# Bellomy Research, Inc. Privacy Notice

Effective Date: November 1, 2020 Last Reviewed On: November 24, 2025

This privacy notice (this "Notice") is applicable to the www.bellomy.com site (the "Site"), any other online service that posts a link to this Notice, and personal information otherwise collected from you by Bellomy Research, Inc. ("Bellomy," "we," "our," or "us"), including our research projects for our clients.

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

Not Applicable to Workforce: This Notice does not apply to our job applicants, current employees, former employees, or independent contractors ("Workforce Members"). For information on our privacy practices for Workforce Members, see our <a href="Workforce Privacy Notice">Workforce Privacy Notice</a>.

Not Applicable to SmartLab: This Notice does not apply to the personal information practices connected with SmartLab. For information on SmartLab privacy practices, see the SmartLab Privacy Notice.

This is a pdf document and can be printed.

### Purpose for Data Collection

Bellomy is a full-service market intelligence firm that provides strategic insight, knowledge, and direction to some of the most respected organizations in the United States. Since 1976, Bellomy has been providing consumers like you the ability to voice opinions by participating in research surveys, focus groups, and online communities and panels. As a research participant, your opinions help inform the development and improvement of new products and services, customer service programs, and public and social policies.

We conduct research for the benefit of our clients, who include for-profit companies, nonprofit organizations, and governmental institutions.

When you participate in research with us or otherwise provide us your Personal Information (defined below), these principles apply:

- We will not share your Personal Information with third parties not disclosed within this Notice without your consent unless required by law (situations described below).
- Your survey responses are confidential and not attributed to you in client reports unless you permit otherwise by written consent.
- We will not present you with offers for our clients' products or services unless you permit otherwise by written consent.
- Occasionally, we may re-contact you to validate your responses. We will be transparent about our purposes for contacting you.
- Your participation in a study is voluntary and your decisions will be respected.

If you have any questions about this Notice, please contact us via email at privacy@bellomy.com or via telephone at 800.443.7344.

#### 2. Personal Information we Collect and Disclose

Bellomy collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("Personal Information"). Personal Information does not include:

- Publicly available information from government records;
- Deidentified or aggregated consumer information;
- Health or medical information covered by the Health Insurance Portability and Accountability Act and the California Confidentiality of Medical Information Act; or
- Personal information covered by various privacy laws, including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994.

When you participate in our surveys, we may ask you for your opinions and also your Personal Information, such as your age and household composition. You may refuse to answer certain questions or discontinue participation in a study at any time. If you join one of our research panels, you may discontinue your membership at any point after joining by following the opt-out process for that particular panel, for more information regarding the opt-out process for a particular panel contact us at privacy@bellomy.com or via telephone at 800.443.7344. For more information on Personal Information practices related to your participation in our surveys conducted through SmartLab, visit the SmartLab Privacy Notice.

The description of our data practices in this Notice covers the 12 months prior to the date this Notice was last updated ("**Reporting Period**") and will be updated at least annually. Our data practices may differ between updates; however, if they are materially different from this Notice, we will provide a supplemental pre-collection notice of the current practices. Otherwise, this Notice serves as our notice at collection. In particular, Bellomy has collected and/or disclosed the following categories of Personal Information from individuals within the Reporting Period:

Category of Personal Information	Examples of Personal Information Collected	Categories of Recipients & Disclosure Purposes
Contact Information	Name, email address, phone number, mailing address	• Service Providers: panel management, email delivery, incentive fulfillment• Clients: only with explicit consent (e.g., follow-up interviews)• Purpose: account administration, study invitations, incentive delivery
Demographic Information	Age, gender, race/ethnicity, education, income range, household composition	• Clients: provided only in aggregated or de-identified form for research insights• Service Providers: data hosting, analytics• Purpose: ensure representative samples and accurate analysis
Survey Responses & Research Data	Opinions, behaviors, preferences, feedback, open-ended text, files uploaded as part of a study	• Clients: research results in de-identified or aggregated form• Service Providers: survey platforms, analytics tools• Purpose: support research studies, generate insights
Account & Panel Information	Username, password (hashed/encrypted), communication preferences, incentive history, participation records	• Service Providers: panel management platforms, secure hosting• Purpose: authenticate users, prevent fraud, manage participation and incentives
Sensitive Personal Information (With Consent)	Health-related responses, demographic attributes (e.g., race/ethnicity), or other sensitive data provided voluntarily	Clients: de-identified or aggregated results unless explicit consent is provided for identity disclosure• Service Providers: secure processing and storage• Purpose: support studies that require sensitive attributes, ensure lawful processing
Technical & Device	IP address, browser type, device identifiers, approximate geolocation,	Service Providers: hosting, fraud detection, quality assurance Purpose: secure the platform, detect bots or

