

# Privacy Policy

last updated: May 2018

## 1. Introduction

FearlessRP provides a survey platform through a Software as a Service (SaaS) model. At FearlessRP the privacy and security of our members, customers, respondents and visitors are of paramount importance. FearlessRP is committed to protecting the data you share with us. This privacy policy explains how FearlessRP processes information that can be used to directly or indirectly identify an individual (“Personal Data”) collected through use of its website and platform.

For the purposes of this policy, FearlessRP defines the term “User” as an entity with which FearlessRP has an established relationship, the term “Respondent” as any individual who responds to surveys powered by FearlessRP or who is included as a contact in a User’s account and the term “Visitor” as an individual that visits our front-end website (for example [www.fearlessrp.net](http://www.fearlessrp.net) ).

Any information stored on FearlessRP’s platform is treated as confidential. All information is stored securely and is accessed by authorized personnel only. FearlessRP implements and maintains appropriate technical, security and organisational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

## 2. Collection and use

### 2.1 .General

The following sections cover the specifics of each of the three groups from which data is collected: website Visitors, Respondents and Users.

### 2.2 Website Visitors

If you are a Visitor to our website only, and not a Respondent to a survey or a user of our platform, then this section is relevant for you.

By visiting this website, you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, please do not visit this website. If required by applicable law, we will seek your explicit consent to process Personal Data collected on this website or volunteered by you. Kindly note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this website may not be possible.

FearlessRP may collect, record and analyze information of Visitors to its website. We may record your IP address and use cookies. FearlessRP may add information collected by way

of pageview activity. Furthermore, FearlessRP may collect and process any Personal Data that you volunteer to us in our website's forms, such as when you register for events or sign up for information and newsletters. If you provide FearlessRP with your social media details, FearlessRP may retrieve publicly available information about you from social media.

Such Personal Data may comprise your IP address, first and last name, your postal and email address, your telephone number, your job title, data for social networks, your areas of interest, interest in FearlessRP products, and certain information about the company you are working for (company name and address), as well as information as to the type of relationship that exists between FearlessRP and yourself.

FearlessRP gathers data about visits to the website, including numbers of Visitors and visits, Geo-location data, length of time spent on the site, pages clicked on or where Visitors have come.

### **2.2.1 Purpose of processing personal data**

FearlessRP uses the collected data to communicate with Visitors, to customize content for Visitors, to show ads on other websites to Visitors, and to improve its website by analyzing how Visitors navigate its website.

### **2.2.2 Sharing personal data**

FearlessRP may also share such information with service vendors or contractors in order to provide a requested service or transaction or in order to analyze the Visitor behavior on its website.

### **2.2.3 Cookies**

Cookies are small pieces of information sent by a website to a Visitor's hard disk. Cookies cannot be used to run programs or deliver viruses to your computer. By continuing to visit the website, you agree to the placement of cookies on your device. If you choose not to accept our cookies, we cannot guarantee that your experience will be as fulfilling as it would otherwise be. We may also place cookies from third parties for functional and marketing purposes. The use of cookies is widespread and benefits the surfer. For further information, see [FearlessRP Cookie Policy](#).

### **2.2.4 Links to other sites**

Please be aware that while visiting our site, Visitors can follow links to other sites that are beyond our sphere of influence. FearlessRP is not responsible for the content or privacy policy of these other sites.

## **2.3 Respondents**

Respondents should be aware that in responding to surveys or survey invitations, they could be disclosing information that could make them personally identifiable to FearlessRP Users. The security and privacy protection implemented on FearlessRP's platform does not cover this type of transfer or disclosure of personal information. Respondents responding to surveys or survey invitations should be aware that they alone are responsible for the

content of their responses. For more detailed information concerning the protection of privacy when responding to surveys or survey invitations, Respondents may contact the entity conducting the survey. It is the User's responsibility to ensure that collection and processing of data is done in accordance with applicable law. FearlessRP will not process Personal Data of Respondents for other purposes or by other means than instructed by its Users.

### **2.3.1. Inquires**

If you wish to inquire about your Personal Data that may have been collected in a FearlessRP survey, we recommend that you contact the entity that created or sent you the survey. As FearlessRP is a Processor, it does not control the Personal Data used or stored in the survey, but processes it on behalf of its User.

