

Introduction

This privacy policy is issued on behalf of Service Measure Limited ("**we**", "**us**" or "**our**"), a company incorporated under the Companies Acts with registered number SC402139 and having its registered office at 3 Clairmont Gardens, Glasgow, G3 7LW.

Service Measure is committed to protecting your privacy. This statement details the steps we take to protect your personal information when you visit our website and sign up to become a mystery shopper. It describes the personal information that we collect, the purposes for which we use such information, and your choices regarding our use of it. The steps we take to protect your personal information and how you can review and correct your personal information are also covered here.

We are a data controller of the personal data that you provide us on our website. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy policy. In this policy, "**Data Protection Legislation**" means all applicable legislation which relates to the protection of individuals with regards processing personal data, including the General Data Protection Regulation (EU) 2016 and the Data Protection Act 2018.

Any questions relating to this policy and our privacy practices should be sent to us using the contact details set out below.

Our collection of information

We use different methods to collect data from and about you. You may give us information about you via our website when you:

- contact us via the website;
- request us to provide a service;
- indicate your interest in our services;
- give us some feedback;
- subscribe to our service;
- register to become a mystery shopper via our website and carry out assignments; and
- from your usage of the website and any other information you post on the website.

The data we collect about you

Information collected directly from you: The personal information we collect may include:

- contact details, such as your name, title, e-mail address, telephone and fax numbers, and physical address;
- information such as your nationality and country of residence that allows us to determine your eligibility;
- information used to customize and facilitate your use of our websites, including login and technical information;

- inquiries about our services;
- information that assists us in identifying the services that best meet your requirements;
- feedback from you about our websites and our services generally;
- if you sign up to become a mystery shopper, we may also collect:
 - your financial information (including credit card or account information) to allow us to pay you;
 - your income band;
 - your consumer preferences such as how often you stay in hotels and your shopping habits; and
 - your height in respect of certain assignments.

Information collected automatically: We collect information about your visit to our sites, including what pages you view, the number of bytes transferred, the links you click, the materials you access, and other actions taken within Service Measure's sites. On sites that you enter with a user ID, we may connect this information with your identity to determine your potential interests in our services. We also collect certain standard information that your browser sends to every website you visit, such as your Internet Protocol (IP) address, your browser type and capabilities and language, your operating system, the date and time you access the site, and the website from which you linked to our site. We do not link this information to your identity.

Our use of your information

Mystery Shoppers: If you register to become a mystery shopper, we use your personal data to communicate with you regarding potential assignments in your area, to manage the assignments that you carry out and to pay you in respect of carrying out such assignments.

Services and transactions: We use your personal information to deliver services or carry out transactions you have requested, to answer customer service requests, facilitating use of our websites, and so forth. In order to offer you a more consistent experience in your interactions with Service Measure, information collected by our websites may be combined with information we collect by other means.

Website improvement: We may use your personal information to improve our websites and related Service Measure services, or to make our websites easier to use by eliminating the need for you to repeatedly enter the same information or by customizing our websites to your particular preference or interests.

Communications: With your consent, we may use your personal information gathered via our websites to inform you of services available from Service Measure. When collecting information that might be used to contact you about our services, we will always give you the opportunity to opt-out of receiving such communications. You have the right to withdraw consent to marketing at any time by contacting us. Moreover, each e-mail communication we send includes instructions to unsubscribe allowing you to stop delivery of that type of communication. If you elect to unsubscribe, we will remove you from the relevant list within 10 business days.

Employment Applications: In connection with a job application or inquiry, you may provide us with information about yourself, such as a resume or curriculum vitae. We may use this information throughout Service Measure and its controlled subsidiaries and affiliates for the purpose of employment consideration. We will keep the information for future consideration unless you direct us not to do so.

Legal grounds for processing

We will only process your personal data when we have legal grounds to do so. Most commonly, we will rely on one of the following legal bases: (i) to enable us to perform the contract we have entered with you, including provision of the services; (ii) if required to comply with a legal or regulatory obligation; (iii) if necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or (iv) if needed to protect your interests (or someone else's interests).

