Privacy Policy

Last modified: March 13, 2017

Introduction

BERA Brand Management, Inc. (“Company” or “We”) respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you, receive from third parties, or that you may provide when you visit the website www.bera-brandmanagement.com or www.berafindlove.com (our “Websites”) or provide responses to consumer surveys conducted by unaffiliated third parties on our behalf, including certain personally identifiable information (“Personal Data”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we receive and collect:

• From unaffiliated third parties who conduct surveys of consumers located in the United States on our behalf, who are compensated for responding to the surveys and informed that the responses that they provide are owned by BERA Brand Management, Inc. and subject to the terms of this Privacy Policy.

• From our Clients and visitors to this Website.

• In email, text, and other electronic messages between you and the Company.

It does not apply to information collected by:

• Us offline or through any other means, including on any other website operated by Company or any third party; or

• Any other third party, including through any application or third party that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. **By accessing or using this Website, you agree to this Privacy Policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.**

**Children Under the Age of 13**

Our Websites are not intended for children under 13 years of age. No one under age 13 may provide any Personal Data to the Websites or the Company. We do not knowingly collect Personal Data from children under 13. If you are under 13, do not use or provide any information
on the Websites or provide any Personal Data or other information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received Personal Data from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at privacy@berabrandmanagement.com.

**Information We Receive And Collect From Unaffiliated Third Parties Who Conduct Consumer Surveys Of United States Consumers On Our Behalf And How We Collect It**

We receive and collect information and data through online and offline surveys of United States consumers that unaffiliated third parties conduct on our behalf. The surveys are optional and consumers can choose not to participate in the surveys. Consumers are compensated for participating in the surveys, are provided with this Privacy Policy, and informed that the responses that they provide to the surveys are subject to the terms of this Privacy Policy.

The Surveys may ask for basic contact information. Whether you provide that type of personal information is entirely optional. But in all cases, the information you provide belongs to BERA Brand Management Inc. The data received and collected from the consumer surveys may include Personal Data, including: name, email addresses, mailing address, and phone number. The data may also include the following categories of demographic information: age, gender, income bracket, education level and ethnicity, race, and other consumer information, including self-reported data on products or services purchased or planned to be purchased or opinions about such products and services. Personal Data does not include aggregated and/or anonymous or anonymized data or information.

**Information We Collect From Clients and Visitors And How We Collect It**

We do not actively collect data from visitors to the Websites. We actively collect several types of information from Clients, including Personal Data, and passively collect data from visitors to the Websites.

- We collect Personal Data from Clients by which they may be personally identified, such as name, postal address, e-mail address, telephone number, or any other identifier by which Clients may be contacted online or offline.

- For visitors to the Websites, we may passively collect data that is about you but individually does not identify you, such as information about your Internet connection, the equipment you use to access our Website and usage details.

We collect information:

- Directly from you when you provide it to us.

- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies.
Information You Provide to Us. The information we collect on or through our Websites may include:

- Records and copies of your correspondence (including email addresses), if you contact us.

Information We Collect Through Automatic Data Collection Technologies. As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.

- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Read ‘Do Not Track Disclosures’ below for information on how you can turn off cookies on your browser and opt out of behavioral tracking on this website and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information we collect automatically is statistical data and does not include Personal Data but we may maintain it or associate it with personal information we collect in other ways or receive from third parties.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** When you visit the Website, we may send one or more cookies—small text files containing a string of alphanumeric characters—to your device. The Websites uses both session cookies and performance cookies, which are persistent. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Website. Specifically, performance cookies are in place so that traffic patterns and uses on the Website may be measured and optimized.

- BERA Brand Management Inc. collects cookies on our Websites to capture information about page visits. This information is anonymous and we use this information only internally to deliver the most effective content to our visitors. Information from the cookies is used to gauge page popularity, analyze traffic patterns on our site and guide development of other improvements to our site. BERA Brand Management Inc. does not require that you accept cookies, however, some functionality on our Websites, may be disabled if you decline to accept cookies. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. You may also change your cookie settings through preferences options in our products and/or services, where applicable. We never give away information about visitors to our Websites. If you choose to e-mail us and provide Personal Data, we will use this
information only to respond to your inquiry. We will not sell, rent or otherwise disclose that Personal Data to third parties unless such disclosure is necessary for the purposes set forth in this Policy, by law or a policy or notice contained or associated with a specific BERA Brand Management Inc. service.

- We also may use Google Analytics and similar tools to help analyze how users use our Service. Google Analytics uses cookies to collect standard Internet log-in information and visitor behavior information. The information generated by the cookie about your use of the Websites (including IP address) is transmitted to and stored by Google. This information is then used to evaluate visitors’ uses of our Websites, compile statistical reports on activity and enhance your experience when you use the Websites. Google will not associate your IP address with any other data held by Google. Click here for more information on how Google uses this data.

How We Use Information Of Clients Or Visitors To The Website

We use information that we collect about you or that you provide to us, including any personal information:

- To provide our Services to you if you are a Client or fulfill any purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Websites or services we offer if you are a Client or in response to a request information on the services we provide.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own services that may be of interest to you. If you do not want us to use your information in this way, please email us at privacy@berabrandmanagement.com.

For more information, see Choices About How We Use and Disclose Your Information.

