



Innovation Plus

ADVISORY PANEL PRIVACY POLICY

March 19, 2018

Your privacy is as important to us as it is to you

Symphony RetailAI (collectively with its affiliates, subsidiaries and divisions, "SRAI" or "we" or "us") is firmly committed to protecting your privacy while fulfilling our mission of collecting information from volunteer panelists. We routinely review our security features and privacy practices and enhance them to better protect your privacy. This Privacy Policy explains in general terms how we collect, store, use, and disclose your Personal Information (as explained below) and certain other information that we receive from you as part of your participation in our advisory panel and any related services (our "program"). This Privacy Policy does not apply to any individual using any other services of ours.

PLEASE NOTE THAT YOUR PERSONAL INFORMATION MAY BE PROCESSED BY US IN THE COUNTRY WHERE IT WAS COLLECTED AS WELL AS OTHER COUNTRIES (INCLUDING THE UNITED STATES) WHERE LAWS REGARDING PROCESSING OF PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY. BY USING THIS SITE AND PROVIDING ANY PERSONAL INFORMATION, YOU ARE CONSENTING TO THE TRANSFER OF DATA FROM YOUR COUNTRY TO A COUNTRY THAT HAS LESS STRINGENT LAWS, AND THE PROCESSING OF YOUR PERSONAL INFORMATION IN CONFORMANCE WITH THIS POLICY.

Children

Children are not eligible to be a part of our program. Protecting the privacy of children is very important to us. We do not collect or maintain Personal Information from people we actually know are under 13 years of age, and no part of our program is designed to attract people under 13 years of age. If we later learn that a user is under 13 years of age, we will take steps to remove that user's Personal Information from our databases and to prevent the user from utilizing or being a part of our program.

What personally identifiable information of yours is collected?

SRAI collects Personal Information comprised of both contact information (e.g., names, addresses, phone numbers and e-mail addresses) and of any other non-public information that we associate with your contact information. Except as set forth in this Privacy Policy, we will never disclose this personal information to anyone.

How do we collect Personal Information about you?

SRAI collects information in several ways. The majority of the personally identifiable contact information is collected when you register in our panel and when you voluntarily complete surveys that we send to you, including a username and password that you can use to access the "members only" areas of our site. We collect a significant amount of information as you participate in our program, as detailed below. In part, we may ask that you download software applications to your mobile device, tablet, or personal computer (PC) and we may request your permission to collect information from your social media accounts, including Facebook and Twitter.

What other information is going to be collected about you?

In addition to your contact information, the kinds of information we collect from you will depend on which components of our program you participate in. In part, we may ask you to download specific applications to your smartphone, as further explained below. We will also ask you to connect with us on Facebook and Twitter. Finally, we may ask you to allow us to learn about your Internet usage by tracking such usage and storing such information.

Though much of this information does not, by its nature, contain personally identifiable information about you, we associate all of it with you and your contact information, and, as a result, we consider it to be Personal Information under this Privacy Policy.

Mobile Device Information: When you install any applications from us, we collect your device type, your wireless carrier, and your individual device ID.

Browser Cookies: While participating in this panel, we will ask you to accept SRAI browser cookies on your tablet and PC. A cookie is a small file stored on your Web browser. The cookie lets us monitor which Internet ads have been loaded into your browser and gather information regarding the date and time of your visits and the solutions and information for which you searched and viewed on the Internet.

We also deploy a separate session cookie when you log into the “members only” area of our Website to allow you to redeem rewards. Session cookies exist only during one session and disappear from your computer when you close your browser or turn off your computer. These session cookies allow us to uniquely identify you when you log in to process your online transactions and requests.

Browser plugin: We may also ask you to install a small program in your Web browser. This program, or “plugin”, helps us collect information on what Web sites you visit, and what advertising you’ve seen.

Social Media: If you connect with us on Facebook and Twitter, we will access your social media profile information, as well as any posts you may make on the service. When you do this, you make certain information available to us, and we associate it with the other Personal Information we have about you. You may restrict and edit the Personal Information that you make available to us by editing your privacy settings on Facebook or Twitter.

How is your information used?

We may use your Personal Information to create anonymous information records by excluding information that makes the information personally identifiable to you. SRAI compiles this information into aggregated and summarized data to ensure your privacy. We never provide our clients with the identity of any panelists within the SRAI network. Our clients use the collected information to better understand how to launch new products into supermarket retailers, and how to create better customer experiences in store.

On a personally identifiable basis, your Personal Information will be used as follows:

- Administer the program to you and respond to your requests;
- Verify the accuracy of the Personal Information you provided;
- Improve the quality of the program; and
- Communicate with you regarding your involvement in the Innovation Plus panel (billing information when applicable), further actual purchases of the items surveyed after launch, incentive redemption information, survey participation and software upgrades).

