

Privacy Policy

Welcome <http://www.luntzglobal.com> (the “Site”). This Site is provided to you by Luntz Global Partners (“we,” “us,” “our,” or “Company”). This policy provides you with details on the information we collect from you and the uses we make of your personal information. If you do not want us accessing and/or using your personal information as described herein, please do not provide us with any. **This policy may be updated from time to time without prior notice, so please check back periodically. If you continue to visit this Site and use the services made available to you after such changes have been made, you hereby provide your consent to the changes.**

We encourage you to read this policy to learn more about what information of yours we collect, how we use it, and how you can “opt-out” of certain communications and uses of your data. Additionally, this policy includes information about how we endeavor to protect your data. If you have any questions about our collection and use of your information, please contact us at [websitecontact@luntzglobal.com].

1. Information Collection

- a. Personally Identifiable Information. We may collect personally identifiable information, including without limitation your name, city, state, date of birth and e-mail address (“PII”) from the Site when you choose to sign up for a focus group by completing an online contact request form on the Site. We use this information to contact you to respond to your inquiry, provide you certain services and access, and as otherwise permitted by this privacy policy. If you contact us, we may keep a record of that correspondence. If you choose to submit content to any public area of the Site (including without limitation by giving us consent to post your content to any public areas of the Site, or in any other manner permitted by the Site), such content will be considered “public” and will not be subject to the privacy protections set forth herein.

If you choose to connect your social media account to the Site, or otherwise access the Site via a third party service, we may collect PII from that social media platform and/or service, and you give us permission to access and use information, content, and/or material you have supplied to that service as permitted by that social media platform and/or service. For example, when you connect your LinkedIn, Twitter, or Facebook account to register for the Site, we may collect the PII you have made publicly available in those accounts in your profile, such as your name, photograph, headline, contact information, experience, education, summary, and location. We may also obtain other non-public information from the social media account with your permission. You understand that you are responsible for the content and picture posted as part of your profile information. In addition, you understand that certain categories of information such as your user name and profile photo are publicly available to other users and Company, and therefore will not be kept confidential.

- b. Non-Personally Identifiable Information. Our Site may collect certain non-personally identifiable information (“Non-PII”), including without limitation your IP type, IP host address, ISP address, cookie IDs and segment IDs associated with cookie IDs, pages viewed and/or search terms entered, browser type, operating system, duration and frequency of visits, anonymous usage statistics including frequency of messaging and interaction with other users, clickstream data other log file data, or social analytics and tracking measurements that do not identify any individual. On mobile devices, we may also collect device type, make and model, operating system, carrier, user ID, similar device IDs, and information about the apps you use. Please note that we may use third party service providers to help operate and provide services in connection with our Site and these third party service providers will collect Non-PII from our Site as well.
- c.
- d. **YOUR PRIVACY IS IMPORTANT TO US.** Luntz Global Partners respects the privacy of respondents and individuals who respond to electronic information requests providing us with their name, address, email and date of birth. When you register to become a focus group participant with Luntz Global Partners, your contact information and other demographic

information is added to our database of potential focus group participants so that we can contact you when a market research study is being conducted that you may qualify for. To protect the identity and confidentiality of participants in our database, Luntz Global Partners. does not resell or redistribute your information to anyone outside of our company.

e.

2. Information Usage

- a. **Personally Identifiable Information.** We and our promotional partners may use your PII, as provided by you through the Site, to contact and correspond with you and/or to respond to your inquiries, as well as for other business purposes such as adding you to marketing lists. We do not sell your PII to third parties or mass marketers. We may disclose your information, including your PII, to third parties who are providing services on our behalf (such as technology vendors), as well as when we reasonably believe we are obligated to do so by law, and in order to investigate, prevent, or take action regarding suspected or actual prohibited activities, including but not limited to, fraud and situations involving potential threats to the safety of any person or property. In the event another company acquires all or most of our assets, all data compiled or owned by us may be among the items transferred in that transaction. In such event, all the data will continue to be governed by this privacy policy. Finally, please note that if you specifically consent to additional uses of your PII, we may use your PII in manner consistent with that consent.
- b. **Non-Personally Identifiable Information.** We use the Non-PII we collect through our Site for a variety of purposes, including to analyze interactions with and performance of the Site. We may also use Non-PII data from third parties (such as data vendors) pursuant to their own privacy policies, and provide access to or share Non-PII with any number of third parties and our business partners, affiliates and advertising clients. Similarly, we may enhance the Non-PII collected via our Site with Non-PII collected from our business partners.

You may have certain rights under the Communications Act, Federal Trade Commission Act, and other state and federal statutes that may apply, and by accepting these terms and using the Site, you are waiving all of these rights as to collection, use, disclosure and storage of your PII and Non-PII collected by us.

3. Cookies and Similar Technologies

A “cookie” is a small amount of data sent to your browser from a web server and stored by your computer. We and each of our business partners and advertisers may use cookies (or clear gifs, web beacons or similar devices, including devices that function in the mobile environment) to collect information from users for purposes such as tracking Site visits and to measure visitor patterns.

This information is not personally identifiable and is used only to improve the Site and enhance your experience. Cookies are not used to retrieve PII from your computer or device, or to retrieve other information from your computer or device for purposes that are unrelated to the Site or your interaction with the Site. We reserve the right to disclose or utilize any of this information in aggregate form, for any purpose, in our sole judgment. Third party advertisers that serve ads on the Site may also use their own cookies.

