

Privacy Statement

Updated September 17, 2024

For the purposes of this Privacy Statement, the terms “**illume**,” “**we**,” “**us**” and “**our**” refer to illume, LLC, 3350 Hidden Lake, Court, Fisherville, KY 40023.

This Privacy Statement describes the types of information, including Personal Information, collected and processed through illume websites, and how illume treats such information. For questions about this Privacy Statement or your Personal Information, please contact privacy@illume-research.com.

Personal Information

By using the term “**Personal Information**” in our Privacy Statement, we refer to information that you individually provide to illume, either directly or indirectly, that, on its own or in combination with other information, can be used to identify you or make you identifiable. Personal Information includes, for example, your name, your mailing address, your telephone number, your email address or other information that identifies you or makes you identifiable.

Information that by itself cannot be used to identify you or make you identifiable does not qualify as Personal Information.

This Privacy Statement covers the following topics:

I. INFORMATION COLLECTED BY ILLUME WEBSITES

1. *Information Collected Indirectly*
2. *Information Collected Directly*

II. DATA COLLECTION

1. *Access to Your Survey or Assessment Results From Another User Account*
2. *Sharing Your Survey Results With Other People*

III. GENERAL INFORMATION ON COLLECTION AND PROCESSING OF INFORMATION

1. *Correcting and Changing User Information and Preferences; Deletion of User Accounts*
2. *Information Security*
3. *Third-Party Information Storage*
4. *Children and Privacy*
5. *Links to Other Sites*
6. *Location of Data Collection and Processing and Storage*
7. *Your Rights*
8. *Sensitive Information*
9. *Dispute Resolution*

10. *Policy Updates*

11. *Accessibility*

12. *Additional Questions or Comments*

I. INFORMATION COLLECTED BY ILLUME WEBSITES

Illume websites gather information in two ways: (1) indirectly (for example, through our site's technology), and (2) directly (for example, when you, the site visitor, voluntarily provide information on various pages).

1. Information Collected Indirectly

Illume indirectly collects a variety of information through your interaction with and use of Illume websites. This information may include, but is not limited to, browser and device information, data collected through automated electronic interactions, application usage data, content information based on your individual interests, demographic information, geographic or geo-location information, statistical and aggregated information ("**Other Information**").

Statistical or aggregated information does not directly identify a specific person, but it may be derived from Personal Information. For example, we may aggregate Personal Information to calculate the percentage of users in a particular ZIP code.

If we combine Other Information with Personal Information, we will treat the combined information as Personal Information.

Cookies and Other Tracking Technologies

Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons).

2. Information Collected Directly

Illume also collects Personal Information and other information that users voluntarily provide. It is entirely your decision to provide the requested information.

Illume keeps all information directly collected confidential, and will use the information only for the particular purpose stated at the point of collection. Illume will seek your specific permission for any additional use. You may choose to have this information removed at any time.

2.1. Other Personal Information Provided Directly

Personal Information provided by you on Illume websites, e.g., via contact forms or via telephone, will be stored in our service database and retained for the period necessary to fulfill our contractual obligations to you in accordance with Art. 6 (1) 1 lit. b) GDPR unless a longer retention period is required by law.

II. DATA COLLECTION

Many Illume websites offer users the opportunity to participate in surveys or assessments via the internet. Illume will provide information about the purpose and process for each survey or assessment as part of the applicable survey or assessment.

1. Access to Your Survey or Assessment Results From Another User Account

Another online user may purchase an access code to a Illume survey or assessment for you. Please note that when participating in a survey or assessment, your results will also be accessible to the online user who purchased the Illume access code. The data accessible to that account holder may include your name and your results, but will not include your specific answers to individual questions within the survey or assessment. In addition, the account holder cannot modify, alter or delete any of your results or User Account data.

After completion of the survey or assessment, you will at all times have the opportunity to change the settings for sharing your results with other account holders and to opt out from sharing your results.

