

Privacy

Scent Lounge Online Community Privacy Notice

Who are we?

We are Krealinks (“**we**” “**our**” “**us**” or “**Krealinks**”). Krealinks are an online data collection group focused on providing high-quality market research data to its clients who are in various business sectors, including other market research agencies and other global and corporate clients of all sizes. We also build and maintain large online consumer panels, providing real-time digital consumer insights to our clients via our market research client surveys and analytics platforms.

We host and administer this online platform and help our client who engaged us to build and manage this community (“**Client**”) to recruit online community members, like you. You can see who our group members are by clicking on the link below:

<https://www.krealinks.com/>

What is our Privacy Commitment to you?

We respect your privacy and are committed to protecting your personal data. This privacy notice describes how we collect, use, share and protect personal data that you provide on <https://www.scent-lounge.com>

(the “**site**”) when you become a community member and participate in our Client’s surveys and/or research studies (“**surveys**”). Our Client wishes to remain anonymous so that the responses to surveys you provide and your use of the Community are not biased in any way.

This Privacy Notice tells you about:

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What personal data do we collect about you and how do we use your personal data?

Being a Community Member

When you register to become one of our Client's community members by completing the registration form on the site, you are able to participate in our surveys and our forum. As part of your registration, you will provide us with your Identity data and Contact data and we will through your participation in the Surveys other data about you, such as; Demographic/Profile data, Technical data and Pseudonymised data will be processed.

Your Identity data and Contact data will be used as follows:

- **Contacting you** for any reason connected with your community membership;
- **Incentive fulfilment** - when you earn incentive points through your participation in the surveys, the points are deposited into your community online account. When you wish to redeem them, your Identity data and Contact data will be used to send you your rewards.
- **Sending you invitations for your participation in surveys** - to ask you if you are interested in participating in our upcoming surveys.
- **Participating in online video qualitative interviews** – We may invite you to participate in an online interview, using a video conferencing tool. If, with your consent you participate in that interview, we and our

Client may obtain a copy of the interview, which will be retained in accordance with our data retention and destruction policy.

If allowed under applicable law and if relevant to the survey, we may from time to time ask for your consent to provide us with Special Categories of personal data about yourself.

We may use your Demographic/Profile data for matching you with appropriate surveys to see if you qualify for particular surveys and your birth date is automatically updated so that we may ensure we select individuals, based on their age as may be required for the relevant survey.

We will view your survey responses either at an individual level or aggregated level. If at an individual level, your responses will be linked to your membership ID, but all direct identifiers (such as your name and contact data will not be shown) and if your survey responses are at an aggregated level, the survey results are provided about groups of individuals (rather than shown individually).

Public forums and blogs

The site offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by other members who access them.

You should be aware that any personal data you choose to make public on the site, in the Community area (under a message on your wall, as an opinion, topic, battle, thumb it) can be read, collected, stored and/or used by other users and could be used to send you unsolicited messages. **We strongly discourage you from disclosing any of your personal data in the community area that you may find on the site and in particular, we would never ask you to provide your Contact data or Identity data on a public community area as part of a survey. We cannot guarantee that third parties with whom you share your personal data via those community areas will keep them secure and confidential. Please be aware that we are not responsible for the personal data you choose to submit or make public. In addition, we are not responsible for the content you publicly post on the site that can be found via web-based search engines.**

Categories of personal data we may process about you

1. **Identity data** – name (includes first, last, maiden and married names), date of birth, marital status, gender, membership id, your image, audio and username.

2. **Contact data** – postal address, email address and telephone number.
3. **Special categories of personal data** – ethnic/racial origin, health, genetics, political opinion, religion, sexual orientation and sex life.
 4. **Demographic/Profile data** - interests, preferences, feedback and survey responses and including, but not limited to; age, marital status, gender, birthday, household size, income, education and employment status.
5. **Technical data** includes internet protocol (IP) addresses, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
6. **“Pseudonymised data”** these are unique identifiers such as membership ID’s, which linked to other data could re- identify you, however direct identifiers, such as; name and Contact data are removed.

Who do we share your personal data with?

Except for the results of surveys, which may be pseudonymised data, we do not allow our Client to process any personal data about you. If on occasions (with your prior consent) we do provide your personal data to our Client, such use shall be for specific surveys, for the purposes of research.

We have engaged Amazon Web Services (AWS) (located in Ireland) to host the Community platform and to provide back up services.

