

SMG Services

California Privacy Notice

Effective Date: July 2020

SCOPE OF DISCLOSURES

This California Privacy Notice (the “**CA Notice**”) supplements the SMG Services Global [Privacy Policy](#) and applies solely to individual residents of the State of California (“**consumers**” or “**you**”).

This CA Notice provides additional information about how we collect, use, disclose, and otherwise process personal information of individual residents of the State of California, either online or offline, within the scope of the California Consumer Privacy Act of 2018 (“**CCPA**”).

Unless otherwise expressly stated, all terms in this CA Notice have the same meaning as defined in our SMG Services Global [Privacy Policy](#) or as otherwise defined in the CCPA.

PERSONAL INFORMATION DISCLOSURES

When we use the term “**personal information**” in this CA Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

For the purposes of this CA Notice, personal information does not include:

- Publicly available information from government records.
- Deidentified, aggregated or anonymized information that is maintained in a form that is not capable of being associated with or linked to you.
- Information excluded from the CCPA's scope, such as:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.
- Information relating to our job applicants, employees, contractors and other personnel.

COLLECTION AND USE OF PERSONAL INFORMATION

In the last 12 months, we have collected the following categories of personal information from the categories of sources and for the purposes set forth below, which reference the personal information, sources and purposes described in our [Privacy Policy](#):

Category of Personal Information	Collected
Identifiers , such as your name, mailing address, email address, zip code, telephone number, or other similar identifiers.	✓
California Customer Records (Cal. Civ. Code § 1798.80(e)), such as date of birth, username and password, company name, job title, business email address, and department.	✓
Protected Classification Characteristics , such as age and gender.	✓
Commercial Information , such as information about products or services purchases, obtained or considered.	✓
Biometric Information , such as physiological and behavioral characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as voice prints or fingerprints.	X
Internet/Network Information , such as your browsing history, log and analytics data, information about the device(s) used to access the services, domain server, search history and information regarding your interaction with our websites or services and other Usage Data.	✓
Geolocation Data , such as information about your physical location collected from geolocation features on your device, including your IP address.	✓
Sensory Information , such as pictures you provide or upload in connection with our services, and the content and audio recordings of phone calls between you and us that we record where permitted by law.	✓
Profession/Employment Information , such as current employer.	✓
Non-Public Education Information (20 U.S.C. § 1232g, 34 C.F.R. Part 99), such as information about your academic record.	X
Other Personal Information , such as personal information you provide to us in relation to a Survey, comment, question, request or inquiry, or information provided to us through Social Media networks.	✓

Inferences , including information generated from your use of our services reflecting predictions about your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	
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SOURCES OF PERSONAL INFORMATION

We collect personal information about you from one or more of the following sources:

- Directly from you, including via information we receive about you through Surveys.
- Indirectly from you, such as through information we collect from you in the course of providing services to you or through our Clients.
- Other SMG affiliates.
- Our Clients.
- Service providers.
- Third parties you direct to share information with us.
- Your browser or device.

Please note: In addition to the categories of sources identified above, we may collect information from publicly available sources and other third-party information providers in order to supplement the information we have otherwise collected.

PURPOSES FOR COLLECTING PERSONAL INFORMATION

We may collect, use, disclose personal information about you for one or more of the purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To communicate with you, including via email, text message, push notification and/or telephone calls.
- To operate, maintain, and provide to you the features and functionality of the services.
- To market to you, including through email, direct mail, phone or text message.
- To personalize your experience and to deliver custom content and product and service offerings relevant to your interests, including but not limited to targeted offers and ads through our website, email, Social Media channels, third-party sites, or on other devices you may use.
- To better understand the demographics of our visitors and measure traffic and analytics on our websites and services.
- To provide our products and services to, and fulfill our agreements with, our Clients.
- For our internal business purposes, such as data analysis, market research insight development, customer research, audits, fraud prevention, developing new products and/or features, enhancing the services, and improving the services and identifying usage trends.

- To recognize you and remember your information when you return to our websites and services.
- To help maintain the safety, security, and integrity of the services, technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our products and services.
- To troubleshoot and resolve technical issues.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate, negotiate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SMG's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by SMG about consumers is among the assets transferred or is otherwise relevant to the evaluation, negotiation or conduct of the transaction.

RECIPIENTS OF PERSONAL INFORMATION

As described in our [Privacy Policy](#), we share personal information with the following categories of third parties for the following business purposes.

- **Within SMG:** We may disclose personal information between and among SMG and its current and future parents, affiliates, subsidiaries, and other companies under common control or ownership.
- **Our Clients:** When you provide comments to SMG, the information you provide may contribute to the services we provide to our Clients and to our overall market research. If you choose to provide us with permission, your comments may be posted on third-party websites and/or our clients' websites. If you access SMG's services to take a Survey regarding your customer experience with one of our Clients, we share the personal information we collect from you about and relating to your survey responses with that Client. We also may combine information received in your Survey responses with information received in Survey responses from other users to better understand overall consumer experiences. When you provide comments to SMG, your comments may be posted on TrumpetRatings.com and/or on our Clients' websites.
- **Service providers:** We may share personal information with third-party service providers that perform business or operational services for us or on our behalf, such as website hosting, infrastructure provisioning, IT services, customer service, email delivery services, marketing and advertising services, and other similar services, subject to contractual terms restricting the collection, use and disclosure of your personal information for any other commercial purpose.
- **Online advertising partners:** We also may share personal information with advertising networks or permit these partners to collect information from you directly on our websites to facilitate online advertising, such as search engines and social network advertising providers to serve targeted ads to you or to groups of other users who share similar traits, such as likely commercial interests and demographics, or third-party platforms.
- **Third parties at your request:** We may share your personal information with third parties whom you authorize to disclose your personal information in connection with products and services we provide to you.

