

## Kantar Health, Privacy Policy

Last updated: 1 April 2021, Version 8.

### 1. Introduction

This Privacy Policy (the “Policy”) is provided by Kantar Health. The specific legal entities that act as controller of your personal data and are defined as “Kantar Health”, “we” or “us” for the purposes of this Privacy Policy are:

Kantar Health LLC, Diamond (KH) UK AssetCo Limited, Kantar Health SAS, Diamond (KH) Germany LocalCo, Kantar Health Srl, Diamond (KH) Spain AssetCo, Diamond (KH) China AssetCo, Diamond (KH) Singapore AssetCo, Diamond (KH) Taiwan AssetCo, Diamond (KH) Korea AssetCo, Diamond (KH) Israel EmployerCo, Kantar Health do Brasil, and ZEG GmbH, trading as Kantar Health or Evidencias.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us on [www.kantar.com/health](http://www.kantar.com/health) (“our Site”), or in our studies, will be processed by us. Taking part in our surveys and research is entirely voluntary. Please read this Privacy Policy carefully to understand our views and practices regarding your personal data and how we will treat it. By using this website, or by registering as a user of the services that we provide, you agree to agree to the processing of your personal data as described by the Policy. We ask you to read this privacy policy carefully.

As a global business, we are committed your privacy, and our obligations under the data protection laws which apply in your region (such as the General Data Protection Regulation (GDPR) or the California Consumer Protection Act (CCPA) For the purpose of this Privacy Policy, “personal data” means any information which relates to an identifiable living individual including a specific household if you are located in California.

### 2. Lawful Collection, Storage and Use of Data

Kantar Health collects information in several ways such as: our website(s), our mobile applications and other activities such as social media, apps and online, face to face or telephone studies.

We have set out below more detailed information about how we use your personal data (including the purpose, source, categories and legal basis for processing).

We will never misrepresent ourselves or what we are doing. If you receive an email that concerns you, purporting to be from us, please let us know as shown below in ‘How to Contact Us’.

Use Case	Purpose	Source	Data collected/process ed	Legal Basis
Operating our website	Ensure that content from our site is presented effectively, according on the device you are accessing it on. Analyse statistical data about users browsing actions and their patterns	We obtain this data from you directly.	IP address, operating system information, browser type	It is our legitimate interest to ensure that our site is presented to you in the most effective way possible

<p><b>Contacting you and/or providing you with information</b></p>	<p>To contact you and provide you with information regarding products or services that you request from us, or that we have determined may be of interest to you or to ask you to participate in market research studies.</p>	<p>We obtain this data from you directly, for example when you download reports or other content from our website, attended our events or conferences, or when you make an enquiry with us.</p>	<p>Name, email address, IP address, phone number, postal address, job title</p>	<p>We will seek your consent or we have determined that we have a legitimate interest in using your details to provide you with relevant information. Further information will be provided in the privacy statement provided prior to you submitting your data. You can withdraw your consent or opt out of communications</p>
<p><b>Market Research</b></p>	<p>To understand your views about certain products and services or to understand your behaviour in different situations</p> <p>To validate answers you gave in a recent survey we conducted.</p> <p>To administer participation e.g. sweepstakes, incentives, etc.</p> <p>To re-contact participants e.g. for ongoing and follow-up surveys</p>	<p>We obtain this data from you directly.</p>	<p>Unique identifier, contact details, email address, mobile number, voice, image, personal opinions, behaviors, and demographic information, such as your age and household composition., your health status, such as condition you may suffer or diagnose and treatments</p>	<p>Consent</p>
<p><b>Scientific Research for academics, public health organisations or Research Council institutes</b></p>	<p>Including but not limiting to clinical studies, health economics and outcomes research (HEOR), non-interventional studies (NIS), real world research (RWR), observational studies, epidemiology research</p>	<p>We obtain this data from you directly. and/ or combined with other secondary database</p>	<p>Identifier, contact details, email address, health data, e.g. disease, health status, diagnose, treatment pattern, unmet needs</p>	<p>Consent or public interest, for scientific research</p>
<p><b>Scientific Research for commercial companies and</b></p>	<p>Including but not limiting to clinical studies, health</p>	<p>We obtain this</p>	<p>Identifier, contact details, email address, health</p>	<p>Consent or legitimate interest,</p>

