

CCPA Privacy Policy

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CCPA Privacy Policy

Introduction

What is CCPA?

CCPA stands for California Consumer Privacy Act it's a law that went into effect January 1st, 2020. This law provides consumers (California Residents) with specific rights regarding personal information. This document will describe your rights under CCPA and also cover how to exercise them with GDCC.

Data controllers and service provider

Who is responsible for your data?

GDCC is a Data Collection or Market Research company. In a market research survey, different parties come together to form the 'research chain'. It begins with the research sponsor and this is the company that decides they want to run a market research project. Next comes the research agency that designs the survey and will report its findings back to the research sponsor. Then comes the fieldwork agency (in this case GDCC) that implements the survey online or over the phone and speaks to respondents all the over the world to collect the opinions and insights that are needed to write the reports. In addition, some other third-parties might get involved to help with some specialized elements of the project, which will vary widely project by project.

Under the applicable data protection legislation, a data controller is the entity that determines the purpose for which ("why") and the manner in which ("how") data is processed. On the other hand, a service provider will act on the specific instructions of the data controller and hold your details for only as long as necessary to complete the work requested of them by the data controller. In any market research project, there will often be more than one data controller and it may also include the support of multiple service providers. All of these parties are legally-bound to protect your privacy and give effect to your rights provided by CCPA.

Exercising your rights provided under CCPA

Access

At any time, you can request access to the personal data we hold about you. This request can be made for free, twice per year. Once you get in touch, we will need to determine whether we are the data controller for your personal details. If we are not, we will ask you to get in touch, speak directly with the data controller or ask you if we can get in touch with them on your behalf. If we are the data controller, you may be able to access this personal data, and correct, amend or delete it, except in the following circumstances:

- The cost of doing so would be disproportionate and unreasonable; or
- We could not release your data without releasing data from other individuals, or confidential commercial information of GDCC or our clients

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Portability

- Based on your consent for us to process data, you also have a right to portability, which means you can request to receive personal data you provided to us in a format that is easy to read and that could be reused by others, if you wanted to share it with another data controller.

Information GDCC will Provide

The following must be included when providing information under right of access:

- The **categories of personal information** GDCC collects about the consumer
- The categories of **sources** of the consumer's personal information
- GDCC **or commercial purpose** for collecting or selling the consumer's personal information
- The categories of any **third parties** with whom GDCC shares the consumer's personal information
- The **specific pieces of personal information** collected about the consumer

Rectification

You can also ask us to rectify the records we hold on you. Inaccurate information can lead to frustration or misleading communication, and we are committed to making sure the information we hold on you is as accurate as possible. We work hard to keep personal information in our control accurate, complete, current and relevant, based on the most recent information available to us. We rely on you to help us keep your personal information accurate and current by answering our questions honestly.

Erasure

You also have a right to erasure, also known as the 'right to be forgotten'. If you consented to our holding or processing your data, you have a right to have any data we hold for you erased if you want to withdraw your consent. Because we often contact you on behalf of other companies that may have shared your contact details with us, we will sometimes need to get back to the company that shared your details and advise them of your decision to withdraw consent. There are limits to what this right to erasure can accomplish: if we erase all your details, we may be in contact with you again by random chance simply because market research must often get in touch with a representative sample of the population; it does not mean we kept your details, but that they came up in random sample selection.

Restriction

You are also allowed to exercise your right to restrict the processing of your personal data. The right to restrict means that we will no longer do any further processing with your data, other than storing your details for the sole purpose of making sure we do not carry out any further data processing; we would do nothing else with your details. This is often the best way to prevent any further contact from us because it allows us to keep just enough information to make sure your contact details are excluded from any subsequent projects.

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Objection

As mentioned, we may sometimes share your personal data with 3rd-party vendors for quality control purposes. Because our legal basis for doing so is legitimate interests, you have a right to object to this processing. Any vendors we contract will operate in accordance with data protection legislation and will make it clear to you when first contacting you that you may object to this processing at any time – this will be communicated to us and acted upon.

