



Information Resources, Inc. (“IRI”) Privacy Shield Notice

Effective May 25, 2018

PRIVACY AT IRI

This Privacy Shield Notice (the “Privacy Notice”) applies to Information Resources, Inc. (“IRI”) and all of its global subsidiaries (collectively referred to as “IRI”, the “Company”, “we”, or “us”).

IRI complies with the EU-U.S. and the Swiss-US Privacy Shield Framework (the “Frameworks”) regarding the collection, use, and retention of Personal Information in order to provide adequate safeguards for the transfer of personal information to the United States from the European Economic Area (“EEA”) and Switzerland. IRI adheres to the principles of the Frameworks (“Principles”) with respect to personal data submitted by IRI’s clients for processing and IRI employee data (collectively “Personal Information”).

Specifically, IRI certifies compliance with the Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the Privacy Notice and the Privacy Shield Principles, the Privacy Shield Principles shall govern. IRI’s Privacy Shield certifications applies to Information Resources, Inc.

If there is any conflict between this Policy and the Principles, the Principles will govern. To learn more about the Frameworks please visit www.privacyshield.gov. You can view our certification at www.privacyshield.gov/list

PERSONAL DATA PROCESSING AT IRI

IRI’s services may involve processing personal data we receive from our client’s shopper loyalty programs, customer relationship management databases, and shopper survey panels. When IRI provides products or services for data analysis for our clients relating to shopper purchasing behaviour, the shopper data IRI receives is typically provided using a loyalty or other program identifier number, not a data subject’s name. That number is assigned a unique identifier. This process is called pseudonymization and is one of the most secure ways to separate sensitive elements from a personal data set.

When IRI provides CRM tools or provides Customer Data for use with CRM tools, we are typically processing data our customer has provided and instructed us to process on their behalf. If IRI manages a CRM directly, we are committed to protecting Data Subject rights.

IRI may also process personal data pursuant to various agreements with our clients. Our services may be deployed on-demand or on-site, and clients may also engage us for professional services and customer support. To fulfil our

contractual obligations, IRI may access Customer Data to provide services, to correct and address technical or service problems, to follow instructions of the customer who submitted the data, or in response to contractual requirements.

When providing services to its business customers pursuant to contracts, IRI also collects personal data such as names, business titles, email addresses, and contact information login credentials, IP addresses, and information about how and when they use our services. IRI also has the personal data of its own employees.

IRI also processes employee data and the data of individuals who apply for employment with IRI. IRI must maintain the personal data of its employees in order to evaluate employee performance, process payroll, administer bonuses and process benefits claims. Third party vendors may be involved in these processes. For instance, IRI uses payroll software vendors in many countries, it uses the services of insurance companies to provide health and life benefits to its employees and it may provide retirement benefits through a third party.

THIRD PARTIES WHO MAY RECEIVE PERSONAL DATA (ONWARD TRANSFER)

IRI may store and process personal data in the United States or any other country in which IRI or its subsidiaries, affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which we or our parent, subsidiaries, affiliates or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

IRI may provide personal data to third parties and vendors that act as agents, business partners, consultants, and contractors to perform tasks on behalf of and under our instructions such as technical support, client education, billing, analytics, and communication. Such Third Parties must agree to use such personal data only for the purposes for which they have been engaged by IRI.

IRI recognizes potential liability in cases of onward transfer to third parties. IRI will not transfer any personal information to a third-party without first ensuring that the third-party adheres to the Privacy Shield principles.

IRI may be required to disclose Customer or HR Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

DATA INTEGRITY & SECURITY

IRI employs procedural and technological measures that are reasonably designed to help protect Customer Data from loss, unauthorized access, disclosure, alteration, or destruction. For example, among other measures, we have implemented physical security measures at our premises (e.g., key cards) and we have established technical safeguards such as firewalls and security patches. However, despite our efforts, please be aware that no data security measures can guarantee security.

DATA ACCESS AND CORRECTION, YOUR CHOICES FOR LIMITING USE AND DISCLOSURE

If you are an individual based in the EU or Switzerland and we process your personal data for our own purposes, you may request access to your personal data. You also have the right to update, correct or delete your personal data. Also, the Frameworks require that participants offer data subjects a choice to opt out of uses and disclosures of their data that are materially different from the purposes for which that data was originally collected or subsequently authorized. Individuals who would like to access their personal information may contact us via our website under the Privacy tab or by emailing IRI's Data Protection Office at Privacy.Officer@iriworldwide.com.

Please note that IRI has limited ability to access data submitted by its customers to the IRI Products and does not have any personal relationship with the individuals whose personal data it processes on behalf of its customers. If you wish to request access to, correct or delete, or to limit the use or disclosure of your personal data please provide us the name of the IRI customer who has submitted your data into the IRI Product. We will refer your request to that customer and will support our customer as needed in responding to your request.

RECOURSE AND ENFORCEMENT

IRI will cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to HR data transferred from the EU and Switzerland.

If you have any questions or concerns, please write to us at the address listed below. If you are an EEA or Swiss resident, we will investigate and attempt to resolve reasonable complaints and disputes regarding our use and disclosure of Personal Information in accordance with the Principles. If an issue cannot be resolved via our internal dispute resolution mechanism, EEA and Swiss individuals may contact or submit a complaint, at no cost, to JAMS, our US-based third party dispute resolution provider. To find out more, go to <https://www.jamsadr.com/eu-us-privacy-shield>.

The Federal Trade Commission (FTC) is the investigatory and enforcement authority for your IRI's Privacy Shield certification. Under certain circumstances detailed in the Privacy Shield, Data Subjects may be able to select binding arbitration for the resolution of complaints. For more information on binding arbitration, see U.S. Department of Commerce's Privacy Shield Framework: Annex I (Binding Arbitration).

Changes to this Privacy Shield Policy. This Privacy Notice may be amended from time to time consistent with the requirements of the Privacy Shield.

CONTACT US

If you have any questions about this Privacy Notice or would like to request access to your EU personal data, please contact us at Privacy.Officer@iriworldwide.com or by mail addressed to the following:

Information Resources, Inc.

Attn: Global Data Protection Officer
Legal Dept. 150 N Clinton St.
Chicago, IL 60661