- **Security providers:** We may share your personal information with third-party security providers, for example, to detect, prevent, or otherwise address actual or suspected fraud, harassment, security or technical issues, violations of any law, rule, regulation or the policies of SMG.
- **Business partners:** We may disclose personal information to third parties with whom we partner to provide contests, joint promotional activities or co-branded services, and such disclosure is necessary to fulfill your request.
- **Other third parties:** From time to time, we may disclose your personal information to third parties who use this information to market to you, to perform analytics and conduct research, or for other purposes, in accordance with their own privacy policies and terms.
- **Analytics providers:** We work with third party analytics providers to better understand the demographics of our users and visitors, and to personalize, enhance and improve our services.
- **Social networks:** We may disclose personal information, such as a unique identifier, hashed email address, or information automatically collected through tracking technologies, to social networks for the purpose of displaying personalized advertising and content on those social networks.
- **Law enforcement and third parties pursuant to legal request:** We may disclose personal information as reasonably necessary to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- **Third parties in the context of a corporate transaction:** We may disclose personal information as reasonably necessary to evaluate, negotiate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SMG's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by SMG about consumers is among the assets transferred or is otherwise relevant to the evaluation, negotiation or conduct of the transaction.

SMG DOES NOT SELL PERSONAL INFORMATION

To be clear, in the previous 12 months we have not sold, rented, released, disclosed, disseminated, made available, transferred, or otherwise communicated a consumer's personal information that we collect through the SMG Services to another business or third party for monetary or other valuable consideration. If that changes, we will update this notice.

YOUR CALIFORNIA PRIVACY RIGHTS

As a California resident, you may be able to exercise the following rights in relation to the personal information about you that we have collected (subject to certain limitations at law):

<p>The Right to Know</p>	<p>You have the right to request any or all of the following information relating to your personal information we have collected and disclosed in the last 12 months, upon verification of your identity:</p> <ul style="list-style-type: none"> • The specific pieces of personal information we have collected about you; • The categories of personal information we have collected about you; • The categories of sources of the personal information; • The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed; and • The business or commercial purposes for collecting the personal information.
<p>The Right to Request Deletion</p>	<p>You have the right to request the deletion of personal information we have collected from you, subject to certain exceptions.</p>
<p>The Right to Opt Out of Sales</p>	<p>Because SMG does not engage in any information sales as that term is defined under the CCPA, this right does not apply to the SMG Services.</p>
<p>The Right to Non-Discrimination</p>	<p>You have the right not to receive discriminatory treatment for exercising these rights.</p> <p>However, please note that if the exercise of these rights limits our ability to process personal information (such as in the case of a deletion request), we may no longer be able to provide you our products and services or engage with you in the same manner.</p>
<p>“Shine the Light”</p>	<p>California residents that have an established business relationship with us have rights to know how their information is disclosed to third parties for their direct marketing purposes under California’s “Shine the Light” law (Civ. Code § 1798.83).</p>

HOW TO EXERCISE YOUR CALIFORNIA CONSUMER RIGHTS

To Exercise Your Right to Know or Right to Deletion

To exercise your right to know and/or your right to deletion, please submit a request by:

- Emailing privacyofficer@smg.com with the subject line “California Rights Request,”
- Calling 800-764-0439.

We will forward your request to the Client sponsoring your Survey. We may need to verify your identity before processing your request. In order to verify your identity, we generally will require the matching of sufficient information you provide us to the information we maintain about you in our systems. Although we try to limit the personal information collected in connection with a request to exercise the right to know and/or the right to

deletion to that personal information identified in your request, certain requests may require us to obtain additional personal information from you. In certain circumstances, we may decline a request to exercise the right to know and/or right to deletion, particularly where we are unable to verify your identity or locate your information in our systems, or as permitted by law. Ultimately, our Client will direct us whether and how to fulfill your request.

Minors Under Age 16

We do not sell the personal information of consumers we know to be less than 16 years of age. Please contact us at privacyofficer@smg.com to inform us if you, or your minor child, are under the age of 16.

FINANCIAL INCENTIVES

Our Clients may elect to offer financial incentives in exchange for your undertaking a particular Survey. Please review the website privacy policy of the particular Client sponsoring the Survey to review any financial incentive disclosures.

UPDATES TO THIS CA NOTICE

We will update this CA Notice from time to time. When we make changes to this CA Notice, we will change the "Effective Date" at the beginning of this CA Notice. All changes shall be effective from the date of publication unless otherwise provided in the notification.

CONTACT US

If you have any questions or requests in connection with this CA Notice or other privacy-related matters, please send an email to privacyofficer@smg.com.

Alternatively, inquiries may be addressed to:

Service Management Group, LLC
Attn: Data Protection Officer
1737 McGee Street
Kansas City, MO 64108