How We Use Information We Collect From Third Parties Who Conduct Consumer Surveys Of United States Consumers On Our Behalf

Information we receive and collect from unaffiliated third parties who conduct consumer surveys of United States consumers on our behalf for which consumers have been compensated belongs to BERA Brand Management, Inc. That information may be anonymized and aggregated by the third party conducting the survey to create anonymized data sets. Alternatively, the information we receive and collect from third parties who conduct consumer surveys of United States consumers on our behalf may contain Personal Data that consumer participants have willingly provided that that has not yet been anonymized and/or aggregated and we may transfer the data to an unaffiliated third party that will anonymize and aggregate the data into anonymized data sets.
Please note that we consider any anonymized datasets that result from the anonymization processes of unaffiliated third parties to be proprietary to BERA Brand Management, Inc. and we will be free to use, sell and disclose the anonymized datasets, and we may offer or sell information and services that are derived from the anonymized datasets. We use anonymized or aggregated data to provide reports and services to our clients that do not contain any Personal Data of a survey participant. We will not use data and information we receive and collect from unaffiliated third parties who conduct consumer surveys of United States consumers on our behalf for any other purposes than those specified in this Privacy Policy.

Disclosure To Third Parties Of Information We Collect From Third Parties Who Conduct Consumer Surveys Of United States Consumers On Our Behalf

In the event the information we receive and collect from third parties who conduct consumer surveys of United States consumers on our behalf does contain Personal Data that has not already been anonymized and/or aggregated, we may provide the data to unaffiliated third parties to anonymize and/or aggregate it and perform analyses on the anonymized and/or aggregated data, unless you have opted out of the data anonymization. The analyzed anonymized and aggregated data is used by BERA Brand Management, Inc. to prepare reports and other analyses and to provide services that BERA Brand Management, Inc. sells to its Clients. These reports and services will not contain any Personal Data. To opt out of the anonymization and aggregation of survey data provided to the unaffiliated third parties conducting surveys on our behalf, you must do so prior to providing such data by not providing the data. See Opt Out Of Disclosure Of Personal Data Anonymization and Aggregation of Survey Responses

Disclosure of Information Of Clients and Visitors To The Website

We may disclose aggregated information about visitors to our Website and our Clients, and information that does not identify any individual and is not Personal Data, without restriction. We may disclose Personal Data that we collect from our Clients or the Website or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep the Personal Data confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of BERA Brand Management, Inc.‘s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by BERA Brand Management, Inc. about our Website visitors or Clients is among the assets transferred.
- To fulfill any purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
• We may also disclose your personal information:
  • To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
  • To enforce or apply the terms agreements with us, including for billing and collection purposes.
  • If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of BERA Brand Management, Inc. our Clients, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

**Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

• You may stop or restrict the placement of session cookies, Google’s cookies and third party cookies on your computer by adjusting your web browser preferences. If you do so, you may still use our website, but this may interfere with some of its functionality [or your ability to complete a survey].

• You may also clear cookies from your computer via your web browser settings.

• You may also wish to use Google Ads Preferences Manager and a Google Analytics opt-out browser add on: click [here](#)

  **Promotional Offers from the Company.** If you do not wish to have your email address/contact information used by the Company to promote our own or third parties' products or services, you can opt-out by sending us an email to privacy@berabrandmanagement.com stating your request to not receive promotional offers. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of purchase of services from the Company.

• **Opt Out Of Disclosure Of Survey Data For Anonymization And Aggregation Of Survey Responses**

  As noted above, the surveys are optional and consumers can choose not to participate in the surveys. Consumers are compensated for participating in the surveys, are provided with this Privacy Policy, and informed that the responses that they provide to the surveys are subject to the terms of this Privacy Policy. In order to opt out of the disclosure of survey response data opt out of the anonymization and aggregation of any survey response data provided to unaffiliated third parties conducting surveys on our behalf, you must decline to provide that information in the first place. Once that data is provided to the unaffiliated third parties, there is no other way to opt out. Opting out of the anonymization and aggregation of any survey response data provided to unaffiliated third parties conducting surveys on our behalf will prevent you from receiving any promised
compensation for completing the survey and agreeing to provide the responses to BERA Brand Management, Inc. subject to the terms of this Privacy Policy.

Accessing, Correcting, Or Deleting Your Personal Data

You have the right to access your Personal Data. If you would like to access and review Personal Data that you provided to us or to third parties in response to surveys conducted by third parties on our behalf, you can contact the third party that conducted the survey or contact us directly at privacy@berabrandmanagement.com.

We will cooperate with the third party who conducted the surveys and will respond to such requests within 30 days. You cannot delete survey response data after a survey has been completed and you have been promised compensation. After survey response data has been anonymized, we can no longer access or delete any Personal Information provided in survey responses. We also may not accommodate a request to change information if we believe the change would violate any law or legal requirement. If you are a Client, you may also send us an email to request access to, correct or delete any Personal Data that you have provided to us. We cannot delete your Personal Data as a Client except by also deleting your account. Notwithstanding a request to delete we may maintain archival copies of certain information for business and legal compliance purposes.

Data Security

We have implemented measures designed to secure your Personal Data and the consumer survey information we receive from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored securely.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Websites.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat Personal Data, we will notify you by email to the primary email address specified in your account if you are a Client and/or through a notice on the Websites home pages if you are a visitor. The date the privacy policy was last revised is identified at the top of the page. Clients are responsible for ensuring we have an up-to-date active and deliverable email address, and for periodically visiting our Websites and this Privacy Policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: Privacy@BeraBrandManagement.com.