those actions, what language preference you have, what you buy and so on.

- Device and browser data.

We collect information from the device and application you use to access our services. Device data mainly means your IP address, operating system version, device type, device ID/MAC address, system and performance information, and browser type. If you are on a mobile device we also collect the UUID for that device.

- Information from page tags.

We use first party and third party cookies and tracking services that employ cookies and page tags (also known as web beacons, see our Cookie Preference) to collect data about visitors to our websites. This data includes usage and user statistics. Emails sent by Polaris I/O or by users through our services also include page tags that allow the sender to collect information about who opened those emails and clicked on links in them. We provide more information on cookies below and in our Cookies Policy.

- Log Data.

Like most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, device type and timestamps.

- Referral information.

If you arrive at a Polaris I/O website from an external source (such as a link on another website or in an email), we record information about the source that referred you to us.

- Information from third parties and integration partners.

We collect your personal information from third parties where, for example, you give permission to those third parties to share your information with us or where you have made that information publicly available online.

We may also collect:

Account Information

- Registration information.

You need a Polaris I/O account before you can use Polaris I/O services. When you register for an account, we collect your first and last name, username, password and email address. If you choose to register by using a third party account (such as your Google or Facebook account), please see “Information from third parties” below.

- Account settings.

You can set various preferences and personal details on pages like your profile settings page. For example, your default language, and communication preferences (e.g. opting in or out of receiving survey communications from Polaris I/O).

Use of some of our services will also result in us collecting the following data on your behalf:

- Profile information.  
When you register for our services you are asked to provide us with information and contact details about yourself to give us more insights into who you are.
- Survey/application data.  
We store your application/survey/response data (questions and responses) for you and provide analysis tools for the client survey owner to use with respect to this data.
- Content and Communication data.  
We store your uploaded content, comments, notifications, content response flags and other communication data for you and provide analysis tools for the client content owners to use with respect to this data.
- Address book information.  
We may allow you to import email addresses and other contact information into an address book so you can easily invite people to take your surveys or fill in your form via our collectors. We don't use this data for our own purposes or contact anyone, except at your direction.
- Commercial and Financial information  
We store your commercial and financial data for you and provide analysis tools for you to use with respect to this data. We don't use this data for our own purposes.

## 3. How we use the information we collect

### 3.1 Client

We process personal data about you either with your consent or in order to:

- Fulfill our contractual responsibility to deliver the services to you;
- To pursue Polaris I/O's legitimate interests of:
  - improving service experience; and
  - developing new products and service features.

In each of the instances where we describe how we use your data in this Privacy Statement, we have identified which of these grounds for processing we are relying upon.

You have consented to us using certain types of tracking and third party cookies on our websites. In particular:

#### 3.1.1 Cookies and Similar technology.

We or third party data and advertising platforms that we work with may use or combine multiple technologies, such as cookies, page tags, mobile identifiers and IP addresses to infer users' common identities across different services and multiple devices such as tablets, browsers, and mobile phones. We may do so, for instance, to tailor ads to users, to enable us to determine the

success of our advertising campaigns and to improve upon them. These third party data and advertising platforms may sometimes use data that we provide to them in order to improve their technologies and their ability to match common devices to users. We also may also use this technology to allow a Client to measure the performance of their email messaging and to learn how to improve email deliverability and open rates.

More details: The above data and techniques are used for personalized marketing, analytics, and related purposes. To learn more about interest-based advertising and how to opt-out of it, please see our Cookies Policy in Section 6. We use this data to personalize online marketing campaigns to be relevant to you and your interests in our services. By clearing your cookies in your browser settings you will no longer see personalized messages in this way but you continue to see ads over the internet that are not based on information you provided to Polaris I/O.

We process your personal information in the following categories of data for legitimate interests pursued by us, which are described in detail in this Privacy Statement. We have undertaken to ensure that we place clear limitations on each of these uses so that your privacy is respected and only the information necessary to achieve these legitimate aims is used. Our primary goal is to improve upon and make sure our services and messaging are relevant for all our users, while also ensuring that personal information of all users is respected and protected.

### **3.1.2 Contact Information.**

We use contact information to respond to your inquiries, send you information as part of the services, and send you marketing information (for as long as you do not opt-out).

