

# PERSONAL DATA PROCESSING DECLARATION

## WE PROTECT YOUR DATA

In this document we provide you with information regarding your rights relating to personal data processing by the market research company Kantar CZ s.r.o. When processing personal data we are governed by legislation, primarily Regulation (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, which defines the conditions under which such data may be processed, determines a series of rules for their processing, and grants you - as the data subjects - a series of rights.

You can be absolutely sure that we will handle your personal data with all due care and in compliance with valid legislation. We protect your personal data to the maximum extent possible in view of the technical level of the available means.

Strict rules apply in our company as to which employee or department may be allowed access to personal data, and which personal data they can process. In principle, we will not transfer your personal data outside KANTAR CZ s.r.o. except in cases where we have your consent.

We recommend that you read the information carefully. We have done our best to ensure it is as easy to understand as possible. If anything is unclear despite this, we will be happy to explain any terminology or passage to you.

The following document will be regularly updated.

## A. What are personal data?

Personal data are any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, 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.

Sensitive data are personal data indicating nationality, racial or ethnic origin, political attitudes, trade union membership, religious and philosophical beliefs, criminal convictions, the health and sexual life of the data subject, and the data subject's genetic data; sensitive data are also biometric data that enable the direct identification or authentication of the data subject.

## **B. What personal data do we process?**

### **1. Registration data**

For a range of activities we collect personal data such as name, address, telephone number, and e-mail address provided to us by the data subject when registering for the panel or as a person interested in cooperation. We also use registration data for the purposes of subsequent communication. We store these personal data for the necessary period of time, such as membership in the panel, or for as long as required by law.

#### ***My Map panel***

We collect contact information and data from questionnaires. We use contact information for communication and to pay rewards. We process answers from the questionnaires separately and only for market research purposes. The legal basis is your consent to data processing and the Accounting Act. The retention period for personal data is the duration of your panel membership or 5 years from the payment of the last reward.

#### ***Persons interested in interviewing***

We collect the contact information necessary to establish contact and to establish the location of the interested person. And for the subsequent preparation of a contract. The legal basis is consent to personal data processing. The retention period is 12 months from registration if the position in the given locality is filled.

#### ***Employees/external collaborators***

We collect the personal data necessary for cooperation, and are also subject to valid legislation. Each employee/external collaborator will receive - among other things - training that includes personal data protection and the confidentiality obligation.

### **2. Data from questionnaires**

The questionnaires contain respondent answers and also the data necessary to check the work performed. We always process these two parts separately and pseudonymization is applied. The answers from the questionnaires are processed in bulk and the client receives them in an anonymized form.

Contact details, recordings, GPS locations and IP addresses are used exclusively for checks. The legal basis for the collection of these data is the legitimate interest of KANTAR CZ s.r.o.

The retention period for personal data is 12 months. The personal data are then automatically erased.

We do not collect or process any personal information other than those necessary to fulfill the relevant purposes. We use only the above personal data and only for the purpose for which we have consent or other legal right.

We may use and store personal data for the purposes of our legitimate interest, legal obligations and legal protection, i.e. the prevention, detection or investigation of criminal offenses, and the prevention of fraud or any other misuse of our services and information systems. We may also need and use personal information for internal and external audit requirements, for information security purposes, or to protect or exercise our rights, privacy, safety or property.

## **C. Your rights**

### **1. The right to information**

The data subject has the right to be informed of the processing of their personal data. This means the right to certain information about the processing of their personal data so that the principle of transparency of processing is complied with. This concerns especially the following information:

- the contact data of the personal data controller
- the purpose and legal basis for the processing
- the recipients of the personal data
- the retention period of the personal data
- all the rights of data subjects
- the reason for the provision of the personal data
- data about the transfer of personal data to third countries outside the EU
- information as to whether automated decision-making occurs, including profiling

### **2. The right to revoke consent**

In cases where the processing of personal data is based on the consent of the data subject, you can revoke your consent at any time. However, the revocation of consent does not affect the lawfulness of the personal data processing that took place before your revocation of consent.

You can revoke your consent granted to KANTAR CZ s.r.o. by e-mail to [cz.gdpr@kantar.com](mailto:cz.gdpr@kantar.com) or in writing to the address Kantar CZ s.r.o Klimentská 10, Prague 1, 110 00.

### **3. The right to access your personal data**

The data subject has the right to request the personal data controller for information on whether it is processing their data, what data it is processing, for what purpose the

personal data are used, to whom they are transferred, the retention period, and where the controller obtained them.

We will be happy to provide you with all this information. You have the right to a free statement of your personal data.

We reserve the right to charge a reasonable fee or to refuse a request only if such requests are manifestly unfounded or disproportionate, in particular in the case of repeated requests.

#### **4. The right to rectification/supplementation**

If you believe that the personal data controller is storing or otherwise processing inaccurate, incomplete or incorrect personal data about you, you can request the personal data controller to correct or supplement them.

