

## PRIVACY & COOKIE POLICY FOR SURVEYS (“Policy”)

Last updated: 3<sup>rd</sup> July 2018

### Introduction

Our surveys are either conducted by

- Kantar UK Limited on behalf of Kantar TNS/ Kantar Public/Kantar Millward Brown. Kantar UK Limited is the data controller
- Millward Brown Ireland Limited on behalf of Kantar Millward Brown Ireland. Millward Brown Ireland Limited is the data controller

By participating in our survey, you agree to this use of your personal data explained below. We ask you to read this privacy policy carefully.

For the purpose of this Policy, the definition of ‘personal data’ is information which relates to and can identify a living individual.

### Lawful collection and use

This Policy explains how we collect, store and use the personal data you provide when taking part in an online, face to face, postal or telephone survey for us.

When we conduct surveys, our interviewers/invitations and questionnaires clearly identify us and explain the purpose(s) of our contact and If applicable, the purpose for our collecting your personal data. You may decline to answer any questions or withdraw from participation in a survey at any time.

When we contact you, generally in person, by telephone, by email or by post, we do so for one of the following purposes:

Case	Purpose	Data collected/ processed	Legal Basis
Surveys	To understand your views about certain products and services or to understand your behaviour in different situations. To validate answers you gave in a recent survey we conducted. Administer prize draws and incentives. Recontact participants e.g. for ongoing and follow-up surveys.	Unique identifier, contact details, email address, voice, image, opinion	Voluntary participation a survey whereby we ask for your consent to use of your personal data
Fraud Protection	Protection of our business interests against fraudulent behaviour	IP address, browser specifications, device specifications, postal addresses, email addresses	Legitimate interests – we have a legitimate interest in protecting our business against fraud or other prohibited behaviour.
Survey Participation Uniqueness	Prevention of multiple entries in surveys by the same individuals	IP address, browser specifications, device specifications	Legitimate interests – we have a legitimate interest in preventing multiple entries by the same individual
Data Matching and Enrichment	We enrich the data we hold on file about you by matching your personal data with other data sources and third parties who specialise in data management.	Unique identifier, contact details, email address, social login, cookie, mobile device ID	Voluntary participation in a survey whereby we ask for your consent to use of your personal data

# KANTAR

We will never misrepresent ourselves or what we are doing. If you receive an email that concerns you, purporting to be from us, please let us know as shown below in 'How to contact us'.

We have contacted you to take part in a survey by telephone, post, face to face or online by

- Randomly selecting your address through Royal Mail's publicly accessible Postcode Address File (PAF) or via Data Ireland Geo Directory
- Randomly knocking on your door
- Randomly ringing your number using a Random Digit Dialler (RDD)
- Receiving your contact details from the client we are conducting the survey for, with whom you may either be registered, received products or services from or generally dealt with
- Buying sample from a sample provider
- Sourcing your information from publicly available resources
- Receiving your contact information from a recruiter that has been in contact with
- Or you have previously agreed to be re-contacted to possibly participate in further surveys

## **Third parties and data transfer across borders:**

You can be assured that we will protect your privacy. We will not make your personal data available to anyone without your agreement unless it is for research or statistical purposes only or if required by law, or if you have agreed otherwise. This includes your name and e-mail address.

Your personal data may be collected, stored, transferred or processed by our sister companies within the WPP group, or 3<sup>rd</sup> party service providers for survey-related purposes, such as data processing, and fulfilment of prize draws or other incentives. They are all contractually bound to keep any information they collect and disclose to us or, we collect and disclose to them, confidential and must protect it with security standards and practices that are equivalent to our own.

Where these transfers are across borders or outside the EEA we shall put safeguards in place to ensure the transfer is made by a legitimate method for the purposes of EU data protection law and secure.

## **Confidentiality, security and industry requirements:**

We take appropriate technological and organisational measures to protect the personal data submitted to us, both during transmission and once we receive it. Our security procedures are consistent with generally accepted commercial standards used to protect personal data.

Unfortunately, no data transmission can be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, we cannot ensure or warrant the security of any information you transmit to us or from our online products or services, and you do so at your own risk. Once we receive your transmission, we will take reasonable steps to ensure our systems are secure.

All our employees are contractually obliged to follow our policies and procedures regarding confidentiality, security and privacy.

We adhere to the following industry requirements:

- The Data Protection Act 2018 and any subsequent legislation, which may be amended from time to time
- We follow the MRS and ESOMAR professional Codes of Conduct
- In the UK, Kantar TNS, Kantar Public and Kantar Millward Brown hold Market Research Society (MRS) Company Partner Accreditation
- In Ireland, Kantar Millward Brown Ireland are members of the Association of Irish Market Research Organisation (AIMRO)

# KANTAR

We combine your survey responses in a given survey with the responses of all others who participate and report those combined responses to the client that commissioned the study, unless one or more of the following criteria are met.