More details: We use your email address to send you marketing (newsletters), unless you indicate a preference to opt-out and for general updates on your account. You can opt out of marketing communications at any time by clicking on the “unsubscribe” link in them and changing the relevant setting on your Account page.

### **3.1.3 How you use our services.**

We use information about how you use our services to improve our services for you and all users.

More details: We collect information about the types of surveys/forms/applications you create (e.g. HR surveys), the types of plans you purchase and your account transactional behavior to build a profile about you so as to help direct you and your organization to other relevant features and services we offer and help you in using our services, for example by making recommendations for you to optimize use of our services.

### **3.1.4 Device and browser data.**

We use device data both to troubleshoot problems with our service and to make improvements to it. We also infer your geographic location based on your IP address.

More details: We collect this to help us improve your service experience through a specific device/browser by optimizing how the website looks in a particular browser, how your screen brightness affects your experience and to ensure the service operates optimally and as it should on different devices and browsers.

### 3.1.5 Log data.

We use log data for many different business purposes to include:

- To monitor abuse and troubleshoot.
- To create new services, features, content or make recommendations.
- To track behavior at the aggregate/anonymous level to identify and understand trends in the various interactions with our services.
- To fix bugs and troubleshoot product functionality.

More details: Your IP address is used to determine where an unknown/unauthorized access may have occurred in your account (abuse monitoring).

- Referral information.

We use referral information to track the success of our integrations and referral processes.

- Third parties and integrations.

We collect and use information from third parties and integration partners, where applicable to one of our services, to:

- Ensure you can sign-up to our service from a third party integration like Facebook/LinkedIn/Microsoft/Google/SSO;
- To personalize our services for you; and
- Ensure you can use our service in conjunction with other services.

See further information here: ([https://www.polarisIO.com/api\\_partners](https://www.polarisIO.com/api_partners)) on our API partners – for other Polaris I/O services see below or on the website for that service.

- Service and Marketing uses.
- Profiling. We combine information about you from third party sources with information we hold about you to create a user profile, which will help us to make our sales and marketing efforts more relevant to you and to personalize and improve your service experience.
- Machine learning. We use machine learning techniques on certain data in order to provide users with useful statistics and more relevant insights from the data they have collected using our services and to optimize our marketing campaigns and for fraud detection. For example, if you have used open text questions in a survey, our machine learning may provide you with useful insights into the trends in responses to that question in our Analyze survey tool.
- To manage our services we will also internally use your information and data, for the following limited purposes:
  - To enforce our agreements where applicable.
  - To prevent potentially illegal activities.
  - To screen for and prevent undesirable or abusive activity. For example, we have automated systems that screen content for phishing activities, spam, and fraud.

### **3.1.6 Legal uses.**

To respond to legal requests or prevent fraud, we may need to use and disclose information or data we hold about you. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

We collect and use the following on the basis that we have to use this information in order to fulfill our contract with you:

### **3.1.7 Your Account Information.**

We need to use your account information to run your account, provide you with services, bill you for our services, provide you with customer support, and contact you about your service or account. We occasionally send you communications of a transactional nature (e.g. service-related announcements, billing-related matters, changes to our services or policies, a welcome email when you first register). You cannot opt out of these communications since they are required to provide our services to you.

### **3.1.8 Your Profile.**

We process other aspects of your account information (like the personal information you provide about your job, your job title, and your marketing preferences) as well as information obtained from public sources, for legitimate interests like providing you with a personalized experience and relevant and useful marketing information as well as to make other product, feature and service recommendations to you and your organization to optimize use of the services we offer. You can object to us using your information as described above but in some cases, our ability to fully and properly provide our services to you may be impacted if you do not want us to collect or use the above data.

In relation to Survey Data

### **3.1.9 Your Data.**

We also use survey questions and responses on an aggregated and anonymized basis as described in this Privacy Statement. We will never sell individual response data or identify / contact individual respondents except on your request or where required by law. Feature descriptions will identify where this is feature linked. In some cases you can avoid the use of your questions/responses in this way by simply choosing not to use a feature or by indicating your preferences in your account. See our “Respondent” section.

## **3.2 Respondent**

We process your personal information in the following categories of data for legitimate interests pursued by us, which are described in detail in this Privacy Statement. We have undertaken to ensure that we place clear limitations on each of these uses so that your privacy is respected and only the information necessary to achieve these legitimate aims is used. Our primary goal is to improve upon and make sure our services and messaging are relevant for all our users, while also ensuring that personal information of all users is respected and protected.

