

MRG Data Privacy Policy

Last updated on January 21, 2021

Management Research Group, Inc. (MRG) is committed to protecting your privacy. This Data Privacy Policy tells you about MRG's policy and practice for the collection, use, processing, storage, transfer, protection, and disclosure of information that we may collect about you through our website, www.mrg.com, or all subdomains including <https://questv2.mrg.com> or other MRG websites. As a result, by using any of our sites you are accepting the practices described in this policy.

Before you access and use our websites, you will be asked to provide your authorization and consent by agreeing to the terms and conditions of this MRG Data Privacy Policy and consenting to the collection, your submission (if applicable), and processing of information about you as described herein, in compliance with relevant data protection laws.

The collection, use, processing, storage, transfer and disclosure of your Personal Information (as defined below) will be limited to the terms under which you provide MRG your authorization. MRG is committed to compliance with all relevant country-specific data privacy laws, including EU Standard Contractual Clauses, model contracts / transfer agreements, privacy statements and policies, and country-specific filings if applicable. This Data Privacy Policy covers www.mrg.com and all other MRG websites.

Collection of Your Personal Information

Personal information ("Personal Information") is data that can be used to identify, either directly or indirectly, an individual to whom the information applies. The information that we may collect from you includes your name, email address, contact preferences, marketing preferences, and as applicable, IP address.

MRG will not collect any Personal Information about you unless you voluntarily choose to provide it to us or our partners, you provide your explicit consent, or unless it is permitted by applicable laws and regulations. You can always “opt out” at any time by clicking the “unsubscribe” link in any email or managing your subscription preferences.

When you do voluntarily provide us with Personal Information, we will use it to provide you information about our products, process your order, register you for an event, create an account, provide customer service, respond to a specific question, offer you the opportunity to register for webinars and certifications, or provide access to additional information or offers. We also use the information we collect to improve the content of our websites, to notify customers of updates to our websites, products, and also to contact customers for marketing and sales purposes, including renewals, that are related to a customer’s specific needs and interests.

Use of Your Personal Information to complete MRG Questionnaires

If you are being asked to complete one of MRG’s questionnaires; all information is collected, stored and transmitted by MRG through the our Assessment websites, Quest <https://questv2.mrg.com> and/or Momentum <https://momentum.mrg.com>. These websites are restricted access sites that allows our clients to manage their MRG-related projects and administer questionnaires. Data collected via these websites is used to create feedback reports for the purpose of individual and organizational development as well as data analysis and research to support strategic organizational development programs. MRG works solely with strategic partners (agents) who have been trained to facilitate feedback to individuals and organizations based on the results of MRG questionnaires. Your MRG strategic partner (agent), as designated by you or your company, will have access to the data you provide us in your questionnaire, and may be involved in collecting, interpreting and/or reporting on that data.

By using our assessment websites, you acknowledge and agree that the content provided by you as well as the conclusions and assessment derived therefrom may be used by us for research, innovation, case studies, and

commercial purposes (such as in speeches, articles, books, etc.) at our discretion. Your assessment data may be aggregated for research, norming and comparison purposes. **Your name and personal information will never be included in these materials.**

Data Controllership

In the context of MRG Questionnaires, MRG primarily acts as a **data processor** for the Personal Information we process.

Basis of Processing

Within the scope of this policy, we may rely on one or more of the following legal grounds for processing of your Personal Information:

1. The need to perform our obligations under a contract or to perform related pre-contractual duties;
2. The legitimate interest of the "Participant" (i.e., the individual who is being rated), such as to demonstrate leadership abilities; and
3. Any other ground, as required or permitted by law in the specific respective context.

How We Receive Personal Information

We may receive your Personal Information through our Assessment websites, Quest <https://questv2.mrg.com> and/or Momentum <https://momentum.mrg.com>. We may also receive your personal data from third parties, in which case we will notify you, where required by applicable laws, without undue delay. In particular, we may receive your Personal Information in our Assessment websites, Quest <https://questv2.mrg.com> and/or Momentum <https://momentum.mrg.com> when you or third parties:

- create an assessment or pulse survey through our Assessment websites;

- invite an observer via through our Assessment websites; or
- complete an assessment or pulse survey through our Assessment websites.

