

Magid Privacy Policy
Last Updated April 17, 2025

1. Introduction

This Privacy Policy (“**Privacy Policy**”) pertains to your accessing and using the magid.com website, participating in a focus group or survey, and related services (the “**Service**”). The Service is operated by Magid with a principal place of business at 8500 Normandale Lake Blvd, Suite 630, Minneapolis, MN 55437 (“**Magid**” or “**we**”). This Privacy Policy describes the information collected through Your use of the Service, how we use it, how we share it, how we protect it, and the rights and choices you (“**You**”) may have in Your information.

This Privacy Policy does not apply to information processed by third parties, for example, when you visit a third-party website or interact with third-party sites, except to the extent those parties collect or process information on our behalf. Please review any relevant third party’s privacy policy for information regarding their privacy practices.

Unless explicitly stated otherwise, any new features that augment or enhance the current Service shall be subject to this Privacy Policy.

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THE SERVICE. USING THE SERVICE INDICATES THAT YOU ACCEPT THIS PRIVACY POLICY IN FULL. IF YOU DO NOT ACCEPT THIS PRIVACY POLICY, DO NOT USE THE SERVICE. By consenting to this Privacy Policy, you consent to receive notifications regarding security incidents to the email address we have on file for you.

Please review the Privacy Policy each time You use the Service. If we materially change this Privacy Policy, if we have Your email address, we will notify You of material changes to this Privacy Policy via email. If we do not have Your email address, we will update this page to reflect any changes to this Privacy Policy.

2. How to Contact Us

The controller of your Personal Data under this Privacy Policy is Magid. If You have any questions about this Privacy Policy or our use of Your Personal Data, you may contact us as follows:

Email: privacy@magid.com

Mailing Address: 8500 Normandale Lake Blvd, Suite 630, Minneapolis, MN 55437

Regional Data Rights, Opt-Out of Data Sales or Sharing; Limit Uses of Sensitive Personal Data: Visit [\[Data Rights Request Form\]](#) or call 866-821-0120

Personal Data We Collect

The following describes how we process data considered personal information or personal data under applicable privacy laws (“**Personal Data**”).

A. Categories of Personal Data We Collect

Audio/Visual Data- Photos or pictures you may send us, as well as audio files and records, such as voicemails, call recordings, and the like.

Biographical Data- Data relating to professional and employment history, qualifications, and similar biographical information.

Contact Data- Identity Data we can use to contact you, such as email and physical addresses, phone numbers, and social media or other communications platform usernames/handles.

Device/Network Data- Browsing history, search history, and information regarding your interaction with a website, application, or advertisement (e.g. IP address, MAC address, SSIDs, application ID/AdID/IDFA, session navigation history, search terms, and similar browsing metadata, and other data generated through applications and browsers, including cookies and similar technologies or other device identifiers or persistent identifiers), online user ID, device characteristics (such as browser/OS version), web server logs, application logs, first party cookies, third party cookies, web beacons, clear gifs and pixel tags.

General Location Data- Non-precise location data, e.g., location information derived from social media tags/posts.

Identity Data- Information such as your name, address, email address, telephone number, gender, date of birth, age and/or age range, account login details (e.g., username and password, avatar, or other account handles/usernames).

Inference Data- Personal Data generated reflecting your preferences, characteristics, predispositions, behavior, demographics, household characteristics, market segments, likes, favorites and other data or analytics.

Sensitive Personal Data- Personal Data deemed “sensitive” under California or other laws. We collect the following categories of Sensitive Personal Data:

- **“Payment Data”** Information such as bank account details, payment card information, including similar data protected as Sensitive Data under applicable law, and relevant information in connection with a financial transaction.
- **“Race or Ethnic Origin Data”** data relating to your race, ethnic, or national origin.
- **“Sex or Sexual Orientation Data”** data related to your sex life or sexual orientation.

Transaction Data- Information about the Service we provide to you and about transactions you make with us or other companies for goods and services and similar information.

User Content- Unstructured/free-form data that may include any category of Personal Data, e.g., data that you give us in free text fields such as comment boxes.

B. Sources of Personal Data We Collect

You - We collect information from You when You use the Service, contact or interact with us, sign up for our e-newsletters or other mailing lists, share information through social media, participate in a focus group or survey, and voluntarily provide us with Your comments and other content in connection with using the Service. When You submit a contact request form through the Service, You provide information to Magid including Your name, email address, company name. When registering to receive the Magid I-Facts newsletter, we collect Your name, email address, company name, and preferred newsletter format. When You participate in a focus group or survey, Magid may collect contact and demographic information including Your name, email address, address, age, gender, marital status, household information, and other information requested in connection with the focus group or survey.

Automatic Collection - When You access and use the Service, we automatically collect information regarding You and Your device, including Your device’s internet protocol address, the domain name of Your internet service provider, Your location, Your mobile device information (e.g. device model and operating system version), Your page visits, Your social sharing activity, and aggregated information that

cannot be used to specifically identify You. Additional information collected is described in the Analytics and Cookies, Local Storage and Other Tracking Technologies sections below.

Service Providers - We receive Personal Data from service providers, such as payment processors, software providers, recruiting platforms, focus group platforms, or survey platforms, each performing services on our behalf.

Social Media Companies - We receive Personal Data from Meta (e.g., Facebook and Instagram) and other social media companies when you interact with that social media company on or in connection with our Service.

