

# Privacy Policy – DMR Panels

## Introduction

As a global data company and provider of research insights, we take privacy and data security very seriously, and believe that everyone's personal data should be handled responsibly and ethically. We know that without the trust of everyone who participates in our research, we could not produce the research that helps our clients make better decisions.

We've tried to make this notice as easy to read as possible, but if anything is unclear, please contact us at [dataprotection@damolekuleresearch.com](mailto:dataprotection@damolekuleresearch.com), and we'll be happy to clear it up.

## What this notice covers

As an organisation that relies on the use of personal data, DMR Panels is responsible for collecting and using your data in a responsible and secure way, and that starts with clearly telling you how we collect, use and protect your personal data. This notice sets out:

- The personal data we may collect from you;
- How and why we use your personal data;
- Why we may share personal data within DMR Panels and with other organizations; and
- The rights and choices you have when it comes to your personal data.

YouGov is made up of a number of companies, each of which separately controls the data provided to it by our members, and those who otherwise participate in our research opportunities. If you are a user or member who registered in India, Research India Private Limited (referred to as "we", "us", "our" or "Damolekule Research & Analytics ") is the controller of your personal data. This means we choose why and how that data is processed. We are based at 1H/25A NIT-1 Faridabad, Haryana.

## Personal data we collect

In this section we explain what personal data we may collect when you become a DMR Panels member or otherwise participate in our research, as well as data that we may collect from other sources

### *Data that we collect from you*

When you join DMR Panels or take part in our research, you provide us with the data that powers our business. While there are certain data that you must provide in order to use some of our services, such as account details when you join DMR Panels, you control how much data you share with us. Whether you only want to participate in certain research opportunities, or all of them – it's your choice (although please note that refusing to provide

certain information may impact your ability to join YouGov and take part in research opportunities).

If you are required to have parental permission to participate with DMR Panels, you confirm that by participating with DMR Panels you have that permission and will provide us with evidence of that permission where required.

<p>When you register with YouGov, we collect:</p>	<ul style="list-style-type: none"><li>• Contact details, such as your name, email and postcode</li><li>• Demographic data, such as your age, gender, and general economic and household information</li><li>• Your account login details, which will be your email address</li><li>• Referral partner IDs, if you arrived on our website by clicking a ‘Join DMR Panels’ advertisement online, or a link in an email from one of our recruitment partners (we pass these IDs back to our recruitment partners to track and improve their effectiveness and to pay them)</li></ul>
<p>When you participate in research opportunities on our website or mobile apps, we collect:</p>	<ul style="list-style-type: none"><li>• Information you proactively share with us about who you are, what you think (for example your opinions on topical issues, companies and brands) and what you do (for example what shops you like to shop in, what TV shows you have recently watched, or what kind of things you own)</li><li>• Device and browser “metadata” (basically an audit trail of your device and browser use), which is information that is collected automatically when you interact with us. Metadata includes your IP address, the make, model and operating system of the device you have used and browser type</li></ul>
<p>If you have agreed to download DMR Market Pulse, our tracking software (you will have been specifically invited to do this, it doesn’t happen automatically), we collect:</p>	<ul style="list-style-type: none"><li>• Device and browser metadata</li><li>• Information about websites you have visited, which applications you have downloaded onto your computer and mobile devices, and how and when you use them (we do not collect any data that you input into secure forms whilst browsing (such as usernames, passwords or online transactions)</li><li>• Search terms that you enter into search engines</li></ul>

	<ul style="list-style-type: none"> <li>Information about what is being watched on certain media apps that you may use, for example Netflix and Amazon Prime</li> </ul>
If you have been invited to participate in online or in-person qualitative research, we collect:	<ul style="list-style-type: none"> <li>Your opinions on the topics that the research is exploring</li> <li>We may also record these interviews with you, but in such cases you will be given full information about the research project and the opportunity not to participate</li> </ul>
When you use our website or use our mobile apps, we collect:	<ul style="list-style-type: none"> <li>Information through the use of cookies and similar technologies</li> </ul>
When you contact us or interact with our website or social media pages, we collect:	<ul style="list-style-type: none"> <li>Any personal data that you may provide about yourself, including your name and contact details and the conversation history of our communications with you</li> <li>Any comments you make on our website or social media pages, and whether you have chosen to 'follow' any other DMR Panels member on our website</li> </ul>
When you redeem your points, we collect:	<ul style="list-style-type: none"> <li>Your bank account or other payment details (such as PayPal) so we can pay you if you choose to redeem your points in cash</li> </ul>

## ***Sensitive personal data***

Some of the data that you provide us may be considered to be 'sensitive' under applicable data protection laws, such as your racial or ethnic origin, religious or philosophical beliefs, information concerning your health or sexual orientation and any other categories of personal data deemed to be 'sensitive' under applicable data protection law. For example, during a survey we may ask whether you regard yourself as belonging to a particular race or religion. We use this information in the same way we use other information we collect, but the law may require that we have your consent to collect and use it.

