



MASMI Group
Privacy Policy



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1. ABOUT MASMI

MASMI is a group of full-service market research companies across Central/Eastern Europe and the Middle East and a member of ESOMAR. As a market research group we depend on collecting and analysing data in our daily business. In doing so, we always tend to minimize processing of personal data by aggregating or anonymizing them as soon as possible so that they cannot be linked to an individual. In situations when we do process personal data we are committed to compliance with high data protection standards. This MASMI Privacy Policy incorporates fundamental principles and requirements of EU General Data Protection Regulation (GDPR) and provides you with information how we collect, use and protect personal data in market research.

2. SCOPE

This Privacy Policy (further in text: Policy) is applicable to all companies within MASMI Group (further in text: MASMI company or MASMI).

In addition, everyone who works for MASMI Group (employees, suppliers, vendors, interviewers etc.) must comply with this Policy as minimum requirement at least, in order to ensure adequate protection of personal data.

This Policy primarily relates to situations when MASMI is so called data controller. Contact details of particular MASMI company are available at <http://www.masmi.com/about-us>.

3. WHAT ARE PERSONAL DATA & OTHER KEY TERMS

Personal data is any information which relates directly or indirectly to a living individual. In particular these are respondents demographic data such are name, last name, address, telephone number, e-mail, data of birth, as well as respondents' answers or usage habits while they are connected to respondents demographic data or other identifier.

Personal data processing or processing includes any activity which we do in relation to personal data, including collection, analysis and storage.

Data controller is the one who determines purposes and manners of processing. MASMI is data controller when it conducts research without client's request or Client's database or detailed instructions.

Data processor. MASMI is in a role of data processor when, for example, a client provides database with contact details of its customers to MASMI together with detailed instructions about research.

Data subject is a term used for person whose personal data are processed in and/or in relation to research, in principle respondents data.

Special categories of personal data are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

4. OUR PRINCIPLES

When we process your personal data we comply with following principles in order to ensure adequate data protection;

- **Lawfulness, fairness and transparency** – we process your personal data only if you have consented to do so or exceptionally if we can rely on other legal basis for personal data processing provided by applicable law. We do our best to be fair and transparent in processing your personal data. This Privacy Policy is an example of this transparency, but you can always contact us for more information.
- **Purpose limitation** – when we collect your personal data it will be for specified purpose (e.g. participation in focus group, or participation in questionnaire). We shall not further process your personal data for any incompatible purposes without your consent, unless we are obliged so by law. For example, if your personal data is collected based on consent for qualitative interview, we shall not use it for other market research.
- **Data minimization principle** – when we plan market research and collect personal data we make sure to collect only relevant data and necessary data for the purpose we want to achieve by research, and not more than that. For example, for research control purpose we need to get your contract detail and in principle one contact will suffice and not both (e.g. e-mail or mobile phone contact).
- **Accuracy** – it goes without saying that we do take care about accuracy of personal data we use in research, for both market research relevancy and your data protection rights purposes.
- **Storage limitation** – we make sure that we keep personal data in a form which allows identification of an individual for no longer than is necessary. In other words, we delete or anonymize personal data as soon as possible in a research process. For example, in principle after quality control your personal data is deleted. Exceptionally, we might store personal data for longer periods if this is necessary for scientific or historical research purposes or statistical purposes allowed or required by law or by client who is acting as data controller.

- **Integrity and confidentiality** – when processing your personal data we make sure to have adequate security measures in place, so that your personal data cannot be accessed by unauthorized persons, lost, damaged or otherwise compromised in any way.
- **Accountability** – when we process your personal data in a role of data controller, which is often the case, we are directly responsible to you for such processing. Even if we subcontract another research agency or other persons to help us in research, we remain responsible and make sure that your personal data is well protected.

5. YOUR RIGHTS

Please be informed that you have various specific rights relating to your personal data processed by MASMI in a role of data controller. You can exercise your rights by submitting particular request in writing to our contacts provided below. We shall do our best to fulfil your request latest within 30 days.

