

# Privacy Policy

This privacy policy explains how Kodo Survey handles your personal information and data. We value your trust, so we've strived to present this policy in clear, plain language instead of legalese. The policy is structured so you can quickly find answers to the questions that interest you the most.

This privacy policy applies to all the products, services and websites offered by Kodo Survey and affiliates, except where otherwise noted. We refer to those products, services and websites collectively as the "services" in this policy. Unless otherwise noted, our services are provided by Kodo Consulting AB.

Please contact Kodo Survey as described in the "Questions?" section below if you have any concerns or complaints of any nature. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please reach out to our contact center.

## Key Privacy Points: The Stuff You Really Care About

### IF YOU CREATE SURVEY PROJECTS:

- **Your survey data is owned by you.** Not only that, but Kodo Survey treats your surveys as if they were private (to the extent you have made the data available via links etc. yourself). We don't sell them to anyone and we don't use the survey responses you collect for purposes unrelated to you or our services, except in a limited set of circumstances (e.g. if we are compelled by a subpoena, or if you've given us permission to do so).
- **We safeguard respondents' email addresses.** To make it easier for you to invite people to take your surveys via email, you may upload lists of email addresses, in which case Kodo Survey acts as a mere custodian of that data. We don't sell these email addresses and we use them only as directed by you and in accordance with this policy.

### IF YOU ANSWER SURVEYS:

- **Surveys are administered by survey administrators.** We host the surveys on our websites and collect the responses that you submit to the survey administrator. If you have any questions about a survey you are taking, please contact the survey administrator directly as Kodo Survey is not responsible for the content of that survey or your responses to it. The survey administrator is usually the same person that invited you to take the survey and sometimes they have their own privacy policy.
- **Are your responses anonymous?** This depends on how the survey administrator will use the data. Contact them to find out.
- **We don't sell your responses to third parties.** Kodo Survey doesn't sell or share your survey responses with third party advertisers or marketers (although the survey administrator might, so check with them if you're in doubt). Kodo Survey merely acts as a custodian on behalf of the survey administrator who controls your data.
- If you think a survey violates our Terms of Use or may be engaging in illegal activity, please inform our [contact centre](#).

## Survey Administrators & Survey Respondents

Kodo Survey is used by **survey administrators** (people who create and conduct surveys online) and **survey respondents** (people who answer those surveys). The information we receive from survey administrators and survey respondents and how we handle it differs, so we have split this privacy policy into two parts:

**Privacy for Survey Administrators**

**Privacy for Survey Respondents**

Go to the one that applies to you.

## 1. What information does Kodo Survey collect?

When you use Kodo Survey, we collect information relating to you and your use of our services from a variety of sources. These are listed below. The sections afterward describe what we do with this information.

### Information we collect directly from you

- **Registration information.** You need a Kodo Survey account before you can create surveys on Kodo Survey. When you register for an account, we collect your username, password and email address. You may also enter a telephone number.
- **Billing information.** If you make a payment to Kodo Survey, we require you to provide your billing details, such as a name, address, email address and financial information corresponding to your selected method of payment (e.g. a credit card number and expiration date or a bank account number). If you provide a billing address, we will regard that as the location of the account holder.
- **Account settings.** You can set various preferences and personal details on pages like your account settings page.
- **Contact information.** You enter e-mail addresses to respondents of your surveys. We don't use these email addresses for our own purposes or email them except at your direction.
- **Survey data.** We store your survey data (questions and responses) for you as long as you have an active account. An account is considered inactive when the license has expired and is not renewed.
- **Other data you intentionally share.** We may collect your personal information or data if you submit it to us in other contexts. For example, if you provide us with a testimonial, or participate in a Kodo Survey contest.

**We don't share or abuse your respondents' email addresses.** Rest assured, Kodo Survey will not email your survey respondents or people in your Address Book except at your direction. We definitely don't sell those email addresses to any third parties.