<b>charitable research organisations</b>	economics and outcomes research (HEOR), non-interventional studies (NIS), real world research (RWR), observational studies, epidemiology research	data from you directly. and/or combined with other secondary database	data, e.g. disease, health status, diagnose, treatment pattern, unmet needs	for scientific research
<b>Safety monitoring (Pharmacovigilance Adverse Events Reporting)</b>	Report Adverse Events during our studies to competent authorities	We obtain this data from you directly. and/ or combined with other secondary database	Identifier, contact details, email address, disease, treatment, product taken and adverse events	Consent, public interest or vital interests (in a health care safety context).
<b>Public Disclosure</b>	To share or disclosed pursuant to judicial or other government subpoenas, warrants, orders or pursuant to similar and other legal or regulatory requirements, we will provide such information to the appropriate authorities.	We obtain this data from you directly. and/ or combined with other secondary database	Identifier, name, contact details, email address, incentive received.	Consent, or public interest, legal obligation
<b>Fraud Protection</b>	Protection of our business interests against fraudulent behaviour or behaviour not in line with our Site Terms and Conditions.	We obtain this data from you directly. and/ or combined with other secondary database	IP address, browser specifications, device specifications, postal addresses, email addresses, official identification number (i.e. ME number)	Legitimate interests – we have a legitimate interest in protecting our business against fraud or other prohibited behaviour.
<b>Survey Participation Uniqueness</b>	Prevention of multiple entries in surveys by the same individuals in line with our Terms and Conditions	We obtain this data from you directly. and/ or combined with other secondary database	IP address, browser specifications, device specifications	Legitimate interests – we have a legitimate interest in maintaining quality data we produce

<p><b>Tracking of the Answers of Recurring Respondents (special research design projects)</b></p>	<p>When you participate in our surveys, we typically use a temporary ID which makes your answers in the survey anonymous to our clients. However, some of our clients have the specific research design need to understand how your opinion has evolved over a period of time. For this specific project type that we call "tracking" projects we will use persistent IDs and we will make this clear at the beginning of each of these surveys. Your survey responses will be considered as personal data and you will have the right to access them. Such projects will contain a notice on the very first page of the survey, so that you can identify them and decide whether or not to take part.</p>	<p>We obtain this data from you directly. and/ or combined with other secondary database</p>	<p>Persistent unique project-specific identifier</p>	<p>Legitimate interests – we have a legitimate interest in maintaining quality data we produce</p>
<p><b>Data Matching and Enrichment</b></p>	<p>We enrich the data we hold on file about you by matching your personal data with third parties. This will help us to improve your panel profile and ensure that we select relevant surveys for you.</p>	<p>We obtain this data from you directly. or combined with other secondary database</p>	<p>Persistent unique identifier, contact details, email address, social login, cookie, mobile device ID, official identification number (i.e. ME number)</p>	<p>Consent and legitimate interest to improve our database</p>

	<p>We utilize matching services (i.e. third parties who are specialized in data management) to acquire additional information about you from public and private data sources (such as social networks, retailers and content subscription services with whom you have an account) or to use your personal data as an aid to develop additional or new types of anonymous data sets (i.e. we compile your aggregate data with data from other consumers to create a new lifestyle segment). The matching service (our partner) holds the personal data we share for a short time, uses it to assemble the additional information, and then return the combined information to us. Partners are contractually bound to delete the data we share with them or and are not authorised to use it in any way other than for this specific purpose.</p>			
<p><b>Advertising Targeting and Media Buying Research</b></p>	<p>We use your personal data to help our clients and vendors enrich</p>	<p>We obtain this data from you</p>	<p>Persistent unique identifier, contact details, email address, social</p>	<p>Consent and legitimate interest to improve our database</p>

	<p>their data by using lookalike modelling techniques.</p> <p>Thanks to your participation in our surveys and your profile data, we can help our clients to improve their advertising targeting, and to create better online advertising models, through lookalike modelling or similar research methodologies. We will use your personal data we collect about you through profile building, participation in research surveys or data matching to match with third-parties and platforms (our partners).</p> <p>We include contractual safeguards to ensure that you will not automatically be targeted for commercial purposes as a result of your data being used to help create a lookalike audience, and that our partners cannot use your data for any other purpose.</p>	<p>directly. and/ or combined with other secondary database</p>	<p>login, cookie, IP address, mobile device ID, official identification number (i.e. ME number)</p>	
<p><b>Ad Exposure and Measurement</b></p>	<p>In addition to cookie-based matching (which you can control and consent to via your panel account), we will use personal data</p>	<p>We obtain this data from you directly. and/ or combined with other</p>	<p>Persistent unique identifier, contact details, email address, social login, cookie, IP address, mobile device ID, official identification</p>	<p>Consent and legitimate interest to improve our database</p>