When you join DMR Panels, you will be asked to agree to our privacy notice and terms and conditions governing your membership. By continuing your registration, you are consenting to our collection and use of sensitive personal data. If you are not a DMR Panels member, you will give your consent by answering the relevant questions within our surveys.

## ***Personal data collected from other sources***

We may also use personal data you have shared with us to derive additional information from other sources:

- **Public sources:** for example, we may compare your postcode against public registers to determine that you live within a certain catchment area for a particular local authority or electoral constituency. We may also use public APIs (which allow two applications to talk to each other) to obtain data from public websites, for example, [Twitter](#) and [YouTube](#) (part of [Google](#), and whose data is not used towards YouGov Signal's daily Sentiment aggregation). Much of this information is non-personal, but it may include social media handles, and associated public posts or comments (but never private posts or account information).
- **Acquisition partners:** if you decide to register with an organisation to receive opportunities from companies like DMR Panels, that organisation will pass your name and contact information to us so we can contact you about joining DMR Panels.
- **Our clients:** who may ask us to combine your data, such as your survey responses, with information they already hold, so they can use the combined data to perform more detailed analysis. We will only agree to do this if we are sure that our clients will not be able to identify you from the combined dataset, or if you have given your consent to be identified.
- **Segmentation partners:** we may purchase data from companies which help us to categorise our members' data into groups or 'segments' based on a classification of consumers devised by the segmentation partner. We add the segment information we purchase to the data we hold about you ([click here for more information about how we share personal data with these companies to add these segments to our own data](#)).
- **Other companies that sell data:** we may purchase data from companies that sell certain types of data that are valuable to us. In these cases, we will either match the data ourselves, or will ask these companies to match the data on our behalf. As with our other service providers, we have contractual safeguards in place to ensure that these companies delete the data once the match has been completed, and they do not disclose or use the data for any other purpose.

You may still receive invitations to participate in our research activities if you have not joined DMR Panels. In these cases we will have received your email address either from a client, or we'll have acquired it from an organisation that maintains databases of contact details so that companies like DMR Panels contact you. We *only* send emails where we are permitted by law to do so and have obtained guarantees from those companies providing the email addresses that the recipient (that's you) has agreed to receive third-party (e.g. from DMR Panels) communications, and we will always tell you where we've got your details from and give you the option to opt-out of receiving further emails from us free of charge.

## How long we'll keep your data

In this section we explain that how long we keep your personal data depends on how it is used

We will only retain your personal data for as long as we need to in order to fulfil the uses we describe in the following section, or until you exercise your right to erasure (which is explained in the section about *Your rights*).

In practice, this means that we'll keep most of your personal data for as long as you are a member of DMR Panels, because we use it to provide you with a great research experience, such as when we use the information you provide us in a survey to select and invite you to participate in our research opportunities that are relevant to you. We will, however, delete

some types of data after a much shorter time. For example, if you participate in any qualitative research projects, we will delete any video footage as soon as it is no longer needed by our researchers to complete the project.

## How and why we use your personal data

In this section we explain how and why we use your personal data, and the choices you have over how your data is used

## Uses of personal data for basic market research

We use the data that you share with us, or that we receive from the other sources mentioned above, to give you the best experience possible, and to provide useful research for our clients. The uses we describe below form the basic agreement we have with our members.

For each of these uses, we process your personal data on the grounds that our processing is **necessary for legitimate interests we pursue as a business**, namely that our business relies entirely on the ability to use your personal data to produce research and insight for our clients. However, **we rely on your consent for –**

- Using sensitive personal data (as described above);
- Sharing personal data with our clients or partners; and
- Collecting specific types of data from you (and we would always make clear at the time we ask for consent which data are involved and the purposes those data would be used for).

