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## **Morpace Privacy Policy**

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## **Morpace Privacy Policy**

Morpace Inc., established in 1941, is an ISO 9001:2008 certified survey research and consulting company providing information which helps its clients understand the needs and preferences of their customers.

Morpace is committed to maintaining the privacy and security of personal information. We do not conduct sales or direct marketing, nor do we provide personal information to be used for direct contact sales or marketing purposes. Please view our Company information on our website or contact us at [information@morpace.com](mailto:information@morpace.com) with concerns or questions.

Morpace complies with the U.S. – E.U. Safe Harbor Framework and adheres to the Safe Harbor Privacy Principles as set forth by the U.S. Department of Commerce with regards to the collection, use and storage of personal information received from the European Union. For more information about the U.S. – E.U. Safe Harbor framework you can visit <http://export.gov/safeharbor>.

## **Research Survey Information**

Personal information provided to Morpace Inc. is confidential. Information collected is combined with information gathered from other survey participants and shown in aggregate excluding personally identifiable information, unless otherwise evident within the survey. If we indicate that personal information may be included in the research findings, we ensure that the information is treated with the strictest confidence. We will not mislead a participant regarding the nature of the research or how the information will be used. Please see the section titled "Disclosure of Personal Information by Morpace" and "Access to Morpace data" for more information.

Research participation is voluntary. Participants may opt-out of current research by disregarding or declining the invitation to participate and are given the opportunity to be removed from future research conducted by Morpace.

At a research participant's request, we will correct, amend or delete incorrect personal information we have collected about them. Such access may be denied or limited by Morpace, if providing such access is unreasonably burdensome, expensive under the circumstances and/or if giving access to such information would violate another person's rights. In some circumstances, Morpace may charge a reasonable fee for access to personal data.

Morpace is a member of the Council of American Survey Research Organizations ("CASRO"), the professional trade association of survey research companies and holds individual membership to European Society of Opinion and Marketing Research ("ESOMAR"). Morpace adheres to the mandated CASRO Code of Standards and Ethics for Survey Research. This code includes requirements for the protection of personal information and respondent identifying information. For more information, please visit the CASRO Code, at [www.casro.org](http://www.casro.org).

Additionally, Morpace adheres to the Standards for Privacy of Individually Identifiable Health Information (“Privacy Rule”) as required by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”).

The Quality Manager is available to answer questions about the Privacy Policy, to request personal information corrections or amendments and for addressing complaints or disputes. For questions, information updates, complaints or to request a copy of the security policy, please email or telephone at 248-737-5300 and request to speak to the Quality Manager. Morpace is committed to cooperating and complying with the EU data protection authorities for dispute resolution.

### **Morpace Survey Web Site**

The only personal information actively collected by Morpace is that which is voluntarily provided. Morpace does not place files or programs such as "cookies" on an individual's computer while they are visiting our web site or taking surveys. If there are occasions where files, programs or cookies are appropriate, this will be disclosed and only done with express permission from the individual. Individual browsers may send limited system information such as IP addresses and originating web sites; this information may be viewed to help understand how our web site is used.

Personal information is safeguarded on secured systems and is used only for the purpose stated. In order to respond to an inquiry, an email address or other contact information may be requested when we are contacted through [information@morpace.com](mailto:information@morpace.com). This information is shared with Morpace employees on a need to know basis only.

Our survey web site may contain hyperlinks to web sites outside of Morpace. Data collection privacy policies may be different on hyperlinked sites not owned by Morpace Inc.; therefore we recommend that the Privacy Policy / Statement is read for each site visited.

Participants consent to the terms of the Morpace Privacy Policy and the use of their information upon entering the Morpace survey web site.

### **Email Addresses and Communication**

Morpace may have personal email addresses in its email system or data files that are acquired through:

- Requests for information submitted to our web site
- Emails sent to Morpace
- Research surveys completed for Morpace
- Clients who have provided email addresses for research purposes

The CAN SPAM Act of 2003 applies specifically to commercial emails sent for the purpose of sales or direct marketing. Morpace does not fall into this category; however, it voluntarily observes the CAN SPAM Act requirements that can be applied to survey research. Morpace uses email as a means of communicating to known clients and customers. When email is used to invite respondents to participate in surveys, the following processes are used to ensure we do not send SPAM:

- We clearly identify ourselves and/or the client when sending an invitation
- We provide contact information should there be any questions or concerns
- We provide the option to be removed from future email research invitations
- We reuse email addresses only as a legitimate follow up to survey research

These processes ensure that we contact only those who could have an expectation of being contacted for research purposes.

### **Disclosure of Personal Information by Morpace**

Morpace will not disclose any individual's personally identifiable information except when we have your permission or if Morpace is required or permitted by law or court orders to collect, use, and / or disclose personal information; notice may not be required.

In the event of a sale, merger, liquidation, dissolution, reorganization or acquisition of Morpace or a Morpace business or business unit, the acquiring party would agree to be bound by the terms of the Morpace Privacy Policy before any information would be transferred.

Personal information may also be disclosed when the survey instrument clearly states that the information will be disclosed or, when a participant makes a request during the survey that can only be fulfilled by disclosing information from the survey.

### **Access to Morpace Data**

Only authorized Morpace employees, vendors, contractors or partners carrying out authorized business functions are allowed to access Morpace data or databases.

Vendors, contractors, or partners who have access to survey information in connection with providing services for Morpace are required, at a minimum, to sign a Confidentiality Agreement. The Confidentiality Agreement requires them to keep the information confidential; they are not permitted to use this information for any purpose other than to carry out the services they are performing for Morpace.

Morpace employees are required to sign a Confidentiality Agreement in which they agree to keep all project and respondent personal information confidential. Employees who violate the Confidentiality Agreement are subject to disciplinary actions, including termination when appropriate.

## **Personal Information Security**

Morpace is committed to keeping personal data secure and will take all reasonable precautions to protect personal information from loss, misuse or alteration. This data is stored on our internal network servers that are protected by firewalls and other appropriate security mechanisms.

Morpace conducts an annual self-assessment to ensure that internal processes comply with the Safe Harbor Privacy Principals. Morpace will self-certify with the U.S. Department of Commerce as being in compliance with all Safe Harbor Privacy Principals annually.

Morpace adheres to the safeguards required by the Security Standards as established under HIPAA as it relates to Electronic Protected Health Information (EPHI), as well as to all Protected Health Information (PHI).

## **Children's Privacy**

Morpace does not knowingly make direct contact with children to participate in research activities. If we require survey information from children, we contact the parent or guardian to arrange the survey activities and we encourage the parent or guardian to closely monitor and participate in the survey activities.

## **Morpace Focus Group Database**

Morpace maintains a Focus Group Database for the purpose of inviting respondents to participate in research activities. Registration into this database is available on the Morpace web site. An invitation to participate in future survey research may also be distributed through other means.

Information provided by participants in the registration questionnaire is voluntary and is used for the purpose of identifying eligibility for participation in future survey research. Follow up questions may be necessary to qualify a respondent for specific research studies. Participation in the Morpace Focus Group Database may be discontinued at any time by sending an email to [information@morpace.com](mailto:information@morpace.com).

## **Changes to this Privacy Policy**

Morpace reserves the right to modify and update this policy and its related business practices at any time. Please view this Privacy Policy on a regular basis.

If you have any questions concerning our privacy policy, please contact us at 247.737.5300 or [information@morpace.com](mailto:information@morpace.com).

Morpace Inc.