



General Privacy Policy

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1 About us

GfK Belgium NV (“We” or “we”) is a market research company and a member of [ESOMAR](#), an international organization focusing on developing better market research methods. We adhere to the [professional standards](#) which ESOMAR sets out for its members and, at the same time, protect your privacy as a participant in our market research activities.

We collect your personal data in the course of for example, your participation in a market research activity, during a business relationship or when you visit our website or use our software applications.

The nature of the personal data we collect, as well as the processing, depends on the context within which the personal data is collected and for which purposes they are collected.

Save as we may otherwise communicate to you, we act in the capacity of data controller. When we collect personal data pursuant to an agreement with a third party, and that third party determines the means for and purposes of the processing, we generally act as data processor on behalf of that third party who will be the data controller.

Since we are based in the European Union, we process your personal data in accordance with applicable European data protection laws and other statutory provisions.

2 What are personal data?

Personal data are information that directly or indirectly identifies you as an individual. Indirectly means in combination with other information, for example, your name, postal address, email address and phone number, or a unique device identifier.

3 Use of personal data

We will use your personal data for the purposes as described below or for such other purposes you specifically consented to. We do not collect and process more or other types of personal data than are necessary to fulfill the respective purposes. If our processing of your personal data is based on your consent, we will only use your personal data for a different purpose with your consent.

1. Registration data and direct communication

For many services we collect your personal data, like: name, postal address, phone number and email address (“Registration Data”). We use your Registration Data to communicate with you about our services, to provide you services and enabling you to use these, and to inform you about our policies and usage terms. We also use your Registration Data as well as the content of our communication to respond to you when you contact us.

2. Participation in Panels

If you choose to participate in a panel, we will, in addition to the Registration Data, collect other relevant information, including personal data. For instance, we collect such personal data:

- in the course of surveys conducted online, via phone or face to face,
- by way of automated data collection through hardware or software web-tracking and audience measurement tools such as tracking applications, browser add-ons, TV meters and special internet routers (data regarding your use of the Internet, streaming and social media platforms and other (online) media channels, as well as your digital devices in general),
- that you actively provide us with during your participation (for example, via applications or devices)

(collectively referred to as "Panel Data").

We will analyze and evaluate this Panel Data, aggregate the Panel Data with the Panel Data of other participants and use the Panel Data for market research purposes. For more detailed information, please also consult the respective consent forms of the specific market research projects to our advertising policy (below).

3. Sensic.net

sensic.net ("Sensic") is a cookie tracking platform which collects information on advertising contacts and streaming media use in connection with online market research panels provided by GfK or third party providers as well as general census measurement not relating to specific panels. GfK uses personal data collected or received from Sensic for data analytics, marketing research, advertising impact research and audience measurement purposes. Sensic cookies do not serve to advertise directly to research participants. For further information on sensic.net please turn to <http://sensic.net/>

4. Use of customer data for advertising purposes

To continuously improve and enhance our services, we may send you marketing communications via email relating to our business which may be of interest to you. You can at any time choose the types of communication you want to receive by updating your email preferences. You may also unsubscribe at any time.

- **Consent:** We will not use your personal data for advertising purposes unless you have voluntarily provided your explicit consent in advance.
- For **existing customers**, we may use the email address you provided to us the context of our existing relationship for providing you with marketing materials relating to similar products or services that you have previously requested, used or participated in. You may, however, object to such use at the time of collection and each time a message is sent. To opt-out of email marketing, please follow the instructions within the email that you receive.

5. Legal obligations and legal defense

We may be required to use and retain personal data for legal purposes and process, or to comply with the law or governmental orders, for example for purposes such as the prevention, detection, or investigation of a crime, loss prevention, fraud or any abuse of our services and IT systems. We may also use your personal data to meet our internal and external audit requirements, information security purposes, or to protect or enforce our rights, privacy, safety, or property, or those of other persons.