Data We Create or Infer - We, certain partners, social media companies, and third parties operating on our behalf, create and infer Personal Data such as Inference Data or Aggregate Data based on our observations or analysis of other Personal Data processed under this Privacy Policy, and we may correlate this data with other data we process about you. We may combine all the Personal Data we collect from or about You and use it in the manner described in this Privacy Policy.

3. Data Processing Contexts / Notice at Collection

A. Focus Groups and Surveys

We generally process Identity Data, Contact Data, Biographical Data, Inference Data, and User Content collected in connection with your participation in a focus group or survey. We may process Sensitive Personal Data, including Race or Ethnic Origin Data and Sex or Sexual Orientation Data, if you provide this information as part of a focus group or survey response. We may collect Payment Data in connection with paying You for Your participation. We may collect Audio/Visual Data if the focus group is recorded, either online via videoconference or in-person with a camera.

We generally process this Personal Data as necessary to facilitate the applicable market research project, or to allow our third-party partners to communicate with and/or assist you. Survey data may be made available to certain third parties, who may use it for their own purposes. We may also store and analyze feedback for our [Business Purposes](#) and [Commercial Purposes](#), for example, to improve our Service and help recommend relevant offers or services. Survey data may be anonymized and processed via Magid Intelligence, which utilizes large language models; however, anonymized data is outside the scope of this Privacy Policy.

B. Website

i. Generally

When you visit our website, we automatically collect and process Identity Data, Inference Data, General Location Data, and Device/Network Data. We use this data as necessary to initiate or fulfill your requests for certain features or functions through our Service, such as delivering webpages or logging activities for security purposes. We may also process this Personal Data for our [Business Purposes](#) and [Commercial Purposes](#).

ii. Cookies, Local Storage, and Other Tracking Technologies

We process Identity Data, Device/Network Data, Contact Data, Inference Data, Transaction Data, and General Location Data in connection with our use of cookies and similar technologies on our Service. We may collect this information automatically, and this information may be collected over time and combined with information collected on different websites and online services, which may track users across websites and apps and over time.

- **Cookies.** We use cookies, which are small data files that are saved to Your device when You use the Service.
- **Type of cookies we use.** We may use both session cookies and persistent cookies. A session cookie is a temporary file which is only active while You are on the Service and is erased once You close Your browser. Unlike a session cookie, a persistent cookie is not deleted when You close Your browser and will remain on Your device indefinitely. We use cookies to identify when You return to the Service, track usage statistics, and store Your preferences.
- **Web Beacons.** Web beacons are small graphic images or other programming code (also known as “web bugs,” “1×1 GIFs” or “clear GIFs”) used to keep track of Your navigation through the Service and Your electronic communication with us. We may include web beacons in our web pages and email messages. Web beacons may be invisible to You, but any electronic image or other web programming code inserted into a web page or email can act as a web beacon. Web beacons or similar technologies may be used for several purposes, including, without limitation, to count visitors to the Service, to monitor how users navigate the Service, to count how many emails that were sent were opened, or to count how many articles or links were viewed. Web beacons may be used to collect certain Personal Data (for example, the email address associated with an email message).
- **Embedded Scripts.** An embedded script is a programming code that is designed to collect information about Your interactions with the Service, such as information about the links on which You click. The code is temporarily downloaded onto Your device from our web server or a third-party service provider. The code is active only while You are connected to the Service and is deactivated or deleted once You disconnect from the Service.

We and authorized third parties may use the above technologies to process your Personal Data for the following purposes:

- for “essential” purposes necessary for our Service to operate (such as maintaining user sessions, content delivery, and the like);
- for “functional” purposes, such as to enable certain features of our Service (for example, to save your language preferences on the website);
- for “analytics” purposes and to improve our Service, such as to analyze the traffic to and on our Service (for example, to help us understand and save Your preferences and interests, so we can personalize Your future visits, or compile aggregate data about website traffic and website interaction so that we can offer better website experiences and tools in the future);
- for “retargeting,” or other advertising and marketing purposes, including technologies that process Inference Data or other data so that we can deliver, buy, or target advertisements which are more likely to be of interest to you; and
- for “social media” e.g., via third-party social media cookies, or when you share information using a social media sharing button or “like” button on our Service or you link your account or engage with our content on or through a social networking website such as Facebook or LinkedIn.

We may also process this Personal Data for our [Business Purposes](#) and [Commercial Purposes](#).

See [Your Choices](#) section below for information regarding opt-out rights regarding cookies and similar technologies. You can instruct Your browser to stop accepting cookies. But, if You do not accept cookies, You may not be able to use all portions of all functionalities of the Service.

Please note, some of our business partners, such as our analytics providers and social media connections, also use cookies and other tracking technologies on the Service, some of which may track users across websites and over time. We, or third party providers, may be able to use these technologies to identify you across Service, devices, sites, and services. Third parties have their own privacy policies and their processing is not subject to this Privacy Policy.

iii. Your Magid Account

We process Identity Data, Inference Data, and Contact Data when you register and create an account for our Service. We process Payment Data if you associate payment information with that account.