0 3	Examples of Personal Information Collected	Categories of Recipients & Disclosure Purposes
Information	cookie/session data	duplicate accounts, improve functionality
III leade X. Interaction Hata	Pages visited, survey completion behavior, time spent, click paths	Service Providers: analytics, fraud prevention• Purpose: improve site performance, validate response quality, detect fraudulent activity
Incentive & Payment Information	Gift card email address, tax/reward eligibility data (if applicable)	Service Providers: incentive fulfillment vendors• Clients: only if required for incentive processing and with participant consent• Purpose: deliver incentives, verify eligibility, comply with tax or accounting requirements
III enal or Security-Relaten	Information related to fraud prevention, duplicate accounts, misuse, or security logs	• Service Providers: security and monitoring vendors• Legal Authorities: where required by law• Purpose: prevent fraud, protect the panel, comply with legal obligations

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

Bellomy obtains the categories of Personal Information set forth above from the following sources:

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

#### Sale or Sharing by Bellomy

Bellomy does not sell, rent, share, trade, or give away any of your Personal Information except as set forth herein unless required by law.

However, Bellomy may share profile information and aggregate usage information in a non-personally identifiable manner with third parties. Additionally, when we disclose Personal Information for a business purpose, we enter into a contract that describes the purpose and requires the recipient both keep that Personal Information confidential and not use it for any purpose except performing the contract, as described in the chart above.

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

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

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

#### **Contacting Respondents**

When our interviewers reach respondents by telephone or in person, they identify themselves and state the purpose(s) of their contact. Our mail-delivered or emailed survey invitations clearly identify us and explain the purpose(s) of our contact.

When we contact you, we will generally do so for one of the following purposes:

- To invite you to join a survey research panel;
- To conduct a survey research interview;
- To validate answers you gave in a survey we conducted; or
- To update our records on the accuracy of your Personal Information.

Occasionally, we may contact you for one of these other purposes:

- To notify you if you have won a sweepstakes that you entered, conducted on behalf of our client; or
- To ask for your permission to use your Personal Information for a purpose that was not identified to you when we first collected your Personal Information.

#### 3. Use of Personal Information

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

- To fulfill the reason you provided the information. For example, reporting your survey responses.
- To provide, support, personalize, and develop the Site, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize and enhance your Site experience.
- To help maintain the safety, security, and integrity of the Site, products and services, databases and other technology assets, and business.
- For testing, research, analysis and product development, including to develop and improve the Site and our clients' products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as a part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our consumers is among the assets transferred.

#### 4. Personal Information of Children

We do not knowingly collect Personal Information from children under 13 years old without verifiable parental consent from a parent or guardian. If you believe that your child under the age of 13 has provided Personal Information to us without parent or guardian consent, please contact us at privacy@bellomy.com and we will delete any such Personal Information of the minor.

### 5. Your State Data Privacy Rights

If you are a resident of California, Colorado, Connecticut, Nevada, Utah, or Virginia, you may have certain rights

under applicable State Laws, including the following:

Right to Know and Request Disclosure (California Residents Only)	The right to request that we disclose certain information to you about our collection and use of your Personal Information, including:  • The categories of Personal Information we collected about you;  • The categories of sources from which your Personal Information is collected;  • Our business or commercial purpose for collecting or selling your Personal Information;  • The categories of third parties to whom we disclose your Personal Information; and  • The specific pieces of Personal Information we collected about you.  In connection with any Personal Information we may sell, share, or otherwise disclose to a third party for a business purpose, you have the right to know:  • The categories of Personal Information about you that we sold or shared and the categories of third parties to whom the Personal Information was sold or shared; and  • The categories of Personal Information we disclosed about you and the categories of third parties to whom the Personal Information was disclosed.  We are not required to:  • Retain any Personal Information that was collected for a single one-time transaction if, in the ordinary course of business, that Personal Information is not retained.  • Re-identify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered Personal Information; or
	Provide the Personal information to you more than twice in a 12-month period.
Right to Confirm	The right to confirm whether or not we are processing your Personal Information.
Right to Access	The right to access your Personal Information, subject to exceptions set out in the applicable State Law. Examples of such exceptions include:  • Information that is aggregated or de-identified; • Information that is part of a formal dispute resolution process; • Information that is about another individual that would reveal their Personal Information or confidential commercial function; and • Information that is prohibitively expensive to provide.
Right to Delete	The right to request that we delete any of your Personal Information that we collected from or about you and retained, subject to certain exceptions. Upon receipt of a verifiable request from you, we will delete, and direct third parties to whom we have disclosed your Personal Information to delete, your Personal Information from our records, subject to exceptions allowable under the applicable State Law. Such exceptions include:  Notification of third parties to delete is impossible or involves disproportionate effort;  Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;  Debug products to identify and repair errors that impair existing intended functionality;  Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us  Comply with an existing legal obligation; or  Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.
Right to Correct	The right to request that we correct any of your Personal Information that is inaccurate. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate Personal Information.
Right to Obtain a Copy	The right to obtain a copy of the Personal Information that you have provided to us in a portable, readily usable format that can be easily transferred to third parties.
Right to Opt Out	The right to opt out of the following uses of your Personal Information:  Sale; Sharing for targeted behavioral advertising; and Profiling.  We will act upon requests to opt out no later than 15 days from the date we receive the request. We may deny your request to opt out if we have a good-faith, reasonable, and documented belief that the request is fraudulent or for any other reason allowable under the applicable State Law. Once you exercise your right to opt out, we will wait at least 12 months before asking you to reauthorize Personal Information sales if permitted by the applicable State Law. However, you may change your mind and opt back in at any time.

