

## **GfK PRIVACY POLICY FOR UNITED STATES CITIZENS**

### **Last Updated 7/20/2019**

GfK is committed to protecting the personal information of United States citizens. This privacy policy (“Policy”) explains how we use the Personal Information we have about you, including Personal Information collected when you visit our websites or other electronic platforms (collectively, the “Site”). It applies to GfK affiliates operating globally (hereinafter, “GfK,” “we,” “us” or “our”).

GfK consists of the legal entities listed <<[here](#)>>, together forming the “GfK Group.” GfK SE is the entity responsible for this privacy notice and it is issued on behalf of the GfK Group.

GfK SE  
Sophie-Germain-Strasse 3-5  
90443 Nuremberg  
Germany

Entered in the Commercial Register at the District Court: Nuremberg, HRB 25014

When referring to “GfK,” “we,” “us,” or “our” in this privacy notice, we are referring to the relevant entity of the GfK Group responsible for processing your personal data. We will inform you which GfK entity is the controller of your personal data when we engage with you as a data subject.

We may update this Policy from time to time. The “Last Updated” legend at the top of this page tells you when this Policy was last revised. Changes will be effective as soon as the updated policy is posted on the Site. We may notify you of material changes to our Policy using the contact details we have about you. Do not use the Site or provide us with your Personal Information if you do not agree with this Policy.

This Policy supplements, but does not replace, other privacy policies provided to you at the time we collect Personal Information from you. Personal Information of United States citizens collected in connection with consumer surveys is governed by a separate privacy policy, which you can access <<[here](#)>>.

### **1. Information We Collect**

In the last 12 months, we may have collected the following categories of personal information (“Personal Information”) from you or about you:

- Personal identifiers, such as names, postal and email addresses, and phone numbers;
- Personal characteristic, such as age, gender, race, and ethnicity;
- Username and password;
- Financial information, such as bank account and payment card details, details about payments to you or received from you, as well as details of products and services you have purchased from us;

- Employment application information we collect from you if you apply for a job at GfK, such as data concerning your professional life, information included in your CV, graduation or other relevant certificates, and employers' references;
- Marketing and communications information, including your preferences in receiving marketing materials from us and from third parties, your preferred communication channels;
- Electronic information, including some Internet Protocol ("IP") addresses, browsing history, and search history, where such information is linked to you;
- Other personal information that you voluntarily provide to us when you complete our surveys, participate in our campaigns, or otherwise engage with us on our Site.

We also collect information that is not considered Personal Information (referred to as "Other Information" in this Policy) because it cannot be used to identify or describe you, or because it is considered public data. This information may include:

- Monitoring data, such as computer type, browser type, screen resolution, and other statistical data involving use of our Site.
- Aggregated data, such as general and aggregated information where the end product cannot be used to personally identify you or any other user of our Site.

## 2. How We Collect Information

We collect Personal Information when you voluntarily provide it, such as when you contact us through the Site, apply for a job or position with us, or subscribe to our services or publications. We also collect Personal Information when you interact with our Site, take an online survey, or when downloading content, or by logging into our client resources platforms. We may supplement this information with personal information about you obtained from third parties. For more information on our privacy practices with respect to consumer surveys, see our GfK US Consumer Surveys Privacy Notice <<[here](#)>>.

We also use various data collection technologies to collect both Personal Information and Other Information:

- **Cookies:** To enhance your experience of the Site, we may use cookies. These are data that a web server transfers onto an individual's computer for recordkeeping and other purposes. If you do not want information collected through the use of cookies, you can disable or decline cookies via your Internet browser. More information can be found on your browser's website. Please be aware that if you choose to disable cookies, all features of our Site may not operate as intended.
- **ETracker Technology:** We use etracker technology to anonymously collect data about the behavior of visitors to our Site. The data collected with this technology is not linked to any Personal Information or otherwise used to identify any person. If this data is linked or reasonably linkable to an individual, we will treat this linked data as Personal Information under this Policy.

- Hubspot: Parts of our Site use HubSpot to personalize your web experience. HubSpot uses cookies to collect Other Information about you. If you voluntarily provide us Personal Information (such as your name, email address, or phone number), HubSpot may link that Personal Information to the Other Information it collects.
- Social Media Plug-Ins: We may collect information that you have made public via your social media accounts. As a convenience to you, our Site uses plug-ins from social media networks like Facebook, Twitter, and LinkedIn. These plug-ins are indicated by the social networks' respective logos on the Site and are used to establish a direct connection with the servers of these social networks. Integration of the plug-in allows the social media network to receive information that you have loaded onto our Site. For example, if you are logged in with Facebook while you use our Site, the plug-in will be able to assign your visit to your Facebook account. This information exchange takes place automatically. To prevent this exchange, you can log out of your social network before using this Site and/or disable cookies through your web browser.