Safeguards we have implemented to ensure the security of your information

The success of our business depends on maintaining the trust of our panel members. To maintain that trust, we believe that we have implemented security practices that meet or exceed the industry standard to protect your information. We will not activate a prospective member's account without confirmation. Additionally, all members are required to use their passwords and usernames when registering, updating their contact information, or accessing "members only" sections of our Web sites.

We maintain reasonable technical, administrative, and physical safeguards to protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of Personal Information. Additionally, only those authorized employees, contractors, and agents who have a need to know Personal Information in connection with the performance of their services are allowed to access this information. However, no data security is perfect and we need your assistance in maintaining data security. Please do not share your username or password with any third party. Please also choose a secure password.

Despite such efforts, however, please note that no company, including SRAI, can fully eliminate risks or guarantee the security of your Personal Information; unauthorized entry or use, hardware or software failure, and other factors may compromise the security of information about you at any time, and we bear no liability for uses or disclosures of personal data or non-personal data arising in connection with the theft thereof. If you have any questions about security, you can contact us at innovationplus-support@symphonyretailai.com. If there is a breach, we will use all reasonable steps to stop the breach.

Disclosure of Personal Information

We may disclose certain Personal Information:

- To third party vendors who help us provide the program, in which case we will require such vendors to process such information based on our instructions and in compliance with this Privacy Policy;
- To third parties to whom you ask us to send Personal Information;
- To a parent company, any subsidiaries, joint ventures, or other companies under a common control (collectively, “**Affiliates**”), in which case we will require our Affiliates to honor this Privacy Policy;
- To a company that merges with us, acquires us, or purchases our assets (including in bankruptcy), in which case such company may continue to process your Personal Information as set forth in this Privacy Policy; or
- If we believe in good faith that such disclosure is necessary to (a) resolve disputes, investigate problems, or enforce our terms and conditions; (b) comply with relevant laws or to respond to requests from law enforcement or other government officials relating to investigations or alleged illegal activity, in which case we can (and you authorize us to) disclose Personal Information without subpoenas or warrants served on us; or (c) protect and defend our rights or property or the rights and property of you or third parties.

We may also share non-personally identifiable information with unaffiliated third parties, such as business partners, in an aggregate, anonymous form, which means that the shared information will not contain nor be linked to any Personal Information.

Accessing and Controlling Your Information

Please be aware that any Personal Information you make available to us on Facebook may also be made available generally on Facebook, including to third parties, pursuant to your Facebook privacy settings. Please be thoughtful about your Facebook privacy settings. The use and disclosure restrictions contained in this Privacy Policy will not apply to any third party, including Facebook. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable.

While navigating our Web sites you may be directed to content or functionality that is hosted by a third-party supplier, not on a SRAI-owned domain. For other Web sites, the site owner's privacy policy will be referenced and will govern how your information is used. We have no control over, do not review and are not responsible for the privacy policies of or content displayed on such other Websites. We recommend that you carefully read the privacy policies of each Web site that you visit for information on their privacy, security, data collection, and distribution policies.

If at any point you decide that you no longer wish to participate in any one of these activities, you can opt out one of two ways:

1. Send an e-mail to innovationplus-support@symphonyretailai.com and you will receive instructions on how to opt-out
2. Visit your profile page at and check the “unsubscribe” box.

Additionally, if you wish to no longer participate in certain activities, you can take steps to cease participation, such as deleting one of the mobile applications or deleting cookies, as applicable.

Upon your termination, we will no longer collect information about you, but we will continue to use information collected prior to you opting out in accordance with this privacy policy, unless otherwise required by law. If we

disclose some of your Personal Information to third parties, we cannot access that Personal Information any longer and cannot force the deletion or modification of any such information by the parties to whom we have made those disclosures.

Our promise to you

We will NOT try to sell you anything from a third party, nor use your Personal Information for marketing purposes. Nor will we ever pass your Personal Information to third parties for marketing purposes.

Changes to the Privacy Policy

We may modify our privacy practices and update and make changes to this Privacy Policy at any time. If we change our privacy policy we will notify you via e-mail regarding the change. We may modify our privacy practices and update and make changes to this Privacy Policy at any time. For this reason, we encourage you to refer to this Privacy Policy on an ongoing basis. This Privacy Policy is current as of the "last revised" date which appears at the top of this page. We will treat your Personal Information in a manner consistent with the version of this Privacy Policy under which it was collected, unless we have your consent via e-mail, telephone or other appropriate means to treat it differently. By continuing as a member, or participating in Research Activities following any Privacy Policy change, you freely and specifically give us your consent to collect, use, transfer, and disclose your Personal Information in the manner specified in such then-current Privacy Policy.

Contact

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