### **3.2.1 Cookies (to include page tags).**

We collect information using cookies when you take a survey. These cookies are used to ensure that the full functionality of our survey service is operational, to ensure the survey operates appropriately and optimally. For more information please read our Cookie section below and our Cookies Policy. After completion of a survey, in most cases, you will be redirected to our website and treated as a website visitor where other cookies may be used so you should read our Website Visitor section if this is of interest to you.

#### Examples

We use page tags to allow the email sender (for a survey or form for example) to measure the performance of email messaging and to learn how to improve email deliverability and open rates. We also use cookies to ensure a respondent can only take a survey once (where the Client has set this function) and to track completion rates of surveys.

### **3.2.2 Contact Information.**

We only use contact information to respond to an inquiry which you, as a Respondent, submit to us.

#### Examples

Our customer support team uses your email address to communicate with you if you have contacted us about a survey, form, application or questionnaire you received, but we will not send marketing to you unless you have otherwise opted-in to marketing.

### **3.2.3 How you use our services (applicable to survey Respondents only).**

We use information about how you use our services to improve our services for you and all users.

#### Examples

We collect information about the types of questions you answer. This data will be aggregated and anonymized so we can examine patterns in terms of respondent preferences when submitting responses (see further below in Information for Survey Respondent section). We collect and use all this data for our legitimate interests like helping us improve the experience for respondents (so that questions are easier to answer), for training purposes and to understand industry trends and to help improve the completion rates on surveys/forms.

We will also use usage information such as the type of survey, form, questionnaire or application that you answered to personalize products we show you on completion of a survey when you are redirected to our website.

### **3.2.4 Device and browser data.**

We use device data both to troubleshoot problems with our service and to make improvements to it. We also infer your geographic location based on your IP address.

#### Other Examples

We collect this to ensure that service experience works well across all possible devices and to infer geographic location to produce aggregated data around Respondent location trends. We also want to use this information to provide an additional data layer to Clients so that they can filter responses by e.g. inferred geographic location. Note however, that we do not collect precise GPS coordinate location. We just infer location from IP address. Finally we will use this information to compare and look at trends on how our service operates and how you interact with surveys, on different browsers and devices.

### **3.2.5 Log data.**

We use log data for many different business purposes to include:

- To monitor abuse and troubleshoot.
- To create new services, features, content or make recommendations.
- To track behavior at the aggregate/anonymous level to identify and understand trends in the various interactions with our services.
- To fix bugs and troubleshoot product functionality.

#### Examples

Your IP address is used to ensure that you do not complete the same survey, form, application or questionnaire twice if the Client has included settings to avoid this (ballot stuffing), for abuse monitoring purposes (so we can identify a Respondent who abused the survey taking experience in a manner contrary to our usage policies or to facilitate the Client in complying with their own legal obligations). We also collect log data to collate aggregated data and metrics on activity at a non-identifying level and so that we can identify trends in survey taking over time.

### **3.2.6 Third parties and integrations.**

We will collect and use information from third parties and integration partners to facilitate Clients in sending surveys/forms/applications/questionnaires to you.

### **3.2.7 Machine learning.**

We will use machine learning techniques on response data, metadata (as described above) and cookie data, in order to provide Clients with useful and relevant insights from the data they have collected using our services, to build features, improve our services, for fraud detection and to

develop aggregated data products. You can read more about this in relation to Polaris I/O surveys below.

- To manage our services we will also internally use your information and data, for the following limited purposes:
- To enforce our agreements where applicable.
- To prevent potentially illegal activities.
- To screen for and prevent undesirable or abusive activity. For example, we have automated systems that screen content for phishing activities, spam, and fraud.

### 3.2.8 Legal uses.

To respond to legal requests or prevent fraud, we may need to disclose any information or data we hold about you. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

### 3.2.9 Use of survey responses (Polaris I/O surveys only)

In general survey responses to Polaris I/O surveys are controlled and managed by the Client (the person who sent or deployed that survey). In those instances Polaris I/O is only processing those responses on behalf of the Client.

Client and Respondent trust is paramount to everything we do and so when we do use data about Respondents, we put Clients and Respondents first. When we do analysis of response data we keep all information confidential.

