



Information Resources, Inc. (“IRI”) GDPR Notice

Effective May 25, 2018

Information Resources, Inc. and its subsidiaries (collectively referred to as "IRI", the “Company”, "we", or "us") takes its data protection and privacy responsibilities under the General Data Protection Regulation ("GDPR") seriously.

This privacy notice explains how we collect, use and share personal information in the course of the business activities of our EU companies, and those of our non-EU companies which relate to the offering of goods and services to, or the monitoring of, individuals in the EU.

- [What personal information we collect and when and why we use it.](#)
- [How we share personal information within IRI and with our service providers, regulators and other third parties](#)
- [Explaining more about Direct Marketing, Profiling, and Automated Decision Making](#)
- [Transferring personal information globally](#)
- [How we protect and store personal information](#)
- [Legal rights available to help manage your privacy](#)
- [How you can contact us for more support](#)

We may amend this notice from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check these pages for the latest version of this notice.

You might find external links to third party websites on our website. This privacy notice does not apply to your use of any third party site.

Important information about IRI:

The IRI entity responsible for your personal information will be the IRI company that originally collects information from or about you. This will often be apparent from the context - for example, if you represent an IRI customer and are used to dealing with our local affiliate in (for example) the UK or Italy. This may also be explained in separate notices made available when your personal information are first collected by that IRI entity, for example where you or the business you work for engages us to provide a service.

You can find out more about IRI at www.iriworldwide.com or by contacting us using the information in the contact us section.

WHAT PERSONAL INFORMATION WE COLLECT AND WHEN AND WHY WE USE IT

In this section you can find out more about

- the types of personal information we collect
- when we collect personal information
- how we use personal information
- the legal basis for using personal information

WHEN WE COLLECT INFORMATION

We collect information about you if you:

- use our websites;
- do business with us as a representative of one of our customers or suppliers;
- apply for a position with IRI - in which case, you should refer to our separate privacy notices for applicants
- contact us with any form of query or complaint;
- visit an IRI office or site;
- subscribe to marketing communications from us; or attend an IRI event, collectively ("you").

We also process personal information on behalf of our customers when we provide our services to them.

When we do this, we act as a "data processor" under relevant data protection laws, whilst our customer (or potentially a third party) will be the relevant "data controller". If you have concerns or questions about our processing of your personal information in the contexts of IRI's services, you should contact our customer. Please note that if you contact us directly, we may need to disclose your request to the relevant customer.

PERSONAL INFORMATION WE COLLECT AND USE

Depending on the context in which we interact with you, the information we collect is likely to include:

- your name;
- your contact details;
- profile / log-in details;
- your marketing preferences;
- CCTV images or identification details (such as in a visitor signing-in book) which may be captured if you visit an IRI office or site;
- any other personal information you provide in correspondence with us, for example where this is relevant to a complaint or query.

Through your use of our websites, we will also collect information - such as IP address and browser generated information (browser type, operating system), as well as information about your browsing session. We do not use this information to identify you as an individual, but in order to tailor or enhance your browsing experience, or in aggregate with data of other users for statistical purposes.

THE PURPOSE AND LEGAL BASIS FOR USING YOUR PERSONAL INFORMATION

Your personal information will be used for the purposes listed in the table below. We will only collect, use and share your personal information where we are satisfied that we have an appropriate legal basis to do this. We have also described the legal bases which we rely in the table. The legal basis we rely upon will impact which rights you have in relation to your personal information (see section below for more details):

Purpose	Legal Basis
Market our products and services	Legitimate interest in contacting customers and potential customers to promote our products and services; or (where required by law) Consent.
Interact with you at events.	Legitimate interest in networking with business contacts and promoting our products and services.
Do business with our partners and suppliers (for example, maintaining CRM records, contacting you about your business with IRI, invoicing).	Legitimate interest in contacting our partners and suppliers; or Compliance with a legal obligation.
Resolve customer queries and complaints.	Legitimate interest in resolving queries and complaints; or Compliance with a legal obligation.
Provide you with access to all parts of our websites, personalize your experience on our websites, and ultimately improve the functionality of the websites for the benefit of all users.	Legitimate interest in providing an enhanced, customer friendly website by understanding how our website is used.
Manage recruitment.	Legitimate interest in selecting appropriate candidates and Consent directly from the applicant to retain data for future opportunities. Please refer to our separate applicant privacy notices
Protect our employees and guarantee the security and safety of our sites.	Legitimate interest in protecting our employees and preventing crime; or Compliance with a legal obligation.
Process hashed or pseudonymized loyalty card numbers, loyalty transaction data, and survey panelist personal data on behalf of our clients in the capacity of a Data Processor.	Performance of a contract with our clients and Consent obtained by our client's acting as Data Controllers.

SHARING PERSONAL INFORMATION WITHIN IRI, WITH OUR SERVICE PROVIDERS, AND WITH OUR REGULATORS

In this section you can find out more about how we share personal information:

- within IRI
- with third parties that help us provide our products and services; and
- our regulators; and other third parties.

