

Owl Solutions Privacy Policy

Last revised on 9/30/2019

Welcome! Below you will find the Privacy Policy for Owl Solutions, LLC ("Owl Solutions", "we" or "us"). We are dedicated to protecting your privacy and handling any Personal Information we collect or receive about you with care and respect. The Owl Solutions Privacy Policy (the "Policy" or the "Privacy Policy") is designed to answer your questions regarding how we process, protect, use, and share information obtained through the Owl Solutions Site, www.owlprogramming.com (the "Site"), and our general privacy practices that are applied to the Personal Information we need for survey programming, fieldwork consulting, data & reporting, and other service offerings (collectively, the "Services").

Scope of the Privacy Policy

We consider Personal Information to be any information relating to an identified or identifiable natural person ('Individual'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Please be aware that this Privacy Policy does not govern all of the information in Owl Solutions' possession. We apply our data privacy practices to the Personal Information we handle. The completeness and accuracy of the Personal Information you provide to Owl Solutions is initially your responsibility. This Policy does not apply to the practices of third parties that Owl Solutions does not own or control, or to individuals that Owl Solutions does not employ or manage.

Owl Solutions complies with applicable privacy laws and regulations. We may be compelled to surrender Personal Information to legal authorities if presented with a court subpoena or similar legal or administrative order, or as required or permitted by the laws, rules and regulations of any nation, state or other applicable jurisdiction.

Personal Information Collection and Use

Information You Provide to Us via the Site

As an end user of the Owl Solutions Site, when you interact with us by navigating through the Site, you may choose to provide us with certain Personal Information that may include, but may not be limited to, your name and e-mail address. In open text fields, you may provide other Personal Information as part of your web submissions to us, but we expect that you limit this Personal Information to only that which is necessary and associated with the nature of your inquiry. It is our legitimate interest to offer you a means to communicate with Owl Solutions through the Site to respond to the questions and requests you may have and provide you with information about Owl Solutions and our Services.

We may automatically and passively collect certain information when you visit or interact with the Site ("Usage Information") through server log files. The Site does not utilize cookies (text files sent to and stored on your computer, mobile phone, or other device ("Device") used to access a Site), web beacons (also known as clear GIFs and pixel tags, which may be used to transmit information back to a Site), or embedded scripts (programming code that is designed to collect information about your interactions with the Site, such as the links you click on, and which is active only when you are accessing the Site). It is our legitimate interest to collect Usage Information for the essential purposes of monitoring the security and health of the Site. Usage Information may include, for example:

- Information about the Device used to access the Site e.g., the browser and operating system you are using, geolocation, and the IP address or other unique identifier ("Device Identifier") of your Device.
- Information about how you accessed the Site, e.g., the URL or advertisement that referred you to our Site, or the search terms you entered into a search engine that led you to our Site (if applicable).
- Information about your visit to and interaction with the Site, e.g., all of the areas within our Site that you visit, and the time of day you visited.

The Site is managed by a third party web hosting company located in the United States.

Please note that the Site is not intended for children and we do not knowingly collect Personal Information from children on the Site. If we discover that we have inadvertently collected Personal Information from anyone younger than the age of 18, we will delete that Personal Information immediately.

Information You Provide to Us Through Our Services

In order to arrange and carry out our Services for our customers, we may have to collect Personal Information about you like name, business email address, phone number, and ancillary details like your role, title, department, and office address. To carry out survey design and facilitation, survey participant sampling, data exportation and reporting, and surveyee reward processing, we will require access to your survey results (which could entail any class or category of Personal Information) and possibly access to survey participant names, contact information, and their role, title, and address. In handling survey participant Personal Information and survey results, Owl Solutions works as a data processor, where we use Personal Information solely at the direction of our customers and in accordance with Service agreements. We do not repurpose this Personal Information for our own means. To perform our Services, we may utilize cloud-based survey design platforms, secure electronic file exchange solutions, third party survey sampling firms, third party language translation services, and cloud-based surveyee reward administration platforms.

Privacy Practices

Lawful, Fair, and Transparent Collection and Processing

The Personal Information we collect and process as an organization is done lawfully, fairly, and in a transparent manner in accordance with applicable legal and regulatory obligations. Our grounds for collecting and processing Personal Information may be based on obtaining consent, carrying out our responsibilities to uphold terms in a contract, compliance requirements, and other conditions and legitimate interests.

When we collect Personal Information from individuals, we strive to inform those Individuals of what the collection involves and what their rights are via our Privacy Policy and notices. Our methods of consent and our Privacy Policy are presented in a fashion that is intelligible, easily accessible, in clear and plain language, and clearly distinguishable from the other matters. We offer consent only in circumstances where it is freely given. If we seek to rely on your consent in order to process certain Personal Information, you have the right to withdraw your consent subsequently. This does not affect the lawfulness of the processing based on consent before its withdrawal.

Data Privacy by Design and by Default

Data protection is a significant consideration in all that we do at Owl Solutions. We design and implement procedures and technologies that allow us to process Personal Information that is adequate, relevant, and limited to what is necessary for the related purposes of handling it. We try to only allow for the collection or ingestion of necessary Personal Information and prevent the intake of irrelevant data. The Personal Information we collect and need to run our business and provide our Services is not further processed in a manner that is incompatible with the specified, explicit, and legitimate original purposes of collection. To us, data protection must be the default whenever we handle Personal Information and not just an optional privilege for Individuals.