Our goal is to improve the user experience across Polaris I/O survey services while maintaining the confidentiality and privacy of responses.

We go into more detail below on how Polaris I/O uses survey data. A Client has some controls over how we use responses in their Account settings and may have turned off our ability to apply machine learning to responses where it is feature linked.

Polaris I/O uses data in the ways described below, for our legitimate interests as described in this section:

The data impacted by this section includes:

- Survey type, question type and responses (at an aggregated level per your privacy permissions)
- Device data
- Log data

Polaris I/O will use automated processes and machine learning, to analyze survey responses, which in turn helps us to:

### 3.2.10 Aggregate response data and activity

We will aggregate responses, activity and behavior of Respondents so that we can identify trends, build product features that optimize responses, make product recommendations and provide guidance on which products and services work best in different scenarios. These product features also provide feedback and recommendations to increase response rates.

### 3.2.11 Extract and analyze patterns:

By understanding response data and Respondent interaction in different types of surveys we can:

- improve our services and ease of use: for example, we might identify when respondents prefer multiple choice versus open text questions and make predictive response suggestions when certain question types are selected. We might also use this data to help improve analysis of responses,
- undertake personalization for survey Clients and Respondents. If a Respondent does not want to be included in this personalization they can clear the cookies in their browser settings after taking a survey.
- improve user experience (for example, by collecting and using device and browser information from Respondents to improve how our survey service operates on those devices and in those browsers), and
- identify insightful data trends (which never identify any individuals).

## 3.3 Visitor

We process personal data about you where:

- You have consented or;
- Polaris I/O's legitimate interests of:
  - improving service experience; and
  - developing new products and service features.

In each of the instances where we describe how we use your data in this Privacy Statement, we have identified which of these grounds for processing we are relying upon.

When you have consented or we have a legitimate basis for doing so, we collect and use the following information about you:

### 3.3.1 Contact Information.

We use contact information to respond to your inquiries or send you information about our services, (either where you have agreed to this at the point of providing your information or where you operate in a business which may be interested in our services and for as long as you do not opt-out).

#### Examples

We provide your email address to a member of our sales team who will contact you if you submitted an inquiry through one of the online forms on our site. You will also receive marketing communications from us if you have consented to this at the point where you provided your information. We will always provide you with the means to opt-out of this marketing at any time.

### 3.3.2 Cookies and similar technology.

We or third party data and advertising platforms that we work with may use or combine multiple technologies, such as cookies, page tags, mobile identifiers and IP addresses to infer users' common identities across different services and multiple devices such as tablets, browsers, and mobile phones. We may do so, for instance, to tailor ads to users, to enable us to determine the success of our advertising campaigns and to improve upon them. These third party data and advertising platforms may sometimes use data that we provide to them in order to improve their technologies and their ability to match common devices to users.

#### Examples

To personalize marketing campaigns run through third party advertisers and help Polaris I/O measure online advertising success and to deliver ads for our services based on user preferences. See our cookies section. If you do not want Polaris I/O to use this information to serve you targeted ads about our services, you may indicate your preferences at [TrustArc Preference Manager](#) or, if you are located in the European Union, at [Your Online Choices | EDAA](#). You may continue to receive ads over the internet that are not based on information you provided to Polaris I/O.

As a result of the above data we collect, we also carry out the following processing for legitimate business interests pursued by us:

### 3.3.3 Profiling.

We combine information about you from third party sources with information we hold about you to create a user profile, which will help us to make our sales and marketing efforts more relevant to you and to personalize and improve our marketing/sales campaigns and website experience.

### **3.3.4 Machine learning.**

We use machine learning techniques on certain data in order to optimize our marketing campaigns.

We process your personal information in the following categories of data for legitimate interests pursued by us, which are described in detail in this Privacy Statement. We have undertaken to ensure that we place clear limitations on each of these uses so that your privacy is respected and only the information necessary to achieve these legitimate aims is used. Our primary goal is to improve upon and make sure our services and messaging are relevant for all our users, while also ensuring that personal information of all users is respected and protected.

### **3.3.5 Device data.**

We use device data both to troubleshoot problems with our service and to make improvements to it. We also infer your geographic location based on your IP address. Some examples relevant to you:

#### Examples

We collect device and browser information from you to troubleshoot website functionality issues and to fix bugs.

