

Policy of ILRES S.A. regarding the processing of personal data during its telephone interviews

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 personal data during telephone surveys?

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

Telephone interviews are one of its effective and often indispensable working tools to obtain a representative survey sample.

Some of these surveys are conducted using telephone interviews during which the person contacted is invited to participate in the survey, without ever being forced to do so.

If the person contacted accepts, he/she answers the survey questions and ILRES S.A. uses the information provided to draw up a report in the form of statistics that it will give to its client, the survey sponsor, or that it will publish. In any case, these reports do not make it possible to identify the participant in the survey, the information concerning them having been aggregated beforehand.

The specific purposes of each survey will be communicated orally to the person contacted before submitting them 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 carry out this data processing?

This processing of personal data takes place on the basis of the consent of the persons who agree to answer the questionnaire and thus to give their opinion on the themes and products addressed in the surveys carried out by ILRES S.A.

However, ILRES S.A. attaches great importance to the respect of everyone's rights. In addition, when the person called asks not to be contacted in the future by phone for its surveys, it records the phone number in question on a "black list", and no longer dials that number.

ILRES S.A. will never force anyone to answer its surveys and will always ask orally if the person contacted agrees to participate. In the case of questions relating to particular categories of personal data, such as political opinion, data relating to health, or data not considered as particular by law, but which remains sensitive, ILRES S.A. will orally point out this circumstance before the person contacted participates. During the questionnaire, the participant will always be free not to answer any questions that might bother them.

4. Who is the data controller of these personal data?

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

ILRES S.A.

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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, or by 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 personal data used in telephone surveys and what happens to them?

ILRES S.A. collects the information that the participants in the survey communicate to it through the questionnaires which they answer. It combines these information and analyses them to produce reports that it publishes or provides to its clients in the form of statistics.

From 1st June 2019 onwards, ILRES S.A. will also use specific demographic information provided by participants, for example the municipality of residence of the user of the telephone number it has randomly generated as well as gender, nationality, working or retired status, etc.).

This information will be processed in order to create a high-quality database of telephone contacts. This will mean storing information that cannot identify a particular individual, but is needed to create stratified survey samples, i.e., put together by randomly selecting numbers from groups in the demographic categories required by the survey.

The operation of linking specific non-identifying demographic information to a telephone number rests on ILRES S.A.'s legitimate interest in having the tools it needs for the conduct of its economic activity, with this high-quality contact base being just one of such tools. To learn more about this use of demographic data to manage the database of contacts, see the notice "*How ILRES S.A. uses your telephone number*" at <https://www.ilres.lu/>.

ILRES S.A. treats all these information confidentially and keeps them secure.

6. What happens to these personal data and for how long are they kept?

The data collected through the questionnaire to which the persons contacted agree to respond are anonymised as soon as possible, depending on the survey, and in particular the duration of the survey. Indeed, for technical reasons, conducting a telephone survey requires temporarily keeping a link between the answers provided by the participant and the telephone number through which he or she was contacted, which is why as long as this link exists, these answers cannot be qualified as anonymous data.

ILRES S.A. will keep 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.

All the same, demographic data linked to the telephone number will be retained by ILRES S.A. for as long as it performs its economic activity, unless the user of this number objects to its doing so.

7. Where and how are these personal data stored?

ILRES S.A. takes every precaution to preserve the security of the information it is required to process. 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 these personal data to other persons?

From their collection to their analysis, the data and information obtained during telephone surveys can be 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.

These service providers only have access to the information essential to the performance of the task entrusted to them by ILRES S.A. This one contractually ensures that these service providers respect all the security measures required regarding 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 telephone surveys to its client, in aggregate form, and without the client being able to identify the participants.

No other personal data obtained during telephone surveys is transferred by ILRES S.A. to anyone unless such communication is required by law.

9. What are your rights regarding your personal data?

If ILRES S.A. processes personal data concerning you, you have the following rights:

- 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.
- b) **Right to rectification and erasure:** You have the right to ask ILRES S.A. to rectify your personal data in its possession which would be inaccurate. You can also ask ILRES S.A. to delete your personal data in its possession.
- 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 data controller, provided that this transfer is technically possible.
- e) **Right to withdraw 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.
- f) **Right to object:** If you withdraw your consent to the processing of the information you have given by participating in a survey, it will no longer be used. This withdrawal of consent will therefore have the same effect as if you opposed its processing.

Each person contacted by telephone has the right to ask not to be called again by ILRES S.A. for surveys, in which case the number will be placed on the "black list" and will no longer be dialled.

- 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.

However, please note that for data collected by telephone, without the identity of the respondent being collected, this request will require the telephone number used. ILRES S.A. also reserves the right to verify that the request is indeed made by the data subject, in particular by asking you to provide again some of the information you provided during the survey in which you participated.

Also note that ILRES S.A. will anonymise personal data as soon as possible, sometimes within a shorter period than the 3 to 6 months set out in point 6 above. It is therefore possible that your data has already been anonymised when you make your request, except for demographic data linked to the telephone number which is used in the context of the management of the database of contacts.

In any event, a reply will always 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.