

## App Survey Panel Privacy Policy

Pureprofile is the technology partner that enables the use of this account to complete surveys and activities that earn AA Smartfuel discounts. Pureprofile is a global market research company with over 20 years experience and is committed to protecting personal data. This privacy policy will inform how Pureprofile (“we” or “us” or “our”) look after AA Smartfuel (“**Partner**”) personal data. This policy supplements our Pureprofile privacy policy and is not intended to override it. Pureprofile’s privacy policy, including the methods with which data is collected and used, is explained below.

For the purposes of this policy the Partner will be referred to as 'The Panel'.

### Information for personal accounts

The Panel is founded on the principle of making your everyday online activities more valuable. We know that you care about how your personal information is used and shared, and we take your privacy seriously.

By visiting and using The Panel you are accepting the practices outlined in this policy.

### Businesses we work with

Pureprofile works with leading market research agencies, brands and partners to help them connect directly with customers. For the purposes of this policy these 3<sup>rd</sup> party businesses will be referred to as ‘**Businesses**’ or ‘**Business**’

### Introduction

By choosing to complete surveys through The Panel you’ll be asked to provide some personal and sensitive information, as detailed here. Our Privacy Policy is based on the following provisions:

- We only store profile information you choose to provide. We use the latest technologies and best practises to protect all personal information from unauthorised physical and electronic access and interference
- We don’t permit Businesses to access your personal information, unless you decide to make this information available
- We don’t forward or transfer your information to any third parties, other than the organisations detailed in this document, which are required to operate The Panel. This disclosure is necessary in your use of The Panel and these organisations are required to respect and maintain our commitments to your privacy and security

We are absolutely committed to these policies.

### What information do we collect?

We collect three broad types of information:

- Information you directly provide us;
- Information about your use and interaction with The Panel;

Information you directly provide us can include:

- profile information;
- any responses you submit during activities;
- the content of any customer service correspondence;
- any other information you directly provide on The Panel

Information about your use and interaction with The Panel can include:

- your IP address, geolocation and data stored in Pureprofile cookies;
- your activities on The Panel, such as when you accept or skip an invitation, your participation in activities and your progression through a particular activity;
- your other account activity, such as when you login to your account, when you send us customer service correspondence and when you opt-in to an application;
- information about the device you're using to access The Panel; or
- your transaction history, including your account balance, the rewards you receive from participating in activities and any rewards you have requested

### **How do we use the information we collect?**

The Panel's use of information:

We use the information you provide us to publish and deliver insights and relevant activities to you through The Panel. This can include:

- Using responses from an activity, which has been provided to a Business in a de-identified way, for further analysis or use, including publication of the de-identified results;
- Help detect and prevent fraudulent activity;
- Maintain the data quality of activity responses;
- Improve and personalise The Panel experience;
- Maintain, operate and improve The Panel; and

Promote our services on affiliated third party websites using banner ads or other materials

Businesses' use of information

There are times when Businesses may require access to profile information such as:

- Profile information to help determine the target audience for an activity; or
- The responses you submit during an activity

All information provided to Businesses will be presented in an aggregated and de-identified format, unless you grant us express permission to do otherwise.

Businesses are also allowed to ask you to provide your name, email address and other contact information during an activity. You should know that:

- you are providing this information directly to the Business and not The Panel;

- your information will be dealt with in accordance with the relevant Business' Privacy Policy and not The Panel's Privacy Policy; and
- you are always free to decline providing contact details to a Business

## Information you can use

Information collected through the platform, applications, third parties and other websites may be used by you to allow you to:

Create a relationship between your account and other online accounts you've registered for;

- help detect and prevent fraudulent activity;
- improve the accessibility of the site; and
- participate in retargeting activities

## Accessing and controlling your information

If you:

- want to obtain access to any personal information that we hold about you;
- object to profiling, including profiling for marketing purposes;
- believe any of your personal information that we hold is inaccurate, incomplete or it is not necessary to hold it; or
- want to delete your personal information from our records, you can email us at [support@pureprofile.com](mailto:support@pureprofile.com) with the subject heading "Attention: Privacy Officer". Please include your full name and account email address in the email. We will use reasonable efforts to resolve your request within 30 days.

We may refuse your request to delete data if we are unable to verify you are the rightful owner of the information. We will provide you with our reasons if we refuse your request and, if you disagree, you are entitled to ask us to make a note of the request with your information.

You may also request that your personal information be restricted from processing where one of the following applies:

- we are verifying the accuracy of personal information, which you believe to be inaccurate;
- the processing is unlawful and you oppose the erasure of personal information;
- we no longer require the personal information but you require it for the establishment, exercise or defence of legal claims; and
- you have objected to processing and we are verifying whether there are legitimate grounds to refuse the objection

## Disclosure to third parties

We will not sell, trade, give or rent any information to a third party unless:

- you have expressly consented;
- such disclosure is permitted by the Terms of Service or this Privacy Policy; or
- required to do so by law

When we provide information to third parties, profile information and activity responses are only disclosed to Businesses in an aggregate and de-identified format. We never provide any personally identifiable Information about you to a Business, unless you expressly grant us permission to do so. This permission will (unless otherwise indicated) generally be required on a case-by-case basis.

## Overseas staff handling your data

Information we collect may be stored and/or analysed and aggregated by staff residing in the United States, United Kingdom, Australia, Greece, The Philippines and India. Our staff, including contractors, are required to maintain the same privacy and data protection standards as required under the General Data Protection Regulation.

## Overseas third parties

Some activities may originate from Businesses based outside of your country of residence and accordingly, you agree to allow your activity response data to be provided to these Businesses. When this happens, we may need to use third party hosting facilities located outside of your country of residence to ensure your information is constantly accessible and backed up in secure data storage facilities. We will ensure all third party hosting providers used are not permitted access to your information.

## Data matching

We may share your information with third parties to determine if these parties already hold information about you. We do this for the following purposes:

- to seek your consent to add the information held by third parties to your The Panel account; and
- to determine if you qualify for an activity (for example for Businesses who want to deploy a survey to individuals already on their database)

If the third party does not hold information about you, we ensure that the information we shared with them is destroyed.

## Linking to other websites

If you associate your account with another website or online account through a Pureprofile product, we may save any data retrieved via this association into our system. In this case, the nature of the data being transferred will be outlined to you and require your express consent. Read the terms of any application carefully before accepting and using an application.

## Information security

We are committed to providing a secure online environment to use The Panel and have invested considerable resources to protect your information from loss, misuse, corruption and unauthorised access. More precisely, we have invested in:

- A secure server software (SSL) technology to encrypt the transfer of all personally identifiable information
- Firewalls that protect against unauthorised access of all of the data we collect and store

Due to the nature of the internet, it's possible that information stored on our servers and data transmitted online can sometimes be accessed by unauthorised third parties. While we make significant investments to ensure that this risk is minimised, we cannot guarantee the information you provided us will never be compromised. By accepting this Privacy Policy, you acknowledge and accept these risks.

## How to contact us

If you have any enquiries or complaints about either our Privacy Policies or procedures, including requesting access to or correcting personal information that The Panel holds, please email us at [support@pureprofile.com](mailto:support@pureprofile.com) with the subject heading "Attention: Privacy Officer". Please include your full name and account email address in the email.

## Policy changes

We may make changes to the Privacy Policy from time to time and you'll be notified of any changes.