These rights are;

- **Right to be informed** about processing of your personal data which we provide you by this Privacy Policy.
- **Right to withdraw consent** – when you give us consent for processing of your personal data you always have a possibility to withdraw that consent at any time. However, personal data processing which was done prior to withdrawal of consent remains valid.
- **Right to access your personal data** means that you can get information whether your personal data is processed as well as other information about that processing (e.g. which personal data, for which purpose etc.)
- **Right to correction of your personal data** if your data is incorrect.
- **Right to erasure (right to be forgotten)** of your personal data, in principle when they are no longer needed for the purpose for which they were collected.
- **Right to restriction of processing of your personal data** under certain conditions defined by law.
- **Right to data portability** enables you to get (back) certain personal data from MASMI in usable and transferable format (e.g. on USB)
- **Right to object to personal data processing** enables you in principle to stop processing of your personal data by MASMI in situations when such processing is based on so called legitimate interest instead of consent.
- **Right not to be evaluated by automated decision making** where based on such evaluation a decision with legal or other significant effect on you would be rendered.

6. TYPES OF PERSONAL DATA WE COLLECT

There are two main types of personal data we collect in doing our business. These are demographic data and response data. Demographic data are for example, name, last name, address, contact (e-mail or telephone number), age, gender. Response data are data that you have provided to us while participating in surveys, panels or other communication with us.

In most cases we do not collect special categories of personal data, such as health or data concerning a natural person's sex life or sexual orientation, religious belief etc. However, when we do collect them (e.g. survey relating to health habits) we provide additional due care in relation to them and we never collect and process them without your consent.

Also, we may collect web usage or other data generated or provided by you when visiting MASMI webpages. These may include demographic data, technical data (IP address, login data, browser type etc.), usage data (information on how you use our webpage) and marketing and communication data (your preferences in receiving marketing from us).

7. HOW WE COLLECT PERSONAL DATA

In most cases we collect personal data directly from you, individuals participating in market research and/or in connection with market research. Also, we often collect your contact details from clients who ordered a research from MASMI (e.g. customer satisfaction survey of client's customers). Below are possible scenarios on how we may collect personal data;

- From respondents who participate in MASMI surveys (on-line, telephone, mail, post or in person)
- From panelists who participate in MASMI panels
- Visitors of MASMI webpages. For more information how we collect personal data on webpages and how you can control it please see *Cookies*.
- Individuals who contact us via our webpages, via email, or other means
- From publicly available sources (e.g. media, publicly available social media posts etc.)

We sometimes receive contact data from clients who order particular research from MASMI. However, in that case, MASMI in principle acts as data processor. This means that we process personal data in the name and on behalf of a client who is data controller. In any case we do not provide clients with your responses in personalized matter, unless you have provided us with consent to do so. Also, we may receive personal data from another agency which subcontracted MASMI to help in research.

8. PURPOSES FOR WHICH WE USE PERSONAL DATA

MASMI collects and uses personal data in most cases for **market research** purposes. This in particular means that we use your personal data to **contact and/or register** you to participate in particular research panel, survey, focus group. Furthermore, we **analyse and evaluate** your responses provided in market research, aggregate them and compare them with other respondents' data. It is important to emphasize that all personal data is aggregated as soon as possible so that it cannot be linked back to an individual. Market research results in almost all cases are provided as aggregated statistic without any personal data. In exceptional situations when this is not a case, we shall always ask for your consent to show your personal data in non-aggregated way.

MASMI in principle does not use your personal data for **advertising purposes**. In exceptional situations when we would like to use your personal data for advertising purposes we shall always ask you for consent to do so.

We use personal data provided or generated by you when visiting our webpage www.masmi.com for **webpages purposes**. This may include essential functioning of our webpages, improving web usage experience, enabling personalized experience and advertising. For more information how we collect personal data on webpages and how you can control it please see *Cookies*.

Last, but not least, we may use your personal data for **legal obligations and legal defence** purposes. We may be obliged to retain and process your data based on legal authorities requests based on law. Also, we may process your personal data for our audit or information security purposes or similar, as well as for our legal defence when necessary. Also, we may use your personal data to enable you exercise your rights with respect to personal data.