6. [reserved]

7. Use of the GfK Homepage (www.gfk.com)

This Privacy Policy also applies to your use of our website at www.gfk.com ("Website"), with the following privacy related mechanics and features.

Cookies: Our Website uses cookies and other technologies to enhance the users' experience and improve the Website's performance, user friendliness and security. For more details, please consult our [cookie policy](#).

- **ETracker technology:** Our Website uses etracker technology (www.etracker.de) to collect visitor behavior data. The data are collected anonymously for marketing and optimization purposes. All visitor data are saved using an anonymous user ID to create an aggregate usage profile. Cookies may be used for this purpose also. By using such cookies, it is possible to recognize the visitor's browser. The data collected via etracker technology will not be used to determine the personal identity of the website visitor or compiled with personal data pertaining to the user of the pseudonym unless agreed to separately by the person concerned. At any time you can object to our collecting, processing and use of your personal data with respect to subsequent services through opting out via: [Refuse data collection](#).
- **Hubspot:** Parts of Our Website use HubSpot (www.hubspot.com) to personalize your web experience. HubSpot utilizes log files which GfK may use for operating the service, quality of service maintenance, and for providing general, anonymous statistics regarding the use of the Website. Only if you voluntarily give us personally identifiable information such as name, email address, address, and phone number in order to do business with us, this data may be linked to automatically collected data. HubSpot also uses cookies to help personalize your online experience. Please consult HubSpot's detailed cookie policy for more information. You can disable HubSpot cookies via: <http://we-online.sites.hubspot.com/opt-out>.
- **Third party websites:** As a convenience to our visitors, our Website may contain links to websites that are not affiliated with, controlled, or managed by us. The policies

and procedures we describe here do not apply to those websites. We are not responsible for the security or privacy of any data collected by these third parties. We recommend contacting the party responsible for those websites directly for information on their privacy policies.

4 Collection of personal data from other sources

We may sometimes collect personal data about you from sources other than you. For example, this may be the case if you have registered with a market research panel provider as a participant, and we are working with this provider to source participants in our research.

In particular, we process personal data collected by third parties using third party crawling and analytics tools such as Brandwatch (www.brandwatch.com) that archive social media data which have been published in open profiles or channels on social media networks or platforms like Facebook, Twitter, Instagram, public online forums or rating portals of online-shops (e.g. eBay or Amazon). GfK may use information that you have made public on social media platforms and other websites to provide its clients with aggregated reports and links relating to public information in a systematic manner.

We may as well collect personal data regarding the exposure of participants in market research projects to advertisement and relevant media content from other sources such as advertising networks, social media platforms and website and mobile app publishers. If we do so, we obtain the participants' prior consent to the data collection and inform them about the sources from which we collect personal data about them. We use such secondary data to enrich the data that we collect from participants in the course of their participation in a panel in order to provide better insights to our customers.

If we collect personal data about you from other sources, then the source should have already informed you in advance about the potential data transfer to us. Upon request, we will provide you such information as required by law concerning the personal data that we collect about you from other sources.

5 How we share personal data

We will disclose your personal data only for such purposes and to such third parties, as described below. GfK will take appropriate steps to ensure that your personal data are processed, secured, and transferred according to applicable law.

1. Within GfK Group

GfK is part of a global organization (the "GfK Group"), consisting of several companies in and outside the European Union, all primarily owned by GfK SE, established in Germany with registered seat at Nordwestring 101, 90419 Nuremberg and registered in the commercial register in Nuremberg under No. HRB 25014 and having VAT No. DE 133 500 719. Your personal data may be transferred to one or more GfK Group affiliated companies as needed for data processing and storage, providing you with access to our services, providing customer



support, making service improvement decisions, content development and for other purposes as described in Section 3 of this Privacy Policy. We do not disclose personal data of participants in market research projects to third parties outside the GfK Group unless the participants have provided their prior explicit consent for the specific purpose.

