

GEOPOLL PRIVACY POLICY

Last modified 01 January 2021

Mobile Accord, Inc. ("MAI") powers innovative mobile services around the world. The website www.geopoll.com (the "Site") and the GeoPoll service are owned by MAI, which is headquartered in Denver, CO, USA. For more information please visit www.geopoll.com.

MAI understands your concerns about how your information is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This GeoPoll Privacy Policy lets you know what information we collect when you visit the Site, register as a GeoPoll user, participate in a GeoPoll survey, download and use the GeoPoll Mobile Application ("Mobile App") or otherwise use the GeoPoll service (collectively, the "Services"), how we use such information, with whom we share it, how we protect it, and the choices we offer you regarding our collection and use of such information. By accessing and using the Services, you acknowledge your consent to the terms and conditions of this GeoPoll Privacy Policy.

1. Types of Information We Collect

Information you give us. We collect information you voluntarily provide to us by virtue of your informed consent. Such includes the following:

Registration information. When you sign up for a GeoPoll account, we may collect certain personal information from you, meaning information about you that can uniquely identify you such as your name, address, telephone number, and e-mail address ("personal information"), if you choose to provide us with such information. Upon registration, we may also collect information about you that does not uniquely identify you, such as information related to your account settings and preferences, if you choose to provide us with such information.

Survey Responses. When you participate in a GeoPoll survey, whether through the Site or other MAI websites, text messages, APIs, Mobile App, and/or buttons, we may collect and store your responses to such surveys. Your survey responses are owned by MAI and used by MAI or its contracted partners.

Information from other sources.

Usage and Device Information. When you access and use the Services, we may collect certain information by automated means, such as cookies and web beacons. A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. A "web beacon," also known as an Internet tag, pixel tag or clear GIF, is used to transmit information back to a web server. We also may use third-party website analytics tools that collect information about visitor traffic on the Services. The information we may collect by automated means may include (i) usage information such as your IP address, browser information and other information related to your visit to and use of the Services; and (ii) information about the device you use to access and use the Services, such as your hardware model, operating system version, unique device identifiers, and mobile network information including your phone number. All usage and device information may be associated with your GeoPoll account.

Location Information. When you access and use the Services using a mobile device, we may collect, store, process, and use information about your actual location through GPS signals or other technologies that determine location, including, but not limited to device latitude/longitude, accuracy, heading, speed, and altitude, cell tower and Wi-Fi access point information. All location information may be associated with your GeoPoll account.

Third-Party Partners. We may also collect information about you from our third-party partners, as further described below.

Please note that we do not collect personal information about your online activities over time and across third-party websites or online services. Additionally, third parties do not collect personal information about your online activities over time and across different websites when you use the Services.

2. How We Use Your Information

We may use the information we obtain about you to register you for a GeoPoll account, provide services you have requested, authenticate users of the Services, respond to your questions and comments, and provide customer support, operate, evaluate and improve our business and the Services, analyze trends and statistics regarding visitors' use of the Services, enforce our [Terms of Use](#) or other agreements.

We may utilize information obtained from you to collect additional information about you from our third-party partners and may combine information that we obtain from you with information from such third-party partners.

We may also use the information we obtain about you in other ways with your consent.

In addition to the uses identified above and elsewhere in this Privacy Policy, we may use your personal information to:

- improve your browsing experience by personalizing the Website and Mobile App and to improve the Services;
- send information or GeoPoll content to you which we think may be of interest to you by post, email, text, or other means and send you marketing communications relating to our business;
- promote use of our Services to you and share promotional and information content with you in accordance with your communication preferences;
- provide other companies with statistical information about our users and respondents. Note: This information will not be used to identify any individual user or respondent;
- send information to you regarding changes to our GeoPoll Terms of Service, Privacy Policy (including the Cookie Policy), or other legal agreements; and
- meet legal requirements.

Legal basis for processing Personal Information

If you are a visitor/partner/client/respondent located in the European Economic Area ("EEA") and subject to the General Data Protection Regulation ("GDPR") or are located in countries outside the EEA that have adopted the GDPR or similar legislation, GeoPoll is likely considered the data controller of your personal information. When required due to the nature of specific project GeoPoll will activate a Data Protection Officer to oversee the data controller competency. The Data Protection Officer can be contacted at legal@mobileaccord.com.

In all such circumstances, the subscriber-respondent will be benefit from informed consent and

Our legal basis for collecting, storing, processing, and using the personal information described above will always require informed consent of the subscriber-respondents and depend on the personal information concerned and the specific context in which we collect it. We will normally only collect, store, process, and use personal information from you only where we have your informed consent to do so (i.e. understand the exercise and opt-in, and retain the ability to opt-out), where we need the personal information to perform a contract with you, or where the collection, storage, processing, and/or use is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

Use of Navigational Information

We use navigational information to operate and improve the Site and the Services. We may also use navigational information alone or in combination with personal information to provide you with personalized information about GeoPoll.