Information Security

We seek to use reasonable administrative, organizational, technical, and physical measures to help protect the Personal Information we process from loss, misuse, and unauthorized disclosure, alteration, or destruction. Only authorized Owl Solutions personnel have access to Personal Information, and each employee with access to Personal Information is obligated to maintain its integrity and confidentiality. Unfortunately, no data transmission or processing can be guaranteed to be 100% secure or error free. If you have reason to believe that your interaction with us is no longer secure, you should immediately notify us in accordance with the section below entitled "Contact Us." Please note that if you notify us by physical mail, this will delay the time it takes for us to respond to the problem.

Transfers of Personal Information to Third Parties

Our relationships with third party service providers, partners, and affiliates allow us to stay agile and focus on developing and providing best-in-class market research solutions and services. When third parties process Personal Information on the behalf of Owl Solutions or require access to the Personal Information we possess to perform their services, we ascertain that the third party is obligated to provide at least the same level of data protection as we hold ourselves to. Owl Solutions maintains contracts with these third parties that restrict their access, use, and disclosure of Personal Information in compliance with the laws and regulations that apply. Our third parties are required to notify us if they determine they can no longer meet the level of data protection expected by Owl Solutions, and we monitor for compliance to our data protection terms depending on the nature of the services being provided.

How Long We Keep Personal Information

We keep your Personal Information only for as long as it is warranted to provide our Services, adhere to the terms and conditions arranged with clients, and comply with our legal or regulatory requirements. When Personal Information is expired or is no longer needed and does not have to be retained, we may return, delete, destroy, or anonymize it, depending on what method is systematically and procedurally possible, most secure, and what our related retention commitments are.

Privacy Practices for Residents of the European Economic Area ("EEA")

International Transfers of Personal Information

Personal Information belonging to residents of the European Economic Area ("EEA") or Switzerland, may be transferred, stored, or processed by us and our services providers, partners, and affiliates in countries whose data protection laws and regulations may be different to the laws of your country (in respect to what is permitted by the relevant services agreement). We allow transfers of Personal Information made between countries or regions only when supported by an appropriate legal agreement or an alternative provision that ensures obligations to Personal Information rights and protections are commensurate. The sufficiency of these agreements and provisions depend on the countries or regions the information is transferred from and to. Examples of agreements and provisions that may be suitable for transfers (depending on the nature of the international exchange) include, but are not limited to, the following:

- The nation or region where Personal Information is transferred from recognizes the nation or region where Personal Information is transferred to as having adequate protections in place. This will be based on the receiving country's or region's rule of law, respect for human rights and fundamental freedoms, relevant legislation, etc.
- Standard data protection clauses are established.
- An approved code of conduct is in place that is paired with binding and enforceable commitments set upon the organization in the third country.
- An approved certification mechanism (e.g. a safe harbor) is in place that is paired with binding and enforceable commitments set upon the organization in the third country.

Privacy Rights

Under applicable laws and regulations, you may be able to exercise certain privacy rights depending on the territory or country you reside in. We will process your request in accordance with these applicable data protection laws. We may need to retain certain information for record-keeping purposes or to complete transactions that you began prior to requesting any deletion. These rights may include:

- Right of access: You may have the right to access the Personal Information that we hold about you.
- Right to rectification: You may have the right to require us to correct any inaccurate or incomplete Personal Information.
- Right of erasure: In certain circumstances, you may have the right to the erasure of Personal Information that we hold about you (for example if it is no longer necessary for the purposes for which it was originally collected).
- Right to data portability: You may have the right to receive the Personal Information concerning you in a structured, commonly used and machine-readable format that can be shared with another organization. The right of data portability also allows you the opportunity to have Owl Solutions transmit that data to another organization directly where technically feasible.
- Right to object to processing: You may have the right to request that Owl Solutions stop processing your Personal Information and/or to stop sending you marketing communications.
- Right to restrict processing: You may have the right to request that we restrict processing of your Personal Information in certain circumstances (for example, where you believe that the Personal Information we hold about you is not accurate or lawfully held).

When processing Personal Information gathered through our products and services, where Owl Solutions' customers are data controllers, we shall work to assist our customers where necessary and able in responding to privacy requests and complaints from Individuals.

We prefer to resolve your questions, complaints, and requests about how we handle Personal Information directly; however, if you are a European resident, you also have the right to lodge a complaint with the relevant data protection authorities. For the contact information of the Data Protection Authorities for each European Union Member State, please click [here](#).

We Will Keep You Informed

Owl Solutions will review and update this Privacy Policy periodically in response to new compliance obligations and changes to our business. When we update this Policy, we will note the date of its most recent revision above. If we make material changes to this Policy, we will take appropriate measures to inform you in a manner that is consistent with the significance of the changes we make and in accordance with applicable laws and regulations. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your Personal Information.

Contact Us

If you have privacy-related inquiries or complaints or require assistance in exercising your privacy rights, please email Owl Solutions at mhendrickx@owlprogramming.com.