

Privacy Policy for Market Research

Krealinks Management registered in the Paris Trade and Companies Register under SIREN number 791140676, whose registered office is located at 34 Boulevard des Italiens 75009 PARIS, Qualtrics, LLC whose registered office is located at 333 W. River Park Drive, Provo, Utah 84604, registered in the USA under number 5596977

in their capacity as Subcontractor, act on behalf of and for the account of its direct client hereinafter referred to as the "Sponsor", the data controller, in order to support or perform the services described below.

The Sponsor may remain anonymous to allow market research or any unbiased inquiry about its products or services. In such a case, the Sponsor either (1) implements directly through the Platform made available by Krealinks/Qualtrics, or (2) decides to entrust the Subcontractor with the services to be performed, informs the Subcontractor of the purposes pursued.

The Sponsor has provided Krealinks/Qualtrics with instructions for the selection of its Community Members, and the commitments to be followed in order to respect the privacy of the persons recruited in connection with:

- (1) the creation of the "Community" on behalf of the Sponsor in order to constitute a representative panel/sample of cat owners and dog owners whose Members, after having consented to join, will be able to register and then be visible under a pseudonym on Krealinks (hereinafter referred to as the "PLATFORM") to preserve anonymity,
- (2) with the ultimate goal of being surveyed and allowing market research to be conducted either directly by Krealinks/Qualtrics, or allowing market research or questionnaires to be conducted directly by the Client through Krealinks/Qualtrics.

At no time shall the Sponsor have access to the Personal Data of its Community Members: either (1) when using the PLATFORM made available by Krealinks/Qualtrics for the purpose of directly surveying Community Members through questionnaires, or (2) for the purpose of exploiting the content, information, survey results, questionnaires collected after surveying Community Members also using the PLATFORM.

The only time that Sponsor may have access to personal data would be upon termination of the contract with Krealinks/Qualtrics, with Krealinks/Qualtrics having the obligation to transfer the list of Community Members to Sponsor or to a new Subcontractor designated by Sponsor to allow continuity of service. In such a case, the Members of the Community shall be informed in advance of any change.

All content, in particular that published on the platform, studies/questionnaires carried out, reports generated through the PLATFORM and/or with the Subcontractor are the full and complete property of the Sponsor with the prohibition for Krealinks/Qualtrics or the Members of the Community to make use of them for itself or for third parties.

This privacy policy (hereinafter the "Privacy Policy") explains how Krealinks/Qualtrics, Subcontractor collects, uses, discloses and safeguards personal data (hereinafter the "Personal Data") collected in connection with recruitment and surveys conducted directly by it or through the PLATFORM on behalf of Sponsor, Data Controller.

This Privacy Policy does not apply to the collection and use of Personal Data from visitors to the websites of the Subcontractor or the Data Controller, which have their own policies.

1. Definitions

Anonymization: set of techniques put in place by the Subcontractor to prevent the identification on all forms, of the users of the platform.

Community: the set of Members constituting a representative panel of dog and/or cat owners built at the request of the Sponsor and using the PLATFORM

Cookies: definition given in the cookie policy of the Subcontractor

https://us.mypetstories.com/en_us/page/cookie-policy-my-pet-stories

Consent: any freely given, specific, informed and unambiguous indication of the data subject's wishes, by which the data subject, by means of a statement or clear affirmative action, signifies his or her consent to the processing of personal data concerning him or her.

Personal Data: all information allowing to identify directly or indirectly member of the community, physical person. It can be his/her name and surname, his/her age, his/her postal or email address, his/her location or his/her IP address (non-exhaustive list).

Member: the owner(s) of a cat or dog who has (have) registered and joined the Sponsor's Community.

Platform: the technical infrastructure made available by the Subcontractor for the benefit of the Sponsor (Krealinks/Qualtrics) and used to recruit and register Members and to have them participate in market research in particular.