### Information we collect about you indirectly or passively when you interact with us

- **Usage data.** We collect usage data about you whenever you interact with our services. This may include which webpages you visit, what you click on, when you performed those actions, and so on. Additionally, like most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, and timestamps.
- **Device data.** We collect data from the device and application you use to access our services, such as your IP address, operating system version, device type, system and performance information, and browser type. We may also infer your geographic location based on your IP address.
- **Referral data.** If you arrive at a Kodo Survey website from an external source (such as a link on another website or in an email), we record information about the source that referred you to us.

## 2. How does Kodo Survey use the information we collect?

**We treat your survey questions and responses as information that is private to you.** We know that, in many cases, you want to keep your survey questions and responses (which we collectively refer to as "survey data") private. Unless you decide to share your survey questions and/or responses with the public we

do not use your survey data other than as described in this privacy policy or unless we have your express consent. We do not sell your survey data to third parties without your permission.

Generally, we use the information we collect from you in connection with providing our services to you and, on your behalf, to your survey respondents. For example, specific ways we use this information are listed below. (See the next section of this privacy policy to see who we share your information with.) However, this privacy policy is not intended to restrict our use of survey questions or responses.

- **To provide you with our services.**
  - This includes providing you with customer support, which requires us to access your information to assist you (such as with survey design and creation or technical troubleshooting).
- **To manage our services.** We internally use your information, including certain survey data, for the following limited purposes:
  - **To monitor, maintain, and improve our services and features.** We internally perform statistical and other analysis on information we collect (including usage data, device data, referral data, question and response data and information from page tags) to analyze and measure user behavior and trends, to understand how people use our services, and to monitor, troubleshoot and improve our services, including to help us evaluate or devise new features. We may use your information for internal purposes designed to keep our services secure and operational, such as for troubleshooting and testing purposes, and for service improvement, marketing, research and development purposes.
  - **To enforce our Terms of Use.**
  - **To prevent potentially illegal activities.**
  - **To screen for and prevent undesirable or abusive activity.**
- **To create new services, features or content.** We may use your survey data and survey metadata (that is, data about the characteristics of a survey) for our internal purposes to create and provide new services, features or content. In relation to survey metadata, we may look at statistics like response rates, question and answer word counts, and the average number of questions in a survey and publish interesting observations about these for informational or marketing purposes. When we do this, neither individual survey administrators nor survey respondents will be identified or identifiable unless we have obtained their permission.
- **To contact you about your service or account.** We occasionally send you communications of a transactional nature (e.g. service-related announcements, billing-related matters, changes to our services or policies, a welcome email when you first register). You can't opt out of these communications since they are required to provide our services to you.
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

### 3. With whom do we share or disclose your information?

**We don't sell your survey data, unless you expressly permit us to!**

**When might we disclose your survey data to third parties?** Only for a limited number of reasons. We share your information with our service providers who help us to provide our services to you. We contractually bind these service providers to keep your information confidential and to use it only for the purpose of providing their services. By using our services, you authorize Kodo Survey to sub-contract. In rare circumstances, we may share information if required by law, or in a corporate restructuring or acquisition context (see below for more details).

**Sharing your surveys with the public.** We will never share your surveys or your results in plain public. You, however, are able to control who can take your survey (i.e. who to share it with) and who to share the results with.

We recognize that you have entrusted us with safeguarding the privacy of your information. Because that trust is very important to us, the only time we will disclose or share your personal information or survey data with a third party is when we have done one of three things, in accordance with applicable law: (a) given you notice, such as in this privacy policy; (b) obtained your express consent; or (c) de-identified or aggregated the information so that individuals or other entities cannot reasonably be identified by it. Where required by law, we will obtain your express consent prior to disclosing or sharing any personal information.

