

# Privacy Policy

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## 1. Scope and Overview

**Ipsos SA**, a French public limited company, having its registered office at 35, rue du Val de Marne, – 75013 Paris, France, with Registration Number 304 555 634 R.C.S. Paris (hereinafter referred to as “**Ipsos**”, “**we**” or “**us**”), acting as manager of [www.ipsos.com](http://www.ipsos.com) (hereinafter referred to as the “**Site**”) is committed to protecting the privacy and security of the users of the Site. This privacy policy (hereinafter referred to as the “**Privacy Policy**”) describes how Ipsos collects and processes the personal data collected from you through this online form (hereinafter referred to as the “**Form**”), available in the Site when you are using and requesting the subject services of the Site.

This Privacy Policy describes the categories of personal data that we collect, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data in various jurisdictions. This Privacy Policy also describes your rights regarding the personal data that we hold about you, including how you can access, correct, and request erasure of your personal data.

This Privacy Policy is drafted to be in line with the EU’s General Data Protection Regulation (“**GDPR**”).

Any information and data which you provide, or which is otherwise gathered by us in the context of the Form and such Site services, will be used by us in compliance with GDPR. Personal data processing carried out by us will respect the principles of lawfulness, fairness, transparency, purpose limitation, storage limitation, data minimization, accuracy, integrity, and confidentiality.

We will only process your personal data in accordance with this Privacy Policy unless otherwise required by applicable laws in your home/residence jurisdiction. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

## 2. Data Controller

The data controller regarding the personal data collected and processes about you when using the Site and providing us with your personal data by submitting the Form is **Ipsos SA**, a French public limited company, having its registered office at 35, rue du Val de Marne, – 75013 Paris, France, with Registration Number 304 555 634 R.C.S. Paris, phone number: (+33) 1 41 98 90 00, email address: [ipsoscommunications@ipsos.com](mailto:ipsoscommunications@ipsos.com).

## 3. Personal Data Processed

As you use the Site and, in particular, as you provide us with information by submitting the Form in order to access the Site’s services, we collect, and process information related to you as an individual (“**Personal Data**”).

We may collect, store, and process the following categories of Personal Data:

### a) Name, title/position, contact details and other Personal Data

When filling in and submitting the Form you will be asked to provide information such as follows, as such information would allow us to adequately delivery you the services of the Site requested through the Form and manage your Form for the purposes described in this Privacy Policy:

- First name\*
- Last name\*

- Company name\*
- Title/position\*
- Industry\*
- Email\*

The Personal Data identified with an (\*) is mandatory in connection with our services related to the Form. Failure to provide or to allow us to process mandatory personal data may affect our ability to accomplish the purposes stated in this Privacy Policy and may prevent you from benefit accordingly of the services of the Site related to the Form.

#### **b) Use of Cookies and Similar Code**

Our Site collects information using cookies and functionally similar technologies to help us to provide you with a good experience when you browse our Site.

Cookies are small files stored on your computer when you visit our Site. Specifically, in respect of cookies, further details of what cookies are can be found by visiting [www.aboutcookies.org](http://www.aboutcookies.org).

Check here for the full Cookie Policy (including list of cookies).

#### **c) Browsing Data**

The Site's operation, as is standard with any similar website on the internet, involves the use of computer systems and software procedures, which collect information about the Site's users as part of their routine operation. While we do not collect this information in order to link it to specific users, it may still be possible to identify those users either directly via that information, or by using other information collected – as such, this information is also considered Personal Data.

This information includes several parameters related to your operating system and IT environment, including your IP address, location (country), the domain names of your computer, the URI (Uniform Resource Identifier) addresses of resources you request on the Site, the time of requests, the method used to submit requests to the server, the dimensions of the file obtained in response to a request, the numerical code indicating the status of the response sent by the server (successful, error, etc.), and so on. This data is used exclusively to compile anonymous, statistical information on the use of the Site, as well as to ensure its correct operation and identify any faults and/or abuse of the Site.

### **4. Purposes and Legal Bases of the Processing Activities**

We intend to use your Personal Data, collected through the Form in order to manage the submitted Forms and deliver our services related to it, more precisely:

- Deliver our services you requested through the Form. The processing for such purposes is based on your acceptance of this Privacy Policy by submitting the Form for the services.
- For direct marketing purposes, to send you newsletters and marketing communications regarding Ipsos, its activities and/or services (e.g. invitations to webinars or various newsletters). The processing for such purposes is based on your consent, separately captured by us for such particular purposes.

We will only process your Personal Data for the purposes we collected it for or for compatible purposes. If we need to process your Personal Data for an incompatible purpose, we will provide notice to you first and, if required by law, seek your consent.