We use personal data to...	For example...
Register, authenticate and administer your account	When you register with DMR, we will use your email address and a pin code to create your account and authenticate your identity each time you log on, and your account details to help us to answer your questions when you contact us.
Select and invite you to participate in research activities	We'll use the information you provide when you join DMR and when you complete research opportunities, such as your postcode and demographic data, to invite you to participate in further research opportunities we think you'll be interested in.
Credit you with the points and rewards that you may be eligible for related to your participation in research opportunities	We will use your contact details to tell you if you have won a prize draw, and your bank account or other payment details to pay you if you convert points awarded into money.
Produce aggregated and anonymous research	We may combine your data, such as your survey responses, with data about other DMR Panels members and turn them into aggregated insights. We may show you these insights as you interact with us (for example, we may show you

	live statistics for questions you have just answered) or provide them to our clients and partners in the form of reports, statistical spreadsheets or dashboards, whitepapers or articles. These insights are anonymous, meaning it will not be possible to identify you personally.
Produce anonymised but non-aggregated respondent-level data for clients	We may provide our clients with spreadsheets that contain data that you have given us in a non-aggregated form. While these data sets are not aggregated, they do not reveal your identity and recipients are contractually bound to not attempt to re-identify the individuals who provided the answers.
Create and publish interesting articles and other public content	We use research data to write interesting articles that may be published on our website, or included in news articles on third-party websites. We believe that our data can be used for the greater good, and so we may publicly publish data sets that can be used by the wider research community. These data sets will never reveal your identity.
Develop and improve our services	We use research data to improve our research tools and methods, which helps us ensure that we are giving you and our clients the best possible experience.
Respond to you when you exercise any of your rights relating to the data we hold about you (more information about the rights you have over your data is set out below)	We will use your account information and internal identifiers to identify the data that is relevant to your request and respond to you.
Detect and prevent fraudulent activity	We use your IP address and other device and browser metadata to identify behaviour that may be contrary to our Terms and Conditions, and we sometimes repeat questions during surveys to check for inattention or other indicators of poor-quality responses.
Perform sanctions checks	We will securely share certain personal data with third parties that perform sanctions checks (searches of government or international body sanctions lists) to reduce the risk of money laundering, terrorist financing, corruption, and other financial crime arising from our activities.

If you don't want us to make use of your personal data in any of the ways described above, sharing your data with DMR Panels and using our services is not for you – you should contact us and ask us to do that for you. We need to use your data in these basic ways to be

able to give your opinions meaning in the world, and to conduct the research that allows us to exist as a business.

## **Uses of personal data for advanced research and modelling**

In addition to the uses we describe above, provided you choose to participate in this way, we may also share your data, such as survey responses, with trusted partner organisations. By matching *personal details* (for example your name, email address and postcode or a unique identifier) or *online identifiers* (such as cookie IDs), our partners can use your data to:

- Create and improve products and services, such as consumer segmentations, to help other organisations better understand the likely characteristics of their customers; and
- Create audiences for advertisers to target with more relevant communications and proposition. The advertising audiences are created by finding people in the population who have similar characteristics to you, via a process called lookalike modelling. We do not permit these partners to include the data they receive from us in the modelled audience, so you could only be included in an audience modelled from YouGov data if these partners already hold information about you.

**You can find a list of the partners we work with in the Permissions page of your DMR Panels and we will only share your data with these partners if you have given us your consent, which we may ask for in a survey.**

Even if you consent to us sharing your data in this way, you can change your mind at any time by clicking 'Edit Settings' under the 'Uses of your data' section on the Permission page in your DMR Panels Account. You have control over which partners we share your data with, and how they are able to use your data. Don't forget to click 'Save changes' when you are done so that your choices are saved.

## ***Our use of personal data to show you targeted advertising***

We think that online advertising could be much better. When you are a member of DMR Panels you'll notice that some of our services will ask for your **consent** to show you personalised ads while you interact with us (for example, in our surveys or apps).

If you agree, these ads will be personalised based on the profiling data you decide to share with us, and you will be able to withdraw your consent at any time. Because the advertising happens within the DMR Panels system (meaning you will only see the ads on Damolekule sites), the data we use to tailor these adverts is never transferred to any third-party advertisers without additional permission from you.

## **Who we may share your personal data with**

In order to use your personal data in the ways described above, we may share it within DMR Panels, with trusted third parties who provide services to us, and on rare occasions with clients (but only if you have specifically agreed to that). Here is some more information about the types of organisation and what we may share with them:



<p><b>DMR Panels</b></p>	<p>DMR Panels is a global organisation. This means that some of the personal data that we collect may be transferred to companies in the DMR group that are in different countries. For example, when a client wants to carry out research in multiple countries, or our global data teams analyse data from across the world.</p>
<p><b>Our clients</b></p>	<p>While our business is built on providing clients with anonymised research insights, on occasion, our clients may ask to combine your research data with their own data to obtain even greater insights or to improve their products or services. In such cases you will be asked if you are willing to provide certain identifying data (such as your email address or a social media handle) to our clients to enable this. Whether you share this data or not is completely up to you.</p>
<p><b>Our service providers</b></p>	<p>We work with trusted service providers that carry out certain functions on our behalf so we can provide our services to you.</p> <p>These organisations process data on our behalf. They only have access to the personal data that they absolutely need to provide the specific service to us, and in all cases we have contractual safeguards in place to ensure that they do not disclose or use it for any other purposes. In some cases, these organisations (for example our payment processors) may need to process your personal data for their own specific purposes, for example to ensure they are compliant with regulations or laws governing their own sectors.</p> <p>Our service providers fall within the following categories:</p> <ul style="list-style-type: none"> <li>• Acquisition technology (helps us to attract people to join DMR Panels)</li> <li>• Providers of cash payments, gift cards and other incentives (make it possible to pay or reward people at the appropriate time)</li> <li>• Data collection technology (enables us to securely collect data submitted by research participants and others)</li> <li>• Research technology (allows us to provide interesting and engaging research opportunities)</li> <li>• Cloud &amp; physical data storage (data storage, which is managed by Damolekule Research &amp; Analytics Private Limited)</li> <li>• Data matching partners (that match our data to third-party data on our behalf)</li> </ul>



	<ul style="list-style-type: none"> <li>• Web application firewall (protects web applications by filtering and monitoring HTTP traffic between a web application and the Internet)</li> <li>• Communications platforms and technologies (enables us to communicate with our research participants and others)</li> <li>• Online advertising (helps us to attract people to join DMR Panels)</li> <li>• Sanctions checks (reduces the risk of money laundering, terrorist financing, corruption, and other financial crime arising from our activities)</li> </ul>
<p><b>Our segmentation partners</b></p>	<p>Our segmentation partners create and sell consumer classifications that help companies understand the demographics, lifestyles, preferences and behaviours of consumers. This information is valuable to our clients, and if requested we will add this data to the insights we provide to them.</p> <p>To do this, we share certain personal data, such as your name, email address and postcode, so that our partners can match it against their own data and tell us which of their segments you belong to. As with our other service providers, we only share the personal data that our segmentation partners need to match our data to theirs, and we have contractual safeguards in place to ensure that they do not disclose or use the data for any other purposes.</p> <p>Our segmentation partners include:</p> <ul style="list-style-type: none"> <li>• Experian (from whom we receive <a href="#">Mosaic</a>, <a href="#">FSS</a> and <a href="#">Consumer View</a> codes)</li> <li>• Acxiom (from whom we receive <a href="#">Personicx</a> codes)</li> <li>• CACI (from whom we receive <a href="#">Acorn</a> and <a href="#">Fresco</a> codes)</li> </ul>
<p><b>Our acquisition partners</b></p>	<p>If you decide to register with an organisation to receive opportunities from companies like DMR Panels, that organisation will pass your name and contact information to us so we can contact you about joining DMR Panels. We will pass back ‘referral IDs’ to these partners to track and improve their effectiveness and to enable us pay them based on how many of their leads join DMR Panels.</p>
<p><b>Other companies that sell data</b></p>	<p>As described above, we may purchase data from companies that sell certain types of data that is valuable to us. In some cases, we will pass personally identifiable information to these companies to enable them to match</p>

	<p>these data sets on our behalf, and pass that matched data back to us. As with our other service providers, we have contractual safeguards in place to ensure that these companies delete the data once the match has been completed and do not disclose or use the data for any other purpose.</p>
<p><b>Other organisations</b></p>	<p>These circumstances are unusual, but we may share personal data with other organisations if:</p> <ul style="list-style-type: none"> <li>• we have to share your information to comply with legal or regulatory requirements (or we reasonably believe that we need to disclose your information for such purposes);</li> <li>• we need to share personal data in order to establish, exercise or defend our legal rights, including with our legal and other professional advisors;</li> <li>• we restructure our business or if we buy or sell any business or assets we may share your data with the prospective buyer or seller;</li> <li>• all or substantially all of our company assets are acquired by another party, your data will be one of the transferred assets</li> </ul>

## Transferring personal data outside the EEA

If you are based in the [European Economic Area \(“EEA”\)](#), or Switzerland, we take all steps possible to ensure that your personal data remains within those areas. However, in some cases we need to share data with other DMR companies or third parties that are in countries outside those areas. These countries may not have similar data protection laws and so they may not protect the use of your personal information to the same extent.

