

Privacy Policy

Effective date: 02/18/2020

This policy statement discloses the information practices of Instant Evaluate (Instant Evaluate, we, us, our) relating to our web sites and web/text surveys, reporting engines (collectively the "Sites"), phone surveys, data collection and any other methods of interacting with Instant Evaluate.

Please read this Policy carefully before using our Sites. In this Privacy Policy we explain how we collect, store, process use and disclose (collectively "Process") our Sites visitors' (you, your) personal information. We are committed to respecting your privacy. The following policy was created in order to comply with the Privacy Act (1974), Personal Information Protection and Electronic Documents Act (PIPEDA) and California Consumer Privacy Act of 2018 (CCPA).

Instant Evaluate's Clients and how this relates to your privacy

Instant Evaluate is a software provider for companies conducting data collection activities via telephone, the internet, text messaging, and other data collection methods. Following collection, the information is analyzed and reported on to the client requested services. These activities are primarily targeting customer and employee satisfaction issues, but may also include market, product, and service research, as well as other types of research. Surveys and data collection are hosted and accessible on Instant Evaluate's hosting site. Reports are processed each day that may provide our clients with your Personal Information for the purpose of improving their operations and/or contacting you to follow up on your service experience, and/or the information you provided.

Be aware that Instant Evaluate's clients may have full access to Personal Information collected from surveying activity, and therefore bear full responsibility for usage of that data. In such cases, please refer to the privacy policy of the Instant Evaluate client who invited you to provide information and feedback, since we are acting as data processors in such cases.

What is Personal Information?

Personal Information means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. It may include your full name, address, zip code, telephone number, date of birth, email address, demographic/classification information (e.g. education or age) IP address, and any other information that identifies who you are or would allow someone to contact you. It also may include client program membership or loyalty numbers. Personal Information only becomes known to Instant Evaluate (a) when you voluntarily provide it to us; (b) when you are taking survey; (c) when it is automatically collected through our Sites or (d) when it is provided by our client that invited you to take a survey.

Processing of Personal Information

Instant Evaluate endeavor to protect your privacy. We apply all necessary relevant technical and organizational measures to protect your Personal Information in accordance with the effective legislation. We use industry standard protocols and technology to protect your information and PI, such as Secure Socket Layer (SSL) technology and secure databases. Your Personal Information is only accessible by a limited number of our employees who have special access rights or required to know such information. Overall, we implement and maintain reasonable security measures to protect our databases and records from unauthorized access, acquisition, destruction, use or disclosure.

The Personal Information Processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated.

We apply following principles in order to protect your privacy: (a) we will not sell or lease your Personal Information to third parties; (b) any Personal Information that you provide to us will be secured with industry standard safety protocols and technology.

Although we will take diligent efforts to ensure safe storage and Processing of Personal Information, we cannot guarantee it to be 100% secure and risk-free. Unauthorized entry or use, hardware or software failure, force majeure and other factors, may compromise the security of your information at any time.

What Personal Information Do We Collect and Process

Source of Personal Information	Categories of Personal Information	Purpose of collecting	Categories and parties we may share your data
Personal Information collected at instantevaluate.com	<ol style="list-style-type: none"> Voluntary provided information (name, phone number, data of birth, e-mail, address, zip, skills, work experience, your message, other Personal Information provided) Automatically collected data (IP address, demographic data, browser type, software type, Site use statistics, local date and time) 	<ol style="list-style-type: none"> We use voluntary provided data to: (a) fulfill request made or reply to your request (for example, reply to service questions, employment inquires, letters, etc.); (b) To identify you and communicate with you; (c) to send marketing and promotional communications; or (d) to process payments. We use automatically collected data to administer our Sites and improve our services. 	We may share Personal Information with our service providers, vendors and affiliates for the purpose of providing of services to you, or fulfilling requires you have made.

Personal information collected through (1) survey webpages or (2) phone surveys.	<ol style="list-style-type: none"> 1. Identity data (name, surname, data of birth) 2. Contact data (e-mail, phone number) 3. Automatically collected data (IP address, browser type, software type, Site use statistics, local date and time) 	<ol style="list-style-type: none"> 1. We collect identity, contact and automatically collected data to provide services to our clients. 2. We use automatically collected data to improve our surveys data and user experience. 	<ol style="list-style-type: none"> 1. We share Personal Information from surveys with our clients, who provide services to you. We also used data for making of statistical reports which is disclosed to our client. 2. We may share Personal Information with our service providers, vendors and affiliates for the purpose of providing of services to our clients, or fulfilling requires you have made.
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In certain circumstances, you may require assistance from Instant Evaluate to complete a survey. If the survey is being administered by telephone, you may be required to leave a voice message. If the survey is being administered online or by other text media, you may be asked to post a message to Instant Evaluate using an e-form or e-mail. Personal Information may be required. In this case, the Personal Information will only be used to contact a participant for the intent of resolving their difficulty in accessing and completing a survey.

If you choose to take a survey, register, or submit personally identifiable information to us, you agree to the use of such information in accordance with this privacy policy. If you have already submitted Personal Information and would like us to remove it from our records, or if you would like to know what Personal Information is held in our records, please contact Instant Evaluate directly.