We use this Personal Data to create and maintain your account, to provide the products and services you request, and for our [Business Purposes](#). We may process Identity Data, Inference Data, and Contact Data for [Commercial Purposes](#). We do not sell or “share” Payment Data or use it for Business Purposes not permitted under applicable law.

iv. Contact Us

We process Identity Data, Device/Network Data, and any Personal Data contained within User Content when you contact us using our contact us form, a contact phone number, mail, or email. We may process Audio/Visual Data if you contact us via phone, leave a voicemail, or submit a photo with your request.

We process Identity Data, Contact Data, User Content, and Audio/Visual Data as necessary to communicate with you about the subject matter of your request and related matters. We may also process this Personal Data for our [Business Purposes](#) and [Commercial Purposes](#).

v. Payments

We process Contact Data, Device/Network Data, Identity Data, Payment Data, Transaction Data, and User Content when you enroll in a survey or focus group, complete a purchase or sale transaction, or start a subscription through your Magid Account. We process this Personal Data as necessary to perform or initiate a transaction with you, process your transaction, order, subscription, and payment, carry out fulfillment and delivery, document transactions, and for our [Business Purposes](#). We may use third party payment processors to process payments on our behalf. Unless you store Payment Data in your profile, we do not store your Payment Data. Note: third-party payment operations, and associated offers, as applicable, are outside the scope of this Policy, including in the case of data breach.

We may process Identity Data, Transaction Data, and Contact Data for [Commercial Purposes](#).

C. Transactional and Promotional Communications

We may process Identity Data, Device/Network Data, and Contact Data in connection with email or SMS communications that we send in relation to our Service. For example, we send transactional emails communications to you if you subscribe to our newsletter, if you sign up for a survey or focus group, or in connection with our delivery of products or services that you request. Additionally, you may receive promotional email communications if you contact us, choose to receive them, or interact with us in way that allows us to send you those communications. We may also automatically collect Device/Network Data when you open or interact with those communications so that we can better understand engagement with our communications. We may also process this Personal Data for our [Business Purposes](#) and [Commercial Purposes](#). You can opt out of promotional communications at any time as specified in [Your Rights and Choices Regarding Your Personal Data](#) below.

D. Trade Shows and Conferences

We may process Identity Data, Contact Data, and User Content if you attend and interact with us at an event, conference, or trade show (“**Event**”). We may process Transaction Data and Payment Data if you sign up for a survey or focus group or make a purchase at an Event.

We process this Personal Data to provide any products or services you request, and for our [Business Purposes](#) and [Commercial Purposes](#).

E. Social Media Posts

We process Identity Data, Contact Data, and User Content if you interact with or identify us on social media (e.g., if you post User Content that engages with or tags our official accounts). We process this Personal Data for our [Business Purposes](#) and [Commercial Purposes](#).

Posts may be public or reposted on our Service. Content you provide may be publicly available when you post it on our Service, or in some cases, if you reference, engage, or tag our official social media accounts or communications platforms.

4. Purposes of Processing

In addition to the processing described above, we generally process Personal Data for several common purposes in connection with our business. Please see below for more information regarding the Business Purposes for which we process your Personal Data.

A. Business Purposes

We generally process Personal Data for the following Business Purposes:

- The purposes for which You provided it;
- To provide services to You;
- To provide user verification services;
- To connect with Your social media accounts and post content You choose to share;
- To process and respond to Your inquiries and comments;
- To send You information about Your relationship or transactions with us;
- To develop new products and services;
- To personalize and enhance Your experience using the Service;
- To send periodic emails. The email address You provide may be used to send You information and updates pertaining to Your account, in addition to receiving occasional company news, updates, newsletters, etc. Note: If at any time You would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email;
- To generate and review reports and data about our user base and service usage patterns;
- To compile aggregate data for internal and external business purposes;
- To prevent fraud and abuse of the Service and to otherwise protect users and visitors and our business;
- To assist law enforcement and respond to subpoenas;
- To administer, operate and improve the Service and for internal business purposes; and
- To perform other business activities as needed, or as described elsewhere in this Privacy Policy.

As explained elsewhere in this Privacy Policy, Personal Data we collect may be processed by our partners in providing related services to the Service (such as administration services, technical services relating to the maintenance, servicing, and upgrading of the products, software, hosting services, data migration services and analytical services, among others).

B. Commercial Purposes

We and certain third parties process Personal Data to further our commercial or economic interests (“**Commercial Purposes**”) depending on the context of collection and [Your Rights and Choices Regarding Your Personal Data](#).

Please Note – We may require your consent, or we may not engage in processing of Personal Data for Commercial Purposes in some jurisdictions. Some of this processing may involve “sales” or “sharing” of Personal Data as defined by applicable law. For more information and to learn about the specific providers we use for these services, please see the “[Regional Data Rights](#)” sections below.

i. Personalized Promotional Communications

We may personalize Promotional Communications based on your preferences. If consent is required by law, we will seek your consent.

ii. Online Advertising

We engage in online advertising, which may be a sale, “sharing” of Personal Data, or “targeted advertising” under applicable law (“**Online Advertising**”). Online Advertising involves various parties and service providers, including third party data controllers, engaged in the processing of Personal Data to deliver and tailor ads you see. These third party vendors, including [Google](#), may use cookies and/or device identifiers to collect Personal Data such as unique IDs, IP addresses, device information, OS/browser type, search requests, and other similar data, as well as information about your visits to our site and the ads you see and view to develop and assess aspects of a profile about you, to deliver more relevant advertisements and offers, and to determine whether and how ads you see are effective. These third-party vendors then show our ads on sites across the internet, using cookies and/or device identifiers to serve ads based on your past visits to our Service. These third parties may augment your profile with demographic and other preferences data derived from these observations and may also track whether you view, whether you interact with, or how often you have seen an ad, or whether you complete a purchase for goods or services or take an action you were shown in an advertisement. These parties may be able to identify you across sites, devices, and over time. You can control how these third parties use your data, and the ads you see on these platforms, using the tools described in the [Your Rights and Choices Regarding Your Personal Data](#) section below.