### **3.3.6 How you use our services.**

We use information about how you have interacted with our websites to improve our website services for you and all users. Some examples relevant to you:

#### Examples

We collect information about the webpages you have visited and your activity on our sites at an aggregate level. We collect this information so that we can track the most visited and most useful parts of our website to identify what are our most popular services.

### **3.3.7 Log data.**

We use log data for many different business purposes to include:

- To monitor abuse and troubleshoot.
- To track your preferences and create new services, features, content or make recommendations personalized for you.
- To track behavior at the aggregate/anonymous level to identify and understand trends in the various interactions with our services.
- To fix bugs and troubleshoot product functionality.

## Examples

Your browser type to determine how we can present our website best within that browser environment.

### **3.3.8 Referral information.**

We use referral information to track the success of our integrations and referral processes.

## Examples

If you clicked on an advertisement for Polaris I/O, presented by one of our partners on the web, which brought you to one of our websites, we will record this information to help us track the success of advertising campaigns

- To manage our services we will also internally use your information and data, for the following limited purposes:
- To enforce our agreements where applicable.
- To prevent potentially illegal activities.
- To screen for and prevent undesirable or abusive activity. For example, we have automated systems that screen content for phishing activities, spam, and fraud.

### **3.3.9 Legal uses.**

To respond to legal requests or prevent fraud, we may need to disclose any information or data we hold about you. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

In some cases, as a former website visitor, we may not have any personal information about you (for example if you have not interacted with our site or have cleared your cookies).

## **4. Information you share**

Many of our services let you share information with others. Remember that when you share information publicly, it can be indexable by search engines. Our services provide you with different options on sharing and deleting your content but we cannot delete content from search engines so you need to be careful about information you make public.

## **5. Information we share**

We do not share your information or data with third parties outside Polaris I/O except in the following limited circumstances:

- If you are a Client that is part of a team plan or Enterprise plan using Polaris I/O, your account information and data will be shared with the primary administrator(s) and your

survey data may also be visible to other members in your team with whom you share your surveys or with whom you collaborate. Your administrator(s) will be able to view your account data, change your passwords, suspend, transfer or terminate your account or restrict your settings. Please refer to your organization's internal policies if you have questions about this.

- If your organization has purchased an Enterprise account and you are using an email address on a domain owned by your employer or organization linked to your individual account, you may be asked to migrate to the Enterprise Account and your email address, name and account data will subsequently be visible to the primary administrator for that account once you have been migrated. You may be notified in advance of this migration and given an opportunity to change the email address linked to your account if you are not using your account for business purposes.
- To help us provide certain aspects of our services we use our affiliates and trusted key partners – in particular, we engage third parties to:
  - facilitate our email collectors for sending surveys by email to Respondents.
  - facilitate customers in making payments.
  - deliver and help us track our marketing and advertising content.
  - help us track website conversion success metrics.
  - manage our sales and customer support services to you.

We enter into confidentiality and data processing terms with partners to ensure they comply with high levels of confidentiality and best practice in privacy and security standards and we regularly review these standards and practices.

- On your instructions, we share your information or data if you choose to use an integration in conjunction with Polaris I/O services, to the extent necessary to facilitate that use. See further information here: ([https://www.polarisIO.com/api\\_partners](https://www.polarisIO.com/api_partners)) on our API partners
- We also may have to share information or data in order to:
  - meet any applicable law, regulation, legal process or enforceable governmental request.
  - enforce applicable policies, including investigation of potential violations.
  - detect, prevent, or otherwise address fraud, security or technical issues.
  - protect against harm to the rights, property or safety of our users, the public or to Polaris I/O and/or as required or permitted by law.
  - facilitate a sale, merger or change in control of all or any part of our company or business or in preparation for any of these events.

## 6. Cookies

We and our partners use cookies and similar technologies on our websites. For more information see our Cookie Preference. For information about cookies used in our surveys please see our Cookie Preference. If you are a customer of Polaris I/O and separately use cookies or similar technologies in conjunction with any of our products and services, then you yourself will be responsible for complying with any laws related to the use of those technologies and this Privacy Statement is not applicable to that use by you.

We use certain cookies, as described in our Cookie Preference and here in our Privacy Statement, that you agree to when you use our sites and, in the case of some cookies, for legitimate interests of delivering and optimizing our services (where the cookie delivers essential functionality).