You may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences. Note that this may cause some features of the Site to work incorrectly. Please note that cookie-based opt-outs are not effective on mobile applications. However, on many mobile devices, application users may opt out of certain mobile tracking activities via their device settings.

4. Clickstream

As you use the Internet, a trail of electronic information is left at each website you visit. This information, which is sometimes referred to as "clickstream data," can be collected and stored by a website's server. Clickstream data can tell us the type of computer and browsing software you use and the address of the website from which you linked to the Site. We may collect and/or use clickstream data to anonymously determine how much time visitors spend on each page of the Site, how visitors navigate throughout the Site and how the Site may be better tailored to meet the needs of visitors. This information will be used to improve the Site and services. Any collection or use of clickstream data will be anonymous, and will not intentionally contain any PII.

5. Security

We have undertaken and will undertake commercially reasonable efforts to prevent unauthorized Internet access to user data retained in our servers. To help prevent unauthorized access, maintain data accuracy, and ensure the appropriate use of information, we adhere to industry standard practices and procedures to help safeguard and secure the information we collect. However, due to the inherent open nature of the Internet, we cannot ensure or warrant the security of any information provided online, and you assume this risk by using the Site. We may aggregate Non-PII data and retain it for analytical purposes. We may retain your PII, if provided by you through the Site, for as long as your inquiry is active (as determined by us) and for a reasonable time thereafter, or if applicable, for as long as you remain on our marketing list. We also may retain your PII for a longer period of time as needed to provide you services or as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements. Even if we delete some or all of your PII, we may continue to retain and use aggregate, anonymous data previously collected and/or anonymize and aggregate your personal information. Please note that we will not be liable for disclosures of your data due to errors or unauthorized acts of third parties, including third party host providers.

6. Links to Third Party Sites and Social Media Platforms

The Site or advertisements we place may contain links to other websites or applications. Other websites or applications may also reference or link to our Site. Some of our third-party website or technology partners may place their own cookies and/or other data collection tools on your Internet browser; however, we have no access to or control over these cookies and/or other data collection tools. These other domains, websites and/or apps are not controlled by us. We encourage our users to read the privacy policies of each and every website and application that they interact with. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

Our Site may also contain links to social media platforms, and you may be given the choice of connecting to one or more social media platforms from this Site. If you choose to do so, then depending upon your social media privacy settings, the personal information that you post, transmit, or otherwise make available on the social media platform may be viewed and/or used by others and we will have no control over such viewing and use. We do not control and are not responsible for any use of your information by or through any of the social media platforms. By linking to any social media platform, you will be assuming the risk that the information you provide on that platform may be viewed and/or used by third parties for any purposes and agree that we have no control or responsibility for such third party viewing and uses.

7. Information Relating to Children

Our Site is designed for those 13 years of age and older. This Site is not intended for, and we do not knowingly collect information from anyone under the age of 13. If we are made aware that we have received such information, or any information in violation of our policy, we will use reasonable efforts to locate and remove that information from our records.

8. Policy Modifications:

We reserve the right, at our discretion, to modify, add, or remove portions from this policy at any time. However, if at any time in the future we plan to use any data in a way that materially differs from this policy, we will post such changes here. We encourage you to periodically review the Site for the latest information on our privacy practices.

9. Site Terms of Use

Use of this Site is governed by, and subject to, the legal notices contained at the Terms of Use available at www.LuntzGlobal.com. Your use, or access, of the Site constitutes your agreement to be bound by these provisions.

10. Opt-Out

By providing your email address to us, you expressly consent to receive email from us. To the extent you have provided us with such contact information, we may contact you by email to verify your account, and for informational, website functionality and operational purposes (provided that we will not give your email address to another party to promote their products or services directly to you). If you receive an email from us, you may unsubscribe from future unsolicited emails through a link, typically at the bottom of the e-mail.

If you have consented to have your PII shared with any third party who may use such information for direct marketing purposes and you no longer wish to have your PII shared with such parties, then you may opt-out of such disclosures by sending an email to websitecontact@luntzglobal.com. However, we are not responsible for removing your PII from the lists of any third party who has previously been provided with your information in accordance with this privacy policy or your separate consent.

Please note that there might be a brief delay between when you submit your request to “opt-out” and when it is processed and reflected in our systems; accordingly you may continue to receive communications from us for a limited time after you unsubscribe. We appreciate your patience.

11. Comments and Questions

We use reasonable processes to ensure compliance with this privacy policy and periodically verify that the policy is accurate. We encourage you to raise any concerns using the contact information provided below, and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of information. You may also request access to your PII (if you have provided PII to us through the Site) and information about our collection, use and disclosure of that information by using the contact information provided below. Subject to certain exceptions prescribed by law, you will be given reasonable access to your personal information, entitlement to challenge the accuracy and completeness of the information, and the ability to have it amended as is appropriate. You can help us maintain the accuracy of your information by notifying us of any changes to your personal information.

Via Email: websitecontact@luntzglobal.com

Via Regular Mail:

William S. Duvall, CFO
Luntz Global Partners, LLC
9165 Key Commons Court
Manassas, VA 20110
accounting@luntzglobal.com

Telephone contact: 703-330-3784

12. Governing Law. This Privacy Policy and our legal obligations hereunder are subject to the laws of New York, regardless of your location. You hereby consent to the exclusive jurisdiction of and venue in the federal and state courts located in the State of New York in all disputes arising out of or relating to the Site.

13. United States of America. The Site is maintained in the United States of America. By using the Site, you authorize the export of your information to the USA and its storage and use as specified in this policy.

Effective Date: This privacy policy is effective and was last updated on May 14, 2015.