We may disclose:

- **Your information to our service providers.** We use service providers who help us to provide you with our services. We give relevant persons working for some of these providers access to your information, but only to the extent necessary for them to perform their services for us. We also implement reasonable contractual and technical protections to ensure the confidentiality of your personal information and data is maintained, used only for the provision of their services to us, and handled in accordance with this privacy policy. Examples of service providers include payment processors, hosting services, email service providers, and web traffic analytics tools.
- **Your account details to your billing contact.** If your details (as the account holder) are different to the billing contact listed for your account, we may disclose your identity and account details to the billing contact upon their request (we also will usually attempt to notify you of such requests). By using our services and agreeing to this privacy policy, you consent to this disclosure.
- **Your email address to your organization.** If the email address under which you've registered your account belongs to or is controlled by an organization, we may disclose that email address to that organization in order to help it understand who associated with that organization uses Kodo Survey, and to assist the organization with its paid accounts. (Please do not use a work email address for our services unless you are authorized to do so, and are therefore comfortable with this disclosure.)
- **The presence of a cookie to advertise our services.** We may ask advertising networks and exchanges to display ads promoting our services on other websites. We may ask them to deliver those ads based on the presence of a cookie, but in doing so will not share any other personal information with the advertiser. Our advertising network partners may use cookies and page tags or web beacons to collect certain non-personal information about your activities on this and other websites to provide you with targeted advertising based upon your interests. If you do not wish to have this information used for the purpose of serving you such targeted ads, you may opt-out at <http://www.youronlinechoices.eu> or <http://preferences-mgr.truste.com/>. You will continue to receive generic ads.
- **Your information if required or permitted by law.** We may disclose your information as required or permitted by law, or when we believe that disclosure is necessary to protect our rights, protect your safety or the safety of others, and/or to comply with a judicial proceeding, court order, subpoena, or other legal process served on us.
- **Your information if there's a change in business ownership or structure.** If ownership of all or substantially all of our business changes, or we undertake a corporate reorganization (including a merger or consolidation) or any other action or transfer between Kodo Survey entities, you expressly consent to Kodo Survey transferring your information to the new owner or successor entity so that we can continue providing our services. If required, Kodo Survey will notify the applicable data protection agency in each jurisdiction of such a transfer in accordance with the notification procedures under applicable data protection laws.

#### 4. What are your rights to your information?

You can:

- **Update your account details.** You can update your registration and other account information on your My Account page. Information is updated immediately.

- **Access and correct your personal information.** As an account holder, you may access and correct certain personal information that Kodo Survey holds about you by visiting your My Account page. Some account holders and other individuals have certain legal rights to obtain information of whether we hold personal information about them, to access personal information we hold about them, and to obtain its correction, update, amendment or deletion in appropriate circumstances. For some information, these rights may be exercised through the My Account page mentioned above, and in all cases, requests to exercise these rights may be directed to our customer support team. These rights are subject to some exceptions, such as where giving you access would have an unreasonable impact on the privacy of other individuals. We will respond to your request to exercise these rights within a reasonable time and, where required by law or where we deem it otherwise appropriate and practicable to do so, we will honor your request.
- **Deleted survey data.** As long as you maintain a paying account with us, we may be able to retain your deleted data for a limited time in case you delete something by accident and need to restore it (which you can request by contacting [customer support](#)). Note that even if you have deleted survey data, if it was previously made available to the public through a public link, additional copies of your data may remain available on the Internet even after your account has been deleted.
- **Cancel your account.** To cancel and delete your account, please contact [customer support](#). Deleting your account will cause all the survey data in the account to be anonymized and non-recoverable. We will respond to any such request, and any appropriate request to access, correct, update or delete your personal information within a reasonable time period required by law. We will promptly fulfill requests to delete personal data unless the request is not technically feasible or such data is required to be retained by law (in which case we will block access to such data, if required by law). To the extent required by law, we will permanently delete your data if you request to cancel your account.

**For how long do we retain your data?** We generally retain your data for as long as you have an account with us, or to comply with our legal obligations, resolve disputes, or enforce our agreements.

## 5. Security, cookies and other important information

**Changes to this privacy policy.** We may modify this privacy policy at any time, but if we do so, we will notify you by publishing the changes on our website. If we determine the changes are material, we will provide you with additional, prominent notice as is appropriate under the circumstances, such as via email or in another conspicuous manner reasonably designed to notify you. If, after being informed of these changes, you do not cancel your subscription and continue to use our services beyond the advance-notice period, you will be considered as having expressly consented to the changes in our privacy policy. If you disagree with the terms of this privacy policy or any updated privacy policy, you may close your account at any time.