[From time to time we may engage third parties to issue you with cheques or processing the delivery of your rewards and they will need to use your Identity data and Contact data for those purposes.]

From time to time, Krealinks may use third-party software for fraud, quality checking and validation purposes, including, but not limited to speeding,

Though we make every effort to preserve your privacy, we may be required to disclose your personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements; or to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, to protect your safety or the safety of others, to investigate fraud or breaches of the site terms, or to respond to a government request.

Who is the data controller?

We and our Client are joint controllers of your personal data and we are jointly responsible for your personal data.

We have appointed a data protection officer (DPO) 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 the DPO using the details set out below.

What are the legal bases we rely on when using your personal data?

We may use your personal data for a number of different reasons, including:

Consent – In certain cases, we collect and process your personal data with your consent e.g. when you participate in surveys.

Legitimate interest – In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests e.g. conducting customer satisfaction research by getting your feedback on our products and/or services.

Contractual obligations – In some circumstances, we may need to process your personal data to comply with a contractual obligation e.g. when your personal data is used to send you your rewards.

Legal compliance – If the law requires us to, we may need to collect and process your personal data in response to lawful requests by public authorities or if e.g. we believe in good faith that disclosure is necessary to protect our rights, to protect your safety or the safety of others, to investigate fraud or breaches of the site terms, or to respond to a government request.

Do we transfer your personal data to other countries?

From time to time your personal data is transferred and/or accessed from a Krealinks company that is located in a different country. Krealinks has put in place transfer agreements using the standard contractual clauses for the transfer of personal data to third countries as decreed by the European Commission.

We use the following companies to process your personal data for the reasons set out below:

Sub processors	Purposes
Krealinks France, UK	Community management

Sub processors	Purposes
Google Cloud, Germany https://cloud.google.com/security/compliance/services-in-scope	Provision of a cloud based platform, on w Application is hosted

What Cookies do we use on the site?

Cookies are used on the site to distinguish you from other users of the site, helping Krealinks to provide you with a good experience when you browse the site and allowing Krealinks to improve their site. For detailed information on the cookies used and the purposes for which they are used, see the Cookie Policy attached: https://scent-lounge.com/en_gb/page/cookies

What other Tracking Technologies do we use?

Automated technologies or interactions. As you interact with the site, we will automatically collect Technical data about your equipment, browsing actions and patterns. We collect this Technical data by using cookies, server logs, digital finger printing technologies and other similar technologies. We may also receive Technical data about you if you visit other websites employing our cookies. Please see our cookie policy https://scent-lounge.com/en_gb/page/cookies for further details.

Server log files: We may collect Internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. This Technical data may be combined with other information collected about you for the purposes of improving our services, site functionality and collecting analytical data.

Fingerprint technologies: In general, digital Fingerprinting technologies assign a unique identifier or "Machine-ID" to a user's computer to identify and track your device ("**Technology**"). The Technology will analyse publicly available information and data obtained from your computer's web browser and from other publicly available data points, including the technical settings of your computer, the characteristics of your computer, and its IP Address, to create a unique identifier, which will be assigned to your device. We use the Technology for quality control, validation, and fraud detection and prevention purposes, including assisting us in ensuring the integrity of survey results. Appropriate technical and operational processes and procedures will be put in place to ensure that the Technology is safe, secure and does not cause undue privacy or data security risks and the Technology will be used and distributed in a professional and ethical manner and in accordance with (a) this privacy notice, (b) any other statements and/or disclosures made to you as a member of the community and (c) applicable laws and market research codes of practice. In the event any unethical conduct is discovered in connection with the use of the Technology, or that the Technology is being used in a manner that is inconsistent with privacy notice, immediate action will be taken to prohibit such unethical conduct and to ensure the proper administration of the Technology.

What is our winner's policy?

Community members receive points for their participation in surveys and might win prizes at special occasions such as contests. All winners are notified by email of their winnings. For more information, please visit our **Terms and Conditions** https://scent-lounge.com/en_gb/page/t-cs

page. We shall post the usernames or first name and first initial of last name of winners on the Reward Page or communicate them via newsletter to all members. For more information about earning points, please visit our terms and conditions page https://scent-lounge.com/en_gb/page/t-cs

What security measures do we undertake to protect your personal data?

We have ensured that appropriate security measures are put in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we ensure that access to your personal data is limited to those employees, agents, contractors and other third parties who have a business need to know. They will only process

your personal data in accordance with our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator or supervisory authority of a breach where we are legally required to do so.