Where and How We Store Your Personal Information

We follow generally accepted industry standards to ensure your personal data is kept secure and protected from accidental loss or unauthorized access, use or alteration, through the following structural and technical measures:

- Confidentiality clauses in all of our employment and service agreements with natural or legal persons having access to personal information;
- Computers and email accounts of all of our employees being password protected;
- Access to GeoPoll accounts being protected by unique login details and passwords;
- Encryption of the personal information while in transport through the https protocol;
- Encryption of the personal information while at rest;
- Encryption of the backups including personal information;
- Personal information stored on secured servers and infrastructures;
- Permissions of access to documents including personal information regularly reviewed and monitored; and
- Regular monitoring of the usefulness of stored personal information and deletion of all personal information no longer required for the purpose for which it was collected.

Unfortunately, and despite our efforts, the transmission of information via the internet is not completely secure. Although we will take reasonable precautions to protect your personal information, we cannot guarantee the security of your data transmitted to / from GeoPoll or through the Internet in general; please note that any such transmission is at your own risk. Once we have received your personal data, we will use our procedures and security features to try to prevent any unauthorized access.

3. Information We Share

We may sell, rent or disclose non-personal information about you. Notwithstanding MAI does not sell, rent or disclose to third parties any of your personal information.

We may disclose your personal information as necessary to (i) comply with a law, regulation or legal request; (ii) enforce or apply our [Terms of Use](#) or other agreements; or (iii) protect the rights, property, or safety of MAI and any person. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

We may engage our third-party partners, service providers, or individuals to perform functions on our behalf and will provide them with personal information and other information as necessary for them to perform their functions. For example, we may engage third parties to conduct research and education data analysis, process payments, and provide customer service.

In the event that MAI is involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, information about you may be sold or transferred as part of that transaction. We will use reasonable efforts to direct any transferee to use your information in a manner consistent with this GeoPoll Privacy Policy.

4. Your Choices, Opting In and Opting Out

We offer you the following choices about what information we collect from you and how we communicate with you:

A. Cookies.

Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Please note, however, that without cookies you may not be able to take full advantage of all of the features of the Services.

B. Marketing Emails.

You may choose not to receive marketing email and/or SMS communications from us by clicking on the “STOP” link in the marketing emails or in the GeoPoll website or App, by adjusting your email preferences using your GeoPoll account, or by texting “STOP” to the GeoPoll shortcode used in your country.

C. Opting Out of GeoPoll Services.

If you wish to opt out or unsubscribe from any GeoPoll service, please contact us as provided for in Section 11 below, otherwise by clicking on the “STOP” link in the marketing emails or in the GeoPoll website or App, by adjusting your email preferences using your GeoPoll account, or by texting “STOP” to the GeoPoll shortcode used in your country.

D. Location Information.

When you access and use the Services on your mobile device, you may choose not to share your location details with us by adjusting your device’s location services settings. For instructions on changing the relevant settings please contact your service provider or device manufacturer.

5. Security

MAI uses reasonable efforts to protect your personal information by using industry-standard encryption technologies when transferring and receiving your personal information. Please note that no electronic transmission of information can be entirely secure. We cannot guarantee that the security measures we have in place to safeguard personal information will never be defeated or fail, or that those measures will always be sufficient or effective.

6. Data Transfers and Retention and Transfers

MAI collects, stores, processes, and uses personal information on our servers. Irrespective of which country you reside in or from which you supply information, you authorize MAI to use your information in the United States or any other country where GeoPoll operates. We may collect, store, process, and use your personal information on a server located outside the country where you live. By accessing and using the Services, you consent to the transfer of your personal information to countries outside of your country of residence. We retain your personal information for the period necessary to fulfill the purposes outlined in this GeoPoll Privacy Policy unless a longer retention period is required or allowed by law.

7. Policy Towards Children

Our Services are not directed to persons under 13. MAI does not knowingly collect or solicit personal information from, anyone under the age of 13. Any personal information we receive from people we believe to be under 13 will be deleted from our system. If you become aware that your child has provided us with personal information without your consent, please contact us at legal@mobileaccord.com and we will delete such information from our system.

8. Access and Correction

You may obtain a summary of your personal information retained by us, or modify, correct, change or update such information by contacting MAI as provided in Section 11 below. You can also request to have MAI remove personal information you have previously provided to us by contacting us via the address listed in Section 11 below.

9. Links and Third Party Websites

Our Services may contain links to other websites for your convenience and information. These websites may be operated by companies not affiliated with MAI. MAI is not responsible for links to or content of any websites not affiliated with MAI, any use of those websites, or the privacy practices of those websites. We recommend that you review the content and policies of all websites that you visit.

10. Modifications and Updates to This Policy

MAI reserves the right to update or modify this GeoPoll Privacy Policy at any time. If we make a material change to our GeoPoll Privacy Policy, we will indicate on the Site that our privacy practices have changed and provide a link to the new policy. In the event we make a material change to how we use your personal information, you will have the opportunity to opt out per the procedures laid out in Section 4 (supra). The date this GeoPoll Privacy Policy was last revised is identified at the top of this page. Please review the Site and this GeoPoll Privacy Policy to check for any updates or changes.

11. Jurisdiction

By using the Site, the Mobile App, and the Services, you agree that the laws of the state of Colorado, without regard to principles of conflict of laws, will govern these Terms of Use and any dispute of any sort that might arise between you and MAI.

Contact Us

You may contact us to provide feedback at:

3000 Lawrence Street
Denver, CO, 80205

Or by email: legal@mobileaccord.com