

## Privacy Policy

This notice applies where we process personal data through our website, or for qualitative research efforts, or in any other interactions with you outside of your use of the services.

### Personal Data We Collect

We may collect personal data directly from you, or automatically when you use our website through the use of technologies such as cookies. We collect this personal data for the purposes outlined below in "How We Use Personal Data."

In terms of the categories of personal data we collect, this breaks down into

#### Categories of Personal Data Collected for Each Purpose

##### 1. Marketing or Advertising

Automatically

- Network and connection information, such as Internet protocol (IP) used to connect your PC or mobile device to the internet, and information about your internet service provider (ISP)
- Identifiers and information contained in cookies:
  - Cookies are text files containing small amounts of information which we download onto your computer or device when you visit our website. To comply with GDPR cookie consent and privacy laws, we require user consent before cookies are used, except those which are strictly necessary.
  - *Essential Cookies*. These help remember your preferences as you move around the site. Because these cookies are necessary to deliver the Services offered to you, you cannot refuse them. You can block or delete them by changing your browser settings.
  - *Performance and Analytic Cookies*. These are sometimes called "statistics" cookies. These cookies may be set on your device when you visit to track information so we can make improvements and report on our performance. These cookies may collect information such as how visitors use the site, the number of visits to the site, and how long a user stays on the site. We might also use performance cookies to test new pages or notify you about new features to see how users react to them.
- Personal data we may collect from you (with consent) includes:
  - Name
  - Email address
  - Phone

##### 2. Research

Permission-based research

- Email address and any information provided voluntarily by you emailing us regarding your participation in a client-sponsored qualitative research study
- Personal data we may collect from you (with consent) includes:
  - Name
  - Title (only if included in email signature)
  - Company name (only if included in email signature)

- Email address
- Phone (only if included in email signature)

### **What information do we collect?**

At times we may request that you voluntarily supply us with personal information. Generally, this information is requested when you want us to follow-up with you one-on-one.

We may gather the following information about you when you use our website:

- Name
- Email address
- Phone

We will not email or contact you, unless you complete the above contact information on our website and hit the "Send" button – which will auto-generate an email to [davids@idebamarketing.com](mailto:davids@idebamarketing.com). We do not store any of the information you submit. The only exception to this rule, is when we are emailed directly. In this instance, contact information provided to us in the email is retained until an inquiry is fulfilled, or, a research interview is complete, and then deleted within 48 hours, from the time of the interview.

### **How we use personal data**

1. Marketing or Advertising

We use the name and email address provided voluntarily (with consent) on our website to respond to specific inbound inquiries only. We delete the information within 48 hours of the email being sent.

2. Research

Permission-based research

We use the email address and any information provided voluntarily by persons emailing us regarding their participation in a client-sponsored qualitative research study, to coordinate interviews, and then delete that information, as soon as said interview is completed – typically 7-10 business days from the initial email interaction.

### **Personal data**

Do we pass your information to third parties?

We do not send your personal information to any other parties.

We will not disclose personal information to anyone else.

We will not sell your personal data to a third party or allow a third party to use the personal data we provide for its own marketing purposes.

### **Data protection**

If requested, we will notify any individual, an identified or identifiable natural person - about their privacy practices and, if applicable to our business practices, by contacting our Data Protection Officer, David Sly via email at [davids@idebamarketing.com](mailto:davids@idebamarketing.com). The notification to individuals will include:

- A description of types of Personal Data collected
- Purposes for which we collect and store Personal Data
- Description of ways in which Personal Data is used by us

- A notice informing individuals they have legal rights (including access, deletion, objection, rectification, etc.) to their Personal Data and their options for exercising such rights, including limiting the use and disclosure of their Personal Data
- Contact information for any inquiries or complaints, including any relevant establishment in the EU that can respond to individual inquiries or complaints
- A notice to Customers of the possibility to invoke binding arbitration and/or notify a competent data protection authority

Note: We do not share data with third parties under any circumstances, so that would not be included in any notification.

### **Providing choice to data subjects**

- We do not share data with third parties under any circumstances, so there are no circumstances whereby data will be disclosed to a third-party or used for a purpose other than that for which it was originally collected, or subsequently authorized.

### **Accountability for onward transfers of data**

We do not transfer or share data with any service providers or third parties.