What are our data retention and destruction policies?

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

You can ask us to delete your data: see the section entitled ***Your rights*** below for further information.

As the results of the surveys and other aggregated or Pseudonymised data are used for research and/or statistical purposes, for which you have been rewarded, we and other third parties may use this information in accordance with the terms indefinitely without further notice to you.

Links

From time to time we may offer visitors the ability to voluntarily link to other sites. We do not review and are not responsible for, the content or effect of the privacy policies of these sites.

Children's privacy

We will not knowingly collect any information online from any child who is under the age of majority without permission from his/her parents, legal guardian or an adult responsible for the care of the child. We comply with COPPA and the ESOMAR guidelines in relation to online surveys concerning children and young people.

Your rights

How do you access your information; use the member services area and/or update, correct or delete your information?

Upon request, we will provide you with information about what personal data we may hold about you. You may access, correct, or request deletion of your personal data, or terminate your membership by logging into your Community Account. By following the appropriate directions, your information should

be automatically updated in our database. For these purposes, and if you are unable to correct your personal data yourself via your Community Account you may write to us at the postal address found at the end of this Privacy notice or contact us by email at contact.scent-lounge@krealinks.com. We will respond to all requests within a reasonable timeframe.

How do you opt out from your community membership?

If you choose to end your membership with the Community, you may discontinue your membership by going to “Account” and selecting “Unsubscribe Options” in the footer. By following the appropriate directions, your record will be marked as “do not contact”, and you will no longer receive invites to participate in future Surveys from Toluna. In addition, you will forfeit any incentive balance that has not been requested as of the time you opt out. In most cases it will take 2 to 3 days to process this change, but please allow up to two full weeks for your status to be finalised. Please note that you may continue to receive communications during this short period after changing your preferences while our systems are fully updated.

You may also send an email directly to contact.scent-lounge@krealinks.com requesting to be removed. Email links are provided on the site so that you may contact us directly with any questions or concerns you may have. Each email we receive is read and responded to individually; please allow two to three business days for us to get back to you.

How long will you use my data for?

If you decide to terminate your membership, we will no longer use your personal data to contact you, but in accordance with our backup procedures, your personal data will be retained and eventually destroyed in accordance with our ***Data Retention and Destruction Policies***. We will continue to employ the security procedures and technologies to keep your personal data safe.

How do you ask a question or make a complaint?

You can direct any questions or complaints about the use or disclosure of your personal data to our ***Privacy Contact***. We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of your personal data within 30 days of receiving your complaint.

If you are based in the EEA, UK or Switzerland and have an unresolved privacy or data use concern that we have not addressed satisfactorily, then please refer to ***Your Rights if you are in the EEA, UK or Switzerland*** to make a complaint under the paragraph entitled ***Make a complaint at any time to a data protection regulator***.

Rights to your personal data

You may:

- **Request access** to your personal data and we may conduct ID checks before we can respond to your request.
- **Have your personal data erased, corrected or restricted** if it is inaccurate or requires updating. You may also have the right under certain circumstances to request deletion of your personal data; however, this is not always possible due to legal requirements and other obligations and factors. You can update your account information via your Account or by contacting us at the address given below.
- **Object to the processing your personal data** if we are not using your personal data for the purposes set out in this privacy policy.

Your rights if you are in the EEA, UK or Switzerland

If our main office is located in Europe or you are a resident or citizen of a country in the European Economic Area (EEA), United Kingdom or Switzerland, we comply with the GDPR, Data Protection Act 2018 and/or the Swiss Data Protection Act. You have the additional rights set out below.

You have the following rights:

- **Have your personal data transferred to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. You may exercise this right by making a request via your online member account.
- **Make a complaint at any time to a data protection regulator.** A list of National Data Protection Authorities can be found here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. we would, however, appreciate the chance to deal with your concerns before you approach the data protection regulator so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on the date at the top of this privacy policy.

If we decide to change our privacy notice, we will post those changes to this privacy statement on the homepage, or other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page prior to the change becoming effective.

It is important that the personal data we hold about you is accurate and current. Please keep your Account details updated if your personal data changes during your relationship with us.

Privacy contact details

You may contact us by writing to: contact.scent-lounge@krealinks.com or Scent Lounge, Krealinks 34 Bd des Italiens, 75009 PARIS, France.