

## Privacy Policy

### Face-to-Face, Telephone and Online Surveys

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#### 1. Introduction

This survey is conducted online, by telephone or face-to-face by us Kantar Belgium SA (Verian), ("we") directly or by our provider MISCO International on behalf of one of our clients. Often our client is the data controller, but sometimes it could also be Verian. By participating in this survey, you agree to the use of your personal information as described in this policy. We ask you to read this privacy policy carefully.

For the purpose of this policy, the definition of 'personal data' is any information that relates to and can identify a living individual.

#### 2. Lawful Collection and Use

The purpose for our collecting your personal data is to conduct public opinion research.

When we contact you, generally by email, post, telephone or in person, we do so to invite you to participate in a face-to-face, telephone or online public opinion survey. Occasionally, we may contact you for one of these other purposes:

Case	Purpose	Data collected/processed	Legal Basis
<b>Further research</b>	Re-contacting you to take part in further research	Contact details, unique identifier, survey data	Consent – we will only invite you for further research if you have given us permission to re-contact you.
<b>Quality Control</b>	Evaluating the performance of the interviewers.	Contact details, including your address	Legitimate interests – we have a legitimate interest in evaluating the performance of the interviewers.
<b>Re-contact for further information</b>	Re-contacting you for clarification of a quality problem in a survey you have already taken part	Contact details, including your address	Consent – we will re-contact you about a survey you have already taken part only if you have given us permission to do this.

When you participate in our survey, we may ask you for a range of information, including, for example, your personal opinions, and demographic information, such as your age and household composition. You may decline to answer any questions or withdraw from participation in a study at any time.

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'.

### **3. 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 purposes only or if required by law. This includes your name, your address and your e-mail address.

Your personal data may be collected, stored, transferred or processed within the Verian group, or third party service providers for research-related purposes, such as data processing, both within and outside the EEA. 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.

### **4. Confidentiality 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 standards and industry requirements:

- MOA and ESOMAR professional codes of conduct;
- ISO 20252 international market research quality standard;
- ISO 9001 international standard for quality management systems;
- ISO 27001 international standard for data security;

### **5. 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 made 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.

## **6. Children's Data Collection**

We never knowingly invite children under the age of 16 years to participate in research studies 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.

## **7. Sensitive Data Collection**

In our survey we may collect sensitive personal data, such as information about your racial or ethnic origin, political opinions, religious or similar beliefs and physical or mental health or condition. We will only collect this kind of data if you have given your explicit consent to do so.

## **8. 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.

## **9. 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 5 years, 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 by ISO 27001, ISO 9001, ISO 20252 and in certain instances the 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.

## **10. 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: 18/04/2018

Last revised: 28/02/2024

### **11. How to Contact Us**

Questions regarding this policy, complaints about our practices and access requests should be directed to the Fieldwork Team via [research@miscomalta.com](mailto:research@miscomalta.com) or in writing to Ms Rebecca Gera, MISCO International, Fino Buildings 1<sup>st</sup> Floor, Mdina Road, Zone 4, Central Business District, Birkirkara.

You can also contact our European Data Protection Team at [Compliance@veriangroup.com](mailto:Compliance@veriangroup.com). Our Data Protection Team monitors for instance our compliance with General Data Protection Regulation plus our privacy policy and is our contact point for the supervisory authorities on issues relating to processing personal data.

### **12. Complaints**

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.

Please contact us using the details above.

You also have the right to complain to the Data Protection Authority. You can direct any complaints about our practices in writing to the Malta Data Protection Authority, Information and Data Protection Commissioner, Level 2, Airways House, High Street, Sliema.