Pseudonymization: according to Article 4.5 of the GDPR the processing of personal data in such a way that it can no longer be attributed to a specific data subject without recourse to additional information, provided that this additional information is kept separate and subject to technical and organizational measures to ensure that the personal data is not attributed to an identified or identifiable individual.

Data Controller: according to Article 4.7 any natural or legal person, public authority, department or other body which, alone or jointly with others, determines the purposes and means of the processing, hereinafter the Sponsor.

Subcontractor: according to Article 4.8 of the GDPR any natural or legal person, public authority, department or other body that processes personal data on behalf of the controller, hereafter Krealinks/Qualtrics.

2. The nature of the Personal Data collected

a. Information you provide when you register as a Member

If you want to be part of the Community as a Member, you must first meet certain selection criteria set up by the Sponsor who wishes to obtain a representative panel/sample of cat and/or dog owners by category and then - after selection - proceed to or finalize your registration on the PLATFORM by respecting its terms of use https://us.mypetstories.com/en_us/page/terms-and-conditions-my-pet-stories

The information you provide to Krealinks/Qualtrics in connection with your recruitment and registration as a Member of the Community is:

- identification data to enable you to register on the platform: your first and last name, the pseudonym you have chosen and which differs from your first and last name, your e-mail,
- personal information that does not allow identification but that will be used to study the behavior of owners towards their animals: for example, the composition of the family (with or without children for example), the place of residence (apartment or house), the region in which you live.

The goal is to allow the clearest possible market research and to allow the Sponsor to make its products more efficient and to address them to clearer targets.

b. Information collected when using the PLATFORM

By joining the Community as a Member, you should know that when you visit the PLATFORM, the solution may collect information about you on each of your visits, namely:

- Technical information. This may include the Internet protocol (IP) address used to connect your computer to the Internet, your login credentials, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- Information about your visit. This may include the full Uniform Resource Locator (URL), navigation path to, through and from the PLATFORM (including date and time), products you viewed or searched for, page response time, download errors, length of time spent on certain pages, page interaction information (such as scrolling, clicks and mouse-overs), methods used to exit pages, and the phone number you used to contact our support center or your social media handle you used to communicate with our customer service teams.

In general, you can set your browser and cookies related to the use of the PLATFORM at any time.

3. Legality of the processing of Personal Data for market research and surveys conducted by Krealinks/Qualtrics and the legal basis "consent":

Krealinks/Qualtrics collects the Personal Data of the contacted person only for the following specific purpose:

- for the recruitment of the person who agrees to become a member of the Community that we wish to create for our Client for the purpose of responding to market research or conducting surveys.

In accordance with Article 6 of the GDPR (General Data Protection Regulation), this collection and associated processing is carried out only after having sought and obtained your explicit and free consent on your membership as a Member of the Community, and on the specific purposes in connection with the processing that will be implemented to make this Community live. To do this, the steps to follow are as follows:

(1) agree to become a Member of the Community according to the criteria that will have been predefined by the Sponsor at the time of recruitment,

(2) finalize your registration to the PLATFORM by defining a login and password and accept the terms of use of the PLATFORM as well as the present Privacy Policy, to allow you to use the PLATFORM as a Member of the Community;

(3) as a Member of the Community enable market research by participating in various events set up by Sponsor directly or Krealinks/Qualtrics such as questionnaires, contests, surveys.

In a more detailed way, by joining the Community, and by registering to the PLATFORM, the Sponsor directly or the Subcontractor Krealinks/Qualtrics (and editor of the PLATFORM) will be able to contact you to:

- invite you to participate in specific market, social and satisfaction research activities;
- obtain your opinions on products, services and activities of the Community;
- enter you, if you consent, in prize draws and contact you to send you prizes in the event that you win;
- inform you of the benefits you receive as a result of registering to use the Community and participating in surveys;
- process your survey responses and analyze the results:
 - presented in aggregate and anonymized form to Sponsor, or;
 - at a level that will only be associated with your pseudonym and will not have any personally identifiable information about you or in a way that allows us to identify you personally;
- provide you with information and services that you have directly requested from us;
- help us improve our services, such as by allowing us to act on information you have provided or to address complaints or concerns you have raised with us;
- ensure that Community content is displayed in the most optimal manner for you and your computer and/or devices;
- inform you of changes to the Community or this Privacy Policy.