The only exceptions when we may disclose your personal data or survey responses to third parties are as follows

- You request or consent to sharing your identifying information and/or individual responses with a third party for a specified purpose;
- When we provide your responses to a third-party processor who is contractually bound to keep the information disclosed confidential and use it only for research or statistical purposes;

## **Cookie disclosures (only for online survey participants):**

Cookies are small text files stored on your computer by a website that assigns a numerical user ID and stores certain information about your online browsing. They are used by web developers to help users navigate their websites efficiently and perform certain functions. The website sends information to the browser which then creates a text file. Every time the user goes back to the same website, the browser retrieves and sends this file to the website's server.

We do not use cookies on standard online surveys.

For behavioural tracking surveys, we use optional cookies / software applications, but only if you have given your explicit consent to such cookies / applications.

As is true of most online surveys, we gather certain information automatically and store it in survey data files. This information may include things like Internet Protocol address (IP address), browser type, Internet Service Provider (ISP); referring/exit pages, operating system and date/time stamp.

We use this automatically collected information to analyse trends such as browser usage and to administer the site, e.g. to optimise the survey experience depending on your browser type. We may also use your IP address to check whether there have been multiple participations in the survey from this IP address.

## **Accuracy:**

We take all reasonable steps to keep personal data in our possession or control, which is used on an on-going basis, accurate, complete, current and relevant, based on the most recent information available to us by you and/or by our client.

We rely on you to help us keep your personal data accurate, complete and current by answering our questions honestly and you are responsible for ensuring that the data controller (which may be us or – more often – our client) is notified of any changes to your personal data.

## **Children's data collection:**

We never knowingly invite children under the age of 16 years to participate in surveys without consent. If it is necessary and appropriate to a particular project to directly involve children under the age of 16 years, we take measures to ensure we have been given permission by the responsible adult.

## **Rights of individuals:**

To request access to personal data that we hold about you, you should submit your request in writing to the e-mail address or postal address shown below in 'How to contact us'.

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

- Right to change your mind and to withdraw your consent
- Right to access your personal data
- Right to rectify your personal data
- Right to erase your personal data from our systems, unless we have legitimate interest reasons for continuing to process the information
- Right to port your personal data (portability right)
- Right to restrict processing of your personal data
- Right to object to the processing of your personal data

We shall also notify third parties to whom we have transferred your personal data of any changes that we make on your request. Note that while we communicate to these third parties, we are not responsible for the actions taken by these third parties to answer your request. You may be able to access your personal data held by these third parties and correct, amend or delete it where it is inaccurate.

## **Data storage and retention:**

Personal data will be retained only for such period as is appropriate for its intended and lawful use, in this case we shall retain data for no longer than 12 months, unless otherwise required to do so by law. Personal data that is no longer required will be disposed of in ways that ensure their confidential nature is not compromised.

As part of the Company Business Continuity plan and as required in certain instances by law, our electronic systems are backed up and archived. These archives are retained for a defined period of time in a strictly controlled environment. Once expired, the data is deleted and the physical media destroyed to ensure the data is erased completely.

## **Notification of material changes:**

We keep our privacy policy under regular review and it may be amended from time to time. We will always have the most up-to-date policy on this web page. We will record when the policy was last revised.

Date created: 13/06/2011

Last revised: 03/07/2018

## **Automated decision making / profiling:**

In certain circumstances we shall carry out automated decision making or profiling about you. However, in the majority of cases this will not result in any legally significant decisions being made about you. You have the right to appeal if any automated decision made about you is legally significant. If you have any questions about this please contact us.



### How to contact us:

Questions regarding this policy or complaints about our practices should be directed to the Quality and Information Security Team via email at [QIS@kantar.com](mailto:QIS@kantar.com) or in writing to Quality and Information Security, 6 More London Place, London, SE1 2QY.

We will investigate all complaints and attempt to resolve those that we find are justified. If necessary, we will amend our policies and procedures to ensure that other individuals do not experience the same problem.

If you have any questions or comments you may contact Kantar's Data Protection Officer, Gillie Abbotts-Jones, please email [QIS@kantar.com](mailto:QIS@kantar.com)

### Complaints and country specific disclosures:

If you are not satisfied with how we handle and protect personal data, you have the right to complain to the Data Protection Authority.

In the UK, this is the ICO and their contact details are

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate)

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

In Ireland, this is the Data Protection Commissioner and their contact details are

Data Protection Commissioner  
Canal House  
Station Road  
Portarlinton  
R32 AP23 Co. Laois

Tel: 1890 252 231 (lo call number)

Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

We are a Kantar Group Company. Our registered name and address is

- UK
  - Kantar UK Ltd, TNS House, Westgate, London W5 1UA
  - UK Companies House number 3073845
  
- Ireland
  - Millward Brown Ireland Limited, 5/6 Ely Place, Dublin 2
  - Ireland Companies Registration Office number 20372