Purposes of Processing

We may process your Personal Information for the purposes of:

- enabling the use of our Assessment websites;
- providing feedback reports for the purpose of individual and organizational development to the parties concerned;
- providing data analysis and research to support strategic organizational development programs for the parties concerned;
- sending you email notifications which you have specifically requested.

Data Retention

Data processed through our Assessment websites,

Quest <https://questv2.mrg.com> and/or

Momentum <https://momentum.mrg.com> will be retained by MRG:

- for as long as the Controller or Processor is a client of MRG;
- until the data is requested to be deleted by the Data Subject;
- until the data is no longer necessary to provide the requested services.

Anonymized data may be aggregated for our own research, norming and comparison purposes. However, we will always respect and honor your request(s) that we delete your Personal Data, subject to the limitations described in this policy.

Assessment Data Ownership

MRG defines the Owner of the assessment data as follows:

1. Each person who completes a questionnaire is considered the Owner of those responses and has the right to request, at any time, that those responses be removed from the MRG system(s).
2. Each person or organization that is the focus of a given report from the MRG system(s) has the right to direct access to copies of those reports as they see fit to any MRG strategic partner.

No Sharing of Information

MRG is committed to maintaining a healthy relationship with our customers and values the information provided on its online platforms. MRG does not share customer information with third parties for purposes outside the scope of the products and services we provide. We will never share, sell, or rent your personal information to third parties for promotional use.

MRG may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims, legal process (including subpoenas), to protect the property and rights of MRG or a third party, the safety of the public or any person, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with the law.

MRG may also be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

Cookies and Other Technologies

MRG's websites, advertisements, emails, and online services may use certain automatic data collection technologies such as cookies to collect data, including personal information, about you while you use our website, our products, and when you interact with us. Collection of user data helps us to understand our users' behavior, web searches, and where on our websites users have visited. Our website uses cookies to distinguish you from other users of our website, helps us to provide you with a good experience when you browse our website, and allows us to improve our website. A cookie is a piece of information that is stored on your computer's hard drive by your web browser. When you visit www.mrg.com (or any of the MRG websites), our server recognizes the cookie, giving us information about your last visit to the website. Many browsers accept cookies automatically, but you can adjust the settings in your browser to disable automatic acceptance of cookies. If you choose not to use cookies, you may experience limited functionality of our website. This Data Privacy Policy only covers MRG's use of cookies and does not cover the use of any propensity management by advertisers. MRG complies with global regulations including the EU Cookie Directive. Visitors to our websites are advised of our use of cookies upon landing on our website.

Information collected by cookies and similar technologies are treated as non-personal information except to the extent under local law that IP addresses (or like identifiers) are otherwise considered Personal Information.

Accuracy and Retention of Personal Information

MRG strives to make it easy for you to keep your Personal Information up to date and to help us maintain its accuracy. Your Personal Information will be stored only for the time period necessary to fulfill the purposes outlined in this Privacy Policy unless otherwise required or permitted by law.

Communications and Subscription Preferences

You have the choice to determine what information you receive from MRG about products and services, and how such information is received by specifying your communication preferences by your subscription details at the communication preferences page. If you wish to discontinue receiving marketing and/or non-transactional e-mails from us, you may do so using an "unsubscribe" link in any email or updating your subscription details at the communication preferences page. We would like to emphasize that this provision does not apply to transactional emails related to users' business relationship with MRG, including completion of MRG's assessment questionnaires.

In the event you choose not to provide certain personal information, we may not be able to respond completely or adequately to your questions, provide updates, and/or information about our products and services. You can always "opt out" of receiving certain communications at any time by updating your subscription details at the communication preferences page or clicking the "unsubscribe" link in any email. We will however continue to use your Personal Information for the limited purpose of sending you important notices relating to information about your purchases and changes to our policies and agreements, or for other reasons permitted by applicable law.