### **3. Why We Collect Information**

We collect Personal and Other Information for both business and commercial purposes. Business purposes are operational, and when we collect Personal Information for these reasons, we do so only to the extent necessary to achieve our operational purpose. Commercial purposes are related to our economic interests. For information on why we collect Personal and Other Information via our consumer surveys, see our GfK US Consumer Surveys Privacy Notice <<[here](#)>>.

We collect Personal Information for the following purposes:

#### Business Purposes

- To maintain and improve our Site;
- To respond when you contact us;
- To make decisions about the possible conclusion of an employment contract;
- To audit our compliance with relevant law;
- To detect and prevent data security risks; and
- To administer user accounts.

#### Commercial Purposes

- To deliver services to you;
- To request feedback about our Site and/or services;
- To improve our products and services;
- To improve our internal marketing plans and materials;
- To communicate with you about services and/or products that we believe will interest you, with your consent; and
- To give you access to the non-public areas in our Site.

#### 4. When We Share Information With Others

It is not our practice to sell the Personal Information collected from your use of our Site. We have not sold any Personal Information collected under this policy in the last 12 months. If you would like to learn more about how we sell data collected via our consumer surveys, please consult the GfK US Consumer Surveys Privacy Notice, available <<[here](#)>>.

We may share the categories of Personal Information listed in Section 1 with our affiliates and third parties as follows:

- With our affiliates during the past 12 months: The GfK group consists of several companies. Your Personal Information may be transferred to other entities within the GfK group for business purposes.
- With service providers during the past 12 months: Service providers are entities employed by us to help run our business. We share Personal Information with service providers for our business purposes. They are contractually prohibited from using or sharing your Personal Information for any reason other than the task for which they were hired.
- With law enforcement, response to emergencies, and compliance: We may use and disclose your Personal Information to others as we believe to be appropriate: (a) to comply with laws, rules, or regulations in any country in which we operate, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from government or public authorities, including government and public authorities outside your country of residence; (d) to enforce our Terms of Use; (e) to protect our operations or those of any affiliated entities; (f) to protect our rights, privacy, safety or property, and those of our affiliated entities, you, or others; and (g) to permit us to pursue available remedies or limit the damages that we may sustain.
- With a corporate sale or organization: We may disclose or transfer any and all Personal Information to an affiliated entity or third party (and their respective advisors) in connection with any reorganization; merger; sale; joint venture; assignment; transfer; or other disposition of all or part of our business, assets, or stock (including in connection to bankruptcy or similar proceedings).
- With a joint venture partner in the past 12 months: We disclose or transfer any and all Personal Information to an affiliated entity or third party (and their respective advisors) in connection with a joint venture.

#### 5. Your Rights

You have the following rights regarding your Personal Information:

- You can request information about our collection and use of your Personal Information over the past twelve (12) months concerning: (i) the categories of Personal Information we collected about you, (ii) the business or commercial purpose for collecting or selling

your Personal Information, (iii) the categories of sources from which your Personal Information is collected, and (iv) the categories of third parties with whom we share your Personal Information. You can request a list disclosing the categories of your Personal Information we may share in connection with our business purpose.

- You can request to receive a copy of your Personal Information in a structured, commonly used, and machine-readable format.
- You can request that we delete your Personal Information, subject to certain legal exceptions communicated to you in response to your request, as applicable.
- You can opt out of direct communication from us regarding services and/or products we believe will interest you by clicking the “Unsubscribe” link that appears at the bottom of the email.
- We will not treat you differently because you have exercised one of the rights outlined above. Our decision to deny your request pursuant to this Policy as permitted by law does not constitute discrimination.

## **6. How to Exercise Your Rights**

If you would like to submit one of the requests described above, you may use either of the following methods:

- Call our toll-free number (1-800-209-8242) and make your request.
- Submit your request via email to [dpo.americas@gfk.com](mailto:dpo.americas@gfk.com).
- Write to us at: GfK US  
Attn: Privacy Requests  
200 Liberty Street  
4th Floor  
New York, NY 10281

To opt out of direct communication from us, you can use one of the above methods or click the “Unsubscribe” link that appears at the bottom of every email we send.