### **Security**

We leverage Microsoft O365 software to run its business, with employees required to update their passwords on a regular basis, to prevent unauthorized access, loss, or misuse of data.

Other safeguards include:

- Administrative safeguards: Only allowing employees access to systems
- Technical safeguards: We require all employees to lock computers when away from their desks; and to store information on a secure network with monitored firewall protection via Microsoft O365; *and* users need to authenticate their devices via a unique password, before accessing electronic information systems
- Physical safeguards: Employees need to store documents containing data in secured cabinets or rooms; ensuring documents containing customer information are not left on desks or in other locations that may be visible to individuals not authorized to access data.

### **Security incidents and breaches of client information**

#### Discovery of Breach

We will notify clients via email of any breach or incident involving personal data or information within twenty-four (24) hours if we discover or suspect that there has been any “security incident” including any (i) loss, misuse, or unauthorized access, use, disclosure, modification, processing, disclosure, or destruction of client information, (ii) interference with system operations in an information system (whether ours or our clients) that has access to client Information, or (iii) any other act or omission which compromises the security, confidentiality, or integrity of client Information.

#### **Breach investigation**

In the event of a breach, we would manage investigation and mitigation of any security incident, and coordinate with clients as appropriate to ensure that the security incident has been remediated and will not reoccur.

#### **Data Integrity and purpose limitation**

Data collected will be limited to the purposes of honoring contractual client commitments, which may include providing research services).

The collection, use, disclosure, transmission, storage and/or disposal of client data is limited to the extent necessary for a specific business purpose(s), in accordance with data minimization or least privileged principles. We only use personal data, where a valid need for the information exists. Specifically, this means limiting the scope of data collected/used and the number of electronic copies; and the retention period of the data – no longer than 48-hours after research interviews are completed. We do not have any physical copies. Such purpose limitations should reflect:

- Data Collection: we only collect information and personal data that is appropriate for a specific, intended, and authorized use. We communicate to our employees a data collection policy that takes into consideration the following rules:
  - Collect only accurate personal data
  - Keep personal data up to date (current)
  - Collect personal data for fair and lawful purposes only that are transparent to individuals
- Authorized Use: Ideba requires personal data for research projects (legitimate "need to know" personal data) in order to coordinate interviews That authorization only extends to the specific data for which there is a legitimate "need to know" for the purposes of performing research services
- Ideba does not share or disclose Personal Data with third parties.
- Personal Data is not downloaded or stored on any personal device, or any other device not controlled by our clients
- Storage of Data: we only store Information as necessary for and in accordance with (i) the contract between us and our clients (typically in a Statement of Work), and (ii) and as governed by our internal policies
- Transmission of Data: We do not transmit (e.g., via mail, fax, email, instant messaging, etc.) client Information without ensuring applicable security controls are in place. We do not transmit such data to anyone who does not need the information, and we take care to ensure emails are sent only to intended recipients.
- Disposal: We dispose of client Information with 48-hours of research interviews being completed.

### **Access**

If asked, we are open to sharing with individuals what personal data about them is being stored and/or used by us, and to correcting/updating that information if asked, and to deleting that information, if asked, provided that the rights of persons other than the individual would not be violated.

### **Recourse, enforcement, and liability**

We are responsible for any inquiries or complaints regarding our privacy practices and any individual can submit an inquiry and/or complaint to [davids@idebamarketing.com](mailto:davids@idebamarketing.com) If an individual is unable to resolve issues with us, we will provide a mechanism for such individuals to invoke binding arbitration and/or notify a competent data protection authority.

If we receive an inquiry or complaint that pertains to information or personal data used on behalf of a client, we will immediately forward such an inquiry or complaint to our client.

### **Staff training and consequences**

We only authorize our employees (as no-one else has access to the data) to process client Information where such employees are bound to confidentiality or are under an appropriate statutory obligation of confidentiality. We would commence disciplinary action or terminate any employees who are found to be in violation of these expectations.

### **How do we use your information for marketing?**

We will only provide the information to you that you have requested via the website, after the auto-generated email is received.

**Where do we send your information?**

We do not send your personal information to any other parties. We will not sell your personal data to a third party or allow a third party to use the personal data we provide for its own marketing purposes. The only exception is if we are required to do so "As required by Law". We may disclose information about you if we believe we must do so to comply with the law or a subpoena, bankruptcy proceeding, or similar legal process. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

**How long do we keep your information?**

We do not keep your personal information when initiated from the website. If information is sent to us via email, this is retained until an inquiry is fulfilled, or, a research interview is complete, and then deleted within 48 hours, from the time of the interview.