We may combine information we receive from other sources with information you have provided to us, and we will use this combined information for the purposes outlined above.

Krealinks/Qualtrics retains evidence of consents for the period of time necessary for processing, which is generally for the duration of the recruited member's use of the PLATFORM and related quality control activities.

Krealinks/Qualtrics is committed to informing survey respondents of the origin of their data when the data was not directly generated by Krealinks/Qualtrics and originated from a contractor or client.

4. Nature of the Personal Data processed and duration of their storage

Krealinks/Qualtrics is committed to ensuring that Personal Data is retained for the duration of your membership as a Member of the Community and user of the PLATFORM.

Effective from 07/19/2023

At your request or upon termination of your membership, your profile will be deleted, except that in cases related to pending litigation where Krealinks/Qualtrics may retain your Personal Data for as long as necessary (extinguishment of all remedies), your Personal Data will be deleted at your request.

For more information on exercising your rights, please see the “Your Rights” section below.

5. Limiting collection and anonymizing Personal Data

Krealinks/Qualtrics is committed to minimizing the impact of the collection of Personal Data **by limiting the collection** to that which is strictly necessary for the purposes of the study and by ensuring that such data is not used in a manner inconsistent with those purposes.

Krealinks/Qualtrics also has procedures in place to assure individuals participating in its studies that they will not suffer harm or injury as a direct result of their participation in the study, including through anonymization techniques and by limiting access to Personal Data to field teams and staff working on the study in question.

Finally, Krealinks/Qualtrics is committed to **preserving the anonymity** of respondents to its studies vis-à-vis the end client by providing the latter only with raw or aggregated, non-nominative data, unless pharmacovigilance obligations require Krealinks/Qualtrics to communicate the identity of respondents to the client, subject to their consent, or if the data is disclosed as part of declarations to meet transparency requirements (e.g., under certain legal obligations such as anti-fraud, anti-money laundering and other relevant legislation).

6. Sharing of Personal Data

a. External service providers:

In addition to transferring Personal Data to Krealinks/Qualtrics’s internal staff and IT staff, Krealinks/Qualtrics may use suppliers or subcontractors to perform certain services related to its business and may transfer Personal Data to them. If so, Krealinks/Qualtrics will screen its vendors and ensure that they have the ability to comply with privacy guidelines and regulations, and will also notify Customers by updating this Privacy Policy. Under no circumstances will the data collected be passed on to third parties for profit. The only possible transmissions to third party partners will be for the purpose of providing the service and for the defined purposes only.

b. International transfers

Personal Data submitted as part of our research is located on our servers in our US data center and is not subject to international transfers.

However, in the course of outsourcing, your Personal Data may be transferred to one or more of Krealinks/Qualtrics’s affiliated companies located in other countries and used for the purposes described above. This Privacy Policy will continue to apply even if we transfer Personal Data to other countries. In the event of international transfers, Krealinks/Qualtrics will (1) ensure that the third party partner provides the necessary guarantees for the confidentiality and security of the Personal Data, (2) take all measures to ensure the security of the said transfers and storage of the Personal Data collected, in particular by entering into agreements with the said entities concerned relating to data protection via the standard contractual clauses issued by the European Commission, and by implementing adequate technical security measures to respect the confidentiality of your Personal Data in accordance with the applicable European legislation. Where necessary, in some cases, Krealinks/Qualtrics will only transfer Personal Data outside the EEA after obtaining the consent of the individuals responding to the surveys.

c. Public organizations

Krealinks/Qualtrics may disclose Personal Data to government agencies, courts, administrative bodies or administrative authorities responsible for the protection of Personal Data, if required or ordered to do so by law.