### Verifying Your Request

To verify that the request is really coming from you, we may request additional personal information permitted by law. We will use this information only to confirm your identity. We will delete any additional information collected for verification purposes as soon as we have verified your identity. If we are unable to verify your identity, we will not be able to comply with your request.

### Authorizing an Agent

You may designate an authorized agent to make the request for you. Authorization must be done

in writing and signed, and the writing must identify the agent and explain what request they are authorized to make. Your authorized agent must include a copy of this writing with the request. If your agent has power of attorney pursuant to applicable law, you are not required to complete a signed writing. However, your agent must submit proof of the power of attorney with the request. If your agent does not submit proof of authorization with the request, we will deny the request.

### Responding to Your Request

We will let you know that we have received your request within 10 days of the date you submitted the request. Our response will also include information about how we will verify your request and when you should expect a response. We will substantively respond to requests to know and delete within 45 days of the date we received the request.

If you have requested that we delete your Personal Information, we may comply with that request by:

- Permanently and completely erasing the Personal Information from our system;
- De-identifying the Personal Information (so that the information cannot reasonably identify, relate to, or describe a particular person); or
- Aggregating the Personal Information (compiling information among a group of consumers and removing consumer identities, so that the information cannot reasonably be linked to an individual or household).

When we respond to your request, we will specify the manner in which we have complied. We will maintain a record of your request to delete as required by applicable law, for a minimum period of 24 months.

### Exceptions

We will be unable to comply with consumer requests in certain circumstances:

- We cannot comply with requests to know specific pieces of personal information if that disclosure would create a substantial, articulable, and unreasonable risk to the security of that information, a consumer account, or our business.
- We will not disclose any government-issued identification number, financial account number, health insurance or medical identification number, account password, or security questions/answers.
- We will not disclose information when disclosure violates federal or state law.
- We will not delete information that is de-identified.
- We may be required to retain personal information for compliance with legal obligations and statutory retention provisions.

If we deny your request, we will inform you of our decision and explain the basis for denial.

## **7. Data Security**

We take steps to protect your Personal Information from unauthorized or unlawful processing; improper disclosure, alteration, deletion, destruction, or damage; and accidental loss. Our safeguards include, but are not limited to, pseudonymization and encryption of data. In addition, our systems are periodically subjected to security assessments, and all GfK employees who work with personal information are regularly trained in the correct handling of personal information.

## **8. Links to Third-Party Sites**

The Site may contain links to other websites, such as social media websites. Please be aware that we are not responsible for the privacy practices or the online content of such third parties. Those privacy policies may differ from ours. We encourage you to read the privacy policy of each third party website you visit before sharing your information with that third party.

## **9. Do Not Track Disclosure**

We do not support Do Not Track browser settings and do not currently participate in any “Do Not Track” frameworks that would allow us to respond to signals from you regarding the collection of your Personal Information or cookie data.

## **10. Protecting Kids’ Privacy**

Our Sites are not intended for use by children under the age of 16. We do not knowingly collect Personal Information from children on this Site, and the Site is not intended to attract children. If you believe we have collected Personal Information about your child, please contact us using the Contact Information in Section 11, below.

## **11. Contact Information**

If you have questions about this Policy, please contact us at:

- Address: GfK US  
Attn: Privacy Requests  
200 Liberty Street  
4th Floor  
New York, NY 10281
- Phone: 1-800-209-8242
- Email: [dpo.americas@gfk.com](mailto:dpo.americas@gfk.com)

If you choose to contact us via email about this Privacy Policy, please mark the subject heading of your email “Privacy Inquiry.”

## **12. California Residents**

If you are a California resident, you may request information about our disclosure of personal information to third parties or affiliated companies for their direct marketing purposes. To make such request, please submit a written request to the following email address specifying that you want a copy of our "California Privacy Rights" notice: [dpo.americas@gfk.com](mailto:dpo.americas@gfk.com).

Please include "Attn: California Privacy" in the subject line. We are not responsible for notices that are not labeled or sent properly, or do not have complete information. Please allow up to 30 days for us to process your request. You may submit such a request once per year.

Non-affiliated third parties are independent from us and if you wish to receive information about your disclosure choices or stop communications from such third parties, you will need to contact those non-affiliated third parties directly.