	<p>you provide to us, such as email address, in a direct matching process with third parties (our clients and partners) to determine if you are a user of that service (such as social networks, websites, mobile apps) for advertising measurement research purposes. We will identify what advertisements you may have been exposed to on those sites and platforms and measure how brand attitudes or brand recall have impacted sales. The third parties that we work with are not allowed to use the data for any other purpose.</p>	<p>secondary database</p>	<p>number (i.e. ME number)</p>	
<p><b>Key Opinion Influence Mapping</b></p>	<p>To understand prescribing and treatment patterns and influence in given disease, therapeutic or expertise areas</p>	<p>We obtain this data from you directly. and/ or combined with other secondary database or public domain</p>	<p>Email address, social media handles</p>	<p>Consent and legitimate interest to understand treatment patterns and influence mapping</p>

**3. Where We Store Your Personal Data**

The data that we collect from you may be transferred to and/or stored outside your territory. It may also be processed by staff operating outside your territory who work for us or for one of our suppliers. If your personal data is transferred to, stored at or otherwise processed outside your country or territory, and that country or territory has not been recognised as providing an adequate level of data protection, we will put in place additional safeguards to protect your personal data, as required by applicable law. (for example, if you are in the EEA, standard contractual clauses would be used if we transfer or store your data outside the EEA).

#### **4. Third Parties (Clients and Suppliers) and Data Transfer Across Borders:**

We may share your personal data (including: name, age, email address, audio/video files, treatment and diagnosis) with companies within our group (Kantar) or vendors to fulfil data processing requirements, e.g. data matching, third party service providers, online ad effectiveness measurement, social media data interactions, scientific publication, pharmacovigilance/safety follow up, incentive payments etc. Where this processing occurs outside your region, we will put in place additional safeguards to protect your personal data as required by applicable law. (for example, if you are in the EEA, standard contractual clauses would be used if we transfer your data outside the EEA).

#### **5. Confidentiality, Security and Industry Requirements:**

We take appropriate technological and organisational measures to protect the personal information submitted to us, both during transmission and once we receive it. Our security procedures are consistent with generally accepted commercial standards used to protect personal information.

All our third-party contractors, site service providers and employees are contractually obliged to follow our policies and procedures regarding confidentiality, security and privacy.

We adhere to the following standards and industry requirements, according to your jurisdiction:

- ACIP (Association des Cadres de l'Industrie Pharmaceutique)
- ADESSAT (Association D'Etude et de Suivi de l'Aménagement du Temps de Travail)
- ADM (Arbeitskreis Deutscher Markt- und Sozialforschungsinstitute e. V.)
- AEDEMO (Asociación Española de estudios de Mercado, marketing y opinión)
- AFCROs (l'association française des sociétés de recherche sous contrat)
- AIMFA (Agrupación de investigación y marketing farmacéutico)
- AMCP (Academy of Managed Care Pharmacy)
- AMIPS (Association des Médecins de l'Industrie et des Produits de Santé)
- AMSRS (The Australian Market & Social Research Society)
- ANEIMO (Asociación de Empresas de Investigación de mercados y opinion)
- APM Health Europe (Medical press agency)
- ASOCS (Association Society of Opinion and Behavior in the Domain of Sante)
- ASSIRM (Italian Market Research, Studys of opinion and social research)
- BHBA (British Healthcare Business Intelligence Association)
- ENCePP® - European Network of Centres for Pharmacoepidemiology and Pharmacovigilance
- EphMRA (European Pharmaceutical Marketing Research Association)
- ESOMAR (European Society for Opinion and Marketing Research)
- Insights Association
- Intellus Worldwide
- ISOQOL (International Society for Quality of Life Research)
- ISPE (International Society for Pharmaco Epidemiology)
- ISPOR (International Society for Pharmacoeconomics and Outcomes Research)
- KORA (Korea Research Association)
- KRPIA (Korean Research-based Pharmaceutical Industry Association)
- Medicines Australia
- MRS (Market Research Society)
- SYNTEC (chambre SYNdicale des sociÉTés d'Études et de Conseils)

#### **6. Cookie Disclosures**



Cookies are small text files stored on your computer by a website that assigns a numerical user ID and stores certain information about your online browsing. They are used by web developers to help users navigate their websites efficiently and perform certain functions. The website sends information to the browser which then creates a text file. Every time the user goes back to the same website, the browser retrieves and sends this file to the website's server.

For behavioural tracking research, we use optional cookies / software applications, but only if you have given your explicit consent to such cookies / applications.

As is true of most online studies, we gather certain information automatically and store it in study data files. This information may include things like Internet Protocol addresses (IP address), browser type, Internet service provider (ISP); referring/exit pages, operating system and date/time stamp.