- **Security.** We are committed to handling your personal information and data with integrity and care. However, regardless of the security protections and precautions we undertake, there is always a risk that your personal data may be viewed and used by unauthorized third parties as a result of collecting and transmitting your data through the Internet. If you have any questions about the security of your personal information, contact [customer support](#).
- **Data locations.** Our servers are based in Sweden, so your personal information will be hosted and processed there. Your personal information may also be processed in, or transferred or disclosed to, countries in which Kodo Survey partners or service providers are located or have servers. These may be in or outside of EU. In case you want to know if any of your personal data is processed outside of Sweden please contact our [contact centre](#).
- **Cookies.** We use cookies and similar technologies on our websites. Cookies are small bits of data we store on the device you use to access our services so we can recognize repeat users. Our cookies expire after a certain period of time. We use cookies and similar technologies for several reasons:
  - **To make our site easier to use.** We use a “Remember me” feature when you sign into your account in order to make it quicker for you to sign in whenever you return to Kodo Survey.
  - **For security reasons.** We use cookies to authenticate your identity, such as confirming whether you are currently logged into Kodo Survey.

- **To provide you with personalized content.** We may store user preferences in cookies to personalize the content you see. We also use cookies to ensure that users can't retake certain surveys that they have already completed.
- **To improve our services.** We use cookies to measure your usage of our websites and track referral data, as well as to occasionally display different versions of content to you. This information helps us to develop and improve our services and optimize the content we display to users.
- You can choose to remove or disable cookies via your browser. Refer to your web browser's configuration documentation to learn how to do this. Please note that doing this may adversely impact your experience of above mentioned reasons we use cookies. Enabling cookies ensures a smoother experience when using our websites. By using our websites and agreeing to this privacy policy, you expressly consent to the use of cookies as described in this policy.
- **Safety of Children and COPPA.** Our services are not intended for and may not permissibly be used by individuals under the age of 18. Kodo Survey does not knowingly collect personal data from persons under 18 or allow them to register. If it comes to our attention that we have collected personal data from such a person, we may delete this information without notice. If you have reason to believe that this has occurred, please contact [customer support](#).
- **About IP addresses.** Our servers record the incoming IP addresses of visitors to our websites (whether or not the visitor has a Kodo Survey account) and store the IP addresses in log files. We use these log files for purposes such as system administration and maintenance, record keeping, tracking referring web sites, inferring your location, and security purposes (e.g. controlling abuse, spam and DDOS attacks). We also store IP addresses along with certain actions you take on our system. By agreeing to this privacy policy, you expressly consent to Kodo Survey using your IP address for the foregoing purposes. If you wish to opt out from the foregoing consent to use your IP address, you must cancel your account (if you have one) or not respond to a survey if requested to do so.
- **Data controller.** Kodo Survey whose contact information is listed above, is the data controller for registration, billing and other account information that we collect from users. However, the data controller for survey data is the survey administrator. The survey administrator determines how their survey questions and responses are used and disclosed. Kodo Survey only processes such survey data in accordance with the instructions and permissions (including those given under this privacy policy) selected by the survey administrator when they create and administer their survey.
- **Accessing and correcting your personal data.** You have the right to access and correct the personal information that Kodo Survey holds about you. This right may be exercised by visiting your account's My Account page or by contacting [customer support](#).
- **Your responsibilities.** By using our services, you agree to comply with applicable data protection requirements when collecting and using your survey data, such as requirements to inform respondents about the specific uses and disclosures of their data.

**Consents. By clicking "I Agree" or any other button indicating your acceptance of this privacy policy, by creating a user account making it possible to use all or parts of the Services or by using the Services you expressly consent to the following:**

- You consent to the collection, use, disclosure and processing of your personal data in the manner described in this privacy policy, including our procedures relating to cookies, IP addresses and log files.
- Our servers are based in the Sweden, so your personal data will be primarily processed in Sweden. It may however be processed in other countries provided that such country guarantees a level of protection corresponding that of GDPR. You consent to this transfer of personal data.
- You consent to us sharing your personal data with relevant persons working for service providers who assist us to provide our services.
- If you have enabled cookies on your web browser, you consent to our use of cookies as described in this privacy policy.