When you dial a toll-free number in the United States, the party you are calling pays for the call. The called party is able to identify your telephone number using a telephone network technology called Automatic Number Identification (ANI). FCC rules limit parties that own toll-free numbers from distributing the telephone numbers identified through ANI and require telephone companies to inform customers that their telephone numbers are being transmitted to toll-free numbers in this way. If you take a Instant Evaluate telephone survey, both Instant Evaluate and its clients may have access to your ANI, but, per FCC rules, will not distribute that telephone number further.

Some surveys and opt-in services offer visitors the option of participating in additional surveys or receiving information from Instant Evaluate or from a Instant Evaluate client or business partner. Visitors must opt-in if they wish to participate or receive such information, and if they do, their Personal Information may be used by Instant Evaluate and/or shared with a client of Instant Evaluate or business partner for that purpose.

Instant Evaluate or its clients may offer various promotions, incentives, or sweepstakes from time to time. When entering a promotional contest, we, our client, or our client's fulfillment

vendor may ask for your name, date of birth, address (e-mail and/or residential) and phone number so that we may communicate with you in the event you are a winner.

Retention of Information

Instant Evaluate will retain Personal Information only for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws, and your consent to such purposes(s) will remain valid after termination of our interaction with you.

Third Party Links

Our Sites may contain links to other websites, services, and web addresses. This privacy policy applies only to our Sites, not those external websites, services and web addresses that we link to. Those websites, services and web addresses have their own privacy policies. We are not responsible for these external websites and services and their privacy policies and practices, as well as their compliance with applicable data protection laws. In addition, if you linked to our Site from an external site, we cannot be responsible for the privacy policies and practices of the owners and operators of that external website and recommend that you check the privacy policy of that external website.

Disclosure of Personal Information

We reserve our right to disclose Personal Information when we or our affiliates, clients, contractors, licensors, officers, agents and/or representatives reasonably believe it necessary to protect our interests, or where you are in breach of our terms and/or this privacy policy. Accordingly, we will have the right to disclose any and all collected Personal Information and/or data, under the following circumstances:

- If required under applicable law, rules or regulations;
- In response to a valid request or subpoena from a government or law enforcement agency.
- To defend ourselves and our affiliates, licensors, officers, agents and representatives from legal claims and processes brought to us by third parties (including takedown notices).
- To defend the property, rights and integrity of any of our affiliates, advertisers or licensors.
- To stop or cause to cease any actions that we may consider to cause –whether allegedly or factually– a contingency or liability.

Age limitations

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) becomes effective. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which states what websites and online services must do to protect children's privacy and safety online.

Please take into account that our Sites are not dedicated to children under the age of 13 years old. We do not knowingly collect any kind of Personal Information from persons under the age of 13. If we learn or have reason to suspect that any user is under the age of 13, we will delete any such Personal Information.

CAN-SPAM Act

The CAN-SPAM Act is the US law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from

being sent to them, and spells out tough penalties for violations.
To be in accordance with CAN-SPAM, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Allow users to unsubscribe by using the link at the bottom of each email.
- Monitor third-party email marketing services for compliance, if one is used.
- Include the physical address of our business or site headquarters.
- Honor opt-out/unsubscribe requests quickly.
- If at any time you would like to unsubscribe from receiving future emails, please contact us.

California Consumers Rights

A. Access to Specific Information and Data Portability Rights

California residents has the right to request data about their Personal Information Processing over the past 12 months. Once we receive and confirm verifiable consumer, we will disclose to you:

- The categories of sources for Personal Information we collected about consumer.
- The Personal Information we collected about consumer (also called a data portability request).

All other information is already disclosed herein. For the avoidance of doubts, we do not sell Personal Information.

B. Deletion Request Rights

California consumers has the right to request the deletion of Personal Information processed, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete Personal Information from our records, unless Personal Information is necessary for us or our service provider(s) to (1) complete the transaction for which we collected the Personal Information, provide a good or service that consumer requested, take actions reasonably anticipated within the context of our ongoing business relationship with consumer, or otherwise perform our contract; (2) detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities; (3) debug products to identify and repair errors that impair existing intended functionality; (4) exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law; (5) comply with a legal obligation; make other internal and lawful uses of that information that are compatible with the context in which Data Subject provided it.

C. Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, consumer should submit a verifiable consumer request to info@instantevaluate.com Only consumers based in California, or a person registered with the California Secretary of State that consumer authorize to act, may make a verifiable consumer request related to Personal Information.

You can make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must: (1) provide sufficient information that allows us to reasonably verify consumer is the person about whom we collected Personal

Information; and contain description allowing us to properly understand, evaluate, and respond to it.

We cannot respond to the request or provide you with Personal Information if we cannot verify the your identity, your California consumer status and authority to make the request and confirm the relation of Personal Information.

D. Response Timing and Format

The verifiable consumer request shall be responded within forty-five (45) days of its receipt. If we require more time, we will inform consumer of the reason and extension period in writing. The responding is free of charge unless it is excessive, repetitive, or manifestly unfounded.

Changes to this Privacy Policy

We reserve the right to change this Privacy Policy at any time in case of changes in the law, our data collection, and use process, the way in which our website and services works. We shall notify you about any changes in our Privacy Policy.

Privacy Questions and Access

If you have questions or suggestions about this privacy statement, the practices of our Sites, or an account of the use that has been made with your information or your interactions with Instant Evaluate, simply contact the following:

Kevin Mooar

800-431-0812

kmooar@instantevaluate.com