To learn about the specific providers we use for these services, please contact us.

5. How Your Personal Data is Disclosed

Personal Data may be disclosed to third parties in accordance with our Privacy Policy. Please note that You may choose not to share certain information as described in [Your Rights and Choices Regarding Your Personal Data](#) below.

A. Third Party Service Providers and Business Partners

We may use third party service providers and business partners to perform functions in connection with the Service, such as site analytics, email marketing, social sharing, focus group coordination and facilitation, survey administration, generative AI tools, and functions related to analyzing and improving the Service usefulness, reliability, user experience, and operation, advertising, storing data, and as otherwise described in this Privacy Policy. We use these services to collect Your information and communicate with You. We also may share users’ Personal Data with advertisers for their direct marketing and promotional purposes and so they can provide services to You. In these cases, the terms, conditions, and privacy practices of the third party - not those of Magid - may govern your transactions, and we may have no control over the Personal Data collected.

B. Business Changes

If we become involved in a merger, acquisition, sale of assets, joint venture, securities offering, bankruptcy, reorganization, liquidation, dissolution, or other transaction or if the ownership of all or substantially all of our business otherwise changes, we may transfer Your information to a third party or parties in connection therewith.

C. Clients and Affiliates

We may also share Your information with our affiliates, our clients, and our clients' affiliates and joint venture partners for purposes consistent with this Privacy Policy. Our affiliates, our clients, and our clients' affiliates and joint venture partners will be required to maintain that information in accordance with this Privacy Policy.

D. Investigations and Law

We may disclose information about You to third parties if we believe that such disclosure is necessary to:

- Investigate, prevent, or take action regarding suspected illegal activities, suspected fraud, the rights, reputation, safety, and property of us, users or others, or violations of our policies or other agreements with us;
- Comply with the law or guidance and cooperate with government or law enforcement officials or private parties;
- Respond to claims and legal process (for example subpoenas); and/or
- Protect against legal liability.

E. Aggregated Information

We may share aggregated information relating to users of the Service with affiliated or unaffiliated third parties. This aggregated information does not contain Personal Data about any user.

F. Analytics

We use third party analytics tools to help us measure traffic and usage trends for the Service. These tools may use cookies and other technologies to collect information about Your use of the Service. These tools collect information sent by Your device or the Service and other information that assists us in improving the Service. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, and better understand Your online activity.

We use Google's Universal Analytics and Pardot to better understand who is using the Service and how people are using it. Google and Pardot use cookies, pixel tags and other technologies to collect and store information such as Service pages visited, places where users click, time spent on each Service page, IP address, type of operating system used, location-based data, device ID, search history, and phone number. We use this information to improve the Service and as otherwise described in this **Privacy Policy**. Please see <http://www.google.com/policies/privacy/partners/> for information about how **Google Analytics** uses this information, visit <https://tools.google.com/dlpage/gaoptout> for information about the **Google Analytics Opt-out Browser Add-on**, and visit <http://www.google.com/settings/ads/> to adjust the settings for Your Google account.

We may also participate in certain Google Advertiser features including Demographics and Interest Reporting, Remarketing, and Google Display Network Impression Reporting. These features use third party cookies and other tracking mechanisms and allow us to market our products to You through advertisements on other websites. You can opt out of these Google features by downloading and installing Google's opt-out browser add-on.

Google Analytics may track You over time and across websites or applications.

G. Social Media Companies

We may share certain Personal Data with social media companies when you interact with Magid on social media. We may allow these third parties to operate through our website, such as through a social media icon link on our homepage.

6. Security

We implement a variety of security measures to protect the safety of Your Personal Data when You enter or submit Your Personal Data.

While we use reasonable measures to protect the information You submit via the Service against loss, theft and unauthorized use, disclosure, or modification, we cannot guarantee its absolute security. No Internet, email, or mobile application transmission is ever fully secure or error free. Email or other messages sent through the Service may not be secure. You should use caution whenever submitting information through the Service and take special care in deciding which information You provide us.

We cannot guarantee that transmissions of Your Personal Data will be fully secure and that third parties will never be able to defeat our security measures or the security measures of our partners. WE ASSUME NO LIABILITY FOR DISCLOSURE OF YOUR INFORMATION DUE TO TRANSMISSION ERRORS, THIRD-PARTY ACCESS, OR CAUSES BEYOND OUR CONTROL.

7. Data Retention Policy

We will retain Your information for as long as You use the Service and for a reasonable time thereafter. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, to comply with applicable laws and to protect Magid), resolve disputes, and enforce our legal agreements and policies. We may maintain anonymized or aggregated data, including usage data, for analytics purposes. Please note that some of the information we have collected may be required for the Service to function properly. We generally consider the following factors when we determine how long to retain data (without limitation):

- Retention periods established under applicable law;
- Industry best practices;
- Whether the purpose of processing is reasonably likely to justify further processing;
- Risks to individual privacy in continued processing;
- Applicable data protection impact assessments;
- IT systems design considerations/limitations; and
- The costs associated with continued processing, retention, and deletion.