We share your information in the manner and for the purposes described below:

- within IRI, where such disclosure is necessary to provide our customers with our services or to manage our business;
- with third parties who help manage our business and deliver services. These third parties have agreed to confidentiality restrictions and use any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us. These include IT service providers who help manage our IT and back office systems, marketing automation providers and events companies;
- with our regulators, such as data protection supervisory authorities, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies.
- we may share in aggregate, statistical form, non-personal information regarding the visitors to our website, traffic patterns, and website usage with our partners, affiliates or advertisers.
- If, in the future, we sell or transfer some or all of our business or assets to a third party, we may disclose information to a potential or actual third party purchaser of our business or assets.

EXPLAINING MORE ABOUT DIRECT MARKETING

In this section you can find out more about

- how we use personal information to keep you up to date with our products and services.
- how you can manage your marketing preferences
- when and how we undertake profiling and analytics
- when and how we carry out automated decision making

How we use personal information to keep you up to date with our products and services

We may use personal information to let you know about IRI products and services that we believe will be of interest to you. We may contact you by email, post, or telephone or through other communication channels that we think you may find helpful. In all cases, we will respect your preferences for how you would like us to manage marketing activity with you.

How you can manage your marketing preferences

To protect privacy rights and to ensure you have control over how we manage marketing with you:

- we will take steps to limit direct marketing to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you;

- you can ask us to stop direct marketing at any time - you can ask us to stop sending email marketing, by following the 'unsubscribe' link you will find on all the email marketing messages we send you. Alternatively you can contact us at Privacy.Officer@IRIWorldWide.com. Please specify whether you would like us to stop all forms of marketing or just a particular type (eg email); and
- you can change the way your browser manages cookies, which may be used to deliver online advertising, by following the settings on your browser.
- We recommend you routinely review the privacy notices and preference settings that are available to you on any social media platforms as well as your preferences within your IRI account.

TRANSFERRING PERSONAL INFORMATION GLOBALLY

In this section you can find out more about:

- how we operate as a global business and transfer data internationally.
- the arrangements we have in place to protect your personal information if we transfer it overseas.

IRI operates on a global basis. Accordingly, your personal information may be transferred and stored in countries outside of the EU, including in particular in the United States of America, that are subject to different standards of data protection. IRI will take appropriate steps ensure that transfers of personal information are in accordance with applicable law and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangement are in place to protect your privacy rights.. To this end,:

- transfers to IRI in the United States are covered by the EU-US Privacy Shield Scheme. More information about our adherence to this scheme and the rights available to you under the Scheme can be found in our [Privacy Shield Notice](#);
- where we transfer your personal information outside IRI or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield or contractual mechanisms such as the Standard Contractual Clauses; or
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed.

You have a right to contact us at Privacy.Officer@IRIWorldWide.com for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

In limited circumstances, transfers of your personal information may be based on context specific derogations which permit transfers in the absence of safeguards, such as where a transfer is necessary for the establishment, exercise or defense of legal claims.

HOW WE PROTECT AND STORE YOUR INFORMATION

Security

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, or the unauthorised disclosure or access

to such information appropriate to the nature of the information concerned. Measures we take include placing confidentiality requirements on our staff members and service providers; limiting access to personal information; and destroying or securely restricting or anonymising personal information if it is no longer needed for the purposes for which it was collected. As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect (where relevant) user names and passwords please take appropriate measures to protect this information.

Storing your personal information

We will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this notice. In some circumstances we may store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, accounting requirements.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information. More detailed information about your rights is included further below.

Please note that, as explained above, we do not legally control personal information which we process in the context of providing services to our customers. Consequently, if you wish to exercise any rights in respect of this information, you should contact our customer, who will work with us to ensure that your rights are satisfied.

- The rights potentially available to you are:
- To access personal information
- To rectify / erase personal information
- To restrict the processing of your personal information
- To transfer your personal information
- To object to the processing of personal information
- To object to how we use your personal information for direct marketing purposes
- To obtain a copy of personal information safeguards used for transfers outside your jurisdiction
- To lodge a complaint with your local supervisory authority

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us at Privacy.Officer@IRIWorldWide.com. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of; (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred.

Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see [right to object](#)); or
- it has been processed unlawfully; or
- to comply with a legal obligation to which IRI is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims;

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

Please note that it is unlikely that we will carry out processing as a data controller which comes within the scope of this right, except potentially in relation to data processed for direct marketing purposes.

Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Right to object to how we use your personal information for direct marketing purposes

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

CONTACT US

The primary point of contact for all issues arising from this privacy notice, is our Global Data Protection Officer, who can be contacted at: Privacy.Officer@IRIWorldWide.com

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to contact us first. We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

To contact your data protection supervisory authority

You have a right to lodge a complaint with your local data protection supervisory authority (i.e. your place of habitual residence, place or work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before your local supervisory authority.