We take efforts to keep the personal data we collect up to date with the help of communication tools.

My Map panel - panel members can check and correct the data provided via a secure website.

External staff (interviewer, recruiter, coordinator, supervisor...) communicate with the staff of their department.

Respondents can use the communication lines set up for this purpose and indicated in point 1.

#### **5. The right to erasure (to be forgotten)**

The data subject may request that their personal data be erased if at least one of the following conditions is met:

- the personal data are no longer required for the purpose for which they were collected or otherwise processed
- the data subject revokes their consent and there are no other legal grounds for processing
- the data subject objects to processing for our legitimate interest, and there are concurrently no predominant legitimate reasons for the processing
- the personal data were processed unlawfully
- the personal data must be erased to fulfil a legal obligation stipulated in European Union or Member State law that applies to us

The right to erasure therefore applies only under these points, i.e. when the given circumstance occurs.

The right to erasure is not an absolute right that would give the data subject the possibility to request the erasure of personal data at any time and in any situation. It is not possible, for example - as part of the right to be forgotten - to request the erasure of all personal data, e.g. upon termination of employment or payment of a reward, as the controller is subject to an obligation to retain certain personal data. After the payment of a reward, we retain the necessary personal data for 5 years for accounting purposes.

## **6. The right to restrict processing**

The data subject may also request a restriction on the processing of their personal data if:

- they challenge the accuracy of their personal data, whereupon the restriction will apply for the period necessary for the personal data controller to verify the accuracy of the personal data
- the processing is unlawful, where the data subject does not want to erase their personal data but instead only requests restrictions on their use
- the personal data are no longer needed for processing purposes, but the data subject requires them to establish, exercise or defend legal claims;
- the data subject objects to the processing pending verification of whether the legitimate interests of KANTAR CZ s.r.o. or the personal data controller override those of the data subject.

If the processing of the data subject's personal data is restricted, KANTAR CZ s.r.o. (or the personal data controller) may only store the personal data. It may only process them in another way with the consent of the data subject, or to establish, exercise or defend legal claims, to protect the rights of another natural or legal person, or for reasons of overriding public interest of the EU or a Member State. In such a case, the data subject will be notified in advance that the restriction on processing will be cancelled.

## **7. The right to transfer personal data**

The right of the data subject, the essence of which is the possibility - under certain conditions - to obtain personal data concerning them which they provided to the controller, in a structured, commonly used and machine-readable format, and the right to transfer such data to another controller without the original controller preventing it. At the same time, the data subject has - if they so request - the right to have their personal data transferred in a structured, commonly used and machine-readable format to another controller, if technically feasible.

Conditions for exercising the right to portability:

- the processing must be based on a legal reason, namely consent or a contract
- the processing is performed automatically.

The exercise of the right to data portability cannot unfavorably affect the rights and freedoms of other persons.

## **8. The right to object**

The data subject has the right to object to processing for the purposes of a legitimate interest.

In the case of our company, this means in particular checks of the work of the interviewers and other checks we use to defend against fraud.

Kantar CZ s.r.o. will not process your personal data further unless we prove serious legitimate grounds for such processing which outweigh the interests or rights and

freedoms of the data subject, or to establish, exercise or defend our legal claims. This right does not apply to consent-based processing.

These objections may also be raised by the data subject against processing for the purposes of the legitimate interest of the personal data controller, such as establishing satisfaction, directly with the personal data controller or processor.

### **9. The right to lodge a complaint**

If the data subject considers that their personal data are being processed unlawfully, they also have the right to lodge a complaint with the supervisory authority in the country in which they live or work, or in the country where the breach occurred. In the case of the Czech Republic, this means the Office for Personal Data Protection.

**Office for Personal Data Protection**

address: Pplk. Sochora 27, 170 00 Prague 7

tel.: 234 665 111

web: [www.uoou.cz](http://www.uoou.cz)

### **10. The right not to be the subject of automated decision-making**

This right ensures that the personal data subject will not be the subject of a decision based solely on automatic processing, including profiling, that has legal effects for them or significantly affects them in a similar way. In other words, it is intended to ensure that legal effects are not decided by automated procedures without human intervention.

Automated decision-making is permissible where necessary for the conclusion or performance of a contract between the data subject and the controller, if this is permitted by EU or Member State law, or if this is based on the explicit consent of the data subject.

**Deadline for compliance with the rights of a data subject:**

Information about adopted measures must be provided without undue delay and in any case within one month from receipt of a request. This deadline may be extended by two months in exceptional cases, of which the data subject must be informed by the controller, including the reasons for such extension.

**Data subject identification:**

We have the right to request the data subject for further information in order to verify their identity if we have any doubts about the identity of the data subject. Even so, this will not be possible in some cases

**Data Protection Officer:**

Please contact our Data Protection Officer should you wish to exercise your legal rights.