We will review retention periods periodically and may pseudonymize or anonymize data held for longer periods.

8. Your Rights and Choices Regarding Your Personal Data

A. Your Rights

You may have certain rights and choices regarding the Personal Data we process. Please note, these rights may vary based on the country or state where you reside, and our obligations under applicable law. See the Regional Data Rights sections at the end of this Privacy Policy for more information regarding your rights/choices in specific regions.

B. Verification of Rights Requests

If you submit a rights request, we typically must verify your identity to ensure that you have the right to make that request, reduce fraud, and ensure the security of Personal Data. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf.

We may require that you match Personal Data we have on file to adequately verify your identity. If you have an account, we may require that you log into the account to submit the request as part of the verification process. We may not grant access to certain Personal Data to you if prohibited by law.

C. Your Choices

You have the following choices regarding our use of your Personal Data.

i. Changing Your Information

You may request to review, update, or have deleted any Personal Data collected from You by Magid on the Service. Just send us an email asking to review or update Your Personal Data, or to have us delete Your Personal Data. However, We reserve the right to retain Personal Data as necessary for our business purposes and to comply with federal and state laws.

ii. Withdrawing Consent

You may withdraw any consent you have provided at any time. The consequence of your withdrawing consent might be that we cannot perform certain services for you, such as location-based services, personalizing or making relevant certain types of advertising, or other services conditioned on your consent or choice not to opt-out.

iii. Promotional Communications

You can withdraw your consent to receive promotional communications by clicking on the unsubscribe link in an email (for email), or for other communications, by contacting us at privacy@magid.com. To opt-out of the collection of information relating to email opens, configure your email so that it does not load images in our emails.

iv. Social Networking

You can adjust the information that a third-party social networking service may make available to us by carefully reviewing the social media service's privacy policy and terms and conditions and by modifying Your privacy settings directly on that service.

v. Opt-Outs Available from Our Partners and Online Advertising

Some of our Service Providers allow users to opt out of their collection of Personal Data. Some of our Service Providers provide information on controlling cookies. For more information, You may visit the [Network Advertising Initiative's Consumer Opt-Out Link](#) and/or the [Digital Advertising Alliance's Consumer Opt-Out Link](#) to opt out of receiving tailored advertising from companies that participate in those programs. To opt out of Google Analytics for Display Advertising or customize Google Display Network ads, You can visit the [Google Ads Settings](#) page. Please note that to the extent advertising technology is integrated into the Service, You may still receive advertisements even if You opt out of tailored advertising. In that case, the ads will just not be tailored to Your interests. Also, We do not control any of the opt-out links above and are not responsible for any choices You make using these mechanisms or the continued availability or accuracy of these mechanisms.

vi. Do Not Track

Our Service does not respond to your browser's do not track signal.

9. Children

We do not knowingly collect Personal Data from an individual under age 16. If You are under the age of 16, please do not submit any Personal Data through the Service. If You have reason to believe that we may have accidentally received Personal Data from an individual under age 16, please contact us immediately at privacy@magid.com.

10. Terms and Conditions

Please also visit **Magid's Terms of Use** at <https://magid.com/terms-of-use/>, which states the terms, disclaimers, and limitations of liability governing Your use of the Service.

11. Changes to the Privacy Policy

We reserve the right to update or modify this Privacy Policy at any time and from time to time. Please review this Privacy Policy periodically, and especially before You provide any information. This Privacy Policy was made effective on the date indicated above. Please check the Service to ensure that You are reviewing the most recent Privacy Policy.

12. Regional Data Rights

A. EEA/U.K./Switzerland

i. EEA/U.K./Switzerland Privacy Rights

Users based in the EEA, U.K., or Switzerland have the following legal rights in respect of their Personal Data. Please review our [verification requirements](#).

- The right to require Magid to confirm whether their Personal Data is being processed, the purpose of any such processing, the recipients of any Personal Data that has been disclosed, the period for which their information is to be stored, and whether any automated decision-making processes are used in relation to their Personal Data;
- The right to require Magid to rectify inaccurate Personal Data without undue delay;
- The right to request the erasure of their Personal Data. Subject to certain conditions, Magid may be required to erase the Personal Data in response to such request where:
 - the Personal Data is no longer necessary in relation to the purpose for which it was collected, such as where a user chooses to terminate his or her use of the Service;
 - where the processing of the Personal Data is based on the user's consent (and the other circumstances described in the Legal Bases for Processing Your Information and Disclosure of Personal Data sections below no longer apply), if the user withdraws his or her consent; or
 - the user objects to the processing of his or her Personal Data and there are no overriding legitimate grounds for the processing.
- Where Magid has disclosed the Personal Data of an EEA, U.K., or Swiss user to a third party, and the user requests the erasure or rectification of the data, Magid will take reasonable steps to inform the third party of such request.
- The right to restrict Magid from processing their Personal Data in certain circumstances, such as where the accuracy of that Personal Data is disputed or an objection has been raised (see below). In such circumstances, Magid will only process that Personal Data with the express consent of the user, or for the establishment, exercise, or defense of legal claims, or for the

protection of the rights of another natural or legal person, or for reasons of important public interest;