Data Security

MRG takes the security of Personal Information seriously. To protect your Personal Information that you have provided us against accidental or unlawful destruction, loss or alteration, MRG uses technical and organizational security measures to prevent any unauthorized disclosure or access. We require you to enter a password to access your account information and encrypt data in transit and at rest. All payment transactions are processed through a gateway provider and credit card information is not stored or processed on our servers. All data is stored securely in the United States. For additional information on MRG's data security measures, please contact privacy@mrg.com.

Data Security Breach

MRG has implemented strict security controls, intrusion detection software and processes to alert us in the case of a potential or actual intrusion of our information systems. If any data security breach occurs and it may impact your Personal Information, you will be notified as soon as possible once the breach has been determined. MRG also commits to notifying all applicable DPAs without undue delay, and within 72 hours if feasible, after becoming aware of a breach.

Collection and Use of Non-Personal Information

When you access www.mrg.com (or other MRG websites), we may automatically collect non-Personal Information even if you don't register. For example, this information may include the operating system used, the domain name of the website that directed you to our website, the number of visits, average time spent on a page and what pages you viewed. We may use this data and share it with our worldwide affiliates to monitor the content and relevancy of the content on our websites to improve the performance, content or your experience on our websites.

Through your use of services to access our website, your communications data (for example, Internet Protocol Address, or IP Address) or utilization data (information on the telecommunications services you accessed) may be technically generated and could, depending on the applicable law, constitute Personal Information. To the extent it is a necessity, the collection and processing of your communications or utilization data, and the subsequent use of such data will only occur and be performed in accordance with the applicable data privacy protection framework and laws.

Forums, Blogs, Third Party Websites and Links

MRG is only responsible for privacy practices of Management Research Group and its websites. MRG's website may contain links to other websites for additional information and convenience. MRG does not control those other websites, endorse or make any representation about other websites,

and is not responsible for the privacy practices of those other websites. Some of MRG websites contain interactive elements such as discussion forums and blogs that allow users to publish their own content. Any information posted on these blogs and forums becomes public, which means it could be read, collected or used by other users in any manner. MRG is not responsible for any Personal Information you choose to submit in forums. Given the inherent operation and nature of the Internet, all Internet submissions are done at user's own risk.

Consent to Transfer, Process and Store Personal Information

MRG is a global organisation. The information you provide to MRG may be transferred or accessed by MRG entities in the European Union, Switzerland and other countries around the world, each of which are responsible for the Personal Information it collects and protects your Personal Information in accordance with this Privacy Policy. MRG operates within the European Commission's current defined parameters (as of July 2020) to continue to use SCCs to transfer data safely from the EU and Switzerland to the United States. The European Commission's SCCs, otherwise known as model contracts or clauses, are contract terms developed and approved by the European Commission to ensure adequate protection for data subjects in accordance with the EU Data Protection Directive 95/46/EC when transferring personal data from the EEA to the USA. MRG has a proven demonstrated commitment to safe data transit principles, including use of European EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and complies with the advice given by such authorities with regard to all data transferred from the EU and Switzerland. MRG remains certified with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce. MRG has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. To learn more about the Privacy Shield programme, and to view our certification page, please visit <https://www.privacyshield.gov/>.

In compliance with the Privacy Shield Principles, MRG commits to the following:

Notice:

When MRG collects your personal information, we'll give you timely and appropriate notice describing what personal information we're collecting, how we'll use it, and the types of third parties with whom we may share it.

Choice:

MRG gives you choices about the ways we will use and share your personal information, and we'll respect the choices you make. If MRG were to ever engage in any onward transfers of your data with third parties other than our agents, we would provide you with an opt-out choice to limit the use and disclosure of your personal data.

