



Notice of personal data processing for Research Participants, Research Participants Recommendation and Applicants

GfK Romania – Institut de Cercetare de Piata S.R.L. (hereinafter “GfK”, “we”, “us” or similar) is a company established and existing under the laws of Romania, whose registered office is in Bucharest, 3 George Constantinescu Street, 2nd district, registered with the Bucharest Trade Registry under number J40/19289/1992, tax code RO 2358448, e-mail: info.romania@gfk.com, phone: +40 21 205 55 00, part of the “GfK Group”, a group of enterprises, comprising companies in Europe and other parts of the world, predominantly owned by GfK SE, with registered office at the address Nordwestring 101, 90419 Nuremberg, Germany, entered in the Commercial Register at the District Court of Nuremberg under registration number HRB 25014.

We collect and process several categories of personal data from our Research Participants (hereinafter “you”), which, in compliance with European Union data protection law, makes us a data controller for such data. Also, when we refer to Research participants below, we will also include in this Data Subjects Category the Research Participants Recommendation and Applicants, except for the parts where specific clauses are presented for the Research Participants Recommendation and Applicants.

We take your privacy extremely seriously and this Notice of personal data processing describes our policies and practices regarding our collection and use of your personal data – such as what data we collect, why we collect it, and what we do with it, and sets forth your privacy rights.

We:

- Process your personal data fairly and in accordance with applicable laws;
- Tell you (either directly or in our policies) about how we will use your personal data;
- Only collect personal data from you when we need it for legitimate purposes, or legal reasons;
- Ensure that your personal data is adequate, relevant and not excessive for the purpose for which we collect it;
- Not keep your personal data for longer than we need to;
- Keep your personal data secure, and limit the people who can access it;
- Ensure that you know how to access your personal data and exercise your rights in relation to it, including being able to keep it accurate and up-to-date; and
- Ensure that any third parties we share your personal data with take appropriate steps to protect it.

Please read this privacy policy carefully to understand how we handle your personal data.

1 DEFINITIONS

When we say “**GDPR**”, we are referring to Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.



According to GDPR, we are the **'controller'** - the legal entity which determines the purposes and means of the processing of personal data, **"personal data"** is any information relating to an identified or identifiable natural person (i.e., a human being, not a company). This person is called the data subject. You are the **"data subject"**. A data subject 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.

2 How we collect and use (process) your personal data

We collect and use your personal data with the purpose to organize our survey, your responses to our surveys, as well as payment of incentives to you (where applicable), as indicated in more detail in the table included in Section 10.

3 Legal Bases For Our Use Of Your Personal Data

We need to have legal bases for using your personal data for the purposes set out in this data privacy notice. We consider that our legal bases are as follows:

- Our collection of data relies on your consent;
- our use of your personal data is necessary for the performance of our obligations under our contract with you (for example, to pay you or to confer a benefit under the terms of an employment contract);
- our use of your personal data is necessary for complying with our legal obligations, particularly as your employer (or prospective employer) (for example, providing your personal data with ITM); or
- where neither one of the above apply, it is necessary for the purposes of our legitimate interests or the legitimate interests of a third party.

If we have asked for your consent to collect and use certain types of personal data, you may withdraw your consent at any time, by contacting us as indicated in section. This withdrawal will not affect the lawfulness of our previous processing of such data.

4 How We Collect The Data

Personal Data may be collected or accessed in a number of ways, including:

- directly from you;
- generated by the Company in conversations, correspondence, observing your browsing habits, etc.;

If you access our website we also process your personal data through cookies, as specified in our cookie notice, which you can access here www.gfk.com/ro/confidentialitate .



5 How we share information

We will disclose your personal data only for the purposes and to those third parties, as described below as well as, for specific cases, as indicated in Section 9 below. GfK will take appropriate steps to ensure that your personal data are processed, secured, and transferred according to applicable law.

5.1 Within GfK Group

Your personal data may be transferred to one or more GfK Group affiliated companies as needed for data processing and storage, making decisions about service improvements, and for other purposes as described in Section 10 of this Notice. We do not disclose your personal data to third party controllers outside the GfK Group (i.e. entities that do not act as our processors) unless with your prior notice and, if needed, prior consent.

