

Privacy Policy

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1. Introduction

Torus Voter Systems, Inc. (“Torus,” “we,” “our,” or “us”) is committed to protecting the privacy of individuals who visit our website (www.torusvotersystems.com), participate in our research surveys and interviews, interact with our landing pages, or engage with our digital advertising campaigns. This Privacy Policy explains what information we collect, how we use it, and the choices available to you regarding your data.

By accessing our website or participating in any Torus research activity, you acknowledge that you have read and understood this Privacy Policy.

2. Information We Collect

2.1 Information You Provide Voluntarily

When you participate in Torus research activities, you may provide:

- Survey and interview responses, including opinions on political candidates, electoral issues, and policy topics
- Contact information (name, email address, phone number, mailing address) provided for compensation eligibility or follow-up communication
- Identity verification information (date of birth, partial address) used solely to confirm respondent eligibility and prevent duplicate participation
- Demographic information voluntarily disclosed during the research process

2.2 Information Collected Automatically

When you visit our website or interact with our digital properties, we may automatically collect:

- Device information (device type, operating system, browser type and version)
- Log data (IP address, access times, pages viewed, referring URL)
- Cookies and similar tracking technologies used for website analytics, session management, and

advertising performance measurement

- Geolocation data derived from IP address (city/state level only; we do not collect precise GPS coordinates)

2.3 Information from Third-Party Sources

Torus obtains publicly available voter registration records, demographic data, and other publicly available information to support respondent qualification, validate the geographic and demographic representativeness of our research panels, and develop our analytical models. This data may include voter name, address, party registration, vote history, and other fields contained in publicly available voter files maintained by state and local election authorities.

This publicly available data is also used in our model expansion process (described in Section 3) to produce individual-level analytical records.

3. How We Use Your Information

We use the information we collect for the following purposes:

- To conduct and improve political opinion research, voter sentiment analysis, and electoral modeling
- To verify respondent eligibility and administer compensation for research participation
- To build and refine analytical models trained on aggregated, geographically scoped electoral district data that predict electoral outcomes at the district, county, and precinct level
- To produce individual-level analytical records by applying model-derived attributes to voter records sourced from publicly available data (see Section 4)
- To measure the effectiveness of digital advertising campaigns related to our research recruitment
- To communicate with research participants about their participation, compensation, or follow-up opportunities
- To maintain the security and integrity of our systems and research data
- To comply with legal obligations and respond to lawful requests from government authorities

4. Data Anonymization, Separation, and Model-Derived Outputs

4.1 Anonymization of Research Responses

Torus maintains a strict separation between identity data and research response data. This is a foundational principle of our data architecture:

- Identifying information collected for verification and compensation purposes is processed in a separate data environment from survey and interview response data.
- Identity information is never recorded alongside, associated with, or appended to substantive response data at any point in the data pipeline.
- No individual's survey or interview responses are attributable to that individual at any stage of processing, model training, or output generation.

4.2 Model Training

The Torus analytical model is trained on aggregated, geographically scoped electoral district data derived from anonymized research responses. The training process does not use, reference, or require any individually identifiable information.

4.3 Model Expansion and Individual-Level Outputs

After the model is trained, Torus applies the model's predictive outputs to individual voter records sourced from publicly available voter files and other public data sources. This expansion process produces individual-level analytical records that contain personally identifiable information (such as voter name and address) enriched with model-derived attributes, including propensity scores, predicted sentiment, and segment classifications.

These model-derived attributes are statistical predictions based on aggregated patterns observed at the geographic and demographic level. They are not direct observations, recordings, or reflections of any individual's actual survey responses, interview statements, or expressed opinions. No individual's research responses are used to score or attribute predictions to that same individual.

4.4 Summary of the Data Pipeline

- **Collection:** Survey and interview responses are collected and immediately separated from identity information.
- **Aggregation:** Anonymized responses are aggregated at the geographic and demographic level.
- **Model Training:** The model is trained on aggregated data only.
- **Expansion:** Model-derived attributes are applied to individual voter records sourced from publicly available data, producing individual-level analytical outputs that contain PII enriched with predicted attributes.
- **Delivery:** Individual-level analytical products are delivered to authorized clients under data licensing agreements with use restrictions.

5. Cookies and Tracking Technologies

Our website uses the following categories of cookies and tracking technologies:

Essential Cookies: Required for basic website functionality, including session management, security, and load balancing. These cannot be disabled.

Analytics Cookies: Used to understand how visitors interact with our website, including pages visited, time spent, and navigation patterns. We use these to improve site performance and user experience.

Advertising Measurement Cookies: Used to measure the performance of digital advertising campaigns that recruit research participants. These cookies track whether an ad impression led to a survey or interview completion.

You may control cookie preferences through your browser settings. Disabling non-essential cookies will not affect your ability to browse our website, but may limit our ability to measure advertising effectiveness.