2. Sharing Your Survey Results With Other People

After completion of the survey or assessment, you may have the opportunity to share your survey or assessment results via email or social networks. Please note that only your name and results will be displayed. By sharing your information from your User Account with any social media service, you are authorizing us to share information we collect from and about you with the social media service provider, other users, and your network of contacts on the social media service, and you understand that the social media service's use of the shared information will be governed by the social media service's privacy policy. If you do not want your Personal Information shared in this way, please do not connect your Illume information to a social media service provider.

III. GENERAL INFORMATION ON COLLECTION AND PROCESSING OF INFORMATION

1. Correcting and Changing User Information and Preferences; Deletion of User Accounts

If you have given your consent in accordance with Article 6 (1) 1 lit. a) GDPR to receiving email communications from Illume but wish to withdraw your consent and discontinue this service, you may do so at any time by clicking the unsubscribe link included in the footer of our emails or by [contacting us](#) (see also below clause III.7. "Your Rights").

You also have the option at all times to have your User Account deleted for any of the Illume websites or to request a revision of your user information at any time. To do so, please [contact us](#).

2. Information Security

Illume employees understand the need for user privacy, and we maintain reasonable and appropriate security procedures to protect your information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Personal Information. Illume has appointed a Privacy Policy Administrator to monitor privacy practices. Access to user data is strictly limited to specific individuals who are trained to respect user privacy. The access given to these employees is restricted to their need for such information for business purposes. A log of those who accessed the data is maintained and monitored to prevent security breaches. However,

no security measure or modality of data transmission over the internet is 100% secure. Although we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee absolute security.

3. Third-Party Information Storage

We provide Personal Information to our affiliates and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Statement and any other appropriate confidentiality and security measures. For example, we use vendors such as Amazon cloud for data storage. Any vendor or agent that we retain is not allowed to use Personal Information they receive from us for any other purpose than to perform the contracted services we have contracted them to perform.

4. Children and Privacy

Illume encourages parents and guardians to spend time with their children online and to be fully familiar with the sites visited by their children. Illume websites do not contain content that is generally considered unsuitable for children.

5. Links to Other Sites

Illume websites may contain links to sites owned and/or operated by other organizations, and the privacy policies of those sites may differ from that of Illume. These sites may collect data and make use of it in ways that Illume does not. We encourage you to review the privacy policies posted on all third-party sites.

6. Location of Data Collection and Processing and Storage

In personally accessing Illume websites, you may be submitting Personal Information and survey or assessment results that Illume will use for business purposes that are consistent with this Privacy Statement. As a worldwide organization, Illume collects information that may be processed internationally throughout Illume offices worldwide. Your information may be processed in the United States or any other country in which Illume maintains facilities, including any Illume subsidiary (a complete list of Illume companies can be found on Illume.com).

Illume keeps Personal Information gathered and processed for the purposes described in this Privacy Statement for as long as there is a business purpose for doing so. Please also see clauses I.2.1 and I.2.2 above for additional information on how we retain your Personal Information.

7. Your Rights

You have the right to access the Personal Information that we hold about you and to correct, update, amend, suppress, delete or otherwise modify any Personal Information where it is inaccurate. When updating your Personal Information, we may ask you to verify your identity before we can act upon your request.

You may also, if governed by GDPR, object to the use or processing of your Personal Information or withdraw consent to use your Personal Information at any time.

Under GDPR, regarding the processing of your Personal Information, you have the following rights:

- the right to require free of charge (i) information on whether your Personal Information is retained and (ii) access to and/or (iii) duplicates of the Personal Information retained. However, if the request affects the rights and freedoms of others or is manifestly unfounded or excessive, we reserve the right to charge a reasonable fee (taking into account the administrative costs of providing the information or communication or taking the action requested) or refuse to act on the request;
- the right to request proper rectification, removal or restriction of your Personal Information;
- where processing of your Personal Information is either based on your consent or necessary for the performance of a contract with you, and processing is carried out by automated means, the right to receive the Personal Information concerning you in a structured, commonly used and machine-readable format or to have your Personal Information transmitted directly to another company, where technically feasible (data portability);
- where the processing of your Personal Information is based on your consent, the right to withdraw your consent at any time without impact to data processing activities that have taken place before such withdrawal or to any other existing legal justification of the processing activity in question;
- the right not to be subject to any automatic individual decisions that produce legal effects on you or similarly significantly affect you; and
- the right to take legal actions in relation to any breach of your rights regarding the processing of the Personal Information, as well as to lodge complaints before the competent data protection regulators.