## 1. What information does Kodo Survey collect?

When you respond to surveys hosted by Kodo Survey, we collect, on behalf and upon instructions (including the ones provided in this privacy policy) of survey administrators, information relating to you and your use of our services from a variety of sources. These are listed below. The sections afterward describe what we do with this information.

### Information we collect directly from you

- **Survey responses.** We collect and store the survey responses that you submit. The survey administrator is responsible for this data and manages it. A survey may ask you to provide personal information or data. If you have any questions about a survey you are taking, please contact the survey administrator directly as Kodo Survey is not responsible for the content of that survey. The survey administrator is usually the same person that invited you to take the survey and sometimes they have their own privacy policy.

**Are your survey responses anonymous?** Your survey administrator can tell you how your answers will be used and if they will be shared in any way. Answers to surveys at Kodo Survey are not automatically anonymous. If you would like them to be anonymous you need to ask the survey administrator for this.

### Information we collect about you from other sources

- **Usage data.** We collect usage data about you whenever you interact with our services. This may include what you click on, when you performed those actions, and so on. Additionally, as with most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, and timestamps. Note that we do not link this usage data to your survey responses.
- **Device data.** We collect data from the device and application you use to access our services, such as your IP address, operating system version, device type, system and performance information, and browser type. We may also infer your geographic location based on your IP address. Your IP address will be linked to your survey responses. By agreeing to this privacy policy, you expressly consent to Kodo Survey using your IP address for the foregoing purposes. If you wish to opt out from the foregoing consent to use your IP address, you must cancel your account (if you have one) or not respond to a survey if requested to do so.
- **Referral data.** We record information about the source that referred you to a survey (e.g. a link in an email).
- **Information from page tags.** We use third party tracking services that employ cookies and page tags (also known as [web beacons](#)) to collect aggregated and anonymized data about visitors to our websites. This data includes usage and user statistics.
- **Your email address.** We don't use this to send you email except at the direction of a survey administrator. If you no longer want to be contacted by a survey administrator, please contact the survey administrator directly.

**Providing survey responses is voluntary.** Remember, you can always choose not to provide an answer to any given survey question.

## 2. How does Kodo Survey use the information we collect?

**Your survey responses are owned and managed by the administrator of the system, and we treat that information as private to the administrator.** Please contact the administrator directly to understand how they will use your survey responses. Kodo Survey does not sell survey responses to third parties and we do not use any contact details collected in our customers' surveys to contact survey respondents.

We also use the information we collect from you (including usage data, device data, referral data and information from page tags) to manage and improve our services, for research purposes, and for the various purposes described in the Survey administrator version of this privacy policy.

### 3. With whom do we share or disclose your information?

**Kodo Survey does not sell your survey responses unless you expressly permit us to!** We will share your survey responses with third parties only as described in this privacy policy.

We disclose:

- **Your survey responses to survey administrators.** We host surveys for survey administrators, but they are really the primary curator of survey data. Anything you expressly disclose in your survey responses will, naturally, be provided to them. Please contact the survey administrator directly to understand how they might share your survey responses.

### 4. What are your rights to your information?

- **Contact the survey administrator to access and correct your responses and personal information.** Because we collect survey responses on behalf of survey administrators, you will need to contact the survey administrator if you have any questions about the survey, or if you want to access or delete anything in your responses. In most cases Kodo Survey cannot help you with this since survey responses are the survey administrator's private information and giving you access may have an unreasonable impact on the privacy of other individuals. We will respond to your request for access or correction within a reasonable time and, where reasonable and practicable to do so, we will provide you with the personal information in the system.

### 5. Security, cookies and other important information

**Changes to this privacy policy.** We may modify this privacy policy at any time, but if we do so, we will notify you by publishing the changes on this website. If we determine the changes are material, we will provide you with additional, prominent notice as is appropriate under the circumstances, such as via email or in another conspicuous manner reasonably designed to notify you. If, after being informed of the changes, you continue to use our services beyond the advance-notice period, you will be considered as having expressly consented to the changes in our privacy policy. If you disagree with the terms of this privacy policy or any updated privacy policy, you may close your account (if you have one) at any time or not respond to a survey.

