

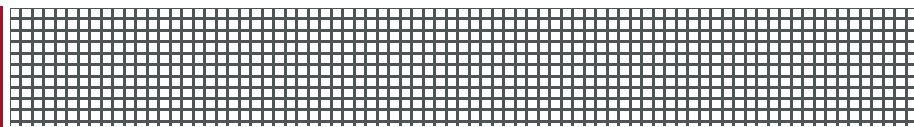
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Opticom International Research AB

GDPR Policy



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What is GDPR

In short: The EU General Data Protection Regulation (GDPR) is a new regulation that addresses the collection, use, processing and transfer of the personal data of European Union citizens.

General Data Protection Regulation

The General Data Protection Regulation (EU) 2016/679 ("GDPR") is a regulation in EU law on data protection and privacy for all individuals citizens of the European Union (EU) and the European Economic Area (EEA). It also addresses the export of personal data outside the EU and EEA areas. The GDPR aims primarily to give control to individuals over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU.^[1] Superseding the Data Protection Directive 95/46/EC, the regulation contains provisions and requirements pertaining to the processing of personal data of individuals (formally called *data subjects* in the GDPR) inside the EEA, and applies to an enterprise established in the EEA or—regardless of its location and the data subjects' citizenship—that is processing the personal information of data subjects inside the EEA.

Controllers of personal data must put in place *appropriate technical and organisational measures* to implement the data protection principles. Business processes that handle personal data must be designed and built with consideration of the principles and provide safeguards to protect data (for example, using pseudonymization or full anonymization where appropriate), and use the highest-possible privacy settings by default, so that the data is not available publicly without explicit, informed consent, and cannot be used to identify a subject without additional information stored separately. No personal data may be processed unless it is done under a lawful basis specified by the regulation, or unless the data controller or processor has received an unambiguous and individualized affirmation of consent from the data subject. The data subject has the right to revoke this consent at any time.

A processor of personal data must clearly disclose any data collection, declare the lawful basis and purpose for data processing, and state how long data is being retained and if it is being shared with any third parties or outside of the EEA. Data subjects have the right to request a portable copy of the data collected by a processor in a common format, and the right to have their data erased under certain circumstances. Public authorities, and businesses whose core activities centre around regular or systematic processing of personal data, are required to employ a *data protection officer* (DPO), who is responsible for managing compliance with the GDPR. Businesses must report any data breaches within 72 hours if they have an adverse effect on user privacy. In some cases, violators of the GDPR may be fined up to €20 million or up to 4% of the annual worldwide turnover of the preceding financial year in case of an enterprise, whichever is greater.

The GDPR was adopted on 14 April 2016, and became enforceable beginning 25 May 2018. As the GDPR is a regulation, not a directive, it is directly binding and applicable, but does provide flexibility for certain aspects of the regulation to be adjusted by individual member states.

Opticom International Research Policy

Opticom follows the guidelines of ICC (International Chamber of Commerce and International ESOMARs where EphrMRA includes guidelines for GDPR)

For more information see:

https://www.esomar.org/uploads/public/government-affairs/position-papers/EFAMRO-ESOMAR_GDPR-Guidance-Note_Legal-Choice.pdf

According to the General Data Protection Regulation (GDPR) there is a clear distinction between:

- Data Controller – who collects and owns the data
- Data Processor – who handles and processes the data on behalf of the Controller

Opticom is a Data Processor within market research

Personnel at Opticom who collect data by interviewing clients or any respondents in market research project are always transparent and lets the respondent know how the gathered data will be used and who the client is. The option to remain anonymous is always offered. Respondents can at any time refuse to answer questions or withdraw their previous answers and request their data to be deleted from the database.

Opticom does not share collected data with any party or persons except the client, who in most cases are the data controller.

Opticom does not save any personal data, the statistical results are archived on an aggregated level and not on an individual level.

In most cases, the data collected for market research does not contain any personal data and in these cases no further action is required.

In case where personal data is processed, which falls under the purview of GDPR policy, as the designated Data Processor Opticom promises to:

- ✓ *Keep clients' data safe, secure and private*
- ✓ *Handle Data Subject requests, such as right-to-erasure and right-to-access*
- ✓ *Keep records of compliance and audit logs as required*
- ✓ *Disclosure our sub-processors and monitor their GDPR compliance*
- ✓ *Notify about security breach using account contact information*

For clients acting as the Data Controller, they must meet certain obligations, such as notifying or obtaining data subjects' consent if they handle or process personal data.

GENERAL TERMS AND PRIVACY

- The research will comply with GDPR and all international/local data protection legislations and Insights Association/ EphMRA/ BHBIA.
- Any information you provide us with will be treated as confidential, it will be combined with feedback from others like yourself. You will remain anonymous and your details will not be shared.
- Your information will only be used for market research purposes and will not be passed to any other organisation without your permission. We need your consent in order for us to collect and use any information about you.
- You have the right to refuse to answer questions or withdraw at any time.