Cookies are small bits of data we store on the device you use to access our services so we can recognize repeat users. Each cookie expires after a certain period of time, depending on what we use it for. We use cookies and similar technologies for several reasons:

### 6.1 To gather metrics about your survey taking experience.

For example, we will collect data about the number of clicks it took Respondents to complete a survey, whether they left and returned to a survey, whether they skipped parts of a survey and how long it took to complete the survey and other details about the survey taking. However, this information is collated and kept at an aggregated and anonymized level only.

### 6.2 To make our site easier to use.

Clients if you use the “Remember me” feature when you sign into your account, we store your username in a cookie to make it quicker for you to sign in whenever you return to Polaris I/O.

### 6.3 For security reasons.

We use cookies to authenticate your identity and confirm whether you are currently logged into Polaris I/O or determine if an incident impacts you.

### 6.4 To provide you with personalized content.

We store user preferences, your default language, device and browser information, your profile information which includes the level of usage of service and the web-pages on our site which you visit, so we can identify you across devices and personalize the content you see.

## 6.5 To improve our services.

We use cookies to measure your usage of our websites and track referral data, as well as to occasionally display different versions of content to you. This information helps us to develop and improve our services (it helps us focus on the parts of the service you seem most interested in) and optimize the content we display to you (which may include marketing content).

## 6.6 To advertise to you.

We, or our service providers and other third parties we work with, place cookies when you visit our website and other websites or when you open emails that we send you, in order to provide you with more tailored marketing content (about our services or other services), and to evaluate whether this content is useful or effective. For instance, we evaluate which ads are clicked on most often, and whether those clicks lead users to make better use of our tools, features and services. If you don't want to receive ads that are tailored to you based on your online activity, you may "opt out" of many of the companies that are involved in such tailoring by going to <https://www.aboutads.info>, [TrustArc Preference Manager](#) or, if you're located in the European Union, at <https://www.youronlinechoices.eu>. Opting out in this way does not mean you will not receive any ads; it just means that you will not receive ads from such companies that have been tailored to you based on your activities and inferred preferences.

## 6.7 Google Analytics.

In addition to the above, we have implemented on our websites and other services certain Google Analytics features that support Display Advertising, including re-targeting. Visitors to our websites may opt out of certain types of Google Analytics tracking, customize the Google Display Network ads by using the Google Ad Preferences Manager and learn more about how Google serves ads by viewing its Customer Ads Help Center. If you do not wish to participate in Google Analytics, you may also download the Google Analytics opt-out browser add-on. You can choose to remove or disable cookies via your browser settings.

# 7. Security

This Security Statement applies to the products, services, websites and apps offered by Eighty Twenty One Inc. and their affiliates (collectively "Polaris I/O"), which are branded as "Polaris I/O", except where otherwise noted. We refer to those products, services, websites and apps collectively as the "services" in this Statement. This Security Statement also forms part of the user agreements for Polaris I/O customers.

Polaris I/O values the trust that our customers place in us by letting us act as custodians of their data. We take our responsibility to protect and secure your information seriously and strive for complete transparency around our security practices detailed below.

## 7.1 Physical Security

Polaris I/O's information systems and technical infrastructure are hosted within AWS data centers.

## 7.2 Compliance

Polaris I/O is compliant with the Payment Card Industry's Data Security Standards (PCI DSS 3.2). Polaris I/O re-certifies this compliance annually.

## 7.3 Access Control

Access to Polaris I/O's technology resources is only permitted through secure connectivity (e.g., VPN, SSH) and requires multi-factor authentication. Our production password policy requires complexity, expiration, and lockout and disallows reuse. Polaris I/O grants access on a need to know basis of least privilege rules, reviews permissions quarterly, and revokes access immediately after employee termination.

## 7.4 Security Policies

Polaris I/O maintains and regularly reviews and updates its information security policies, at least on an annual basis. Employees must acknowledge policies on an annual basis and undergo additional training such as HIPAA training, Secure Coding, PCI, and job specific security and skills development and/or privacy law training for key job functions. The training schedule is designed to adhere to all specifications and regulations applicable to Polaris I/O.

