Privacy Policy

The Concept System® Global MAX™

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Table of Contents

1.0 Introduction

This Privacy Policy applies to all the products, services, websites and apps offered by Concept Systems Inc (CSI). We refer to those products, services, websites and apps collectively as the "services" in this Privacy Policy.

References to "data" in this Privacy Policy will refer to whatever data you use our services to collect, analyze and report, whether it be participant responses, data collected in a form, or data inserted on a site hosted by us.

Reference to personal information or just information, means information about you personally that we collect or for which we act as custodian.

2.0 Information we collect

Who are **"you"?**
We refer to "you" a lot in this Privacy Policy. To better understand what information is most relevant to you, see the following definitions.

> ➢ **License Holder**

You hold an account with Concept Systems Inc and you hold a **Global MAX™** License to conduct research using Group Concept Mapping.

> ➢ **Participant**

You have received an invitation from a **Global MAX™ License Holder** to participate in a Group Concept Mapping research project.

> ➢ **Website Visitor**

You visited www.conceptsystems.com and submitted a request to csiinfo@conceptsystems.com for information concerning our products and services.

Information we collect about you.

Contact Information (for example an email address).
You might provide us with your contact information, whether through use of our services, as a Participant in a GCM project, a form on our website, an interaction with our sales or customer support team, or a response to one of Concept Systems Inc's surveys.

Usage information.
Like most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files can contain data about the nature of each access, email address or user account, browser versions, operating system versions, and timestamps.

Device and browser data.
We collect data from the device and application you use to access our services, such as your operating system version, device type, system and performance information, and browser type.
- o Information from page tags.
  We use third party tracking services that employ cookies and page tags (also known as web beacons) to collect data about visitors to our websites. This data includes usage and user statistics (for example, how many visitors to conceptsystems.com).
- o Referral information in the aggregate.
  If you arrive at a Concept Systems Inc website from an external source (such as a link on another website or in an email), we record information about the source that referred you to us.
- o Email Communications.
  Emails sent by Concept Systems Inc or by users through our services include page tags, images, and links that allow the sender to collect information about who opened those emails and clicked on links in them. We provide more information on cookies below and in our Cookies Policy.

Information from third parties and integration partners.
We collect your personal information or data from third parties if you give permission to those third parties to share your information with us or where you have made that information publicly available online.

  ➢ If you are a **License Holder** we will also collect:

Account Information.
- o Registration information.
  You need a Concept Systems Inc account before you can use Concept Systems Inc services. When you register for an account, we collect your first and last name, username, password and email address.
- o Billing information.
  When purchasing a product or service, we require you to provide your billing details, such as organization name, contact name and address for invoicing purposes.
- o Project Activation Form.
  In order for Concept Systems Inc to initiate a project for you on Global MAX™ you must complete a Project Activation Form. This form includes project specific information such as the Project Administrator, Billing Information, the Product or Service, Project name and description.
- o Account settings.
  You can set various preferences and personal details on pages like your profile page.

Use of some of our services will also result in us collecting the following data on your behalf:

Participant Address book information.
We allow you to import email addresses as account names into a participant section of Global MAX™. Concept Systems Inc does not use these email addresses for our own purposes or email them except at your direction and direct support requests.
Research data.
We store your research data (participant list, questions, responses, and analysis scenarios).

Other data that you intentionally share.
We may collect your personal information or data if you submit it to us in other contexts. For example, if you provide us with a testimonial, or participate in a CSI contest.

> ➢ If you are a Project **Participant,** we will also collect:

Your email address.
If a License Holder uses the built-in email invitation system to send you a project invitation email, we may collect your email address when the License Holder provides it to us. We do not use this to send you email except at the direction of a License Holder. If you no longer want to be contacted by a License Holder, please contact the License Holder directly.