## **2.4 Users**

### **2.4.1. General**

In order to provide services to its Users, FearlessRP collects certain types of data from them. Furthermore, FearlessRP's Users collect information from Respondents when they produce and distribute surveys. This section will describe how these two types of data are collected and used by FearlessRP as well as geographical differences that effect this policy. Data entered or transferred into FearlessRP by Users such as texts, questions, contacts, media files, etc., remains the property of the User and may not be shared with a third party by FearlessRP without express consent from the User.

### **2.4.2 Collection of User data**

During a User's registration and later on FearlessRP's platform, they provide information such as name, company name, email, address, telephone, credit-card number and other relevant data. This information is used by FearlessRP to identify the User and provide them with support, services, mailings, sales and marketing actions, billing and to meet contractual obligations.

FearlessRP Users can at any time access and edit, update or delete their contact details by logging in with their username and password to FearlessRP's platform. FearlessRP Users may create more Users with different privilege levels within their account. It is the responsibility of the User that creates other User accounts, to choose the level of access each User should have. Once these new Users log into FearlessRP, they meet the definition of User in this policy. FearlessRP will not retain User data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

### **2.4.3 Collection of Respondent data**

Surveys used for gathering feedback are created by Users, who make them available to relevant businesses, organizations, and individuals. It is the User's responsibility to ensure that collection and processing of data is done in accordance with applicable law. FearlessRP will not process Personal Data for other purposes or by other means than instructed by its Users.

Respondent data includes data from individuals uploaded, transferred or manually entered by a FearlessRP User into their account for the purpose of providing feedback to the User by responding to surveys. Personal Data may include, personal contact information such as name, home address, home telephone or mobile number, email address, information concerning family, lifestyle and social circumstances including age, date of birth, marital status, number of children, employment details, education/qualification, business contact details, gender, religion, race, health detail and other sensitive Personal Data. Answers to questions by Respondents, may also include Personal Data.

The purpose of collecting Personal Data as part of a survey will vary depending on the survey, as set up by FearlessRP's Users. As FearlessRP provides surveys to a wide group of customers and businesses, the purpose may vary greatly. For Users in the EEA, or for Users providing surveys to Respondents in the EEA, the User will be the "controller", as defined in the Directive and the GDPR. The purpose will consequently be defined by FearlessRP's User.

If you or your organization are required under the European Union's General Data Protection Regulation (GDPR) to enter into a contract, or other binding legal act under EU or Member State law, with your data processors, [review and accept FearlessRP's Data Processing Agreement](#) in your FearlessRP account.

#### **2.4.4. Geographical location**

FearlessRP offers a number of data regions. A FearlessRP "Data Region" is a set of data centers located within a defined geographical area where User and Respondent data is stored. Personal Data is not transmitted between Data Regions. For FearlessRP Users with accounts located in FearlessRP's European Data Region, all Personal Data is processed in the EEA. For Users with accounts in the Data Regions: United States of America (US) and Canada, all Personal Data is processed solely in the respective country. For Users with accounts in our Asia Pacific Data Region, all Personal Data is processed in Singapore.

##### **2.4.4.1 Processing in the European Economic Area (EEA)**

For Users with accounts located in FearlessRP's European Data Region, all processing of Personal Data is performed in accordance with privacy rights and regulations following the EU Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 (the Directive), and the implementations of the Directive in local legislation. From May 25th, 2018, the Directive and local legislation based on the Directive will be replaced by the Regulations (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation (GDPR), and FearlessRP's processing will take place in accordance with the GDPR.

###### **2.4.4.1.1 Controller**

FearlessRP processes Personal Data both as a Processor and as a Controller, as defined in the Directive and the GDPR:

The FearlessRP entity which you as a User entered an agreement with when using FearlessRP's platform, will be the Controller for User data, as outlined above in "Collection of User data" section.

For Respondent data, as outlined in the “Collection of Respondent data” section, the User will be the Controller in accordance with Directive and GDPR, and FearlessRP will be the Processor.

FearlessRP adheres to the Directive of 1995 and the GDPR from May 25th, 2018. Consequently, FearlessRP processes all data provided by its Users with accounts in its European Data Region, in the European Economic Area (EEA) only.

All data collected by FearlessRP Users through surveys will be stored exclusively in secure hosting facilities provided by Amazon Web Services. FearlessRP has a data processing agreement in place with its provider, ensuring compliance with the Directive. All hosting is performed in accordance with the highest security regulations. All transfers of data internally in the EEA is done in accordance with this data processing agreement.