We may process your personal data for more than one legal ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

Our use of cookies and web beacons

Cookies are small files that websites save to your hard disk or to your browser's memory. We may use them to track the number of times you have visited the site, to track the number of visitors to the site, to determine and analyze visitors' use of our sites (including the effectiveness of online advertising), to store information that you provide such as your preferences, and to store technical information useful for your interactions with our websites. We may use session cookies (cookies that are deleted when your browser session ends) to store your user ID, elements of your user profile, to facilitate your movement around our websites (particularly in connection with information searches and order placement) and other information useful in administering the session. You have the ability to accept or decline cookies. Most Internet browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies or to notify you when a cookie is being placed on your computer. If you choose to decline cookies, you may not be able to fully experience the features of our website or other websites that you visit. Our sites also may contain electronic images known as web beacons - sometimes called single-pixel gifs - that allow us to count the number of users who have visited those pages. We may include web beacons in promotional e-mail messages or Newsletters in order to determine whether messages have been opened and acted upon.

Disclosure of your personal information

The information you provide to us will be treated by us as confidential. However, we may disclose your information to other third parties who act for us for the purposes set out below or for any additional purposes approved by you:

Disclosure to our group companies: We may disclose your data to other companies in our group of company which is based in the USA.

Disclosure to service providers: Service Measure contracts with other companies to provide services on our behalf, such as hosting websites, sending out information, processing transactions, and analyzing our websites. We provide these companies with only those elements of your personal information they need to deliver those services.

Disclosure in connection with transactions: In connection with certain transactions, we may disclose some or all of your personal information to financial institutions, government entities, and shipping companies or postal services involved in fulfillment.

Disclosures in connection with acquisitions or divestiture: Circumstances may arise where for strategic or other business reasons Service Measure decides to sell, buy, merge or otherwise reorganize businesses in some countries. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or receiving it from sellers. It is Service Measure's practice to seek appropriate protection

for information in these types of transactions.

Disclosure for other reasons: We may disclose personal information if required to do so by law or in the good-faith belief that such action is necessary to comply with legal requirements or with legal process served on us, to protect and defend our rights or property, or in urgent circumstances to protect the personal safety of any individual.

Security

Service Measure is committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. For example, we store the personal information you provide on computer systems with limited access that are located in facilities to which access is limited. For sites to which you login, it is your responsibility to ensure the security of your password and not to reveal this information to others. When you move around a site to which you have logged in, or from one site to another that uses the same login mechanism, we verify your identity by means of an encrypted cookie placed on your machine.

Reviewing your personal information

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. In some cases, you can review and correct personal information provided through our websites by going to the page on which you provided the information. In all cases, you can make a request to review and correct your personal information collected via our websites or ask Service Measure to stop using it by completing our Contact Us form. We may take steps to verify your identity before providing you access to your personal information. You can help us to maintain the accuracy of your information by notifying us of any change to your mailing address, phone number, or e-mail address.

How long we will keep your information

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

Details of retention periods for different aspects of your personal information are available in our retention policy are available by contacting us using the details provided below. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

International transfers of personal information

We share your personal data within our company group. This will involve transferring your data to the USA.

Some of our external third parties are also based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission ([Please click here for further information](#));

- Where we transfer your data to certain third parties outside of the EEA, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe ([Please click here for further information](#)); and/or
- Where we transfer data to the US, we may transfer data to third parties if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US ([Please click here for further information](#)).

Children's information

Service Measure does not knowingly collect information from children and does not target or direct its websites to children.

Links to other sites

Our websites may contain links to other sites such as Service Measure sales affiliates, professional and government organizations, and publications. We also link to third-party providers that host, maintain and operate on-line training curricula. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites.

Your rights

Under Data Protection Legislation, you have the following rights in connection with your personal data, which can be exercised in certain circumstances:

Request access: to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check we are lawfully processing it.

Request correction: of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure: of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing: of your personal information where we are relying on a legitimate interest (or those of a third party). You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing: of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer: of your personal information to another party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format; and

Withdraw your consent: where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide services to you or allow you to carry out assignments on our behalf.

If you would like to exercise any of your rights above, please contact us using the details set out below.

Changes to this privacy statement

Service Measure may occasionally update this privacy statement. When we do, we will revise the “last updated” date at the bottom of the privacy statement. Any changes we make to our privacy policy in the

future will be posted on our website and, where appropriate, displayed on our premises notified to you by e-mail.

Contact us

We have appointed Gary Haase as our data protection representative who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact Gary Haase using the details set out below:

Email address:	gary@servicemeasure.com
Postal address:	6 Braidholm Crescent, Suite 2/2, Glasgow G46 6HQ
Telephone number:	0141 255 2344