Participant responses.
We collect and store the participant responses that you submit when participating in a Group Concept Mapping activity. The License Holder is responsible for this research data and manages it. A Group Concept Mapping project may ask you to provide personal information or data. If you have any questions about the project for which you are a participant, please contact the License Holder directly as Concept Systems Inc is not responsible for the content of that research project. The License Holder is usually the same person that invited you to participate in the project and may have their own privacy policy.

3.0 How we use the information we collect

> ➢ For the **License Holde**r:

We treat your research data as information that is private to you, except if you have made the project available via a public link. We do not use your research data other than as described in this privacy policy or unless we have your express consent.

Generally, we use the information we collect from you in connection with providing our services to you and, on your behalf, to your participants. For example, specific ways we use this information are listed below. However, this privacy policy is not intended to restrict our use of research data that you have chosen to make available online through a public link.

We process personal data about you in order:
- o To provide you with our services;
- o To manage our services;
- o To contact you regarding your service or account;
- o To contact you for marketing purposes;
- o To respond to legal requests and prevent harm.

To provide you with our services.
This includes providing you with customer support, which requires us to access your contact information to assist you (such as with Group Concept Mapping design and creation or technical troubleshooting).

To manage our services.
We internally use your information, including certain research data, for the following limited purposes:
- o To monitor, maintain, and improve our services and features. We internally perform statistical and other analysis on device data and log data we collect to monitor, troubleshoot, and improve our services. We may use your information for internal purposes designed to keep our services secure and operational, such as for troubleshooting and testing purposes, and for service improvement, research and development purposes.
- o To enforce our Terms of Use agreements where applicable.
- o To prevent potentially illegal activities and screen for and prevent undesirable or abusive activity.

To contact you about your service or account.
We occasionally send you account related communications of a transactional nature (e.g. service-related announcements, billing-related matters, changes to our services or policies, a welcome email when you first register).

To contact you for marketing purposes.
If you opt-in for marketing communication, Concept Systems Inc does not sell or share any License Holder or project administrator contact information with third party advertisers or marketers.

To respond to legal requests and prevent harm.
To respond to legal requests or prevent fraud, we may need to use or disclose information or data we hold about you. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

➢ For the **Participant**:

The data for Group Concept Mapping projects hosted by our web application, **Global MAX™** are controlled and managed by the License Holder. The web application collects data (including the ones provided in this privacy policy), on behalf of and upon the instruction of the License Holder.

Participating in a Group Concept Mapping project is voluntary.
Remember, you can always choose not to participate or not to provide an answer to any given project question (especially those requesting your personal information or data). However, sometimes this will prevent you from completing a project activity if the License Holder has marked that question as requiring a response.

Participant responses.
We collect and store the participant responses that you submit. The License Holder is responsible for this research data and manages it. A Group Concept Mapping project may ask you to provide personal information or data. If you have any questions about the project for which you are a participant, please contact the License Holder directly as Concept Systems Inc is not responsible for the content of that research project. The License Holder is usually the same person that invited you to participate in the project and may have their own privacy policy.

Are your Project responses anonymous?
You will need to ask the License Holder as it depends on how they have chosen to configure their research project. We provide instructions to License Holders on how to collect responses anonymously. However even if a License Holder has followed those steps, specific questions in the project may still ask you for your personal information or data that could be used to identify you.

Your Project responses are owned and managed by the License Holder, and we treat that information as private to the License Holder, except if the License Holder has made the questions and response available via a public link. Please contact the License Holder directly to understand how they will use your Project responses. Some License Holders may provide you with a privacy policy or notice at the time you are invited to participate in a project and we encourage you to review that to understand how the License Holder will handle your responses. Concept Systems Inc does not sell Project Participant data to third parties nor we do use any contact information collected in our customers' Projects to contact Project participants.

We process personal data about you in order:
- o To respond to an inquiry which you submit to us;
- o To respond to a request for assistance that you submit to us;
- o To troubleshoot a technical issue.

> ➤ For the **Website Visitor**:

We process personal data about you where you have consented to respond to your inquires, send you information as part of the services, and send you marketing information (as long as you do not opt-out).

