



## Privacy Policy

### 1. Introduction

Hays Worldwide Research Group (HWRG) dba FUEL and Focus Room provides marketing research services within the United States and Globally. At HWRG, the privacy and security of our customers, respondents and visitors are of paramount importance. HWRG is committed to protecting the data you share with us. This privacy policy explains how HWRG processes information that can be used to directly or indirectly identify an individual (“Personal Data”) collected through use of its website and services.

For the purposes of this policy, HWRG defines the term “User” as an entity with which HWRG has an established relationship, the term “Respondent” as any individual who participates in surveys powered by HWRG or who is included as a contact in a User’s account and the term “Visitor” as an individual that visits our front-end website (for example [www.fuelyourworld.com](http://www.fuelyourworld.com) or [www.focusroom.com](http://www.focusroom.com))

Any information stored on HWRG’s database is treated as confidential. All information is stored securely and is accessed by authorized personnel only. HWRG implements and maintains appropriate technical, security and organizational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

### 2. Collection and use

#### 2.1 General

The following sections cover the specifics of each of the three groups from which data is collected: website Visitors, Respondents and Users.

#### 2.2 Website Visitors

If you are a Visitor to our website only, and not a Respondent to a survey or a user of our database, then this section is relevant for you.

By visiting this website, you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, please do not visit this

website. If required by applicable law, we will seek your explicit consent to process Personal Data collected on this website or volunteered by you. Kindly note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this website may not be possible.

HWRG may collect, record and analyze information of Visitors to its website. We may record your IP address and use cookies. HWRG may add information collected by way of page view activity. Furthermore, HWRG may collect and process any Personal Data that you volunteer to us in our website's forms, such as when you register for events or sign up for information and newsletters. If you provide HWRG with your social media details, HWRG may retrieve publicly available information about you from social media.

Such Personal Data may comprise your IP address, first and last name, your postal and email address, your telephone number, your job title, data for social networks, your areas of interest, interest in HWRG products, and certain information about the company you are working for (company name and address), as well as information as to the type of relationship that exists between HWRG and yourself.

HWRG gathers data about visits to the website, including numbers of Visitors and visits, Geo-location data, length of time spent on the site, pages clicked on or where Visitors have come.

### 2.2.1 Purpose of processing personal data

HWRG uses the collected data to communicate with Visitors, to customize content for Visitors, to show ads on other websites to Visitors, and to improve its website by analyzing how Visitors navigate its website.

### 2.2.2 Sharing personal data

HWRG may also share such information with service vendors or contractors in order to provide a requested service or transaction or in order to analyze the Visitor behavior on its website.

### 2.2.3 Cookies

Cookies are small pieces of information sent by a website to a Visitor's hard disk. Cookies cannot be used to run programs or deliver viruses to your computer. By continuing to visit the website, you agree to the placement of cookies on your device.

### 2.2.4 Links to other sites

Please be aware that while visiting our site, Visitors can follow links to other sites that are beyond our sphere of influence. HWRG is not responsible for the content or privacy policy of these other sites.

## 2.3 Respondents

Respondents should be aware that in responding to surveys or survey invitations, they could be disclosing information that could make them personally identifiable to HWRG Users. The security and privacy protection implemented on HWRG's database does not cover this type of transfer or disclosure of personal information. Respondents responding to surveys or survey invitations should be aware that they alone are responsible for the content of their responses. For more detailed information concerning the protection of privacy when responding to surveys or survey invitations, Respondents may contact the entity conducting the survey. It is the User's responsibility to ensure that collection and processing of data is done in accordance with applicable law. HWRG will not process Personal Data of Respondents for other purposes or by other means than instructed by its Users.

### 2.3.1. Inquires

If you wish to inquire about your Personal Data that may have been collected in a HWRG survey, we recommend that you contact the entity that created or sent you the survey. As HWRG is a Processor, it does not control the Personal Data used or stored in the survey, but processes it on behalf of its User.

## 2.4 Users

### 2.4.1. General

In order to provide services to its Users, HWRG collects certain types of data from them. Furthermore, HWRG's Users collect information from Respondents when they produce and distribute surveys. This section will describe how these two types of data are collected and used by HWRG as well as geographical differences that effect this policy. Data entered or transferred into HWRG by Users such as texts, questions, contacts, media files, etc., remains the property of the User and may not be shared with a third party by HWRG without express consent from the User.

### 2.4.2 Collection of User data

During a User's registration and later on HWRG's database, they provide information such as name, company name, email, address, telephone, and other relevant data. This information is used by HWRG to identify the User and provide them with support, services, mailings, sales and marketing actions, billing and to meet contractual obligations.

