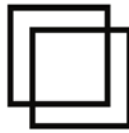


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Lucid Holdings, LLC
&
The General Data Protection Regulation (GDPR)



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What is GDPR?

The General Data Protection Regulation is a regulation that is intended to provide data protection for all European Union data subjects. The regulation governs the transmission and storage of personal data relating to individuals and applies if the Controller, Processor or Data Subject is based in the EU. The regulation stipulates Data Subjects must give consent to the processing of his or her Personal Data, have a right to access their Personal Data and have a right to request erasure of Personal Data. GDPR goes into effect May 25, 2018.

DEFINITIONS

Personal Data - any information relating to an identified or identifiable natural person ('data subject') that can identify, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.¹

Data Subject - an identified or identifiable natural person.

Processing - any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

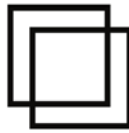
Controller - the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Processor - a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

Consent - of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her.

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¹ EU Courts have found that IP addresses, device identifiers, and cookie ID's are "Personal Data" for purposes of EU privacy law.

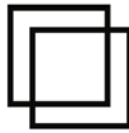


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Is Lucid a Controller or a Processor? ...It Depends

	Product/Service	Controller	Processor
Platform	Fulcrum	Lucid (for Personal Data it collects on Fulcrum).	Lucid's Processors.
		Suppliers (for Personal Data collected outside of Fulcrum).	Suppliers' Processors and potentially Lucid.
		Buyers (for Personal Data collected outside of Fulcrum).	Buyers' Processors and potentially Lucid.
		Suppliers and Buyers and Lucid are Joint Controllers for Personal Data shared between them.	Suppliers', Buyers', and Lucid's Processors for Personal Data shared between them.
Managed Services	Federated Sample (Customer Programs and Hosts)	Lucid uses Fulcrum. See above.	Lucid uses Fulcrum. See above.
		Lucid's Customer.	Lucid and Customers' Processors (e.g. Programming Service Providers and Survey Hosting Platforms).
	Federated Sample (Customer and Lucid share Programming and Hosting Responsibilities)	Lucid uses Fulcrum. See above.	Lucid uses Fulcrum. See above.
		Lucid's Customer.	Lucid, Lucid's Sub-processors (e.g. Programming Service Providers or Survey Hosting Platforms) and Customers' Sub-processors (e.g. Programming Service Providers or Survey Hosting Platforms).
	Federated Sample (Lucid Programs and Hosts)	Lucid uses Fulcrum. See above.	Lucid uses Fulcrum. See above.
		Lucid's Customer.	Lucid and Lucid's Sub-processors (e.g. Programming Service Providers and Survey Hosting Platforms).
	Proof	Lucid uses Fulcrum. See above.	Lucid uses Fulcrum. See above.
		Customer.	Lucid and its Sub-processors.

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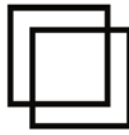
Supplier Due Diligence

Lucid is allowing our Fulcrum Suppliers to self-certify GDPR compliance using the following check list as guidance. All Fulcrum Suppliers who supply EU sample must self-certify compliance in order to be a Fulcrum Exchange Member.

- ✓ Development of a GDPR Privacy Compliance Plan to demonstrate Privacy by Design*
- ✓ Creation of a consent management program
- ✓ Establishment of a data-processing activities mapping/inventory and justification for processing such data
- ✓ Creation of a Data Subject Access Rights procedure
- ✓ Development of a Right to Erasure or Right to be Forgotten procedure
- ✓ Foundation of the required Information Security Policy
- ✓ Generation of a Breach/Incident Management plan
- ✓ Execution of Data Protection Impact Assessments (DPIAs) and Privacy Impact Assessments (PIAs) as part of a Privacy by Design Program
- ✓ Appointment of a Data Privacy Officer (DPO)

*A GDPR Privacy Compliance Plan is a requirement from suppliers in order to self-certify GDPR compliance

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Lucid's Progress Towards GDPR Compliance:

Development of a GDPR Privacy Compliance Plan to demonstrate Privacy by Design

Lucid's GDPR Compliance Program, including Privacy by Design processes, will be available to all customers after GDPR goes into effect. Our Privacy Policy, Cookie Policy, and Code of Conduct will be released to ensure that Lucid and its Suppliers and Buyers are all working together to ensure compliance with GDPR. Lucid will be appointing an external Data Privacy Officer (DPO).

Creation of a consent management program

Product changes are underway to ensure that when Lucid is Controller it is able to collect consent from the affected Data Subjects.

When Suppliers acts as Controllers during their initial contacts with their respondents, Suppliers are required to collect consents from those Data Subjects.

When Buyers acts as Controllers (for example, when Personal Data is collected from Data Subjects during the actual survey), Buyers are required to collect consents from those Data Subjects.

Establishment of a data-processing activities mapping/inventory and justification for processing such data. Creation of a Data Subject Access Rights procedure.

Lucid uses OneTrust software to assist with its compliance initiatives. We completed our Data Mapping and Data Inventory activities using OneTrust. We are also using OneTrust to manage Data Subject Access Rights, Requests to be Forgotten, Execution of Data Protection Impact Assessments. and Privacy Impact Assessments.

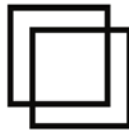
Foundation of the Required Information Security Policy

Lucid is creating an Information Security Program with policies and procedures that are aligned with ISO27001 standards and hopes to seek certification in 2019.

Creation of Vendor Management Function and Process

Vendor management officer hired and processes are being implemented throughout our organization to proactively manage Lucid's supply chain and the processing of personal data.

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Have More Questions? Drop us a line!

Please reach out to compliance@luc.id should you have questions our would like to discuss further.

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