2. External service providers

We may commission other companies and individuals to perform, within the framework of data processing agreements, certain tasks on our behalf. We may, for example, provide personal data to agents, contractors or partners for hosting our databases and applications, for data processing services, or to send you information that you requested, or to call-centers for the purpose of provision of support services or interviewing in the course of market research projects. We will only share with or make accessible such data to external service providers to the extent required for the respective purpose. They may not use the data for any other purposes, in particular not for their own purposes or those of party's outside the GfK Group. GfK's external service providers are contractually bound to respect the confidentiality of your personal data.

3. Customer Relationship Management (CRM)

For Customer Relationship Management (CRM) purposes the contact information (such as name, email address, telephone number, address) of our customers, vendors or other contract partners is stored on our service partner HubSpot's servers in the U.S., please consult section 6 'International transfers of personal data' below for more details on our international data transfer policy.

4. Business transfers

In connection with any reorganization, restructuring, merger or sale, or transfer of assets (collectively "Business Transfer"), we will transfer data, including personal data, to a reasonable extent and as necessary for the Business Transfer, and provided that the receiving party agrees to respect your personal data in a manner that is consistent with applicable data protection laws. We will inform persons in advance of their personal data becoming subject to a different privacy policy.

5. Public bodies

We will only disclose your personal data to public bodies where this is required by law or an governmental order. GfK will for example respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.

6 International transfers of personal data



Under specific circumstances, GfK may transfer your personal data to countries outside the European Union/ European Economic Area (EEA), so called "third countries". Such third country transfers may relate to processing activities described under Section 3 (Use of personal data) of this Privacy Policy. This Privacy Policy shall also apply if we transfer personal data to third countries that, by law, offer a different level of data protection than that of your country of residence. In particular, an international data transfer may apply in the following scenarios:

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.

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 and, where applicable, with your consent. 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. (see: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm), occur on the basis of agreements including standard contractual clauses adopted by the European Commission or other appropriate safeguards in accordance with the applicable law.

Our Marketing partner, HubSpot, Inc., headquartered at 25 First St., 2nd floor, Cambridge, Massachusetts 02141, USA, participates in and has certified its compliance with the 'EU-US Privacy Shield Framework' (www.privacyshield.gov/welcome).

7 Processing of personal data of children

GfK will not collect or process personal data of children under 16 years old ("Child") unless with parental consent, pursuant to applicable local law. If we become aware that personal data from a Child were inadvertently collected, we will delete such data without undue delay.

8 Processing of sensitive data

We may, in certain cases, process special categories of personal data concerning you ("sensitive data"). Sensitive data refer to personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, or a natural person's health sex life or sexual orientation. We may for example process sensitive data that you evidently have made public. We may also process sensitive data as necessary for the establishment, exercise or defense of legal claims. We may also process your sensitive data if you have voluntarily given your prior, express and separate consent in a specific context for a specific purpose, such as in the course of your participation in a market research activity.

9 Security

GfK takes data security seriously. We apply an appropriate level of security and have therefore implemented reasonable physical, electronic, and administrative procedures to safeguard the personal data we collect against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed. Our information security policies and procedures are closely aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements.

In the event of a data breach concerning personal data, GfK will follow all applicable data breach notification laws.

10 Your legal rights

As a data subject you have specific legal rights relating to the personal data we collect from or about you or process. GfK will respect your individual rights and will properly handle your concerns.

The following list contains information on your legal rights which arise from data protection laws applicable on the date of this Privacy Policy:

- **Right to withdraw consent:** Where the processing of personal data is based on your consent you may withdraw this consent at any time by following the procedures described in the respective consent form. We will see to it that consent can be withdrawn by the same means as it was given – e.g., electronically. As a participant in a market research project please note that by withdrawing consent your participation in the respective project will end and you will no longer be eligible for any rewards or incentives that GfK may offer to participants.
- **Right to rectification:** You may request us to rectify or supplement personal data concerning you. We make reasonable efforts to keep personal data in our possession or under our control and that 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. Where we provide such portals, we expect users to regularly review their personal details and, if necessary, supplement or correct the same.
- **Right to restriction:** You may obtain from us restriction of processing of your personal data:
 - for the period we need to verify the accuracy, when you contest the accuracy of your personal data;
 - if the processing is unlawful and you request the restriction of processing rather than erasure of your personal data,
 - if we do no longer need your personal data but you require them for the establishment, exercise or defense of a legal claim, or
 - while we verify whether our legitimate interests outweigh yours, if you have objected to the processing.