7. Cookies and other technologies

As described in its Cookie Policy, Krealinks/Qualtrics uses cookies and similar technologies (e.g., web beacons and device identifiers) to recognize you and/or your devices. You can control cookies through your browser settings and other tools. You can also opt out of our use of cookies and similar technologies that track your

Effective from 07/19/2023

behavior. For more information about the cookies we use, please see our Cookie Policy https://us.mypetstories.com/en_us/page/cookie-policy-my-pet-stories

8. Processing sensitive data

Depending on the subjects dealt with in the studies commissioned by its clients, Krealinks/Qualtrics may be required to process sensitive data, particularly when using or handling products. Krealinks/Qualtrics is committed to processing such sensitive data in accordance with applicable regulations.

In such a case, Krealinks/Qualtrics will require its Client, the Study Sponsor, to first conduct a privacy impact assessment. Such studies will be subject to special consideration and processing on a case-by-case basis in the event of high-risk exposure of the individuals recruited and participating in the study.

The analysis will contain at least:

- A systematic description of the processing operations envisaged and the purposes of the processing;
- An assessment of the necessity and proportionality of the processing operations with regard to the purposes;
- An assessment of the risks generated by the processing;
- The measures envisaged to deal with the risks.

9. Personal Data concerning children

Krealinks/Qualtrics does not collect Personal Data from children under the age of 15 - or any other required legal age defined by applicable law - without the prior permission of the parent or legal guardian.

10. Your rights:

- Under applicable law, you have the following rights:
 - **Accessing your Personal Data:** upon your written request, we will make available to you, to the extent required and/or permitted by law, a list of your Personal Data that is being processed by Krealinks/Qualtrics.
 - **Modifying your Personal Data:** if you believe that your Personal Data is inaccurate, you can request its rectification or proceed directly to the rectification by connecting to the PLATFORM.
 - **Deleting your Personal Data:** you may request deletion of your Personal Data from our databases at any time if you no longer wish Krealinks/Qualtrics to process your Personal Data. At your request, your profile may be either suspended or deleted from the platform. All information and content collected through questionnaires, studies and surveys, other than your Personal Data itself, is retained by Krealinks/Qualtrics and is transmitted to the Sponsor of the surveys/studies, a client of Krealinks/Qualtrics, who is the legitimate owner of the data.
 - **Limiting the processing of your Personal Data:** if you believe that the processing of your Personal Data is inaccurate or unlawful, you may request that the processing be limited.
 - **Objecting to the processing of your Personal Data:** you have the right to object to the processing at any time. Your Personal Data may then be deleted by Krealinks/Qualtrics and you will no longer be a Member of the PLATFORM User Community.

In order to exercise any of these rights relating to personal information we may hold, please submit your request in writing to info@krealinks.com. When we receive an access request from an individual, we will respond within 30 (thirty) days of receiving the request unless the request is unclear or complex.

11. Safety

The security of your Personal Data is important to us, and we have put in place reasonable organizational and technical measures to safeguard the information Krealinks/Qualtrics collects in the course of its business.

Effective from 07/19/2023

Access to your Personal Data is granted only to those employees who require it in order to perform their duties. Krealinks/Qualtrics has implemented security protocols on its PLATFORM, including as described in Krealinks/Qualtrics's technical protocol, such as using a secure, encrypted email service for sending and receiving Personal Data files. This protocol complies with internationally recognized standards and is regularly reviewed and updated as necessary.

12. Changes to this Privacy Policy

As applicable law changes, we may update our privacy practices and this Privacy Policy at any time. For this reason, we encourage you to refer to this Privacy Policy at all times. This Privacy Policy is current as of the "last revised" date at the top of this page. By agreeing to register as a Community Member on the PLATFORM after any changes to the Privacy Policy, you give us your free and specific consent to collect, use, transfer and disclose your Personal Data in accordance with the Privacy Policy then in effect.