We use this automatically collected information to analyse trends such as browser usage and to administer the site, e.g. to optimise the study experience depending on your browser type. We may also use your IP address to check whether there have been multiple participations in the study from this IP address.

For further information, see our detailed Cookie Policy below.  
<https://www.kantar.com/cookies-policies>

## **7. Accuracy**

We take all reasonable steps to keep personal information in our possession or control, which is used on an on-going basis, accurate, complete, current and relevant, based on the most recent information made available to us by you and/or by our client.

We rely on you to help us keep your personal information accurate, complete and current by answering our questions honestly and you are responsible for ensuring that the data controller (which may be us or - more often - our client) is notified of any changes to your personal data.

## **8. Children's Data Collection:**

Kantar, Health Division recognizes the need to provide further privacy protections with respect to personal data collected from children. We never knowingly invite children under the legal age set by the authorities in the country in which you reside to participate in research studies without parental permission. If it is necessary and appropriate to a particular project to directly involve children under the legal age, we take measures to ensure we have been given permission by their parent or legal guardian.

Kantar, Health Division will provide parents and guardians information about the survey topic, about any personal or sensitive information which may be collected from the children, the way this data will be used and whether and with whom Kantar, Health Division may share such information.

While the child is completing the survey, it is the responsibility of the parent or guardian to supervise them. We do not sell children's personal data we have collected.

In certain circumstances, we may require additional consent for public health, regulatory, or commercial reasons. We will explain this to you and the reasons for requiring it at the time we ask for it.

## **9. Sensitive Data**

Kantar, Health Division may collect personal data that is classified as "special categories" of personal data. This includes racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. You can choose whether or not to provide this data to us.

## **10. Rights of Individuals:**

To request access to personal data that we hold about you, you should submit your request in writing to the e-mail address or postal address shown below in “*How to Contact Us*”.

To request access or deletion of personal data that we hold about you, you should submit your request in writing to the e-mail address or postal address shown below in “How to Contact Us”. When you make a request you should indicate the division of Kantar in which you are making the request – in this instance Kantar Health - and, any other relevant identifiers such as your Panel ID). If you contact us using an email address or contact details for which we do not hold a record of, we may request a copy of a valid government issued or official identification (such as drivers licence or passport).

You have the following rights in relation to your personal data:

- Right to change your mind and to withdraw your consent
- Right to access your personal data
- Right to rectify your personal data
- Right to erase your personal data from our systems, unless we have legitimate interest reasons for continuing to process the information
- Right to port your personal data (portability right)
- Right to restrict processing of your personal data
- Right to object to the processing of your personal data
- Right to opt out of the sale of your personal data if we sell your data.
- Right to not be discriminated against for exercising any of the rights available to you under applicable data protection laws.
- If you wish to exercise any of these rights (for example you no longer wish to receive marketing from us), you can use the link or unsubscribe button provided in our email correspondence, or see our contact details below in the “How to contact us” section.

If necessary, we will also notify third parties to whom we have transferred your personal data of any changes that we make on your request. Note that while Kantar Health communicates to these third parties, Kantar, Health Division is not responsible for the actions taken by these third parties to answer your request. You may be able to access your personal data held by these third parties and correct, amend or delete it where it is inaccurate.

## **11. Data Storage and Retention**

Personal information will be retained only for such period as is appropriate for its intended and lawful use, in this case we shall retain data for no longer than 12 months, unless otherwise required to do so by law, or contractually agreed by our clients. Personal information that is no longer required will be disposed of in ways that ensure their confidential nature is not compromised.

As part of the Company Business Continuity plan and as required by ISO 27001, ISO 9001, ISO 20252 and in certain instances the law, our electronic systems are backed up and archived. These archives are retained for a defined period of time in a strictly controlled environment. Once expired, the data is deleted and the physical media destroyed to ensure the data is erased completely.

## **12. Updates to our Privacy Policy:**

We keep our privacy policy under regular review and it may be amended from time to time and at least every 12 months. We will always have the most up-to-date policy on this web page. We will record when the policy was last revised.

Last updated: 1 April 2021

## **13. How to Contact Us:**

Our General Counsel and Data Protection Officer is Gillie Abbotts-Jones. Questions regarding this Privacy Policy and access requests should be directed to [info@kantarhealth.com](mailto:info@kantarhealth.com) or 6 More London

Place, London, UK. If you are located in the United States, a toll-free number to contact us for privacy queries is provided on [kantar.com](http://kantar.com).

#### **14. Complaints & Country Specific Disclosures:**

If you consider that our processing of your personal data infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state or jurisdiction of your habitual residence, your place of work or the place of the alleged infringement. To find the contact details of your country supervisory authority, please consult our dedicated page:

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