**International Data Transfers**

If information is sent to us via email, this is retained until an inquiry is fulfilled, or a research interview is complete, and then deleted within 48 hours, from the time the interview is completed – typically 7-10 business days from the initial email interaction.

Ideba's primary processing activities are in the United States, with 100% of contact information hosted in-region. Personal data we collect may be transferred to, used, and stored in the United States, and there are no other jurisdictions in which Ideba, or our service providers are located. By providing us with your personal data, you agree to such transfer and/or processing. Ideba assesses the circumstances involving all cross-border data transfers and has suitable safeguards in place to require that your personal data will remain protected in accordance with this notice. In the event of such a transfer, we ensure that: (i) the personal data is transferred to the United States only (as we do not have offices or hosting in any other country); or (ii) the transfer is made pursuant to appropriate safeguards, such as the applicable standard contractual clauses.

**Third Party Websites**

Our website does not link to any third-party websites.

**How do we protect your information?**

We take appropriate measures leveraging Microsoft M365 to ensure the limited information provided to us via autogenerated emails is kept secure.

**Your rights**

You are entitled to ask if we are processing your personal information by automated means and on the basis of your consent (see "How do we use it?", above).

**Protection for Children**

This Site is not intended for users under the age of 16, and we have no intention of collecting personally identifiable information from children (i.e., individuals under the age of 16). If a parent or guardian learns that a child has provided us with personally identifiable information, that child's parent or guardian should contact [davids@idebamarketing.com](mailto:davids@idebamarketing.com) and send a request marked "Privacy - Urgent" if they would like the information submitted by the child deleted from our Outlook inbox, respecting that is the only way in which we receive information submitted on the website. We will delete the auto-generated email within 72-hours.

**Modern Slavery Act**

Ideba Marketing US Inc. does not tolerate any form of modern slavery or human trafficking in any part of our business. Ideba Marketing US, Inc.

**Supply Chain**

Ideba only uses "approved suppliers" who are appointed by the President of Ideba Marketing US, Inc., for commonly used services. These are used very rarely, noting 99%+ of all services provided to clients are provided by full-time employees (FTEs) of the company.

### **Definitions**

"Applicable data protection laws" means Regulation 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 (commonly referred to as the GDPR), as transposed into domestic legislation of each Member State and the laws implementing the GDPR and Directive 2002/58/EC on Privacy and Electronic Communications as amended from time to time and transposed into domestic legislation of each Member State, Assembly Bill 375 of the California House of Representatives, an act to add Title 1.81.5 (commencing with Section 1798.100) to Part 4 of Division 3 of the Civil Code, relating to privacy and approved by the California Governor on June 28, 2018, as it is amended from time to time (commonly referred to as the CCPA), and to the extent applicable all information security and data privacy and protection laws of any other country.

"Personal data" means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly, in particular by reference to an identifier such as a name, title, location, or an online identifier of that natural person. For clarification, Personal Data includes but is not limited to contact information such as a person's name, email address and IP address.

"Client information" is any and all data obtained by us from our clients, and their business (including legal, financial, and compliance information), or its employees, customers, end-users, or partners.

### **Responsible Disclosure**

Ideba Marketing US, Inc. appreciates and values the identification and reporting of security vulnerabilities carried out by well-intentioned, ethical security researchers. If any vulnerabilities are identified, these can be communicated to [davids@idebamarketing.com](mailto:davids@idebamarketing.com)

### **Contacting Us**

If you have any questions about this privacy policy, the practices of this Site, or your dealings with this Site, you can contact us at [davids@idebamarketing.com](mailto:davids@idebamarketing.com) Our mailing address is: Ideba Marketing US, Inc., 3215 SE 69th Avenue, Portland, Oregon, 97206.

### **Changes to this privacy policy**

We review this privacy policy on a regular basis to ensure that it is up to date with our use of your personal information, and compliant with applicable data protection laws. We reserve the right, at our discretion, to revise this privacy policy at any time. The updated privacy policy will be posted on our website. You are encouraged to review this privacy policy from time to time.