HWRG Users can at any time update or delete their contact details by contacting HWRD. HWRG will not retain User data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

### 2.4.3 Collection of Respondent data

Surveys used for gathering feedback are created by Users, who make them available to relevant businesses, organizations, and individuals. It is the User's responsibility to ensure that collection and processing of data is done in accordance with applicable law. HWRG will not process Personal Data for other purposes or by other means than instructed by its Users.

Respondent data includes data from individuals uploaded, transferred or manually entered by a HWRG User for the purpose of responding to surveys. Personal Data may include, personal contact information such as name, home address, home telephone or mobile number, email address, information concerning family, lifestyle and social circumstances including age, date of birth, marital status, number of children, employment details, education/qualification, business contact details, gender, religion, race, health detail and other sensitive Personal Data. Answers to questions by Respondents, may also include Personal Data.

The purpose of collecting Personal Data as part of a survey will vary depending on the survey, as set up by HWRG's Users. As HWRG provides surveys to a wide group of customers and businesses, the purpose may vary greatly. For Users in the EEA, or for Users providing surveys to Respondents in the EEA, the User will be the "controller", as defined in the Directive and the GDPR. The purpose will consequently be defined by HWRG's User.

### 2.4.4. Geographical location

HWRG offers a number of data regions with many of their partners. A HWRG "Data Region" is a set of partner data centers located within a defined geographical area where User and Respondent data is stored. For HWRG Users with accounts located in HWRG's European Data Region, all Personal Data is collected in the EEA. For Users with accounts in the Data Regions: United States of America (US) and Canada, all Personal Data is collected and processed solely in the respective country.

#### 2.4.4.1 Processing in the European Economic Area (EEA)

For Users with accounts located in HWRG's partner European Data Region, all processing of Personal Data is performed in accordance with privacy rights and regulations following the EU Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 (the Directive), and the implementations of the Directive in local legislation. From May 25th, 2018, the Directive and local legislation based on the Directive will be replaced by the Regulations (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation (GDPR), and HWRG's processing will take place in accordance with the GDPR.

#### 2.4.4.1.1 Controller

HWRG processes Personal Data both as a Processor and as a Controller, as defined in the Directive and the GDPR:

The HWRG entity which you as a User entered an agreement with when partnering with HWRG or use of the database, will be the Controller for User data, as outlined above in “Collection of User data” section.

For Respondent data, as outlined in the “Collection of Respondent data” section, the User will be the Controller in accordance with Directive and GDPR, and HWRG will be the Processor. HWRG adheres to the Directive of 1995 and the GDPR from May 25th, 2018.

All data collected by HWRG Users through surveys will be stored exclusively in secure hosting facilities provided HWRG partners. All hosting is performed in accordance with the highest security regulations. All transfers of data internally in the EEA is done in accordance with this agreement.

#### 2.4.4.2 Processing in the United States Of America (US)

For Users with accounts in the HWRG US Data Region, HWRG processes data solely in data centers located in the US. HWRG has adopted reasonable physical, technical and organizational safeguards which substantially mirror the EU safeguards against accidental, unauthorized or unlawful destruction, loss, alteration, disclosure, access, use or processing of the User’s data in HWRG’s possession. HWRG will promptly notify the User in the event of any known unauthorized access to, or use of, the User’s data.

All data collected by HWRG Users through surveys will be stored exclusively in secure hosting services provided by Microsoft Office 365 . HWRG’s contract with its hosting provider ensures that all hosting is performed in accordance with the highest security regulations. HWRG’s policy is to protect and safeguard any personal information obtained by HWRG in accordance with United States state or federal laws governing the protection of personal information and data. Accordingly, HWRG adheres to practices and policies that aim to safeguard the data.

### 3. Retention and deletion

HWRG will not retain data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations. For Respondent data, HWRG’s Users have control of the purpose for collecting data, and the duration for which the Personal Data may be kept. For Respondent data, Users with an active account will therefore, have the responsibility to delete data when required. When a user’s account is terminated or expired, all Personal Data collected through the database will be deleted, as required by applicable law.

## 4. Acceptance of these Conditions

We assume that all Visitors of our website, Respondents to surveys powered by HWRG and users HWRG's services and database have carefully read this document and agree to its contents. If someone does not agree with this privacy policy, they should refrain from partnering with HWRG, using our website and database. We reserve the right to change our privacy policy as necessity dictates. Continued use of HWRG website and database after having been informed of any such changes to these conditions implies acceptance of the revised privacy policy.

## 5. Our Legal Obligation to Disclose Personal Information

We will reveal a user's personal information without his/her prior permission only when we have reason to believe that the disclosure of this information is required to establish the identity of, to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property belonging to HWRG or to others who could be harmed by the user's activities or of persons who could (deliberately or otherwise) transgress upon these rights and property. We are permitted to disclose personal information when we have good reason to believe that this is legally required.