

Kynetec & Kleffmann Group

General Privacy Notice for Clients, Suppliers and Research Participants

This Privacy Notice explains how we collect, use, disclose and protect Personal Data

Dated: 11th March 2020

Issued by:
Data Protection Team

Contact:
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1 About Kynetec and Kleffmann

Kynetec is a global market research company, specializing in Animal Health, Agriculture and selected b2b markets. Our main respondent groups are farmers, agronomists and veterinarians. In November 2019, Kleffmann Group merged with Kynetec. Kleffmann is a leading provider of agricultural market research services.

Our core business is to collect and process information about availability, usage or performance of specific services, products or industries, to support our clients and business partners. We are committed to very strict ethical standards and business targets. We never share statements from or about individuals. Reporting is generally limited to general information, like behavior, opinions and attitudes of predefined target groups, or market development, market shares, average prices.

We comply with all respective obligations under applicable global data privacy laws such as, but not limited to, GDPR, the UK Data Protection Act 2018 and with all applicable professional rules such as, but not limited to, ICC/ESOMAR International Code of Marketing and Social Research Practice. Kynetec is a member of ESOMAR, an international organization focusing on developing better market research methods. We adhere to the professional standards which ESOMAR sets out for its members and, at the same time, protect your privacy as a participant in our market research activities. Kynetec has been awarded a Fair Data Accreditation from the Market Research Society in the UK which demonstrates our visible commitment to the handling of personal data and our adherence to the 12 Fair Data Principles. For more information on Fair Data, please visit <https://www.fairdata.org.uk/>

This privacy notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

2 Personal Data we collect

We may collect information that can specifically identify you, such as your name, address, telephone number, email address, profession, etc. when you voluntarily submit it to us. It does not include data where the identity has been removed (anonymous data). The type of personal data we use has been grouped together as follows:

- **Identity** – includes name, marital status, date of birth, nationality, profession, gender, age
- **Contact** – includes physical address, email address and telephone numbers
- **Financial** – includes bank account details
- **Transactional** – includes details about payments between Kynetec and their suppliers and clients
- **Usage** – includes information about how our website, products and services are used
- **Marketing information** – includes preferences on receiving marketing from us
- **Technical** – we use cookies to collect information automatically about individuals who visit our website. Please see our cookie policy for further details
- **Research** – includes survey data or other data collected from participation in research studies

We have no intention of collecting or processing personal data from children or young people. If we become aware that personal data from a child under the age of 16 has been inadvertently collected without parental or guardian's consent, we will use all reasonable efforts to delete such information unless the original data collection exercise requires such information.

3 Use of personal data

Processing data is our core function to deliver market research studies to our clients. We have set out below, in separate tables for Suppliers, Clients and Research Participants, a description of all the ways we plan to use your personal data, and which of the legitimate interests we rely on to do so. We will only use personal data for the purposes for which we collected it as set forth in this privacy notice, unless you have specifically provided your consent to another use of your personal data. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

(a) Suppliers

| Purpose / Activity | Type of Data | Lawful basis for processing, including basis of legitimate interest |
|--|--|--|
| To register you as a new supplier and build a profile | (a) Identity (b) Contact | Performance of a contract with your company |
| To process and pay for services provided to us: - manage invoices, credit notes and payments; financial history | (a) Financial (b) Transactional | Performance of a contract with your company and necessary for our legitimate interest (to pay monies owing) |
| To manage our relationship with you, which will include: - notifying you about changes to our terms or privacy notice | (a) Identity (b) Contact (c) Marketing | (a) Performance of a contract (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated) |