5.2 External service providers

Where necessary, we will commission other companies and individuals to perform certain tasks contributing to our services on our behalf within the framework of data processing agreements. We may, for example, provide personal data to providers of apps hosted in the cloud, employment related medical services, etc. We will only share or make accessible such information to the minimum extent possible and only based on written instructions from our side. This information may not be used by them for any other purposes, in particular not for their own or third party purposes. GfK's external service providers are contractually bound to respect the confidentiality of your personal data.

5.3 Public bodies

We will only disclose your personal data to public bodies where this is required by law, for example when we provide incentives to you. GfK will for example respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence. Where we are not precluded by law to do so, we will inform you about such disclosure of your data (or data concerning you indirectly).

6 International transfers of personal data

Under specific circumstances, it will also be necessary for GfK to transfer your personal data to countries outside the European Union/ European Economic Area (EEA), so called "third countries". Such third country transfers may refer to all processing activities describes under Section 10 of this Notice. This Notice shall apply even if we transfer personal data to third countries, in which a different level of data protection applies than in your country of residence. In particular, an international data transfer may apply in the following scenarios:



6.1 Legal entities of GfK Group

GfK Group's legal entities outside the European Union have entered into intra-company data protection agreements using standard contractual clauses adopted by the European Commission to safeguard your privacy and legitimize international data transfers. Moreover, GfK's U.S. entities have entered into data protection agreements with service providers and other business partners. These agreements require the contracting parties to respect the confidentiality of your personal data and to handle personal data concerning individuals in the European Union in accordance with applicable European data protection laws.

6.2 Other third parties outside the EU / EEA

Any transfers of personal data to third parties outside the GfK Group will be carried out with your prior knowledge. Any transfers of personal data into countries other than those for whom an adequacy decision regarding the level of data protection was made by the European Commission, as listed on http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm, occur on the basis of contractual agreements using standard contractual clauses adopted by the European Commission or other appropriate safeguards in accordance with the applicable law.

7 Security

We have security arrangements in place to guard against unauthorised access, improper use, alteration, destruction or accidental loss of your personal data.

We take appropriate organisational and technical security measures and have rules and procedures in place to ensure that any personal data we hold on computer systems is not accessed by anyone it shouldn't be.

When we use third party organisations to process information on our behalf we ask them to demonstrate their compliance with our security requirements, and any instructions we may give them and their compliance with relevant data protection legislation throughout the time they work for us. These organisations take their instructions from us and their obligations with regard to what information they process and what they can do with it are agreed in the contracts we have with them.

8 Retention

Your personal data will be retained as long as necessary to achieve the purpose for which it was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law.

The storage period is detailed in the table included in Section 10



9 Which are your legal rights?

As a data subject you have specific legal rights relating to the personal data we collect from you. GfK will respect your individual rights and will deal with your concerns adequately.

- **Right to withdraw consent:** You may withdraw your consent to the processing of your personal data at any moment.
- **Right to access:** You may ask from us information regarding personal data that we hold about you, including information as to which categories of personal data we have in our possession or control, what they are being used for, where we collected them, if not from you directly, and to whom they have been disclosed, if applicable. You may obtain from us one copy, free of charge, of personal data we hold about you. We reserve the right to charge a reasonable fee for each further copy you may request.
- **Right to rectification:** You may obtain from us rectification of personal data concerning you. We make reasonable efforts to keep personal data in our possession or control which are used on an ongoing basis, accurate, complete, current and relevant, based on the most recent information available to us. In appropriate cases, we provide self-service internet portals where users have the possibility to review and rectify their personal data.
- **Right to restriction:** You may obtain from us restriction of processing of your personal data, if:
 - you contest the accuracy of your personal data for the period we need to verify the accuracy,
 - the processing is unlawful and you request the restriction of processing rather than erasure of your personal data,
 - we do no longer need your personal data but you require them for the establishment, exercise or defense of legal claims, or
 - you object to the processing while we verify whether our legitimate grounds override yours.
- **Right to portability:** At your request, we will transfer your personal data to another controller, where technical feasible, provided that the processing is based on your consent or necessary for the performance of a contract. Rather than receiving a copy of your personal data you may request that we transfer the data to another controller, specified by you, directly.
- **Right to erasure:** You may obtain from us erasure of your personal data, where
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - you have a right to object further processing of your personal data (see below) and execute this right object to the processing;
 - the personal data have been unlawfully processed;

unless the processing is necessary:



- for compliance with a legal obligation which requires processing from us;
 - in particular for statutory data retention requirements;
 - for the establishment, exercise or defence of legal claims.
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- **If processing is based on the legitimate interests pursued by GfK or a third party:** You may object – at any time – to the processing of your personal data due to your particular situation, provided that the processing is not based on your consent but on our legitimate interests or those of a third party. In this event we shall no longer process your personal data, unless we can demonstrate compelling legitimate grounds and an overriding interest for the processing or for the establishment, exercise or defense of legal claims. If you object to the processing, please specify whether you wish the erasure of your personal data or the restriction of its processing by us.

 - **Right to lodge a complaint:** In case of an alleged infringement of applicable privacy laws, you may lodge a complaint with the data protection supervisory authority in the country you live in or where the alleged infringement occurred.

Please note:

- **Time period:** We will try to fulfill your request within 30 days. However, the period may be extended due to specific reasons relating to the specific legal right or the complexity of your request.

- **Restriction of access:** In certain situations we may not be able to give you access to all or some of your personal data due to statutory provisions. If we deny your request for access, we will advise you of the reason for the refusal.

- **No identification:** In some cases, we may not be able to look up your personal data due to the identifiers you provide in your request. In such cases, where we cannot identify you as a data subject, we are not able to comply with your request to execute your legal rights as described in this section, unless you provide additional information enabling your identification.

- **Exercise your legal rights:** In order to exercise your legal rights, please contact our privacy helpdesk in writing or text from, e.g. by writing an email to protectiadatelor@gfk.com or a letter to the address stated below, or call our confidentiality line: +40 21 205 55 00. You may also turn directly to our Data Protection Officer: dpo_romania@gfk.com.

10 Details about our processing of research data

We process personal data that you provide to us directly, as well as data that we collect about you during the term of our collaboration. These categories are summarized below:

No.	Process Description	Type of personal data processed	Purpose of the data processing	Legal basis of data processing	Retention period	Recipients
1.	Incentives [ID: 406]	Bank account Email Address Name Personal identification number Phone Number Postal Address	Research Data - payment of incentives to the research participants	Compliance with a legal obligation of the controller	6 months after study completion	other companies in the group, public authorities
2.	Fieldwork* [ID: 407] *To be understood as data collection (by phone)	Bank account Date of birth Email Address Name Personal identification number Phone Number Postal Address Voice	The data of research participants is processed as part of the fieldwork operations.	Consent	6 months after end of project Suppliers 10 years since survey completion	other companies in the group
3.	Online panel recruitment [ID: 408] (if case)	Age Bank account Company Consumption habits GfK Process Register 14 Cookie data Date of birth	- Sending invitation for registering Online panel through third parties channels/own database/databases from suppliers; respondents registration to Online panel	Steps at the request of the data subject prior to entering into a contract	until the research participant asks the deletion of data or 1 year since the last completed interview	none

		Demographic information Education Email Address Income Internet browsing / web log data Internet device identifiers IP Logging Data Name Personal identification number Phone Number Postal Address Salary Time stamp Username				
4.	Data processing [ID: 410]	Date of birth Email Address Name Personal identification number Phone Number Postal Address	Providing survey specification	Consent	6 months after end of project	processors, other companies in the group,
5.	Scripting [ID: 411]	Research participants Date of birth Email Address Logging Data	Research Data The data of research participants is processed as part of the data scripting	Consent	6 months after end of project	other companies in the group

		Name Personal identification number Phone Number Postal Address Research data Salary Voice records	operations, for presenting the processing results to the client.			
6.	Target profiling* & allocation [ID: 422] *For target group establishment	Date of birth Email Address Name Phone Number Postal Address	Research Data - processing is necessary for the performance of the study to which the data subject is party	Consent	6 months after end of project	other companies in the group
7.	Respondent compensation [ID: 1503]	Bank account Name Personal identification number	Other purpose: Sustaining OPS business	Legal obligation	10 years since payment date	other companies in the group
8.	Statement for local authorities [ID: 1508]	Research participants Incentive amount Name Personal identification number	Other purpose: Legal obligations requirements	Legal obligation	5 years since statement date	other companies in the group, public authorities