- The right to receive their Personal Data from Magid in a structured, commonly-used and machine-readable format;
- The right to object to the processing of their Personal Data by Magid where:
 - o Magid has relied on the “legitimate interest” basis for processing that Personal Data, in which case we will immediately stop processing the user’s Personal Data unless we have compelling legitimate grounds which override the interests, rights, and freedoms of the user; or
 - o the Personal Data is used for direct marketing purposes, in which case we will immediately stop processing the user’s Personal Data for such purposes.
- The right to lodge a complaint with the data protection supervisory authority of the EU member state or other jurisdiction that is governed by the GDPR, U.K. GDPR, or Swiss privacy law, where the user resides.
- The above legal rights are subject to various conditions and exceptions, including where the data is used for statistical or scientific research purposes and the exercise of the right would prevent such purposes from being attained or would seriously impair their attainment.

ii. Legal Bases for Processing Your Personal Data

Legal Basis	Description of Basis & Relevant Purposes	Contexts / Purposes / Disclosures
Performance of a Contract	The use of Your Personal Data may be necessary to perform the agreement You have with us to provide or participate in focus groups or surveys and to respond to Your requests.	<u>Contexts</u> <ul style="list-style-type: none"> • Contexts where Personal Data (excluding Sensitive Personal Data) is processed for purposes listed below • Cookies, Local Storage, and Other Tracking Technologies (strictly necessary) <u>Purposes</u> <ul style="list-style-type: none"> • The purposes for which You provided it • To provide services to You • To provide user verification services • To process and respond to Your inquiries and comments <u>Disclosures</u> <ul style="list-style-type: none"> • Third Party Service Providers and Business Partners • Clients and Affiliates
Legitimate Interests	We use Your Personal Data for our legitimate interests. We rely on our legitimate interest to manage our customer and	<u>Contexts</u>

	<p>participant relationships, to administer, analyze, and improve our services and the content on the Service, to operate our business, including through the use of service providers and subcontractors (who may have access to Your data – see further information under the section Disclosure of Personal Data), to send You notifications about our services, to archive, keep records, and perform statistical and analytical activities, or to use Your Personal Data for administrative, fraud detection, audit, training, security, or legal purposes.</p>	<p>Contexts where Personal Data (excluding Sensitive Personal Data) is processed for specified legitimate interests or purposes listed below</p> <p><u>Purposes</u></p> <ul style="list-style-type: none"> • To develop new products and services • To generate and review reports and data about our user base and service usage patterns • To compile aggregate data for internal and external business purposes • To administer, operate and improve the Service and for internal business purposes • To perform other business activities as needed <p><u>Disclosures</u></p> <ul style="list-style-type: none"> • Third Party Service Providers and Business Partners • Business Changes • Clients and Affiliates • Investigations and Law • Aggregated Information • Analytics • Social Media Companies
Consent	<p>Where other lawful bases are not available for the processing of Your Personal Data, We may rely on Your consent as the legal basis for the collection and use of Your Personal Data. You are free to withdraw Your consent at any time, subject to the Your Choices Regarding Your Information section below and the preceding Legal Bases for Processing Your Information in this Section.</p>	<p><u>Contexts</u></p> <ul style="list-style-type: none"> • Contexts where Personal Data is processed for purposes listed below • Cookies, Local Storage, and Other Tracking Technologies (except strictly necessary) • Processing of Sensitive Personal Data • Promotional communications <p><u>Purposes</u></p> <ul style="list-style-type: none"> • To connect with Your social media accounts and post content You choose to share • To send You information about Your relationship or transactions with us • To send periodic emails or personalized promotional communications • Online Advertising <p><u>Disclosures</u></p> <ul style="list-style-type: none"> • Third Party Service Providers and Business Partners • Social Media Companies

Compliance with Legal Obligations	We may use Your Personal Data to comply with legal obligations to which we are subject, including to comply with legal process.	<u>Purposes</u> <ul style="list-style-type: none"> • To assist law enforcement and respond to subpoenas • To defend Magid and comply with laws <u>Disclosures</u> <ul style="list-style-type: none"> • Lawful Recipients
Performance of a task carried out in the public interest	This processing is based on our need to protect recognized public interests. We may use your Personal Data to perform a task in the public interest or that is in the vital interests of an individual.	<u>Purposes</u> <ul style="list-style-type: none"> • To prevent fraud and abuse of the Service and to otherwise protect users and visitors and our business <u>Disclosures</u> <ul style="list-style-type: none"> • Lawful Recipients

B. U.S. States/California

i. U.S. States/California Privacy Rights

Under the California Consumer Privacy Act (“CCPA”) and other state privacy laws, residents of certain US states may have the following rights, subject to regional requirements, exceptions, and limitations.

Confirm- Right to confirm whether we process your Personal Data.

Access/Know- Right to request any of following: (1) the categories of Personal Data we have collected, sold/shared, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Data was collected; (3) the purposes for which we collected or sold/shared your Personal Data; (4) the categories of third parties to whom we have sold/shared your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you.

Portability- Right to request that we provide certain Personal Data in a common, portable format.

Deletion- Right to delete certain Personal Data that we hold about you.

Correction- Right to correct certain Personal Data that we hold about you.