(b) Clients

| Purpose / Activity | Type of Data | Lawful basis for processing, including basis of legitimate interest |
|---|-----------------------------|--|
| To register you as a new client and build a profile | (a) Identity (b) Contact | Performance of a contract with your company |

| | | |
|--|--|---|
| <p>To process and request payment for services provided by us:</p> <ul style="list-style-type: none"> - manage invoices, credit notes and receive payments; financial history | <ul style="list-style-type: none"> (a) Financial (b) Transactional | <p>Performance of a contract with your company and necessary for our legitimate interest (to request monies owing)</p> |
| <p>To manage our relationship with you, which will include:</p> <ul style="list-style-type: none"> - notifying you about changes to our terms or privacy notice | <ul style="list-style-type: none"> (a) Identity (b) Contact (c) Marketing | <ul style="list-style-type: none"> (a) Performance of a contract (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated) |
| <p>To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p> | <ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical | <ul style="list-style-type: none"> (a) Necessary for our legitimate interest (for running our business, provision of market research services, network security, to prevent fraud, and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation |
| <p>To deliver relevant content/services to you</p> | <ul style="list-style-type: none"> (a) Identity (b) Contact (c) Usage (d) Marketing (e) Technical | <p>Necessary for our legitimate interests (to review how clients use our services, to develop them, to grow our business, to offer new services)</p> |
| <p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p> | <ul style="list-style-type: none"> (a) Technical (b) Usage | <p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business)</p> |
| <p>To make suggestions and recommendations to you about products/services that may be of interest to you</p> | <ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical (d) Usage | <p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p> |

(c) Research participants

| Purpose / Activity | Type of Data | Lawful basis for processing, including basis of legitimate interest |
|---|---|--|
| To hold your data in a database as part of a research panel | (a) Identity (b) Contact (c) Research | Legitimate interest to store personal data and contact data subjects to participate in research relevant to the professions and interests of these data subjects. The processing of personal data is essential to pursue this interest |
| To contact you to invite you to participate in research | (a) Identity (b) Contact (c) Research | Legitimate interest to store personal data and contact data subjects to participate in research relevant to the professions and interests of these data subjects. The processing of personal data is essential to pursue this interest |
| To re-contact you for quality control purposes related to your research participation | (a) Identity (b) Contact (c) Research | Legitimate interest to store personal data and contact data subjects to participate in research relevant to the professions and interests of these data subjects. The processing of personal data is essential to pursue this interest |
| To store data for the purpose of re-contacting research participants for tracking and longitudinal research | (a) Identity (b) Contact (c) Research | Legitimate interest to store personal data and contact data subjects to participate in research relevant to the professions and interests of these data subjects. The processing of personal data is essential to pursue this interest |
| Store the minimal personal data required to conduct scientific and statistical research | (a) Identity (b) Contact (c) Research | <p>Legitimate interest to store personal data and contact data subjects to participate in research relevant to the professions and interests of these data subjects. The processing of personal data is essential to pursue this interest</p> <p>Data is stored in accordance with data minimization and data retention policies</p> |

| | | |
|--|---|--|
| To contact you and collect and process data from you on behalf of a client (the data controller) – such as a client’s customers, employees or stakeholders | (a) Identity (b) Contact (c) Research | Under the grounds of contract, legitimate interest, or consent as specified in the signed DPA with data controller (the client) |
| To collect and process sensitive personal data such as health data or data from adults regarding children under the age of 16 years | (a) Identity (b) Contact (c) Research | <ul style="list-style-type: none"> (a) Consent is received via a clear definition or purpose and an affirmation statement (b) This consent may be collected orally, electronically or in writing (c) This date of the consent and its nature is recorded and stored (d) The subject has the right to withdraw this consent |

Kynetec is a member of the UK’s Market Research Society (MRS) <https://www.mrs.org.uk/> and ESOMAR <https://www.esomar.org> and complies to their standards

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4 How we share personal data

We will disclose your personal data only as described below. We will take appropriate measures to ensure that your personal data is processed, kept secure and transferred or accessed according to applicable global laws.