Additionally, we may also process your Personal Data for own legitimate interests to prevent fraud and to ensure network and information security, including preventing unauthorized access to our Site and electronic communications systems and preventing malicious software distribution or other computer code, file, or program harmful to the Site.

It is not mandatory for you to give Ipsos your Personal Data for all these above-mentioned purposes. However, if you do not, Ipsos will not be able to manage properly the Form you submit to us. The refusal on processing or transfer of the Personal Data or refusal to supply Personal Data for the purposes set forth hereinabove may make it impossibility to register your Form in our database or could prevent us from properly managing it.

If you have provided your consent to the collection, processing, and transfer of your personal data for direct marketing purposes, you have the legal right to withdraw your consent at any time by simply unsubscribing from any activation we make using your contact details as such option will be available with each such occasion. The withdrawal of the consent shall not affect the lawfulness of the processing carried by Ipsos before the consent's withdrawal.

Please note that for a very short period of time, between the date you withdraw your consent and the date our databases are in full sync with your action of withdrawing consent, you may still receive incidental communications from us until our systems are in full sync with your action of withdrawing consent.

## 5. Data Sharing

We will only disclose your Personal Data to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering the Site and the Form you submit (hereinafter also referred to as the “**Recipients**”). We generally do not use third-party service providers for processing purposes related to this Privacy Policy.

Generally, we may share your Personal Data for the following purposes where permitted or required by applicable law:

- i) to other companies within Ipsos (including outside of your home jurisdiction) for the purposes set out in this Privacy Policy and as necessary to administer the Form and to carry out activities related to the provision of services through the Site, who have undertaken an obligation of confidentiality or are subject to an appropriate legal obligation of confidentiality (e.g., employees of Ipsos).
- ii) Ipsos’s subcontractors acting as data processors for Ipsos for various purposes, and only upon instruction of Ipsos, including but not limited to subcontractors for data storage and hosting services, Site maintenance. For the data storage, hosting services and site maintenance we rely on our trusted vendor, Acquia Inc., 53 State Street, Boston MA 02109, USA. You can read their privacy policy here: <https://www.acquia.com/about-us/legal/privacy-policy>;
- iii) public entities, bodies or authorities to whom your Personal Data must be disclosed, under the applicable law or following binding orders from those entities, bodies or authorities. When we disclose your Personal Data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum Personal Data necessary for the specific purpose and circumstances.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your Personal Data consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers to process your Personal Data for their own purposes. We only permit them to process your Personal Data for specified purposes in accordance with our instructions.

## 6. Cross-Border Data Transfers

As a rule, all Personal Data collected by us through the Form via the Site and processed by us for the purposes mentioned in this Privacy Policy are stored in the United States, so except you are a resident of United States your data will be always transferred to and stored in the United States as the servers supporting the collection of Forms are located in the United States.

If you are located in the EU or elsewhere outside the United States, under the GDPR, as the controller is based in the EU, the transfers of your data can be based, among other mechanisms, on an adequacy decision or on agreements including standard data protection clauses approved by the European Commission. Generally, unless an adequacy decision is in place, we have implemented Standard Contractual Clauses to secure the transfer of your Personal Data to the United States.

Further information, including a description of the mechanisms of transfer (e.g. the applicable Standard Contractual Clauses, that may be applicable to your Personal Data) can be obtained by contacting us as set out at Section 10 and be requested to our data Protection Officer.

## 7. Security of Personal Data

We take our responsibilities to keep your Personal Data secure very seriously. As such we take every reasonable precaution to ensure your Personal Data is protected from accidental loss and unauthorized access, use, alteration, or disclosure. These precautions include appropriate physical security of our offices, controlled access to Site systems, and use of secure, encrypted internet connections when collecting personal information. In addition, we limit access to Personal Data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

## 8. Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for.

Under some circumstances we may anonymize your Personal Data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent, as such types of data does not constitute personal data anymore, under the applicable laws or regulations in data protection field.

Specifically, the main retention periods for your Personal Data, are as follows:

- a) We will keep your Personal Data related to your Form as long as necessary to deliver you the Site services you requested through the Form (sending you so as you download the requested report), but no more than 30 days as of the day you submitted the Form requesting our services.
- b) If, based on your separate consent, you agree to receive direct marketing communication from Ipsos, we will keep and process your Personal Data for such purposes for an indefinite period of time, unless you have not withdrawn your consent for such processing, by unsubscribing from our direct marketing campaigns. In such a case, your Personal Data will be deleted immediately, as a rule, as soon as we receive your notification regarding such withdrawal of consent. Please note that between the moment you confirm the subscription and the date your Personal data is actually deleted from all our databases/systems, you may still receive incidental communications from us until our systems are in full sync with your action to withdraw consent.

