

# **Policy of ILRES S.A. regarding the processing of personal data concerning the personal data of its MyPanel Members**

## **1. What is personal data?**

The term 'personal data' includes means any information relating to an identified or identifiable natural person ; an identifiable natural person 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. Why does ILRES S.A. process the personal data of *MyPanel Members*?**

ILRES S.A. is a market research and opinion research company. Its activity leads it to carry out multi-thematic surveys.

Some of these surveys are conducted with volunteer participants, called *MyPanel members*. These are persons who have agreed to ILRES S.A. regularly inviting them to participate in the surveys it conducts via online questionnaires.

When you want to become a *MyPanel Member*, ILRES S.A. asks you to register via an online form, which includes general information about you, such as your municipality of residence, your date of birth, the number of persons in your household.

Once registered, you will be regularly invited to complete online questionnaires.

Each completed questionnaire entitles you to a reward, the amount of which varies according to the number of questions asked. You can ask at any time for the payment of the sum of your rewards to the bank account of your choice, yours, that of a third party, or even that of a charity.

The purpose of the processing of the personal data of its *MyPanel Members* by ILRES S.A. is to have a panel of persons who agree to communicate on a regular basis their opinion on the themes and products addressed in the surveys that it submits to them so that these opinions can be used to establish statistics.

The specific purposes of each survey will be communicated at the same time as the invitation to participate, if not at the beginning of the questionnaire. This could be, for example, surveys on topical issues, political polls, opinions concerning a product, etc.

### **3. What authorises ILRES S.A. to process MyPanel Members' data?**

The processing of the personal data of *MyPanel Members* takes place on the basis of the consent of said members. It is on a voluntary basis that you become a *MyPanel Member*, and you may remove yourself from this list of panellists at any time. Similarly, although ILRES S.A. counts on the collaboration of each of its *MyPanel Members*, none of them are ever required to participate in the survey to which they are invited, or even to answer all the questions asked in a survey.

Nevertheless, it goes without saying that certain information are essential to the maintenance of the relationship that each of the *MyPanel Members* has with ILRES S.A. The latter cannot invite its *MyPanel Members* to respond to its surveys without using their email address, and it need to know the bank details of the person to whom it has to pay their rewards, whether this is their own or that of a third party.

### **4. Who is responsible for processing the personal data of MyPanel Members?**

ILRES S.A. is the controller, i.e. the person who determines the purposes and means of the processing.

ILRES S.A.

Head Office: Atrium Business Park, 41, rue du Puits Romain, L-8070 Bertrange

Telephone: +352 499291

<https://www.ilres.com>

ILRES S.A. has appointed a data protection officer who you can contact by email at the following address [DPO@ilres.com](mailto:DPO@ilres.com), or using the following details:

Postal address: ILRES S.A., Atrium Business Park, 41, rue du Puits Romain, L-8070  
Bertrange

Telephone: +352 499291

It may be that the ILRES S.A. client is a joint controller for the processing of the data collected through the survey. It may also be that ILRES S.A. is only the data processor. The identity of this jointly data controller or of the data controller for which ILRES S.A. would be the data processor will be communicated whenever possible to the person participating in the survey, either before participating, or sometimes at the end of the questionnaire when it is necessary to hide this identity so as not to influence the participant's responses. It may also exceptionally be that the identity of the jointly data controller or of the data controller for whom ILRES S.A. would be the data processor must remain secret, in which case the reasons for this secrecy will be explained orally before the questionnaire is taken.

In any event, participants may always contact ILRES S.A. to obtain information relating to data processing and to assert their rights.

## **5. How are the personal data of *MyPanel Members* used and what happens to them?**

ILRES S.A. collects the information that its *MyPanel Members* communicate to it through questionnaires to which they reply, in order to carry out surveys and polls relating to economic, political and social life and market studies. It combines this information and analyses it to produce reports that it publishes or provides to its clients in the form of statistics.

ILRES S.A. also invites its *MyPanel Members* to participate in surveys conducted by its business partners, in which case it is these partners who collect the information communicated through the questionnaire. However, these partners do not have access to the contact details of *MyPanel Members*. ILRES S.A. also verifies that the content of the survey questionnaires emanating from these partners does not allow them to identify the *MyPanel Members*, and has taken contractual measures prohibiting such identification.

Published or client reports do not identify participants. The personal data of the *MyPanel Members* are treated confidentially and stored securely.

## **6. What happens to the personal data of *MyPanel Members* and how long are they kept?**

ILRES S.A. keeps the information enabling it to make contact with the *MyPanel Members* and pay their rewards as long as they are members of this panel.

It keeps for the same period the data necessary to establish panellist profiles, i.e. demographic characteristics such as date of birth, gender, nationality, municipality of residence or income category. It needs this information when the survey it conducts only concerns a targeted audience that can be selected on the basis of these demographic characteristics. Thanks to these demographic profiles, ILRES S.A. can avoid needlessly contacting *MyPanel Members* who are not involved in the current survey. For example, avoiding contacting men when the only purpose is to gather the opinion of women, or avoiding contacting residents in the north of the country when only the opinion of residents in the south is required.

The *MyPanel Members* may consult the list of demographic information ILRES S.A. has about them by logging into the account assigned to them when they registered.

Other information and opinions that the *My Panel Members* communicate to ILRES S.A. or to one of its business partners on the occasion of surveys, i.e. that which does not constitute demographic characteristics, nor data necessary to contact or pay its panellists, are anonymised as soon as possible, according to the survey, and in particular the duration during which it must take place. ILRES S.A. will keep these personal data for a period of 3 to 6 months, in order to be able to respond to the client's request to verify the validity of the survey.

