

# PRIVACY POLICY AND INFORMATION NOTICE ON PROTECTION OF PERSONAL DATA

Last Updated Date: October 2019

This Privacy Policy and Information Notice on Protection of Personal Data ("Policy") has been drafted by the Company, which is the data controller as per the Personal Data Protection Law numbered 6698 (the "PDPL") and residing at the address of Esentepe Mahallesi, Büyükdere Cad. No. 127 Astoria / C02 Şişli, İstanbul in order to inform you about the following:

- To indicate the kind of personal data which the Company collects and processes,
- To indicate how such personal data is used,
- To explain with whom the company may share your personal data,
- To explain what your rights are on your personal data which are processed by the Company and how you can exercise those rights; and
- To explain communication channels regarding your requests.

## A. PROCESSED PERSONAL DATA AND LEGAL BASES FOR DATA PROCESSING

When you establish a commercial relationship with the Company, participate in the market research studies conducted by the Company, visit our offices and contact us, you share certain personal data with us.

### *1. We process your personal data for the following purposes and legal bases;*

Data Subjects	Purposes of Data Processing	Legal Basis for Processing
Participants of market research studies	To carry out various market researches on behalf of our clients within the scope of our activities	Pursuant to the Article 5 (1) of the PDPL, basing on your explicit consent
	To contact with the data subjects in order to verify the compliance of market research studies with the industry standards	
	Presenting the data we gathered within our studies at sector conferences in order to constitute exemplary research	
Employees of our clients	Promoting and announcing our company activities, models and events	
Employees of our clients, our suppliers and employees of our suppliers	To fulfil our liabilities arising from our contractual relationships (such as carrying out joint studies, providing services and meeting service demands, invoicing, etc.) with the clients.	Pursuant to the Article 5 (2) (c) of the PDPL; necessity of processing personal data of parties of a contract for executing or performing the contract

Data Subjects	Purposes of Data Processing	Legal Basis for Processing
Visitors of the Site	Managing important information, changes in policies, terms and conditions about the Site	Pursuant to the Article 5 (2) (f) of the PDPL; necessity of processing personal data for the legitimate interests of the data controller
Visitors of our offices	Ensuring our facility's security regarding office visits	

## *II. Special Categories of Personal Data*

As long as we do not specifically demand or request you to do so, we do not wish you to transmit any special categories of personal information (for example, information about race or ethnicity, political opinion, religion or other beliefs, health, criminal record or union membership) through the Site or otherwise.

### **B. TRANSFER OF YOUR PERSONAL DATA AND THE RECIPIENT GROUPS**

We can share the information collected within the scope of our relationships with our clients and during our market research studies, with the following recipient groups:

Data Subjects Whose Personal Data are Transferred	Purpose of the Transfer	Recipient Groups
Participants of market research studies	To carry out our market research studies	Clients, Kantar UK. Ltd. and affiliates at global level ( *the Affiliates may be established including but not limited to the following countries: France, England, Germany, the Netherlands), third parties which we procure services from
	To establish communication in order to conduct market research studies	Third parties which we procure services from
Employees of our clients	To establish communication in order to conduct market research studies	Our clients
Employees of our suppliers	Improve the operation of our Site	Kantar UK. Ltd. and affiliates at global level
Visitors of the Site		

Additionally, your Personal Data may be shared with regulatory and supervisory bodies, other official institutions and public institutions or organizations, which are authorized to request your personal data.

## C. THIRD PARTY WEBSITES AND THEIR SERVICES

Privacy, information and other applications of third parties which are placed on the Site or related to the Site and collecting your personal data regards to our relationship with you, including websites and web properties operated by third parties (also including without limitation, all types of applications) are not within the scope of the Policy and we are not responsible for such applications. The availability of, or inclusion of a link to such website or property on the Site does not imply endorsement of it by the company or shows company's aim on your redirection to the content of such links.

## D. SECURITY

We implement required organizational, technical and administrative measures in order to protect the personal data under our control. If you feel that your interaction with us is not secure anymore, (e.g. in case you feel that the security of any personal data you have disclosed to us has been compromised), please immediately notify us on the issue, as set out below in section "Your Choices and Rights".

## E. IP ADDRESSES AND COOKIES

<https://thesource.kantar.com/sites/data-protection/SitePage/175002/cookies-and-tracking>

## F. RETENTION PERIOD FOR YOUR DATA

We are legally responsible for keeping your data limited to our purposes for processing data and other legal obligations. Our data retention period is determined by considering many variables such as our data processing purpose, the sensitivity and extent of the data, the risk of data disclosure and our legal obligations.

## G. DATA OF THE CHILDREN

We do not invite children under the age of 16 directly to research activities without their consent. However, if the participation of children under the age of 16 is appropriate and necessary for certain projects, we take the required measures to grant appropriate consent from their parents or guardians.

## H. YOUR CHOICES AND RIGHTS

We kindly remind you that accuracy of the information which you disclose on the Site and retention of such information up-to-date is material for execution of your rights as per the PDPL and relevant legislation, and you will be responsible for liabilities, which may arise from misinformation.

As per the Article 11 of the PDPL you have the right to request,

- to learn whether your personal data are processed or not,
- to demand for information as to if your personal data have been processed,
- to learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose,
- to know the third parties to whom your personal data are transferred in country or abroad,
- to request the rectification of the incomplete or inaccurate data, if any,

- to request the erasure or destruction of your personal data under the conditions referred to in the PDPL,
- to request notification to third parties regarding that your personal data has been transferred, whether your personal data that has been processed incompletely or incorrectly has been corrected and your personal data has been deleted or destroyed,
- to object to a result against you, which occurs by analyzation of your data solely through automated systems,
- to claim compensation for the damage arising from unlawful processing of your personal data.

Additionally, you may exercise your rights regarding your personal data by applying us in writing via following address: Esentepe Mahallesi Büyükdere Caddesi No:127 Şişli – İstanbul or by sending an e-mail to [Privacy-TR@kantar.com](mailto:Privacy-TR@kantar.com).

## I. UPDATES TO THE POLICY

We may change the Policy. Please refer to the “**Last Updated Date**” placed above the Policy, in order to find out when the Policy is revised. Any updates in this Policy shall be deemed in force, once the revised Policy is published on the Site. Your use of the Site following such duly updates shall be deemed as you accept updates on this Policy.