#### **2.4.4.2 Processing in the United States Of America (US)**

For Users with accounts in the FearlessRP US Data Region, FearlessRP processes data solely in data centers located in the US. FearlessRP has adopted reasonable physical, technical and organizational safeguards which substantially mirror the EU safeguards against accidental, unauthorized or unlawful destruction, loss, alteration, disclosure, access, use or processing of the User’s data in FearlessRP’s possession. FearlessRP will promptly notify the User in the event of any known unauthorized access to, or use of, the User’s data.

All data collected by FearlessRP Users through surveys will be stored exclusively in secure hosting facilities provided by Amazon Web Services. FearlessRP’s contract with its hosting provider ensures that all hosting is performed in accordance with the highest security regulations. FearlessRP’s policy is to protect and safeguard any personal information obtained by FearlessRP in accordance with United States state or federal laws governing the protection of personal information and data. Accordingly, FearlessRP adheres to practices and policies that aim to safeguard the data.

#### **2.4.4.3 Processing in Canada**

For Users with accounts in the FearlessRP Canada Data Region, FearlessRP processes data solely in data centers located in Canada. FearlessRP has adopted reasonable physical, technical and organizational safeguards which substantially mirror the EU safeguards against accidental, unauthorized or unlawful destruction, loss, alteration, disclosure, access, use or processing of the Users data in FearlessRP’s possession. FearlessRP will promptly notify the User in the event of any known unauthorized access to, or use of, the User’s data.

All data collected by FearlessRP Users through surveys will be stored exclusively in secure hosting facilities provided by Amazon Web Services. FearlessRP’s contract with its hosting provider ensures that all hosting is performed in accordance with the highest security regulations. FearlessRP’s policy is to protect and safeguard any personal information obtained by FearlessRP in accordance with Canadian laws governing the protection of personal information and data. Accordingly, FearlessRP adheres to practices and policies that aim to safeguard the data.

#### **2.4.4.4 Processing in other regions**

For Users with accounts in our Asian Pacific Data Region, FearlessRP processes data solely in data centers located in Singapore. FearlessRP has adopted reasonable physical, technical and organizational safeguards which substantially mirror the EU safeguards against accidental, unauthorized or unlawful destruction, loss, alteration, disclosure, access, use or processing of the Users data in FearlessRP's possession. FearlessRP will promptly notify the User in the event of any known unauthorized access to, or use of, the User's data.

All data collected by FearlessRP Users through surveys will be stored exclusively in secure hosting facilities provided by Amazon Web Services. FearlessRP's contract with its hosting provider ensures that all hosting is performed in accordance with the highest security regulations. Accordingly, FearlessRP adheres to practices and policies that aim to safeguard the data.

### **3. Retention and deletion**

FearlessRP will not retain data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations. For Respondent data, FearlessRP's Users have control of the purpose for collecting data, and the duration for which the Personal Data may be kept. For Respondent data, Users with an active account will therefore have the responsibility to delete data when required. When a user's account is terminated or expired, all Personal Data collected through the platform will be deleted, as required by applicable law.

### **4. Acceptance of these Conditions**

We assume that all Visitors of our website, Respondents to surveys powered by FearlessRP and users FearlessRP's platform have carefully read this document and agree to its contents. If someone does not agree with this privacy policy, they should refrain from using our website and platform. We reserve the right to change our privacy policy as necessity dictates. Continued use of FearlessRP website and platform after having been informed of any such changes to these conditions implies acceptance of the revised privacy policy. This privacy policy is an integral part of FearlessRP's [terms of use](#).

### **5. Our Legal Obligation to Disclose Personal Information**

We will reveal a user's personal information without his/her prior permission only when we have reason to believe that the disclosure of this information is required to establish the identity of, to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property belonging to FearlessRP or to others who could be harmed by the user's activities or of persons who could (deliberately or otherwise) transgress upon these rights and property. We are permitted to disclose personal information when we have good reason to believe that this is legally required.

### **6. FearlessRP's Data Protection Officer**

FearlessRP has a “Data Protection Officer” who is responsible for matters relating to privacy and data protection. This Data Protection Officer can be reached at the following address:

- FearlessRP  
Attn: Data Protection Officer  
flrpnet@gmail.com

## 7. For Further Information

If you have any further questions regarding the data FearlessRP collects, or how we use it, then please feel free to contact us by email at: [flrpnet@gmail.com](mailto:flrpnet@gmail.com) or send a PM to the owner.