6. Data Sharing and Third Parties

Torus does not sell raw personal information collected directly from research respondents. We may share information in the following circumstances:

- **Service Providers:** We work with trusted service providers who assist with research operations, data hosting, payment processing for respondent compensation, and website analytics. These providers are contractually required to protect your data and use it only for the purposes we specify.
- **Anonymized Research Outputs:** Aggregated, anonymized research findings may be shared with clients, including political campaigns, advocacy organizations, and media organizations, for electoral analysis purposes. These outputs contain no individually identifiable information.
- **Individual-Level Analytical Products:** Individual-level analytical records produced through our model expansion process (described in Section 4.3) may be delivered to authorized clients under separate data licensing agreements. These agreements include use restrictions governing how such data may be used and prohibiting re-identification of research respondents.
- **Legal Compliance:** We may disclose information when required by law, subpoena, court order, or other legal process, or when we believe in good faith that disclosure is necessary to protect our rights, your safety, or the safety of others.
- **Business Transfers:** In the event of a merger, acquisition, or sale of assets, your information may

be transferred as part of that transaction. We will notify you of any such change via our website.

7. Data Retention

We retain different categories of data for different periods:

- Identity verification data: Retained for a maximum of 90 days after compensation has been disbursed, then permanently deleted.
- Contact information: Retained for up to 12 months for follow-up research opportunities, unless you request earlier deletion.
- Survey and interview responses: Retained in anonymized, aggregated form indefinitely for model training and analytical purposes. Because these responses are anonymized, they cannot be traced back to any individual.
- Individual-level analytical records: Retained for the duration of active client engagements plus 12 months following the conclusion of such engagements.
- Website analytics data: Retained for up to 24 months in aggregate form.
- Advertising measurement data: Retained for up to 12 months.

8. Your Rights and Choices

Depending on your jurisdiction, you may have the following rights regarding your personal information:

- Access: You may request a copy of the personal information we hold about you.
- Correction: You may request that we correct inaccurate or incomplete personal information.
- Deletion: You may request that we delete your personal information, subject to certain exceptions (such as legal retention requirements). Please note that because survey and interview responses are anonymized and cannot be linked to your identity, deletion requests apply to identity verification data, contact information, and any individual-level analytical records associated with your publicly available voter record.
- Opt-Out: You may opt out of future research communications at any time.
- Withdraw Consent: Where processing is based on consent, you may withdraw that consent at any time without affecting the lawfulness of processing conducted prior to withdrawal.

To exercise any of these rights, please contact us at privacy@torusvotersystems.com. We will respond to verified requests within 30 days.

9. Data Security

We implement appropriate technical and organizational measures to protect your personal information against unauthorized access, alteration, disclosure, or destruction. These measures include encryption of data in transit and at rest, access controls limiting data access to authorized personnel, regular security assessments, and architectural separation of identity data, research response data, and analytical output environments.

No method of transmission over the Internet or electronic storage is completely secure. While we strive to protect your information, we cannot guarantee absolute security.

10. Children's Privacy

Torus does not knowingly collect personal information from individuals under the age of 18. Our research activities are directed at adults of voting age. If we learn that we have collected personal information from a minor, we will take steps to delete that information promptly. If you believe a minor has provided us with personal information, please contact us at privacy@torusvotersystems.com.

11. State-Specific Disclosures

If you are a resident of a state with specific privacy legislation (including but not limited to California, Virginia, Colorado, Connecticut, and New York), you may have additional rights under applicable state law. These may include the right to know what personal information is collected, the right to request deletion, the right to opt out of the sale of personal information, and the right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects.

Torus does not sell raw personal information collected directly from research respondents. Individual-level analytical products derived from publicly available data and model-derived attributes may be delivered to authorized clients as described in Section 6. To exercise any state-specific rights, contact us at privacy@torusvotersystems.com.

12. Changes to This Privacy Policy

Torus reserves the right to modify, amend, or replace any provision of this Privacy Policy at any time and at its sole discretion, for any reason, including but not limited to changes in our data practices,

business operations, applicable law, or regulatory guidance. Changes may be made without prior notice to you beyond updating this page.

When changes are made, we will update the effective date at the top of this page. We may, but are not required to, provide additional notice of material changes via our website or other communication channels.

Your continued use of our website, participation in research activities, or engagement with any Torus digital property after any modification constitutes your acceptance of the revised Privacy Policy. If you do not agree with any changes, you must discontinue use of the Site and contact us to exercise your data rights as described in Section 8.

13. Contact Information

If you have questions about this Privacy Policy or wish to exercise your privacy rights, please contact us:

Torus Voter Systems, Inc.

Attn: Data Security Officer

90 Prince St. #2N

New York, NY 10012

Email: privacy@torusvotersystems.com

Data Security Officer: Byron Crowell, Acting Chief Technology Officer

Policy Review Cycle: Annual, or upon material change to data practices

Governing Law: State of New York; applicable federal law including CAN-SPAM Act and TCPA