

## Chatter Marketing, Inc. d/b/a Coherency Privacy Statement

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*Last revised January 5, 2016*

The purpose of this Privacy Statement is to inform you about the practices and procedures of Chatter Marketing, Inc. d/b/a Coherency (as follows, “we” or “us”) in handling Personal Information and to inform you about the Personal Information we collect about you (for example, when you participate in one of our surveys). It explains how we use and disclose that information, the choices you have regarding such use and disclosure, and how you may correct that information.

From time to time, we may make changes to this Privacy Statement. The Privacy Statement is current as of the “last revised” date which appears at the top of this page. We will treat Personal Information in a manner consistent with the Privacy Statement under which it was collected and our Privacy Policy, unless we have your consent to treat it differently. This Privacy Statement applies to any information we collect or receive about you, from any source.

### 1. What is Personal Information?

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**Personal Information** is any information that is identifiable with you. This information may include but is not limited to your name, mailing address, phone numbers, email address, identification numbers and, in certain circumstances, your opinions and individual preferences. Personal Information, however, does not include (i) your name, business title or business address and business telephone number and fax in your capacity as an employee of an organization; and (ii) depending on the jurisdiction, publicly available information. However, if in your capacity as an employee of an organization you participate in one of our surveys, your responses will be treated as Personal Information.

### 2. How do we collect your Personal Information?

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We will always collect your Personal Information by fair and lawful means (for example, when you respond to one of our surveys). We collect your Personal Information where we have obtained your consent to do so or as otherwise permitted by law.

### 3. How do we use your Personal Information?

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We identify the purposes for which we use your Personal Information at the time we collect such information from you and obtain your consent, in any case, prior to such use. One of the primary purposes for which we collect your Personal Information is to conduct marketing and social research through conducting surveys. We may also use your Personal Information as otherwise permitted by law. If you provide us with sensitive personal information such as health or financial information, we will obtain your express consent for the collection, use and disclosure of sensitive personal information.

### 4. To whom do we provide your Personal Information?

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We identify to whom, and for what purposes, we disclose your Personal Information, at the time we collect such information from you and obtain your consent to such disclosure. For example, we may disclose your Personal Information:

- a. to a client of Chatter Marketing, Inc. d/b/a Coherency for the client’s purposes of conducting further research;
- b. a third party engaged by Chatter Marketing, Inc. d/b/a Coherency to perform functions on its behalf;

- c. such other disclosures of Personal Information to such persons for which you provide your consent; and
- d. as otherwise permitted by law.

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## **5. When and how do we obtain your consent?**

We obtain your consent prior to collecting, and in any case, prior to using or disclosing your Personal Information for any purpose. You may provide your consent to us either orally or in writing. For example, when you respond to a survey, you provide your consent to allow us to use your Personal Information for the purposes of conducting marketing and social research and, in certain circumstances, to disclose your Personal Information to our clients. From time to time, we may collect, use or disclose your Personal Information based on your consent and as permitted by law. If you provide us with sensitive Personal Information such as health or financial information, we will obtain your express consent for the collection, use and disclosure of such sensitive personal information.

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## **6. How do we ensure the privacy of your Personal Information when dealing with our affiliates and other third parties?**

We ensure that all our affiliates and other third parties which are engaged to perform services on our behalf and are provided with Personal Information are required by contract to observe the intent of this Privacy Statement and our Privacy Policy and practices or are governed by the same Privacy Policy.

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## **7. How long will we use, disclose or retain your Personal Information?**

We will use, disclose or retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected and as permitted or required by law. We have established minimum and maximum retention periods and procedures for maintaining and destroying your Personal Information.

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## **8. How can you review your Personal Information that we have collected, used or disclosed?**

We will make available to you any specific Personal Information on you in our custody or control, that we have collected, used or disclosed, upon your written request, to the extent permitted by law. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes.

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## **9. How do you know that the Personal Information we have on you is accurate?**

We will ensure that your Personal Information is kept as accurate, complete and up-to-date as possible. When we collect Personal Information from you, we rely on you for its accuracy. When we collect personal information from other sources, we ask for a representation from such source as to the accuracy of such personal information.

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## **10. What if the Personal Information we have on you is inaccurate?**

You can at any time, demonstrate in writing the accuracy or completeness of the Personal Information we have on you. If you successfully demonstrate that the Personal Information we have on you is inaccurate or incomplete, we will amend the Personal Information as required. Where appropriate, we will transmit the amended information to third parties having access to your Personal Information.

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#### **11. How fast will we respond to your written requests?**

We will attempt to respond to each of your written requests not later than thirty (30) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit.

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#### **12. Are there any costs to you for requesting information on your Personal Information or on our Privacy Policy or practices?**

We will not assess any costs to you for access to your Personal Information or on our Privacy Policy or practices without first providing you with an estimate of the approximate costs, if any. You may withdraw your requests for access to information by notifying us within the thirty-day notice period disclosed on the estimate.

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#### **13. How do we know that it is really you requesting your Personal Information?**

We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your Personal Information. Any such information shall be used only for this purpose.

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#### **14. What safeguards have we implemented to protect your Personal Information?**

We have implemented physical, organizational, contractual and technological security measures to protect your Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification. The only employees, who are granted access to your Personal Information, are those with a business 'need-to-know' or whose duties reasonably require such information.

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#### **15. How do you contact us regarding access to your Personal Information or our Privacy Policy and practices?**

All **comments, questions, concerns or complaints** regarding your Personal Information or our Privacy Policy and practices, should be forwarded to our Privacy Officer as follows.

In writing:

Attn: Privacy Officer

Chatter Marketing, Inc. d/b/a Coherency

9220 W. Sunset Blvd.

Los Angeles, CA 90069

By email: [info@coherency.com](mailto:info@coherency.com)

We will inform you when you make an inquiry or lodge challenges or complaints of the relevant procedures.