Opt-Out (Sales, Sharing, Targeted Advertising, Profiling)- Right to opt-out of the following:

- If we engage in sales of data (as defined by applicable law), you may direct us to stop selling Personal Data.
- If we engage in Targeted Advertising (aka “sharing” of Personal Data for cross-context behavioral advertising), you may opt-out of such processing.
- If we engage in certain forms of “profiling” (e.g., profiling that has legal or similarly significant effects), you may opt-out of such processing.

Opt-out or Limit Use and Disclosure of Sensitive Personal Data- Right to opt-out of the processing of certain Sensitive Data or request that we limit certain uses of Sensitive Personal Data. This right does not apply in cases where we only use Sensitive Personal Data where necessary or for certain business purposes authorized by applicable law.

Opt-in/Opt-out of Sale/Sharing of Minors' Personal Data- To the extent we have actual knowledge that we collect or maintain Personal Data of a minor under age 16 in California, those minors must opt into any sales/sharing of Personal Data (as defined under CCPA), and minors under the age of 13 must have a parent consent to sales/sharing of Personal Data. All minors have the right to opt-out later at any time.

Non-Discrimination- California residents have the right to not receive discriminatory treatment as a result of their exercise of rights conferred by the CCPA.

List of Direct Marketers- California residents may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.

Remove Minors' User Content- Residents of California under the age of 18 can delete or remove posts using the same deletion or removal procedures described in this Privacy Policy or otherwise made available through the Service. If you have questions about how to remove your posts or if you would like additional assistance with deletion, contact us using the information below. We will work to delete your information, but we cannot guarantee comprehensive removal of that content or information posted through the Service.

Your California Privacy Rights-Section 1798.83 of the California Civil Code permits California residents to request from a business, with whom the California resident has an established business relationship, certain information about the types of Personal Data the business has shared with third parties for those third parties' direct marketing purposes and the names and addresses of the third parties with whom the business has shared such information during the immediately preceding calendar year. You may make one request each year by emailing us at privacy@magid.com.

ii. Submission of Requests

You may submit requests by [contacting us](#) as described above (please review our [verification requirements](#) section). If you have any questions or wish to appeal any refusal to act in response to a rights request, contact us at privacy@magid.com. We will respond to any request to appeal within the period required by law.

iii. Categories of Personal Data Disclosed for Business Purposes

For purposes of the CCPA, we have disclosed to Service Providers for "business purposes" in the preceding 12 months the following categories of Personal Data, to the following categories of recipients:

Categories of personal information that we have disclosed for business purposes in last 12 months	Categories of third parties to whom the information was disclosed
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, or other similar identifiers	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey Companies; Website Content and Format Providers
Categories of personal information described in subdivision (e) of Section 1798.80 (California Customer Records statute, Cal. Civ. Code 1798.80(e)), such as name, address, and	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey Companies; Website Content and Format Providers

telephone number, education, employment, and employment history	
Characteristics of protected classifications under California or federal law	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey Companies; Website Content and Format Providers
Commercial information, including records of products purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Advertising/Marketing Providers; Affiliates; Analytics Providers; Social Media Platforms; Website Content and Format Providers
Biometric information	Security Providers
Internet or other electronic network activity information, including browsing history, search history, information regarding your interaction with an Internet website, application, or advertisement	Advertising/Marketing Providers; Affiliates; Analytics Providers; Social Media Platforms; Website Content and Format Providers
Geolocation data	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey Companies; Website Content and Format Providers; Storage Providers
Audio, electronic, visual, thermal, olfactory, or similar information	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey Companies; Website Content and Format Providers; Videoconferencing Platforms; Phone Service Providers
Professional or employment-related information	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey Companies; Website Content and Format Providers
Inferences drawn from your personal information to create a profile reflecting your preferences, characteristics, predispositions, behavior, etc.	Advertising/Marketing Providers; Affiliates; Analytics Providers; Social Media Platforms; Website Content and Format Providers

iv. Categories of Personal Data Sold, Shared, or Disclosed for Commercial Purposes

For purposes of the CCPA, we have “sold” or “shared” in the preceding 12 months, the following categories of Personal Data to the following categories of recipients:

Categories of personal information that we have sold in last 12 months	Categories of third parties to whom the information was sold
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, or other similar identifiers	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey Companies; Website Content and Format Providers
Categories of personal information described in subdivision (e) of Section 1798.80 (California Customer Records statute, Cal. Civ. Code 1798.80(e)), such as name, address, telephone number, education, employment, and employment history	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey Companies; Website Content and Format Providers
Characteristics of protected classifications under California or federal law	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey Companies; Website Content and Format Providers
Commercial information, including records of products purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Advertising/Marketing Providers; Affiliates; Analytics Providers; Social Media Platforms; Website Content and Format Providers
Biometric information	Security Providers
Internet or other electronic network activity information, including browsing history, search history, information regarding your interaction with an Internet website, application, or advertisement	Advertising/Marketing Providers; Affiliates; Analytics Providers; Social Media Platforms; Website Content and Format Providers
Geolocation data	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey Companies; Website Content and Format Providers; Storage Providers
Audio, electronic, visual, thermal, olfactory, or similar information	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey

	Companies; Website Content and Format Providers; Videoconferencing Platforms; Phone Service Providers
Professional or employment-related information	Advertising/Marketing Providers; Affiliates; Analytics Providers; Recruiting Platforms; Social Media Platforms; Focus Group and Survey Companies; Website Content and Format Providers
Inferences drawn from your personal information to create a profile reflecting your preferences, characteristics, predispositions, behavior, etc.	Advertising/Marketing Providers; Affiliates; Analytics Providers; Social Media Platforms; Website Content and Format Providers

v. Categories of Sensitive Personal Data Used or Disclosed

For purposes of CCPA, we may use or disclose the following categories of Sensitive Personal Data: Payment Data, Race or Ethnic Origin, Sex or Sexual Orientation Data. However, we do not sell or share Sensitive Personal Data or use it for purposes other than those listed in CCPA section 7027(m).