In these cases we put in place appropriate safeguards to make sure your personal data remains adequately protected. Specifically, we make use of one of the following:

- **Standard contractual clauses:** we use standard contractual clauses for the transfer of personal data to organisations outside the EEA. These contractual commitments have been adopted by the European Commission and ensure adequate protection for personal data transferred to countries outside the EEA by binding recipients of personal data to certain data protection standards including obliging them to apply appropriate technical and security measures. We use standard contractual clauses when we transfer data to other DMR Panel companies and for transfers to recipients that are not located in a country covered by an adequacy decision (see below).
- **Adequacy decisions:** where the European Commission, or other relevant competent authority, has determined that a country outside the EEA or Switzerland offers an adequate level of data protection, personal data may be sent to that third country without implementing any other safeguards mentioned above. DMR Panels may rely

on adequacy decisions when transferring data to companies based in countries where such assurances have been given.

## How we store and protect your personal data

We know how important it is to protect your personal data while we have it. This section describes some of the measures we take to ensure that it is kept secure

We do everything we can to protect your personal data from loss or misuse, and from unauthorised access, disclosure, alteration and destruction. This section describes some of the measures we take to ensure that your personal data is secure:

- We use data centres that have a high level of physical security measures to host and protect your data and our systems;
- We conduct independent penetration tests on an annual basis and are continuously scanning our systems and applications for vulnerabilities in our systems; if you ever think that you have found a security issue or vulnerability in one of our systems please let us know at [priyanka@damolekuleresearch.com](mailto:priyanka@damolekuleresearch.com)
- We use encryption to secure your personal data whilst it is in transit using TLS and in storage using AES256 encryption;
- We allow access to attributable data (by which we mean data that directly identifies you) only to those YouGov employees and contractors who need it to carry out their job responsibilities, for example our support team to allow them to respond to you when you contact us;
- We make security the responsibility of all our employees and contractors and we train our staff to identify security risks and protect your data.

Our website may from time to time contain links to and from other websites. If you follow a link to any of those websites, please note that those websites ought to have their own privacy notices and that we do not accept any responsibility or liability for those websites. Please check those privacy notices before you submit your information to those websites.

## Emails and notifications

This section explains the choices you have when it comes to emails and notifications we may send to you

We may contact you by email, SMS and/or web and push notifications to –

- **Invite you to take part in research opportunities:** if you register with DMR Panels, it is integral to your participation that we are able to send you emails and notifications inviting you to participate in research projects, which could be conducted online via survey, by downloading a mobile app, or in person.
- **Tell you when your opinions have made the news:** we use the information you give us when you take part in our research to write interesting articles that may be published on our website or included in news articles on third-party website, and we may email you to let you know when your opinions have featured in these articles.
- **Encourage you to refer your friends and family to join DMR Panels:** we'll send you a unique link that you can pass on to friends and family.

For all the emails and notifications mentioned above, we rely on our legitimate interest in running our research operation – and ensuring that members are adequately informed about their account with us – as the legal grounds for this processing.

## Your rights

This section explains the rights that you have in relation to the personal data that we hold about you

Depending on the applicable data protection laws, you may have certain rights in relation to the personal data that we hold about you, which are designed to give you more choice and control over your personal data. These rights are explained below, and we will not discriminate against you for exercising any of these rights. If you choose to exercise a right, we will not remove you from our surveys or panels (unless you specifically request to be removed), impose a penalty or provide you, or suggest that you may receive, a different level or quality of services.

Right	What does this mean?
The right to request access to personal data (or, the "Right to Know")	You can request a copy of the data that we hold about you and related information, and to receive this data in a structured and machine-readable format (data portability).
The right to request rectification of personal data	You can ask us to correct any inaccurate data about you and to complete any incomplete data that we hold about you
The right to request erasure of personal data	You can request that we delete the personal data we hold about you

## Exercising your rights

You can exercise any of these rights by using the contact details below. Once you have submitted your request we may contact you to request further information to authenticate your identity (because we want to make sure it is actually you requesting your data) or to help us to respond to your request. Except in rare cases, we will respond to you within 1 month of receiving this information or, where no such information is required, after we have received full details of your request. As noted above, while some rights apply generally, some are only available in certain circumstances, so if we feel that any right is not available to you we will let you know along with the reason for our decision.

### Email:

Information@damolekuleresearch.com

### Mail:

The Data Protection Officer

1H/25A NIT-1, Faridabad, Haryana -121001

## How to contact us

If you have questions about this notice, or about how we collect, store and use personal data, you can contact us at [information@damolekuleresearch.com](mailto:information@damolekuleresearch.com)

## **Updates to this notice**

This notice was last updated on the date that appears at the beginning of the notice. While we reserve the right to change this notice at any time, if any material changes are made we will let you know via email or any other appropriate means to give you the opportunity to review the changes before they become effective.

**Effective: 5<sup>th</sup> May 2022**