Illume complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Illume has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Illume has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Illume commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and UK individuals and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact Illume at: privacy@illume-research.com.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Illume commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss

Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Illume commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to <https://www.jamsadr.com/DPF-Dispute-Resolution> an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.jamsadr.com/DPF-Dispute-Resolution> for more information or to file a complaint. The services of <https://www.jamsadr.com/DPF-Dispute-Resolution> are provided at no cost to you.

If neither Illume nor our third-party dispute resolution provider resolves your complaint, you may pursue binding arbitration through the Data Privacy Framework Panel. To learn more about the Data Privacy Framework Panel, visit <https://www.dataprivacyframework.gov>

Illume may sometimes provide personal information to third parties to perform services on our behalf. If we transfer personal information received under the Data Privacy Framework to a third party, the third party's access, use, and disclosure of the personal information must also be in compliance with our Data Privacy Framework obligations, and we will remain liable under the Data Privacy Framework for any failure to do so by the third party unless we prove we are not responsible for the event giving rise to the damage.

To exercise the rights referred to above, please contact us at privacy@illume-research.com.

As far as we process your Personal Information on the basis of our legitimate interests pursuant to Art. 6 (1) lit. f) GDPR, you may object to processing at any time. You may find the detailed description of our processing activities and the legal basis in the sections before. If you object, we will no longer process your Personal Information unless there are compelling and prevailing legitimate grounds for the processing or the data are necessary for the establishment, exercise or defense of legal claims. If you object to such processing, we ask you to state the grounds of your objection in order for us to examine the processing of your Personal Information and decide whether to adjust the processing accordingly.

Please note that the processing of your Personal Information may involve advertising activities as described above. If you do not want that we process your Personal Information for direct marketing activities, you can object free of charge at any time via email: privacy@illume-research.com.

Illume will obtain your consent before sharing your Personal Information with any third party that is not acting as an agent or vendor to perform tasks on our behalf or to use the information for a purpose materially different from the purpose for which it was initially collected or subsequently authorized by you. An exception to this will be (among others) where Illume's processing of Personal Information is necessary for compliance with a legal obligation under the applicable law.

8. Sensitive Information

For processing of your sensitive information (e.g., medical information, Personal Information revealing ethnic or racial origin, political opinions, religious or philosophical beliefs, trade union membership, the

processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or a natural person's sex life or sexual orientation), we will obtain your consent or, where legally required, your explicit consent.

Illume is among others not required to obtain explicit consent under GDPR with respect to sensitive information where the processing is (a) necessary to protect the vital interests of the data subject or another natural person where the data subject is physically or legally incapable of giving consent; (b) necessary for the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity; (c) necessary to carry out Illume's obligations in the field of employment law insofar as it is authorized by European Union or Member State Law or a collective agreement pursuant to Member State Law providing for appropriate safeguards for the fundamental rights and the interests of the data subject; or (d) related to information that is manifestly made public by the individual.

9. Dispute Resolution

If you have any complaints regarding our compliance with this Privacy Statement, you should first [contact us](#). We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with this Policy.

Illume is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). Illume may be required to disclose personal information that we handle under the Data Privacy Framework in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

10. Policy Updates

Additional information that is particular to specific Illume websites may exist, and updates to this policy may be posted. For these reasons, we suggest that users who may have specific concerns about the information being gathered and use of that information regularly view the Privacy Statement on each website. Illume reserves the right to change the policy on use of information collected at any time by posting an updated version on each website. If required by law, we will provide you with notice of any update.

11. Accessibility

We are committed to ensuring this Privacy Statement is accessible to individuals with disabilities. If you wish to access this Privacy Statement in an alternative format, please contact us as described below.

12. Additional Questions or Comments

If you have any inquiries, complaints, access requests and any other questions or comments regarding Illume's Privacy Statement, please [contact us](#).