



Ifop Group commitments regarding the protection of personal data:

The handling of personal data has always been a cornerstone of Ifop's relationship of trust with its collaborators. As part of its activities, Ifop has always undertaken to process personal data in accordance with the applicable laws and regulations, and in particular to take every effective and appropriate precaution to maintain and assure both the confidentiality and security of data.

In addition to complying with the professional code of conduct that applies to market research companies (the ICC/ESOMAR International Code on Market, Opinion and Social Research and Data Analytics), to which Ifop adheres, the protective framework created by the new European regulation (GDPR) tightens up existing practices. Ifop has taken these major advances into account by enacting a series of measures, which are explained below.

Lawfulness of personal data processing as part of Ifop's market research studies and surveys, and consent:

In accordance with Article 6 of the GDPR, Ifop only collects personal data if it obtains the **freely given, specific and informed** prior consent of the person contacted to respond to the market research study or survey, after having explained to that person the purpose of data collection in a clear, accurate and concise way.

Evidence of this consent will be kept by Ifop for the period necessary for processing, generally the duration of the study and associated quality control activities.

Ifop undertakes to inform the person responding to the study of the origin of their data if this data comes from a contractor or customer rather than being directly generated by Ifop. The new European Regulation authorizes Ifop to reuse customer data for research purposes, as market research studies are categorized as scientific research.

Minimization and anonymization of personal data

Ifop has made a commitment to reduce the impact of personal data collection **by limiting and minimizing collection** to the elements required for the purposes of the study, and by ensuring that this data is not used in a way that is incompatible with these purposes.

Ifop has also introduced procedures to guarantee that those participating in its studies do not experience any harm or injury as a direct result of their collaboration in the study, through the use of anonymization techniques and by limiting access to personal data to field teams and study personnel working on the study in question.

Finally, Ifop undertakes to **protect the anonymity** of individuals responding to its studies with regard to the final customer, by only providing the latter with aggregated data or raw data that does not include names.



Sharing of personal data

Third parties:

In addition to transferring personal data to its internal and IT teams, Ifop may appoint a supplier or subcontractor to perform certain services related to its activities, and may therefore transfer personal data to this third party. Ifop selects its suppliers and ensures that they have the capacity to comply with the directives and regulations relating to personal data protection, and will only transfer personal data if a prior, signed **commitment and agreement** exists between this third-party and Ifop.

International transfers

Ifop does not transfer any personal data outside the European Economic Area (EEA) unless a prior transfer agreement has been established with the entity receiving the personal data, and unless it has received guarantees that this entity has implemented measures offering the same level of security as that required by European regulations.

Public bodies

Ifop may disclose personal data to public bodies, courts, administrative bodies or the administrative authority responsible for the protection of personal data if the law so requires or if it receives an order requiring it to do so.

Personal data concerning children

Ifop will neither collect nor process personal data concerning children aged below 16 years – or below the legal age established by French law – without prior consent from their parent or guardian.

Processing of sensitive data

Ifop undertakes to process research requests targeting sensitive data on a case-by-case basis. This notably includes data that reveals racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, and genetic or biometric data, or data concerning health or sex life, as well as studies that, due to their processing, would present a serious threat to personal rights and freedoms.

In close collaboration with the customer and prior to implementation, an impact analysis will be performed for these studies in order to determine the personal data protection issues associated with these operations.

The analysis will include the following as a minimum:

- a systematic description of the planned processing operations and the purposes of processing;
- an evaluation of the necessity and proportionality of operations in terms of the purposes;
- an evaluation of the risks generated by processing;
- the measures taken to mitigate these risks.



Storage and security of personal data

Ifop guarantees that personal data **is not kept any longer than is required for the purpose** for which it was collected or processed, with the application of a clear system regarding storage periods.

Ifop has implemented **security protocols** to control risks, as described in an Ifop technical protocol, notably through the use of an encrypted, secure messaging service for sending and receiving personal data files. This protocol complies with internationally recognized standards and is regularly examined and updated if necessary.

Dedicated team, training and internal tools

Internal tools

In accordance with the regulations, Ifop has a specific internal documentation system:

- covering documentation relating to the processing of personal data: the records of processing activities, the impact analyses performed, the monitoring of transfers outside the EEA or contractual clauses;
- covering documentation relating to informing individuals: information notices communicated to the person whose data has been collected, the consent form template, the procedure that allows individuals to exercise their rights (rights of access, modification, etc.);
- covering the contracts that set out the roles and responsibilities of each actor: contracts with subcontractors.

Training

In 2017, Ifop launched a program to train all its teams and raise awareness regarding the new European Regulation on the protection of personal data.

Dedicated team

Ifop has set up an internal team dedicated to personal data protection, headed by the Data Protection Officer and IT Resources Manager.

Rights of individuals

Ifop informs the individuals surveyed about how they can exercise their rights, and has implemented procedures to meet the demands of participants exercising their rights regarding the personal data concerning them that has been collected directly by Ifop, notably:

- ✓ Right of access: the right to ask Ifop about the personal data it holds, including queries on the type of personal data that Ifop holds or controls, the purpose for which it is used, where Ifop collected the data if Ifop did not collect it directly, and, where relevant, the parties to whom it has been disclosed.
- ✓ Right to withdraw consent: Ifop ensures that consent can be withdrawn in the same way in which was granted.
- ✓ Right to rectify, to object: Ifop rapidly takes into accounts requests to rectify, delete or object to the personal data it holds.



- ✓ Right to portability: Ifop will transfer a copy of the personal data in a structured, commonly used, legible format to another data controller if it receives such a request as provided for by law.

Contact details

Any questions or requests regarding the measures taken by the Ifop Group in relation to personal data protection or the exercise of the rights summarized above should be addressed to:

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