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	Please note that we do not sell your Personal Information.
	Nevada residents may also submit verified requests to opt out of the sale of covered information under Nevada Revised Statutes Chapter 603A.
Right to Limit the Use of Sensitive Personal Information	The right to (a) direct us to limit the use of Sensitive Personal Information that we may collect about you as described above in "Personal Information Collection and Disclosure," and (b) to know if your Sensitive Personal Information is used or disclosed to a third party, for additional, specified purposes. The right to limit allows the limitation of the use of Sensitive Personal Information only for purposes necessary to:  • Perform the requested services or provide the requested goods; • Help ensure the security and integrity of the use of your Personal Information; • Perform services on behalf of our business, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders, payments, or returns, or verifying customer information; and • Undertaking activities to verify the quality of, maintain, and/or improve our services or systems.
Right to Non-Discrimination	The right to not be retaliated or discriminated against because you have exercised your data privacy rights. This means that we cannot, among other things:  Deny goods or services to you;  Charge different prices or rated for goods or services, including through the use of discounts or other benefits or imposing penalties;  Provide a different level or quality of goods or services to you; or  Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.  We may, however, charge a different price or rate or provide a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to our business by your Personal Information. We may also offer loyalty, rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection, sale, or retention of Personal Information. Any permitted financial incentive we offer will contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time. You will have an opportunity to review any incentive terms prior to opting into participation. For more information on financial incentives, see "Notice of Financial Incentive" below.

### 6. Exercising Your State Data Privacy Rights

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

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

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

The applicable State Law may allow or require us to refuse to provide you with access to some or all of the Personal Information that we hold about you, or we may have destroyed, erased, or made your Personal Information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your Personal Information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

For California residents, we will provide access to your Personal Information, subject to exceptions set out in the CCPA, such as information that is aggregated or de-identified.

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

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

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

# 7. Security of Personal Information

We have put in place reasonable administrative, technical, and physical safeguards to protect against unauthorized access to the Personal Information we collect. However, no security measures are completely impregnable and we cannot guarantee against all potential security breaches. If you have any questions about security of our services, contact us via email at privacy@bellomy.com or contact us via telephone at 800.443.7344.

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

### Notice of Financial Incentive (if applicable)

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

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

#### 9. Unsolicited Email or SPAM

We do not intentionally "spam" email addresses to seek participation in surveys. Rather, we send email invitations only to people who we believe have opted in (i.e., affirmatively agreed to receive invitations) to our communications.

We will give every person who receives an email invitation the opportunity to opt out of that invitation and all future emails. We do not knowingly invite children under the age of 13 to participate in research studies without obtaining verifiable parental consent from a parent or guardian.

### 10. Data Retention

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

#### 11. Links to Other Sites

If you visit a third-party website that is linked from our Site, you should read that site's privacy notice before providing any Personal Information. We are not responsible for the practices of such third-party websites, and a link to such website is not an endorsement by us of such website's privacy practices, products, or services.

# 12. Technology

#### Use of Cookies

Cookies are pieces of data stored on a user's computer tied to information about the user. We use session cookies and persistent cookies. A session cookie expires automatically when you close your browser. A persistent cookie will remain until it expires or you delete your cookies. Expiration dates are set in the cookies themselves, some may expire after a few minutes while others may expire at a later time. Persistent cookies can be removed by following Internet browser help file directions. Cookies might be used on our Site to enable certain functions, provide analytics, store your preferences, enable ad delivery, and more.

You may learn more about cookies and how to opt out of them by visiting the following third-party website: www.allaboutcookies.org.

#### **Digital Fingerprints**

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

#### Log Files

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

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

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

### 13. Not Intended for Use Outside of the U.S.

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

where laws regarding processing of Personal Information may differ from the laws of other countries.

# 14. Consumers with Disabilities

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

# 15. Changes in Our Privacy Notice

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

# 16. Contacting Bellomy

Questions regarding this Notice, the Personal Information practices of Bellomy, or your data privacy rights should be directed via email to privacy@bellomy.com, via telephone at 800.443.7344, or via the following postal address:

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