1. Legal entities within the Kynetec and Kleffmann group of companies

We are a global organization. Personal data may be transferred or accessed via a secure portal by one or more affiliated companies. We guarantee that the processing of such data will take place exclusively in a Member State of the EU or another country of the European Economic Area or in a third country that has been determined by the European Commission as ensuring an adequate level of data protection. Kynetec and Kleffmann group companies outside of the EU have entered into an intra-company data protection agreement using the standard contractual clauses adopted by the European Commission to safeguard your privacy and legitimize international data transfers. A list of countries outside of the EU from where group companies may access your information is contained in Appendix A.

2. Business transfers

In connection with any business reorganization, restructuring, merger or sale, or other transfer of assets, we will transfer data (including personal data) as necessary, provided that the

receiving party agrees to respect your personal data in a manner that is consistent with applicable data protection laws. We will continue to ensure the confidentiality of any personal data and give notice should any personal data become subject to a different privacy notice.

3. Public bodies

We will only share your personal data with public bodies where we have a duty to disclose this as required by law; for example, requests from courts, regulatory agencies, law enforcement agencies and other public and government authorities, which may include authorities outside your country of residence.

5 Security

The security of your personal data is very important to us. We have put in place appropriate physical, electronic and administrative security measures to safeguard the information we collect. In addition, we limit access to your data to those employees, agents, contractors and other third parties who have a legitimate business need to know in order to perform their duties. They will only process your data on our instructions and they are subject to a duty of confidentiality.

In the event of a suspected data breach containing personal data, we will follow all applicable data breach notification laws.

6 Your legal rights

As a data subject you have specific legal rights relating to the personal data we collect from you. We will respect your individual rights and will deal with your concerns appropriately.

Data subjects have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you.
- **Request erasure** of your personal data. If we are unable to comply with your request of erasure for specific legal reasons, we will notify you of these reasons (if applicable) at the time of your request.
- **Object to processing** of your personal data
- **Request restriction of processing** of your personal data
- **Withdraw consent at any time.** Please note this will not affect the lawfulness of any processing carried out before you withdraw your consent.
- **Lodge a complaint** with the relevant country Supervisory Authority (for example, the Information Commissioner’s Office (ICO) is the UK’s supervisory authority for data protection issues).

We will try to fulfill your request within the time period required by law. Occasionally it may take us longer if your request is particularly complex. In this case we will notify you and keep you updated. We will not charge a fee for dealing with your request unless it is deemed to be excessive or repetitive.

If we are unable to give you access to all or some of your personal data due to statutory provisions, we will advise you of the reason for this.

In some cases, we may not be able to look up your personal data due to the information identifiers you provide in your request. Examples of personal data which we cannot look up are:

- data collected through browser-cookies
- data collected from public social media sites provided you have posted your comment under a username which is not known to us.

In these cases, unless you provide additional identification information, we will be unable to comply with your request.

For residents of California, please click [here](#) for more information on how to exercise any of the above rights which may apply to you under the California Consumer Privacy Act (CCPA).

7 Retention of your personal data

In general, we will delete the personal data we collected from you if they are no longer necessary to achieve the purposes for which they were originally collected. However, we may be required to store your personal data for a longer period due to statutory provisions.

In addition, we will not delete all of your personal data if you requested us to refrain from re-contacting you in the future. For this purpose, we keep records containing information on people who do not want to be re-contacted in the future.

8 Changes to this Privacy Notice

We reserve the right, at our discretion, to modify our privacy practices and update and/or make changes to this privacy notice at any time. For this reason, we encourage you to review this privacy notice on an ongoing basis. We will treat personal data in a manner consistent with the privacy notice under which they were collected, unless we have your consent to treat it differently.

9 Contact information

Please direct your questions regarding data protection, any requests in the exercise of your legal rights or if you have any concerns about how your personal data is used to:

data.protection@kynetec.com for Kynetec companies and datenschutz@kleffmann.com for Kleffmann companies

Appendix A

Argentina

Australia

Brazil

Canada

China

Hong Kong

India

Japan

Kazakhstan

Malaysia

Mexico

Russia

Serbia

Singapore

Switzerland

Turkey

Ukraine

USA