## 7.5 Personnel

Polaris I/O conducts background screening at the time of hire (to the extent permitted or facilitated by applicable laws and countries). In addition, Polaris I/O communicates its information security policies to all personnel (who must acknowledge this) and requires new employees to sign non-disclosure agreements, and provides ongoing privacy and security training.

## 7.6 Dedicated Security Personnel

Polaris I/O also has a dedicated Trust & Security organization, which focuses on application, network, and system security. This team is also responsible for security compliance, education, and incident response.

## 7.7 Vulnerability Management and Penetration Tests

Polaris I/O maintains a documented vulnerability management program which includes periodic scans, identification, and remediation of security vulnerabilities on servers, workstations, network equipment, and applications. All networks, including test and production environments, are regularly scanned using trusted third party vendors. Critical patches are applied to servers on a priority basis and as appropriate for all other patches.

We also conduct regular internal and external penetration tests and remediate according to severity for any results found.

## 7.8 Encryption

We encrypt your data in transit using secure TLS cryptographic protocols. Polaris I/O data is also encrypted at rest.

## 7.9 Development

Our development team employs secure coding techniques and best practices, focused around the OWASP Top Ten. Developers are formally trained in secure web application development practices upon hire and annually.

Development, testing, and production environments are separated. All changes are peer reviewed and logged for performance, audit, and forensic purposes prior to deployment into the production environment.

## 7.10 Asset Management

Polaris I/O maintains an asset management policy which includes identification, classification, retention, and disposal of information and assets. Company-issued devices are equipped with full hard disk encryption and up-to-date antivirus software. Only company-issued devices are permitted to access corporate and production networks.

## **7.11 Information Security Incident Management**

Polaris I/O maintains security incident response policies and procedures covering the initial response, investigation, customer notification (no less than as required by applicable law), public communication, and remediation. These policies are reviewed regularly and tested bi-annually.

## **7.12 Breach Notification**

Despite best efforts, no method of transmission over the Internet and no method of electronic storage is perfectly secure. We cannot guarantee absolute security. However, if Polaris I/O learns of a security breach, we will notify affected users so that they can take appropriate protective steps. Our breach notification procedures are consistent with our obligations under applicable country level, state and federal laws and regulations, as well as any industry rules or standards applicable to us. We are committed to keeping our customers fully informed of any matters relevant to the security of their account and to providing customers all information necessary for them to meet their own regulatory reporting obligations.

## **7.13 Information Security Aspects of Business Continuity Management**

Polaris I/O's databases are backed up on a rotating basis of full and incremental backups and verified regularly. Backups are encrypted and stored within the production environment to preserve their confidentiality and integrity and are tested regularly to ensure availability.

## **7.14 Your Responsibilities**

Keeping your data secure also requires that you maintain the security of your account by using sufficiently complicated passwords and storing them safely. You should also ensure that you have sufficient security on your own systems. We offer TLS to secure the transmission of survey responses, but you are responsible for ensuring that your surveys are configured to use that feature where appropriate.

## **7.15 Logging and Monitoring**

Application and infrastructure systems log information to a centrally managed log repository for troubleshooting, security reviews, and analysis by authorized Polaris I/O personnel. Logs are preserved in accordance with regulatory requirements. We will provide customers with reasonable assistance and access to logs in the event of a security incident impacting their account.

## 8. Data Retention

If you hold an account with Polaris I/O we do not automatically delete the data in your account – you are responsible for and control the time periods for which you retain this data. If you are a Respondent, you will need to ask the Client how long your responses will be stored in Polaris I/O services.

We also describe the expiry periods for cookies in our cookies policy.

## 9. Safety of Minors

Our services are not intended for and may not be used by minors. “Minors” are individuals under the age of 13 (or under a higher age if permitted by the laws of their residence). Polaris I/O does not knowingly collect personal data from Minors or allow them to register. If it comes to our attention that we have collected personal data from a Minor, we may delete this information without notice. If you have reason to believe that this has occurred, please contact customer support.

## 10. Data Transfers and Privacy Shield Certification

Your information and data may be processed in and transferred or disclosed in the United States and countries in which our affiliates are located and in which our service providers are located or have servers. You can view where our affiliates are located on the Office Locations page.

### 10.1 EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield.

Eighty Twenty One Inc. is located in the United States and accordingly, data (to include Respondent data) will be transferred to the United States.