## **D. Which laws address the issue of personal data?**

When processing your data, we are governed by the applicable legislation and by international codes of conduct for market research.

<b>The General Data Protection Regulation - GDPR</b>	Regulation 216/679/EU	protection for personal data in the EU, effective from 25 May 2018
<b>Accounting Act</b>	Act No 563/1991, on accounting	the processing of accounting data
<b>The Personal Data Protection Act</b>	Act No 101/2000, on the protection of personal data	personal data protection
<b>ICC/ESOMAR Code</b>	code of ethics	an international code of conduct for market research, public opinion research, sociological research, and data analytics

## Glossary of terms

### **anonymization**

Anonymized personal data are those data that do not even indirectly help identify a certain person and are therefore not connected with them in any way. This means they can be handled more freely as they are not regulated by the strict rules to protect personal data. Anonymized data are often used in research, which works with large amounts of data and where specific individuals are not important, but rather general statistics or trends observed on the basis of a large amount of input data.

### **sensitive data**

Data of a special nature, such as information about your health or biometric data enabling the identification of a person.

### **cookies**

Short text files sent to your browser by the websites you visit, allowing the websites to record information about your visit, such as your preferred language and other settings. This may make your next visit to the site easier and more productive. Cookies are important. Browsing the web would be much more complicated without them.

### **geolocation**

Data about the geographical location of a mobile phone or computer connected to the Internet (whether accurate or at country level).

### **legitimate interest**

An interest of the controller or a third party, for example in a situation where the data subject is a customer of the controller.

### **personal data**

information about a specific, identifiable person.

<b>Pseudonymization</b>	the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures that ensure the personal data are not attributed to an identified or identifiable natural person
<b>controller</b>	The person who determines the purpose and means of the processing of personal data; the controller may entrust such processing to a processor.
<b>data subject</b>	A living person to which personal data relate.
<b>purpose</b>	The reason the controller is using your personal information.
<b>processing</b>	The activity that the controller or processor performs with personal data.
<b>processor</b>	The person who processes personal data for the controller.

## **E. Special section - personal data protection according to the CCPA (California Consumer Privacy Act)**

This special section applies only to persons covered by the CCPA. The protection of personal data according to the previous paragraphs also applies to these persons.

The CCPA is a state law that aims to strengthen privacy and consumer protection rights for California residents in the United States.

For the purposes of the above law, the definition of “personal data” is considered to be data relating to an identifiable living individual or a specific household if located in the state of California.

To prevent the misuse of data, only information obtained directly from the data subject are used as the source of personal data.

We collect and process personal data within the scope pursuant to part B of this statement and for the purposes described above. We do not share the personal data of a data subject with any third parties, except as described in part B of this statement.

We do not sell the personal data of a data subject to any third parties.

There is no reward for the provision of the personal data of a data subject.



We never knowingly contact persons under the age of 16 (children) to participate in studies without the consent of a parent or legal guardian. If it is necessary and appropriate to directly involve children under the age of 16 in a specific project, we take measures to ensure we have the consent of a parent or legal guardian. We do not sell children's personal data.

In cases where the personal data of children (all persons under the age of 16 at the time of collection) are collected, the consent of a parent or legal guardian is always required. Such a person (parent or legal guardian) must be identified using their ID and must confirm that no further consent is required from another parent or legal guardian. We do not sell personal data of children that we have collected in accordance with the above.

If you want to request access to the personal information we hold about you, please send your request in writing to the e-mail address or postal address listed in the "How to contact us" part. When submitting your request, please indicate the Kantar division to which your request relates (i.e. KANTAR CZ s.r.o.). If you contact us using an e-mail address or contact information we do not have on file, please also provide us with a copy of a valid national or official document (such as a driver's license or passport).

You have the following rights in relation to your personal data:

- The right to change your mind and revoke your consent
- The right to access your personal data
- The right to correct your personal data
- The right to the erasure of your personal data from our systems if we do not have a legitimate interest in continuing to process the data
- The right to transfer your personal data (the right to portability)
- The right to restrict the processing of your personal data
- The right to object to the processing of your personal data
- The right to opt out of the sale of your personal data if we sell your data
- The right not to be discriminated against for exercising any of the rights that you may exercise in accordance with applicable data protection laws.

If necessary, we will notify any other parties - such as our suppliers or service providers to whom we have provided your personal data - of any changes made at your request.

We regularly review our personal data protection principles, and these may be updated on an ongoing basis. You will always find the current version of these rules on our website, including information about the last revision.

Last revision: 01/09/2020

The name of our Data Protection Officer: Gillie Abbotts-Jones

How to contact us:

KANTAR CZ s.r.o.

Klimentská 1207/10, Nové Město, 110 00 Prague 1, Czech Republic

[cz.gdpr@kantar.com](mailto:cz.gdpr@kantar.com)

toll-free line (in English only for callers from the USA): +1 866-471-1399