4.0 Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it can be indexable by search engines. Our services provide you with different options on sharing and deleting your content, but we cannot delete content from search engines, so you need to be careful about information you make public.

5.0 Information we share

> ➤ For the **License Holde**r:

When might we disclose your personal information or research data to third parties?
Only for a limited number of reasons. We share your information with our service providers who help us provide our service to you. We contractually bind these service providers to keep your information confidential and to use it only for the purpose of providing their services. In rare circumstances, we may share information if required by law, or in a corporate restructuring or acquisition context.

Sharing your projects with the public.
You are able to control who can participant in your Project by changing your project settings. For example, projects can be made completely public or limited to a restricted list of stakeholders.

We recognize that you have entrusted us with safeguarding the privacy of your information. Because that trust is very important to us, the only time we will disclose or share your personal information or research data with a third party is when we have done one of three things, in accordance with applicable law: (a) given you notice, such as in this privacy policy; (b) when you don't opt out of communications; or (c) de-identified or aggregated the information so that individuals or other entities cannot reasonably be identified by it. Where required by law, we will obtain your express consent prior to disclosing or sharing any personal information.

We may disclose:
Your information to our service providers.
We use service providers who help us to provide you with our services. We give relevant persons working for some of these providers access to your information, but only to the extent necessary for them to perform their services for us. We also implement reasonable contractual and technical protections to ensure the confidentiality of your personal information and data is maintained, used only for the provision of their services to us, and handled in accordance with

this privacy policy. Examples of service providers include payment processors, and hosting services.

Your account details to your billing contact.
If your details (as the account holder) are different to the billing contact listed for your account, we may disclose your identity and account details to the billing contact upon their request (we also will usually attempt to notify you of such requests). By using our services and agreeing to this privacy policy, you consent to this disclosure.

Your information if required or permitted by law.
We may disclose your information as required or permitted by law, or when we believe that disclosure is necessary to protect our rights, protect your safety or the safety of others, and/or to comply with a judicial proceeding, court order, subpoena, or other legal process served on us.

Your information if there's a change in business ownership or structure.
If ownership of all or substantially all of our business changes, or we undertake a corporate reorganization (including a merger or consolidation) or any other action or transfer between Concept Systems Inc entities, you expressly consent to Concept Systems Inc transferring your information to the new owner or successor entity so that we can continue providing our services. If required, Concept Systems Inc will notify the applicable data protection agency in each jurisdiction of such a transfer in accordance with the notification procedures under applicable data protection law.

➢ For the **Participant**:

With whom do we share or disclose your information?

Your Project responses to License Holders.
We host Projects for License Holders, but they are the primary curator of Project data. Anything you expressly disclose in your Project responses will, naturally, be provided to them. Please contact the License Holder directly to understand how they might share your Project responses. Please see the License Holder version of this privacy policy to understand what Concept Systems Inc tells License Holders about how we handle Project responses, and to whom Concept Systems Inc may disclose Project responses.

We will share your personal data and Project responses with third parties only as described in this privacy policy.

➢ For the **Website Visitor**:

We do not share personal data about you with third parties.

6.0 Cookies and other important information

Cookies. We use cookies and similar technologies on our websites. Cookies are small bits of data we store on the device you use to access our services, so we can recognize repeat users. Each cookie expires after a certain period of time, depending on what we use it for. We use cookies and similar technologies as follows:

> A cookie-based session identifier can be used to recover from interrupted (i.e. crashed) session; a session will have an expiration time to minimize security issues with this approach. Browser sessions need to have persistent information stored for each user. A session record will be created in the database for each active browser session and used to store this persistent information.

> You can still choose to remove or disable cookies via your browser. Refer to your web browser's configuration documentation to learn how to do this. Please note that doing this may adversely impact your ability to use our services. Enabling cookies ensures a smoother experience when using our websites. To manage flash cookies, click here. By using our websites and agreeing to this privacy policy, you expressly consent to the use of cookies as described in this policy.