13. Your Nevada Privacy Rights

The Nevada Revised Statutes (NRS 603A.300 et seq.) permit a Nevada consumer to direct an operator of an Internet website or online service to refrain from making any sale of any covered information the operator has collected or will collect about that consumer. If you are a Nevada consumer, you may submit a request pursuant to this directive by emailing us at privacy@magid.com. We will provide further information about how we verify the authenticity of the request and your identity. For more information on how we process the Consumer Health Data of Nevada residents, please see our [Consumer Health Data Privacy Policy](#) below.

14. Consumer Health Data Privacy Policy

A. Categories of Consumer Health Data We Collect

We do not actively collect health information from You. Nevertheless, we may receive the following categories of personal information linked or reasonably linkable to a consumer and that may identify the consumer's past, present, or future physical or mental health status ("**Consumer Health Data**") as defined under Washington State's My Health My Data Act ("**MHMDA**") and similar laws, under the following circumstances and for the following purposes:

Categories of Consumer Health Data Collected	The purposes of collecting, using, and sharing	How Consumer Health Data will be used or processed
<ul style="list-style-type: none"> Biometric data, such as facial photos or voice recordings 	<ul style="list-style-type: none"> If you provide a photo or voice recording while participating in a survey, focus group, or otherwise in your User Content 	<ul style="list-style-type: none"> We may process facial photos if you upload a photo that includes your face We may process video or voice recordings as

	<ul style="list-style-type: none"> • To facilitate survey response collection and/or interviews • For customer service purposes • To conduct video conferences 	<ul style="list-style-type: none"> part of a recorded interview or survey • We may process voice recordings as part our customer service • We may process your facial photo or voice recording if you participate in a video conference with Magid
<ul style="list-style-type: none"> • Individual health conditions, treatment, diseases, or diagnoses 	<ul style="list-style-type: none"> • If you provide this information in connection with a focus group or survey response, or if such information is otherwise contained in your User Content 	<ul style="list-style-type: none"> • We or our clients or service providers may process this information in the relevant survey results • We may use this information to respond to your request or otherwise provide services to You

B. Sources of Consumer Health Data We Collect

We collect Consumer Health Data from you directly when you contact or interact with us, share information through social media, participate in a focus group or survey, or voluntarily provide us with Your comments and other content in connection with using the Service.

C. Sharing of Consumer Health Data

i. Categories of Consumer Health Data We Share

We may share the following categories of Consumer Health Data with third parties and affiliates:

- Biometric data, such as facial photos or voice recordings
- Individual health conditions, treatment, diseases, or diagnosis

ii. Categories of Third Parties with Which We Share

We may share Consumer Health Data with the following categories of third-party recipients: Third Party Service Providers and Business Partners, Clients, and Affiliates.

iii. Specific Affiliates with Which We Share

We may share Consumer Health Data with the following Affiliates: N/A

D. Consumer Health Data Privacy Rights

i. Your Rights

Under the Washington State MHMDA and similar laws, residents, and natural persons whose Consumer Health Data is collected in certain states may have the following rights, subject to verification, exceptions, and limitations:

Right to Confirm/Access/Know: Up to twice annually, you have the right to (a) confirm whether we are collecting, sharing, or selling your Consumer Health Data, and (b) access such data, including a list of all third parties and affiliates with whom we have shared or sold the consumer health data and an active email address or other online mechanism that you may use to contact these third parties.

Right to Delete: You have the right to request deletion of the Consumer Health Data held by us and our affiliates, processors, contractors, and other third parties.

Right to Withdraw your Consent/Opt-Out: You may withdraw any consent you have provided at any time. The consequence of your withdrawing consent might be that we cannot perform certain services for you, such as location-based services, personalizing or making relevant certain types of advertising, or other services conditioned on your consent or choice not to opt-out.

Right to Non-Discrimination: You have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the MHMDA and similar laws.

ii. How to Exercise your Rights

You may submit requests as follows (please review our [verification requirements](#)).

- You may send an email to privacy@magid.com with your email address, phone number or address on file, and your request.
- You may write to us at Magid, 8500 Normandale Lake Blvd, Suite 630, Minneapolis, MN 55437 with your contact information on file and your request.

If you have any questions or wish to appeal any refusal to act in response to a MHMDA rights request, contact us at privacy@magid.com. We will respond to any request to appeal within the period required by law.

Washington Residents: If your appeal is unsuccessful, you can raise a concern or lodge a complaint with the Washington State Attorney General [here](#).

Nevada Residents: If your appeal is unsuccessful, you can raise a concern or lodge a complaint with the State of Nevada Attorney General [here](#).