Onward Transfer:

MRG will not disclose your information to unaffiliated third parties without first obtaining your permission, unless of course it's to meet national security or law enforcement requirements. In cases of onward transfer to third parties of data of EU or Swiss individuals received pursuant to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, we are liable for appropriate onward transfers of personal data to third parties.

Security

MRG takes appropriate physical, technical, and organizational measures around security, availability, processing integrity, and confidentiality to protect personal information from loss, misuse, unauthorized access or disclosure, alteration or destruction.

Data Integrity:

MRG takes appropriate steps to make sure the personal information in our records is accurate.

Relevance:

MRG collects only as much personal information as we need for specific, identified purposes, and we won't use it for other purposes without obtaining your consent.

Retention:

MRG keeps your personal information for as long as required to fulfill the purposes for which it was collected, or as permitted by law.

Access:

MRG acknowledges that EU and Swiss individuals have the right to access the personal information that we maintain about them. MRG provides ways for you to access your personal information, as required by law, so you can correct inaccuracies (see Access to Information below).

Enforcement:

MRG regularly reviews how we're meeting these privacy promises, and we provide an independent way to resolve complaints about our privacy practices. MRG commits to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and complies with the advice given by such authorities with regard to all data transferred from the EU and Switzerland. MRG is also subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

Independent Recourse:

MRG commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact MRG at:

Lida Hutchings - CFO, 14 York Street, Suite 301, Portland, Maine 04101 USA

MRG also commits to refer unresolved privacy complaints under the EU-US and Swiss-US Privacy Shield Principles to the EU DPAs/Swiss FDPIC. If your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

Access to Information

MRG gives you access to the following information about you for the limited purpose of viewing and, in certain cases, updating that information. This list may change as the MRG online systems evolve.

- Your Profile Account
- Your Shopping Cart

Right to be Forgotten

MRG is committed to taking reasonable steps to ensure that any Personal Information requests to be forgotten can be erased with our existing technology will be done so in a reasonable time of the request. However, this doesn't apply to information that you have made public by posting on our forums, blogs, or have made available to third parties yourself, this is beyond the reach of what MRG can erase. MRG will do everything possible to erase your Personal Information if you withdraw your consent (opt out) from receiving information for us and request the right to be forgotten. However, MRG will not be able to erase all of your Personal Information if it is technically impossible due to limitations to existing technology, or for legal reasons (MRG is mandated by local law to keep the Personal Information).

Children's Privacy

MRG will not knowingly collect Personal Information from any person that is not a legal adult, as defined by local law, without insisting that they seek prior parental consent, if such consent is required by applicable law. MRG does not target children in connection with its products, services, and websites. In the event MRG uses or discloses Personal Information of a person that is not a legal adult, MRG will seek parental consent pursuant to local laws and regulations in order to protect the person that is not a legal adult.

Changes to this Privacy Policy

As a global company, our systems will mature and change as will this Data Privacy Policy. Changes to this Data Privacy Policy with the most recent revision date will be posted at www.mrg.com. We encourage you to review this Privacy Policy periodically for any changes or updates.

Contact Us

MRG is committed to responding to reasonable requests to review any of your Personal Information we may have and to amend, correct, or delete any inaccuracies. To have your information amended, corrected, or deleted, or if you have any questions that weren't answered in this Data Privacy Policy, you can contact us at Management Research Group 14 York Street, Suite 301, Portland Maine 04101 USA or email us at privacy@mrg.com. If requested to remove data, we will respond within a reasonable time frame.

For our clients that require Data Processing Agreements, Standard Contractual Clauses:

The European Commission's SCCs, otherwise known as model contracts or clauses, are contract terms developed and approved by the European Commission as ensuring adequate protection for data subjects in accordance with the EU Data Protection Directive 95/46/EC when transferring personal data from the EEA to the U.S. If you are a MRG client or partner transferring personal data in connection with MRG products and services, please promptly complete, sign and return a copy of the [MRG Standard Data Processing Addendum](#) to privacy@mrg.com.