- **Security.** We are committed to handling your personal information and data with integrity and care. However, regardless of the security protections and precautions we undertake, there is always a risk that your personal data may be viewed and used by unauthorized third parties as a result of collecting and transmitting your data through the Internet. If you have any questions about the security of your personal information, contact customer support.
- **Data locations.** Our servers are based in Sweden, which is where your personal information will be hosted and processed by us. Your personal information may also be processed in, or transferred or disclosed to, countries in which the survey administrators are located.
- **Cookies.** We and our partners use cookies and similar technologies on our websites. Cookies are small bits of data we store on the device you use to access our services so we can recognize repeat users. Each cookie expires after a certain period of time, depending on what we use it for. We use cookies and similar technologies to provide you with personalized content. We may store user preferences, such as



your default language, in cookies to personalize the content you see. We also use cookies to ensure that users can't retake certain surveys that they have already completed.

We don't believe cookies are sinister, but you can still choose to remove or disable cookies via your browser. Refer to your web browser's configuration documentation to learn how to do this. Please note that doing this may adversely impact your ability to use our services. Enabling cookies ensures a smoother experience when using our websites. By using our websites and agreeing to this privacy policy, you expressly consent to the use of cookies as described in this policy.

- **Online Tracking.** We currently do not process or comply with any web browser's "do not track" signal or other similar mechanism that indicates a request to disable online tracking of individual users who visit our websites or use our services.
- **Safety of Minors and COPPA.** Our services are not intended for and may not be used by minors. "Minors" are individuals under the age of majority in their place of residence. Kodo Survey does not knowingly collect personal data from minors or allow them to register. If it comes to our attention that we have collected personal data from a minor, we may delete this information without notice. If you have reason to believe that this has occurred, please contact customer support.

## 6. Additional information

- **Data controller.** Kodo Survey is the data controller for e.g. registration, billing and other account information that we collect from users. However, the data controller for survey data is the survey administrator. The survey administrator determines how their survey questions and responses are used and disclosed. Kodo Survey only processes such survey data in accordance with the instructions and permissions (including those given under this privacy policy) selected by the survey administrator when they create and administer their survey.
- **Accessing and correcting your personal data.** You have the right to access and correct the personal information that Kodo Survey holds about you. This right may be exercised primarily by contacting the survey administrator (as this is the data controller and owner of the survey data).

**Consents. All invitations to answer a survey include a link to this Privacy policy. By answering the survey you are indicating your acceptance of this privacy policy. You then expressly consent to the following:**

- You consent to the collection, use, disclosure and processing of your personal data in the manner described in this privacy policy, including our procedures relating to cookies, IP addresses and log files.
- Our servers are based in Sweden, so your personal data will be processed there. You consent to that.
- You consent and agree that we may transfer your data to data processors located in other countries than Sweden provided that such country guarantees a level of protection corresponding that of GDPR.
- You consent to us sharing your personal data with relevant persons working for service providers who assist us to provide our services.
- If you have enabled cookies on your web browser, you consent to our use of cookies as described in this privacy policy.

## 7. Additional information for Japanese users

- You agree that you are responsible for notifying the respondents of surveys that you create using our services about how Kodo Survey may use the respondents' survey responses and personal data as described in this privacy policy and obtaining prior consent from respondents to disclose their personal data to Kodo Survey.

## 8. Additional information for Brazilian users

- The personal information collected, stored, used and/or processed by Kodo Survey, as described in this privacy policy, are collected, stored, used and/or processed in accordance with Brazilian Law No. 12,965/2014. By clicking “I Agree” or any other button indicating your acceptance of this privacy policy, you expressly consent to the collection, use, storage and processing of your personal information by Kodo Survey as described.

## **9. Additional information for Australian users**

- If you are dissatisfied with our handling of your complaint or do not agree with the resolution proposed by us, you may make a complaint to the Office of the Australian Information Commissioner (OAIC) by contacting the OAIC using the methods listed on their website at <http://www.oaic.gov.au>. Alternatively, you may request that we pass on the details of your complaint to the OAIC directly.