Timelines and identity verification

If you want to exercise any of these rights, please contact us via e-mail or postal mail at the contact details provided under 'Getting in touch'. Our teams will try to act on your requests no later than 30 days after receipt. If we require more time, we will let you know within this timeframe. We may need to get in touch first to ask for additional information confirming your identity, so that we do not act on malicious or fraudulent requests.

This information will only be stored to verify that your request is genuine after which it will be destroyed; it will not be used for any other purpose. If your request is likely to affect other data subjects, we may take additional verification steps, but this will be communicated to you in writing. If we cannot deliver on your request at all, we will be in touch in writing to explain why. If the request is deemed unreasonable or excessive, we may request you to pay a small fee before we send you a copy of your data – this will be kept to a reasonable amount.

Withdrawing consent and withholding information

No obligations in research

If you previously consented to our processing your personal data, you can withdraw this consent at any time. There are three methods for you to do so:

1. **Over the phone** If you would like to do so over the phone during a survey, please let our telephone interviewers know and we will act on this immediately. We will end the interview and record your consent withdrawal for that survey.
2. **Over the phone via toll free number** If you decide you no longer want us to process your data please call 1800-729-6774 and we will be available to assist with this. Any information you can provide about the survey you completed (such as study ID or topic) will allow us to help you as efficiently as possible.
3. **E-mail** If you no longer want us to process your data for any purpose, including future survey invitations, please e-mail us at compliance@gdcc.com to let us know.

When you participate in our research, we may ask you for your personal opinions, as well as demographic information, such as your age and household composition. You are under no obligation to answer any question we ask you and you can discontinue participation in a study at any time.

Confidentiality of survey responses and personal data

When working on reports or feeding back the results of surveys we conduct, we include your responses in a list with all the other participants and report this in a file to our client where you are not identifiable.

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This may then be used by our client to report to the research sponsor with findings from the survey. We will never report your individual survey responses or convey them in such a way that you are personally identifiable in the file, with a few exceptions. We may disclose your data and survey responses to 3rd-parties as follows:

1. You request or consent to sharing your identifying information and individual responses with the third parties for a specified purpose;
2. We provide your responses to a 3rd-party who is contractually bound to keep the information disclosed confidential and use it only for research purposes; this may be to ensure they do not contact you again to take part in a survey you already completed or for quality control purposes;
3. In the rare but possible circumstance that the information is subject to disclosure pursuant to judicial, legal or regulatory requirements.

Your survey responses may be collected, stored or processed by our affiliated companies or non-affiliated vendors, both within and outside the EU. They are contractually bound to keep any information they collect and disclose to us or we collect and disclose to them confidential and must protect it with security standards and practices that are equivalent to our own, no matter where they themselves are based. See 'International transfer of data'.

Security of personal information

We are ISO 27001 certified. In essence this means that, throughout our organization, we have processes and procedures in place to minimize any risk of unauthorized people accessing any data.

We inform and train our employees about our policies and procedures regarding confidentiality, security and privacy, and we emphasize the importance of complying with them. Our security procedures are consistent with generally accepted commercial standards used to protect personal information and are reviewed regularly to ensure this is maintained.

We may transfer personal information to affiliated companies or non-affiliated vendors for research-related purposes, such as data processing. We require these companies to safeguard all personal information in a way that is consistent with our measures and as regulated by law. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. These include encryption, password-protection, secure file transfer and other measures like limiting the number of users that can access your information at any point in time – we review this on a regular basis.

Retention of data

We will always make sure to keep only the data we need and only for the time we need it for. We review the data we hold on a regular basis. If we find the purpose for which we collected it is no longer relevant – we delete it. We also strive to collect only the data we need.

The specific timeframe will vary but if we have no business or legal need to keep it, we will either delete it securely or anonymize it to ensure no one can ever link you to it.

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Getting in Touch

We have appointed a Data Protection Officer who is the point of contact for any questions you may have in relation to this Policy, your personal data and how we use it. The DPO also acts as the point of contact for any organization or regulatory body that would have questions about your data and how we use it. If you have any questions, including about this Policy, please call 1800-729-6774, e-mail our DPO on compliance@gdcc.com or reach out by postal mail to:

FAO: Data Protection Officer

Global Data Collection Company BV (GDCC)

1170 Financial Blvd Suite 500, Reno, NV 89503