

GDPR POLICY FOR RESPONDENTS

Ifop Group commitments regarding the protection of personal data in the context of its studies and surveys.

Effective as of 08.09.2025

Ifop Group respects the privacy of respondents to its studies and surveys. This policy on the rights of respondents to our studies and surveys explains how we collect, use, disclose and protect personal data (hereinafter 'Personal Data') collected during our studies and surveys.

This Policy applies to all entities/subsidiaries of the Ifop Group. For more details for each entity of the Group, please refer to the links at the end of the document.

This Policy does not apply to the collection or use of Personal Data from visitors to our website pages; if you would like more information about how your Personal Data is used in this context, [please refer to our dedicated GDPR policy](#).

1. Lawfulness of the processing of Personal Data in the context of Ifop Group studies and surveys and consent

Each entity within Ifop Group informs respondents about how their Personal Data is collected and processed by sending them information notices. These notices are tailored to the type of study being conducted and, where applicable, validated in advance with our clients.

In accordance with Article 6 of the General Data Protection Regulation (hereinafter 'GDPR'), Ifop Group, either directly or through its subcontractors, collects respondents' Personal Data on the legal basis of consent.

We therefore make it a point of honour to obtain consent that is valid under the GDPR, i.e. free, specific, informed and unambiguous consent from the person contacted to respond to our study or survey, after explaining the purposes of the collection to them in a clear, precise and concise manner.

We also systematically ensure that our subcontractors comply with these conditions when collecting consent from respondents.

- ❖ **Free consent:** when the person is approached, the person is informed that their response to the questionnaire is optional and that their refusal to respond will not result in any negative consequences for them;
- ❖ **Specific consent:** the person is only asked to respond to a specific study;

- ❖ **Informed consent:** the person is informed, prior to the collection of their data, of the purposes pursued and the categories of data collected;
- ❖ **Unambiguous consent:** a positive action by the person concerned is required to access our questionnaire.

The consent of respondents is obtained prior to any response to our questionnaires. The methods used to obtain consent vary depending on the methodology of the study in question.

Ifop Group retains proof of this consent for the period necessary for processing, i.e., generally for the duration of the study and related quality control activities.

Ifop Group is authorised under the GDPR to reuse Personal Data, initially collected by third parties for other purposes, insofar as market research activity is considered to be scientific research.

2. Retention period for Respondents' Personal Data

Ifop Group undertakes to retain Respondents' Personal Data for no longer than is necessary for the purposes for which it is collected or processed, applying clear rules on retention periods.

The default retention period for your Personal Data within Ifop Group is twenty-four (24) months from the end of the study or survey concerned.

However, these periods may vary depending on the type of survey, Ifop Group entity concerned by the survey, and the needs of the Ifop Group's clients.

If you have any questions about the retention period for your Personal Data in the context of our surveys, please do not hesitate to contact us directly as indicated in the '[Your rights](#)' section below.

3. 3. Minimisation of Respondents' Personal Data

In order to comply with the principle of minimisation, Ifop Group ensures that it only collects Personal Data that is relevant, adequate and limited to what is necessary for each study carried out:

- ❖ Ifop Group only collects categories of data that are relevant and/or specified by clients and that enable a specific purpose to be fulfilled, i.e. the objective of collecting Personal Data;
- ❖ Ifop Group ensures that Personal Data is not used in a manner incompatible with this purpose.

Ifop Group undertakes to preserve the anonymity of the persons responding to its studies vis-à-vis the end client by providing the latter only with raw or aggregated and non-nominative data, except in special cases, in which case the transmission of identifying Data to Ifop Group's clients is subject to the prior express consent of the respondent concerned.

4. 4. Transfer of your Personal Data and subcontracting

4.1 External subcontracting

In addition to transferring Personal Data to its internal teams and IT teams, Ifop Group may use external suppliers or subcontractors to perform certain services related to its business and may therefore need to transfer your Personal Data to them.

Ifop Group selects its suppliers and ensures that they can comply with the guidelines and regulations relating to Personal Data protection, by requiring them to make contractual commitments to this effect before any operation is carried out on behalf of Ifop Group.

Various measures have been put in place to ensure that its subcontractors comply with the principles of Personal data protection, namely:

- ❖ the systematic signing of contractual commitments including at least the clauses required by the GDPR;
- ❖ the use of encrypted messaging for any transfer of Personal Data outside our secure internal network;
- ❖ the possibility of conducting an audit to verify compliance with legal and contractual obligations. A procedure associated with this audit has been adopted;
- ❖ Adherence to our ethical charter, which includes the ESOMAR code of conduct.

4.2 Internal subcontracting within Ifop Group

Depending on the purpose of the study, Ifop Group entities may need to exchange your Personal Data with each other, in France or internationally. To this end, Ifop Group entities have entered into intra-group agreements to provide a legal framework for such transfers.