When a *MyPanel Member* indicates its intention to withdraw from the list of panellists, ILRES S.A. will keep the number of the bank account to which he has requested payment of his rewards, the first and last names, or the company name of the holder of this account, as well as his address, for a period of ten years beginning on 1 January following the date

of the last reward payment made. ILRES S.A. must keep this information in order to fulfil its obligation to keep accounting documents provided for by the Commercial Code. It will then no longer use this information for other purposes.

ILRES S.A. will delete the other information concerning the person wishing to withdraw from the *MyPanel Members* at the latest one month after receipt of the decision to withdraw or request for deletion of the data, except the information necessary to prove that it has actually processed the request. These information will be kept for the sole purpose of proof during the statutory limitation period applicable to all administrative procedures or civil and criminal actions against it in connection with this processing, as well as where appropriate until the pronouncement of all final decisions following the introduction of such procedures or actions.

## **7. Where and how are the personal data of *MyPanel Members* stored?**

ILRES S.A. takes every precaution to preserve the security of the information it processes. For this purpose, it has put in place all the measures necessary to secure its IT systems. Personal data are stored on secure servers located within the European Union, and are only accessible to a limited number of its employees.

## **8. Does ILRES S.A. communicate the personal data of its *MyPanel Members* to other persons?**

In order to proceed with the payment of the rewards of its panellists, ILRES S.A. transfers to its Luxembourg banking institution the number of the bank account to which he has requested this payment, the first and last names, or the business name of the holder of this account, as well as his address.

This information is also transferred by ILRES S.A. to its accountant.

From their collection to their analysis, the data and information obtained during surveys are stored via a private Cloud system. The Cloud service providers used by ILRES S.A. store these information on secure servers located within the European Union.

All these service providers only have access to the information essential for the performance of the task entrusted to them by ILRES S.A. The latter contractually ensures that they respect all the security measures required with regard to these information, and that they do not use them for purposes other than carrying out the task entrusted to them by ILRES S.A..

ILRES S.A. communicates the data and information obtained during the online surveys to its client, in aggregate form, and without the client being able to identify the participants.

When it asks its *MyPanel Members* to participate in a survey of one of its commercial partners, ILRES S.A. communicates to this partner a list of temporary codes created specifically for each survey. These codes are necessary for ILRES S.A. to identify the panellists who responded to the survey and are therefore entitled to the reward. Each of these codes corresponds to one of the *MyPanel Members* invited to participate in the commercial partner's survey but, in order to keep the identity of its panellists confidential,

ILRES S.A. does not inform this partner to whom it has assigned the codes in question.

No other personal data concerning the *MyPanel Members* is transferred by ILRES S.A. to anyone, unless such communication is required by law.

## 9. What are the rights of *MyPanel Members* about their personal data?

If you are a *MyPanel Member*, you have the following rights concerning your personal data processed by ILRES S.A.:

- a) **Right of access:** You have the right to ask ILRES S.A. to provide you with information concerning the personal data it holds about you. The list of these information is accessible by logging into the account that was assigned to you when you registered.
- b) **Right to rectification and erasure:** You have the right to ask ILRES S.A. to rectify your personal data in its possession which may prove to be inaccurate. You can also ask ILRES S.A. to delete your personal data in its possession. However, this request may result in your removal from the list of *MyPanel Members*, while your continued inclusion in this list requires the use of your contact and demographic information. In addition, ILRES S.A. will keep the data concerning you insofar as it is required to do so in order to comply with its legal obligations, including in particular that of the ten-year conservation of its accounting documents, or when the conservation of this data is necessary for the exercise or defence of its legal rights.
- c) **Right to restriction of processing:** You have the right to ask ILRES S.A. to suspend the processing of your personal data until verification can take place (for example, to verify the accuracy of the personal data processed).
- d) **Right to data portability:** You have the right to ask ILRES S.A. to transmit your data directly to another controller, provided that this transfer is technically possible.
- e) **Right to withdraw your consent:** You have the right at any time to withdraw your consent to the processing of the information you have given by participating in a survey.

You also have the right to withdraw your consent at any time for ILRES S.A. to process the information you have given it by becoming a *MyPanel Member*, i.e. your contact details and demographic data. However, this request will result in your removal from the list of *MyPanel Members*, while your maintenance in this list requires the use of your contact data and demographic information. In addition, ILRES S.A. will keep the data concerning you insofar as it is required to do so in order to comply with its legal obligations, including in particular that of the ten-year conservation of its accounting documents, or when the conservation of this data is necessary for the exercise or defence of its legal rights.

- f) **Right to object:** You have the right to oppose the processing of your personal data by ILRES S.A.
- g) **Right to lodge a complaint with the supervisory authority:** In the event that you consider that ILRES S.A. does not respect your rights regarding the processing of your personal data, you may lodge a complaint with a supervisory authority. For the Grand Duchy of Luxembourg, this supervisory authority is the National Commission for Data Protection (<https://cnpd.public.lu>).

## 10. How can you exercise these rights?

You can exercise your rights concerning your personal data by writing to ILRES S.A., Atrium Business Park, 41, rue du Puits Romain, L-8070 Bertrange, or by email at the following address [DPO@ilres.com](mailto:DPO@ilres.com).

However, please note that ILRES S.A. will anonymise the personal data collected during the surveys as soon as possible, sometimes within a shorter period than the 3 to 6 months announced in point 6. above. It is therefore possible that your data has already been anonymised when you make your request.

A reply will then be sent to you as soon as possible and, except in special circumstances of which ILRES S.A. will inform you, at the latest one month following receipt of your request.