Eighty Twenty One Inc. has certified its compliance with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield. Polaris I/O is committed to subjecting all personal information received from European Union (EU) member countries and Switzerland, in reliance on the Privacy Shield Framework, to the Framework’s applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce’s Privacy Shield List. [Privacy Shield | Privacy Shield](#).

Polaris I/O also complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

When Polaris I/O receives personal information under the Privacy Shield and then transfers it to a third-party service provider acting as agent on Polaris I/O's behalf, Polaris I/O has certain liability under the Privacy Shield if both (i) the agent processes the information in a manner inconsistent with the Privacy Shield and (ii) Polaris I/O is responsible for the event giving rise to the damage. With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Polaris I/O is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. In certain situations, Polaris I/O may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Please contact Polaris I/O as described in Section 14 below if you have any concerns or complaints of any nature. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider, (free of charge) at [File An EU-US Privacy Shield or Safe Harbor Claim](#).

Under certain conditions, more fully described on the Privacy Shield website [How to Submit a Complaint](#), you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

## 11. Changes to our Privacy Statement

We can make changes to this Privacy Statement from time to time. We will identify the changes we have made on this page. In circumstances where a change will materially change the way in which we collect or use your personal information or data, we will send a notice of this change to all of our account holders.

## 12. Personalized solicitations and marketing

You can opt-out from health screening solicitations in your account and we provide opt-out options in all direct marketing emails. Finally, if you do not wish to see personalized marketing content on the web related to our service you can clear the cookies in your browser settings.

## 13. Who is my data controller?

As mentioned above – all response data at an individual level is controlled by the Client. Polaris I/O can be a data controller of data about Respondents only in the very limited ways described in section 3 - Respondent.

For Creators, Respondents, Website Visitors and Panel who are addressed in this Privacy Statement and who are located outside the United States, your data controller is Eighty Twenty One Inc Europe UC to the extent that it is processing your personal data.

## 14. Your rights

This section describes the rights you may have generally as a customer of any Polaris I/O service.

You may wish to exercise a right to obtain information about yourself or to correct, update or delete that information. Some of these rights may be subject to some exceptions or limitations in local law. Please note your rights and choices vary depending upon your location. We will take reasonable steps to verify your identity and we will respond to your request to exercise these rights within a reasonable time (and in all cases within 30 days of receiving a request) subject to the below for specific categories of person.

### 14.1 Client Rights

Where you hold an account with any SurveyMonkey service, you are entitled to a copy of all personal data which we hold in relation to you. You also may be entitled to request that we restrict how we use your data or object to some aspect of our treatment of your data. You can access a lot of your data in your own account when you log in. If you want to exercise your rights, please contact us at “ <https://polarisio.com/contact-us/data-request/>”.

### 14.2 Respondent Rights

Where you have responded to a survey, form, questionnaire or application sent to you by a Creator, using a SurveyMonkey service, you will need to reach out directly to that individual or organization to discuss managing, deleting, accessing, restricting access to or otherwise withdrawing consent for use of, the information which you provided to them in your responses. SurveyMonkey does not control your response data and, accordingly, is not in a position to directly handle these requests in relation to that data. If you are having difficulties finding this Creator or if you have any other questions after reading this Privacy Statement, you can contact us at “ <https://polarisio.com/contact-us/data-request/>” and we will try our best to help you.

### 14.3 Visitor Rights

For rights and choices specific to California consumers please see our Security Statement that addresses the regulations around regional specific privacy. Please note we will take reasonable steps to verify your identity and the authenticity of your request. Once verified, we will maintain your request in the event our practices change.

## 14.4 Other rights and choices

- For rights and choices specific to California consumers see our Security Statement that addresses the regulations around regional specific privacy. Please note we will take reasonable steps to verify your identity and the authenticity of your request. Once verified, we will maintain your request in the event our practices change.

## 15. Exercising your rights

Except as explicitly provided herein, please use the following Contact Information for Privacy Inquiries and contact us at “ <https://polarisio.com/contact-us/data-request/>”.

## 16. Complaints

If you are resident in the European Union and you are dissatisfied with how we have managed a complaint you have submitted to us, you are entitled to contact your local data protection supervisory authority. Polaris I/O has registered with the Data Protection Commission and operates under the remit of the Irish Office of the Data Protection Commissioner (see: [ODPC Website](#))