Ifop Group entities concerned are as follows:

- ❖ **Ifop Eastwego Shanghai** - Unit 1108, Lee Gardens, No.668 Xinzha Road, Jing 'an District, 200041 Shanghai (Chine)
- ❖ **Ifop Eastwego Hong Kong** – 42/F., Central Plaza, 18 Harbour Road, Wanchai, Hong Kong
- ❖ **Ifop Inc.** – 10 Rockefeller Plz Suite 1001 New York NY 10020 (USA)
- ❖ **Brain Value Shanghai** - Suite 405, Yuyuan Road 108, 200040 Shanghai (Chine)
- ❖ **Brain Value Hong-Kong** - Unit B6, 12th Floor, Wing Wah Building, No. 677 King's Road, Quarry Bay, Hong Kong Island, Hong Kong

All Ifop Group entities are also subject to the same strict rules regarding the processing, storage and security of your Personal Data.

4.3 External international transfers

Ifop Group does not transfer any Personal Data outside the EEA without first ensuring that:

- ❖ The data controller is informed of this transfer;
- ❖ The entity is located in a country whose legislation is deemed equivalent to the GDPR or, failing that, has signed a contract with the relevant Ifop Group entity authorising such a transfer;
- ❖ The entity has implemented measures offering the level of security required by the regulations.

In any event, Ifop Group only transfers Personal Data outside the EEA after informing respondents of this possibility and provided that respondents have not objected to it.

4.4 Public bodies

Ifop Group may be required to disclose Personal Data to public bodies, courts, administrative bodies and authorities responsible for the protection of Personal Data, if required to do so by law or if ordered to do so.

5. Processing of sensitive Personal Data

Depending on the subjects covered in the studies commissioned by its clients, Ifop Group may be required to process sensitive Personal Data.

For more information on the classification of such sensitive Personal Data: <https://www.cnil.fr/fr/particulier>

Ifop Group undertakes to treat on a case-by-case basis any requests for studies which, due to the nature of their processing, would expose respondents to a high level of risk.

Thus, when such a case arises, Ifop Group requests the explicit consent of the respondent to collect this sensitive Personal Data and works with the data controller to implement specific measures. These measures are considered on a case-by-case basis depending on the nature and volume of the data collected.

6. Personal data of minors

In general, studies conducted by Ifop Group are carried out on adults. However, where applicable, Ifop Group undertakes not to process the Personal Data of minors under the age of 15 - or any other legal age defined by the applicable law of the country where the study is conducted - without parental authorisation.

7. Your Rights

Under applicable law, you have the following rights:

Access to your Personal Data: if you request it in writing, we will provide you, to the extent required and/or permitted by law, with the Personal Data concerning you that is processed by Ifop Group.

Rectification of your Personal Data: if you believe that your Personal Data is inaccurate, you may request that it be rectified.

Erase of your Personal Data: if you believe that it is no longer necessary for Ifop Group to process your Personal Data, you may request that it be erased from our databases.

Restriction of processing of your Personal Data: if you believe that the processing of your Personal Data is inaccurate or unlawful, you may request that processing be restricted. Ifop Group

will then only store said Personal Data and will not process it in any other way without your consent.

Objection to the processing of your Personal Data: if you have previously consented to the processing of your Personal Data by Ifop Group, you have the right to object to such processing on grounds relating to your particular situation at any time.

In order to exercise any of these rights relating to personal information that we may hold, please submit your request in writing to:

- If it concerns Ifop : dpo@ifop.com
- If it concerns Sociovision (Groupe COFREMCA): dpo@sociovision.fr
- If it concerns Brain Value: dpo@brainvalue.fr
- If it concerns Occurrence or Deep Opinion: conformite@occurrence.fr

For any request to exercise rights by respondents interviewed during our studies, Ifop Group has implemented an internal procedure to ensure that such requests are responded to within the time limits imposed by the regulations. This procedure includes all stakeholders (any subsequent subcontractors and data controllers).

8. Teams and Training

GDPR compliance within Ifop Group is supervised by the Group's Legal Director and DPO, who heads an internal team specialising in Personal Data protection.

All staff at all entities within Ifop Group undergo training and awareness programmes on the principles of the GDPR and the Group's internal procedures. Our operational teams receive systematic training when they join the Group and then regularly throughout their career within the Group.

9. IT security and Artificial Intelligence

The security of your Personal Data is very important to us.

Ifop Group's IT teams, under the supervision of the Chief Information Security Officer (CISO), implement technical and organisational measures to ensure the security of the Personal Data collected, processed and stored, and thus protect it against accidental or unlawful destruction, loss, alteration, disclosure and unauthorised access.

Ifop Group may use artificial intelligence processes. We are adapting our processes to comply with European Regulation (EU) 2024/1689 on artificial intelligence (AI) for 2026 and have set up a dedicated monitoring system to comply with any legislative developments in this area.

Where applicable, specific information will be brought to the attention of respondents in order to comply with our transparency requirements.

10. Changes to this Policy

This Policy on the Rights of Respondents to our studies is effective as of the date of the last revision appearing at the top of this page. However, it may be modified at any time.

You can refer to the specific Personal Data Protection Policies for the various companies affiliated to Ifop by following the links below:

1. [Brain Value SAS Policy](#)
2. [Occurrence SAS Policy](#)
3. [Deep Opinion SAS Policy](#)

* * *