Data locations.
Our servers are based in the United States, so your personal information will be hosted and processed by our service provider in the United States.

Online Tracking.
We currently do not process or comply with any web browser's "do not track" signal or other similar mechanism that indicates a request to disable online tracking of individual users who visit our websites or use our services (unless otherwise stated in a service-specific privacy statement).

7.0 Security

We are committed to handling your personal information and data with integrity and care. However, regardless of the security protections and precautions we undertake, there is always a risk that your personal data may be viewed and used by unauthorized third parties because of collecting and transmitting your data through the Internet. If you have any questions about the security of your personal information, contact customer support.

The server for The Concept System® website is located in a locked facility with restricted access. Only the approved host company (DigitalOcean) has physical access to the server. All data is stored in a single database instance on the server. The database TCP-IP port is closed by the server computer firewall. When a License Holder sends an email through the system, our approved third-party email service provider SendGrid is used.

All functional areas of The Concept System® web application have access restrictions based on permissions and assignments. Access is checked at the start of every web page delivery, and

invalid access exceptions are redirected to the appropriate page that explains why the intended page cannot be displayed. Concept Systems Inc staff are only assigned permissions as necessary to complete their duties and receive security awareness training.

Within a project, a License Holder has access to change the project settings and assign participants to the tasks of brainstorming, sorting statements, and rating statements. Participants are assigned by the License Holder to various tasks such as brainstorming, sorting, and rating statements. If access is attempted by a participant to an unauthorized task, then they are returned to a valid web page with an explanatory message.

With anonymous participation, participants can complete a section of the project without needing to log into a personal account. This allows them to participate without the worry of their answers being linked back to them. If a section is set to anonymous, the participant can record a randomly generated user name and password to return to their saved work. Anonymous participation is most commonly used and recommended for the Brainstorming phase of the project.

The Concept System® projects are run with encrypted packet transmission (SSL). A project invitation URL (https) can be sent to participants and the participant's session will be encrypted. IP addresses are no longer logged.

Should you purchase online, in order to minimize the risk of security incidents, we fully outsource all payment processing to FoxyCart.com. FoxyCart is PCI DSS (Payment Card Industry Data Security Standard) Compliant as a Level 1 Service Provider and is listed on both Visa and MasterCard's global registries. Anytime you submit payment information via our website, you are submitting through FoxyCart's secure infrastructure. If you opt to save your payment information during checkout, that information is stored at FoxyCart. We don't have access to your payment details except for the last 4 digits, the card type, and the expiration date.

Our Contact Information for security inquiries is security@conceptsystems.com

8.0 Data Retention

If you are a **License Holder** with Concept Systems Inc we do not delete the data in your account – you are responsible for and control the time periods for which you retain this data. There are controls in your account where you can delete data at the account level (all data in your account) and at the response level.

If you are a **Participant**, you will need to ask the License Holder how long your responses will be stored in Concept Systems Inc services.

Delete your project data.
As long as you maintain an account with us, we may retain your deleted data for a limited time. To the extent permitted by law, we will permanently delete your data if you request to cancel your account.

Cancel your account.

To cancel and delete your account, please contact our customer support team at csiinfo@conceptsystems.com. Deleting your account will cause all the project data in the account to be permanently deleted from our systems within a reasonable time period, as permitted by law, and will disable your access to any other services that require a Global MAX™ account. We will respond to any such request, and any appropriate request to access, correct, update or delete your personal information within the time period specified by law (if applicable) or without excessive delay. We will promptly fulfill requests to delete personal data unless the request is not technically feasible, or such data is required to be retained by law (in which case we will block access to such data, if required by law).

