

# DATA PRIVACY POLICY EFFICIENCE 3

#### Who are we?

Efficience3 is an independent marketing and opinion research institute based in France. As such, we treat personal information collected during your participation in a market study or in commercial relations in strict compliance with the European Data Protection Regulations (RGPD) and any other legal provision concerning the treatment of personal data.

## What categories of personal data do we treat?

We may collect personal data directly from you or have it provided to us by a third party. In accordance with the principle of minimization, we collect and use only the data necessary for the purposes for which they are processed.

The different categories of data collected and processed during our surveys are as follows:

- Identification data (first name, last name)
- Contact data (postal address, email address, telephone number)
- Connection data (including public IP address, date and time of your connection to our surveys, model and version of your web browser)
- Study data (including answers you provided to us during the interviews and/or those provided to you by the study sponsor(s) or a third party)

#### Why do we treat your personal data?

We collect and process data for marketing and opinion studies that you agree to take part in on behalf of our clients within the framework of the contract that unites us. The final processing may take the form of a database and / or statistical analysis reports.

## How long do we keep your personal data?

We keep your personal data until we have finished the treatments for which they were in our possession and we delete them.

Nevertheless they can be saved for a longer period if certain legal provisions oblige us

In the same regard, if you wish not to be contacted by us again, whether by email or phone, we must archive your personal details, for technical reasons. We will consent for the retention of this data unless you specify otherwise.

## What if your personal data reaches us from other sources?

We may also collect your personal information other than directly from you, for example through market research panel providers with whom we work and register and whose privacy policy you have accepted. In the event that your personal data is transmitted to us without you having been informed, we will inform you of the origin of this transfer during our first contact.



# What happens in case of legal obligation and legal defence?

In order to protect our services, our computer system, and as part of the prevention of infractions, losses or possible fraud, we may be required to keep your personal data within the limits of what we are legally authorized. This data may also be used to meet external or internal audit requirements but also for the respect of our rights, confidentiality, for our protection and for that of others.

#### How is your personal data secured?

We have defined technical and organizational measures to protect your data appropriately according to their nature, extent of treatment and accessibility. It can be for example encryption of data, management of access rights...

Respect for the security and protection of your data is essential for all our employees and our service providers.

## Who are the recipients of your personal data?

We do not transmit any personal data to our customers, except if you have been specifically notified as such during our contact and you have explicitly given us your consent.

Our collaborators have access to your personal data only to allow for the desired treatment.

We may commission subcontractors to intervene in our market studies and in this context to transmit or give them access to your personal data. These service providers will only be able to use your data for the study for which we commissioned them and undertake contractually not to retain them retrospectively or to use them for their own needs or for the needs of a third party. These service providers have the obligation to comply with the European General Regulations on Data Protection and compliance with this charter.

#### What are your rights regarding the protection of your personal data?

In accordance with the European Regulation 2016/679 of 27 April 2016 on the protection of personal data, you have several rights for the management of your data.

Unless a legal obligation prevails, you have the right to:

- Ask us to provide you with information about the personal data we process about you,
- Correct, update or supplement inaccurate or incomplete personal data concerning you,
- > Delete or request the deletion of personal data about you,
- > In certain circumstances, asking us to limit the way we process personal data about you,
- Remove the consent you may have given us,
- Prevent you from processing personal data about you based on our legitimate interests or those of third parties,



- Obtain from us the portability of personal data about you that we process by automated means, to another controller, where technical means allow us, on the basis of your consent or a contract that you have concluded with us,
- File a complaint with a supervisory authority (<u>www.cnil.fr</u>) if you are not satisfied with the way we have managed your personal data, or in the case of a request for information or respect of privacy if you are.

### Who to contact for the exercise of your rights?

For any question relating to this charter or the exercise of your rights, you can send us in accordance with the regulations, an application accompanied by a valid proof of identity by email or by mail to:

Our data protection officer : Cédric ARNOULD - dpo@efficience3.com

Efficience3 26 rue Buirette FR-51100 REIMS

We will process your request within a maximum of one month from the date of receipt.

## Update of our data protection charter

We reserve the right to update this charter periodically and without notice. Any changes take effect immediately from the publication of the new charter on our website Efficience3.com. However, we will treat your personal data in accordance with the Charter that was in place at the time when we collected such data