9. LEGAL BASES FOR PERSONAL DATA PROCESSING

We always make sure that we have necessary legal basis explicitly provided by law prior to collecting and using your personal data. Legal bases vary depending on different types of processing. However, in most cases we process your personal data on the following legal basis;

Consent; in most cases we ask you for consent to process your personal data. This would be, for example, in case of quantitative or qualitative research based on random selection or respondents, panel researches, on-line researches, customer satisfaction research (if not based on existing data basis), demographic segmentations based on research projects, researches based on monitoring of data collected online.

By consent we mean freely given, specific, informed and unambiguous indication of your wishes by a clear affirmative action. In principle we shall ask for your consent in writing (e.g. before participating in focus groups) or when this is not possible, we shall ask it orally (e.g. telephone surveys).

Sometimes we may rely on consent that you have provided to our client who ordered a research from MASMI and is data controller. However, in case that client would like to get back from MASMI your responses in research we shall inform you and ask for your consent prior to providing client with your responses.

Legitimate interest; we may rely on our or our client's legitimate interest to conduct research or other processing if this is necessary to pursue such interest and provided that these interests are not overridden by your interests. In any case we make sure that our activities are adequately balanced to ensure protection of personal data.

For example, we shall rely on legitimate interest to contact you for research quality control, in customers' satisfaction research if based on existing clients' databases, quantitative and qualitative research when using existing client databases, analysis of social media data etc.

10. CONFIDENTIALITY AND SECURITY OF PROCESSING

We always treat your personal data confidential and securely. This means that we apply adequate organizational and technical measures when processing your personal data. In particular this includes that only authorized persons have access to your personal data on need to know basis. Also, all persons who has access to personal data are bound by confidentiality obligation. Furthermore, we use adequate physical and IT security measures to safeguard your personal data from unlawful destruction, loss, alteration, unauthorized access, transmission etc. In case of any personal data breach we follow procedure prescribed by EU GDPR law.

11. SUBCONTRACTORS

MASMI may subcontract another person (e.g. interviewers, controllers) and or market research agencies for particular research which includes personal data processing. In that case we require that subcontracts act in accordance with our Privacy Policy as minimum. Also, we conclude data protection agreement and/or confidentiality statement with them. In particular, subcontractors are allowed to process personal data exclusively in a way and for purposes defined by MASMI and they are strictly prohibited to disclose or enable access to personal data to unauthorized parties. It is important to emphasize that MASMI as data controller remains responsible for processing of your personal data.

12. DISCLOSURE AND TRANSFER OF PERSONAL DATA

Your personal data and your privacy is very important to MASMI. We never sell your personal data. Also we never disclose it to third parties unless we are obliged or authorized by law (e.g. on request of national authorities), we have your consent to do

so (e.g. to provide it to a client) or we engage subcontractor to help us in market research (subject to appropriate safeguards).

In case that it is necessary for MASMI company doing research to transfer personal data to another e.g. subcontractor in so called third countries we ask for your consent to do so or conclude EU Standard Contractual Clauses agreement. Third countries are in principle all countries outside EU/EEA for which additional safeguards, such as consent or special agreement, is necessary.

13. PERSONAL DATA STORAGE

We make all reasonable steps to store your personal data for a minimum period possible. In general we shall delete your data or make them anonymize when they are no longer necessary to achieve the purpose for which they were collected. In addition, prior to deletion and anonymization of your personal data, we use different pseudonymization methods to keep your personal data even safer and not to disclose them to more persons than strictly necessary (e.g. we may code your demographic data).

14. WHOM TO CONTACT

In case you have any questions with respect to this Privacy Policy or any other data protection related questions please contact our respective MASMI company. Contact details for each MASMI company are provided at <http://www.masmi.com/about-us>.

15. CHANGES OF PRIVACY POLICY

This Privacy Policy is applicable as of September 1, 2018. This Privacy Policy and any changes of it will be at least always accessible at www.masmi.com.