Additionally, in case our system starts receiving repeated notifications that our communications (e.g. newsletters) are not being delivered to you anymore due to various reasons (e.g. due to deletion/closing of your email address, change of email address etc.), we will delete your data within no more than 30 days as of our assessment that our communications are not delivered to you anymore/properly.

## 9. Your Rights Related to Personal Data. How to Lodge a Complaint

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during the delivery of our services.

Your rights include the following rights:

### **The right of access**

You have the right to request a copy of all the information we hold about you. More precisely, you have the right to obtain from us a confirmation your Personal Data is processed or not, and, if so, access to such data and relevant information in connection with such data, such as: the purposes of the processing, the categories of data concerned, the recipients or categories of recipients to whom the data has been or are to be disclosed, in particular recipients from third countries or international organizations; where possible, the period for which data is expected to be stored or, if that is not possible, the criteria used to establish that period; or, where the data are not collected from you, any available information on their source.

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### **The right to rectification**

You also have the right to request the correction of any Personal Data we hold about you. Depending on the purpose of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

### **The right to data portability**

Furthermore, you have the right for all the information you have provided to us to receive it in a structured, commonly used, auto-readable format and you are entitled to have it transferred to another party without any obstacles from us, where the processing is based on your consent and the processing is carried out by automatic means.

In exercising the right to data portability, you are entitled that your Personal Data to be transmitted directly from us, only where this is technically feasible.

### **The right to erasure (“the right to be forgotten”)**

You also have the right to request from us the deletion or erasure of the personal information we hold about you. Generally, data subjects have the right to obtain, without undue delay, the deletion of their personal data, if personal data are no longer necessary for the purposes for which they were collected or processed; if data subjects withdraw their consent on the basis of which processing is carried out and there is no other legal basis for processing; or if personal data must be deleted for compliance with a legal obligation of ours.

#### **The right to restriction of processing**

You have the right to obtain a restriction on the processing of your Personal Data in the cases and conditions provided by the law, such as the situation in which the accuracy of the data is disputed or we do no longer need the Personal Data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

If the processing has been restricted, such Personal Data may be processed, except for storage, only with your consent or for the establishment, for exercising or for the defence of a right in court or for the protection of the rights of another natural or legal person; or for reasons of public interest.

#### **The right to object**

**At any time, you have the right to object, for reasons related to your particular situation, to the processing we do based on the legitimate interest lawful basis, including to the profiling related to such processing. Where you exercise your right to object, we will no longer process Personal Data unless we demonstrate that we have legitimate and compelling grounds for the processing which override your interests, rights and freedoms; or that the purpose of processing is the establishment, exercise or defence of a right in court.**

If you would like to exercise any of your above rights, have any questions or require further information about our Privacy Policy or our compliance with data protection laws, please contact the Data Protection Officer using the contact details indicated in Section 10 below.

Any such communication and all requests must be in writing, via email or postal letter. We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the Personal Data that we hold about you or make your requested changes. If we cannot provide you with access to your Personal Data, or solve any of part of a request of yours, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

If you have any complaints, we will appreciate if you give us an opportunity to resolve any issue first, by contacting us as set out above. You are, however, always entitled to contact the French data protection authority, so if you believe that we have handled your information in an unlawful manner, you are entitled to file a complaint CNIL at 8 rue Vivienne CS 30223 F-75002 Paris, Cedex 02, Tel. +33 1 53 73 22 22, Fax +33 1 53 73 22 00, website: <http://www.cnil.fr/>. Other national data protection authorities may also receive your complaint.

## **10. Data Protection Officer**

We have appointed a Data Protection Officer (“DPO”) to oversee compliance with our privacy and data protection requirements, as well as with this Privacy Policy. If you have any questions about this Privacy Policy or how we handle your Personal Data, or would like to request access to your Personal Data or exercise any of your rights as data subject, please contact us as mentioned below:

By email sent to: [DPO.France@ipsos.com](mailto:DPO.France@ipsos.com) or do not hesitate to [contact us](#), or write us at: [ipsoscommunications@ipsos.com](mailto:ipsoscommunications@ipsos.com) and your request will be forwarded accordingly, to the relevant team and department for solving.

Or write to us at:

Data Protection Officer, Ipsos SA, 35, rue du Val de Marne, – 75013 Paris, France.

Please quote the email address you used for registration with our services in your email or letter.

## **11. Changes to This Privacy Policy**

We reserve the right to update this Privacy Policy at any time, and we will provide you with a new Privacy Policy when we make any updates. If we would like to use your previously collected Personal Data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your Personal Data for a new or unrelated purpose. We may process your Personal Data without your knowledge or consent only where required by applicable law or regulation.