9.0 Safety of Minors

Our services are not intended for and may not be used by minors. "Minors" are individuals under the age of 13 (or under a higher age if permitted by the laws of their residence). Concept Systems Inc does not knowingly collect personal data from Minors or allow them to register. If it comes to our attention that we have collected personal data from a Minor, we may delete this information without notice. If you have reason to believe that this has occurred, please contact our support team at privacy@conceptsystems.com

10.0 Changes to our privacy policy

We may modify this privacy policy at any time, but if we do so, we will notify you by publishing the changes on this website. If we determine the changes are material, we will provide you with additional, prominent notice as is appropriate under the circumstances, such as via email or in another conspicuous manner reasonably designed to notify you. If, after being informed of the changes, you continue to use our services beyond the advance-notice period, you will be considered as having expressly consented to the changes in our privacy policy. If you disagree with the terms of this privacy policy or any updated privacy policy, you may close your account (if you have one) at any time or not respond to an invitation to participate in a Project.

11.0 Personalized marketing

You can opt-out from direct marketing in your account and we provide opt-out options in all direct marketing emails. Alternatively, you can contact privacy@conceptsystems.com at any time to be removed from our mailing list.

12.0 Who is my data controller?

As mentioned above – all response data at an individual level is controlled by the License Holder. Concept Systems Inc can be a data controller of data about Participants only in the very limited ways described in the section **3.0 How we use the information we collect – Participant**

13.0 Your rights

You have certain legal rights to obtain information as to whether we hold personal information about you, to access personal information we hold about you, and to obtain its correction, update, amendment or deletion in appropriate circumstances. Some of these rights may be subject to some exceptions or limitations. We will respond to your request to exercise these rights within a reasonable time (and in all cases within 30 days of receiving a request).

Rights which you are entitled to are:
- o Right to restrict processing
- o Right to object to processing
- o Data access rights
- o Right of Rectification
- o Data portability rights
- o Right to Erasure; and
- o Right to withdraw consent

➢ For the **License Holder**:

Where you hold an account with Concept Systems Inc, you are entitled to request that we restrict how we use your data or object to some aspect of our treatment of your data. Please submit your request to privacy@conceptsystems.com.

You can log in and access and update if necessary the personal information we have on file per the following:

Update your account details.
You can update your profile and change your password on your My Account page. Information is updated immediately.

Access and correct your personal information.
As an account holder, you may access and correct certain personal information that CSI holds about you by visiting your My Account page.

Data portability.
Concept Systems Inc also enables you to export your data from our system so that you can back it up or use it with other applications;

Download/backup your Project data.
The **Global MAX™ web application** provides you with the ability to export, share and publish your project data (through reports) in a variety of formats. Please refer to the *Global Max™ Software Guide linked below*

http://www.conceptsystems.com/content/uploads/2015/09/CS-Global-Max-Software-Guide.pdf

For some information, these rights may be exercised through the My Account page mentioned above, and in all cases, requests to exercise these rights may be directed to our support team at privacy@conceptsystems.com.

These rights are subject to some exceptions, such as where giving you access would have an unreasonable impact on the privacy of other individuals. We will respond to your request to exercise these rights within a reasonable time and, where required by law or where we deem it otherwise appropriate and practicable to do so, we will honor your request.

➢ For the **Participant**:

Where you have responded to an invitation to participate in a Group Concept Mapping project sent to you by a License Holder, using Concept Systems Inc service, you will need to contact directly that individual or organization to discuss managing, deleting, accessing, restricting access to or otherwise withdrawing consent for use of, the information which you provided to them in your responses. Concept Systems Inc does not control your response data and, accordingly is not in a position to directly handle these requests in relation to that data. If you are having difficulties contacting this License Holder you can contact us through privacy@conceptsystems.com and we will do our best to assist you.

Where you wish to exercise any of the above rights with respect to the categories of Participant data described in the policy for which Concept Systems Inc is a data controller, please contact us here privacy@conceptsystems.com.

➢ For the **Website Visitor**:

Where you have visited our website and you want to exercise any of the above rights please contact our support team here privacy@conceptsystems.com.

14.0 Exercising your rights

For privacy inquiries or if you are dissatisfied with how we have managed a complaint please contact us at:

Concept Systems Inc
136 East State Street
Ithaca, NY 14850
United States

privacy@conceptsystems.com