- **Right to access:** You may ask 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 under our 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 also ask us information concerning the period we expect storing the data and, where applicable, information concerning automated individual decision-making and profiling based on your personal data. You may obtain from us a copy, free of charge, of the personal data we hold about you. We reserve the right to charge a reasonable fee for each additional copy you may request.
- **Right to portability:** At your request, we will provide you with a copy of your personal data in a structured, common and machine-readable format. You have the right to transfer that copy to another controller of your choice or, if technically feasible, request that we do so directly. This right to portability exists where the processing occurs on the basis of your consent or is necessary for the performance of a contract to which you are a party and is carried out by automated means.
- **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 object to the processing and there are no overriding legitimate grounds for the processing;
 - the processing is based on your consent, you withdraw your consent and there is no other legal ground for the processing;
 - the personal data have been unlawfully processed;
 - the personal data must be erased for compliance with a legal obligation to which we are subject;
 - the personal data have been collected in relation to the offer of information society services to a Child;

unless and to the extent the processing is necessary

- for exercising the right of freedom of expression and information;
 - for compliance with a legal obligation which requires processing from us, in particular for statutory data retention requirements;
 - for the establishment, exercise or defense of legal claims.
- **Right to object:** At any time you may object 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 outweighing your interests, rights and freedom 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 from receipt. However, the period may be extended due or relating to the number of requests received 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 or other legal grounds. If we do not honour your request, we will inform you why we do not.
- **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. Two examples of personal data which we cannot look up when you provide your name and email address are:
 - data collected through browser-cookies, unless you gave your consent to the use of cookies for market research purposes as a member of a GfK online panel and are still a member of that panel at the time of your request,
 - data collected from public social media sites provided you have posted your comment under a nickname which is not known to us.

In such cases, where we cannot identify you as a data subject, we are not able to honour your request 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, e.g. by email or letter. You may also turn directly to our Data Protection Officer. For contact information, please refer to the end of this Privacy Policy.

11 Retention of your personal data

In general, we will delete the personal data we collected from you if they are no longer necessary to achieve the purposes for which they were originally collected. However, we may be required to store your personal data for a longer period due to e.g. statutory provisions.

In addition, we will not delete all of your personal data if you requested from us to refrain from re-contacting you in the future. For this purpose, GfK keeps records which contain information on people who do not want to be re-contacted in the future (e.g. by means of bulk emailing or recruiting campaigns for market research projects). We qualify your request as consent to store your personal data for the purpose of such record keeping unless you instruct us otherwise.



12 Changes to this Privacy Policy

We reserve the right to, at our discretion, modify our privacy practices and update and make changes to this Privacy Policy at any time. For this reason, we encourage you to refer to this Privacy Policy on an ongoing basis. This Privacy Policy is current as of the "last revised" date which appears at the top of this page. We will treat your personal data in a manner consistent with the Privacy Policy under which they were collected, unless we have your consent to treat them differently.

We will also keep prior versions of this Privacy Policy in an archive for your review.



13 Contact information

Please direct your questions regarding the subject matter of data protection and any requests for exercising your legal rights to our data protection helpdesk:

Email: dpo_belgium@gfk.com

Phone: +3216742424.

Mail: GfK Belgium NV

Attn.: Data Protection Officer

A. Nobelstraat 42

B-3000 Leuven, Belgium

All requests will be brought to the attention of our Data Protection Officer. For Belgium this is Mr. Sven Mertens.