

## **ADDITIONAL PRIVACY NOTICE – YOUR RIGHT TO SPEAK**

This notice is about the collection and use of your personal data when you use Kantar’s protected Right to Speak (RTS) reporting channels. You can read more about the way the RTS process works in the [Kantar RTS Policy](#).

The RTS Policy explains that you may make a report in the following ways:

- by using the RTS ‘EthicsPoint’ Portal provided by Kantar’s supplier Navex Global
- by using the Hotline operated by Navex Global
- by using local reporting channels

All reports from our staff will be dealt with in accordance with the Employee Privacy Notice that applies to the country or market where you work, as supplemented by the information in this additional notice. The EthicsPoint portal, the Hotline or your local channel are provided so that you can exercise your right to speak up and express any serious concerns you may have about the way that Kantar operates and conducts its business or about suspected danger or wrongdoing. This is often called “**whistleblowing**”.

Your use of the RTS channels is legally protected. Kantar will keep information you provide confidential unless local laws in the country where you work require us to disclose the information or the identity of an individual.

### **What personal data is collected and processed?**

The RTS services that Kantar provides capture the following personal data and information that you submit when you make a report:

- (i) your name and contact details (unless you report anonymously);
- (ii) the name and job title of the persons you name in your report - if you provide such information; and
- (iii) a description of the alleged misconduct and/or a description of the circumstances of the incident.

### **Who receives or can access the data?**

The personal data you report will initially be restricted to the central investigations team and the allocated investigator. It may later be shared within Kantar under the direction of the Kantar Legal team. If you use the Navex channels to report a matter within the scope of the EU Whistleblowing Directive, rather than using a local channel, you acknowledge that by choosing to report to the Navex Portal or Hotline you are agreeing that the investigation and report will be handled by the central investigations team and appointed investigator rather than locally.

Data you submit may be referred to external legal advisers, public authorities such as regulators and potentially passed to the police, but you will normally be notified before this happens. Exceptionally in some cases (such as money laundering) Kantar is obliged to tell the authorities without further reference to you.

Kantar will usually notify any person who is the subject of a report except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information.

With some exceptions, the person who is the subject of the report may access information concerning them in the report (**with the exception of the identity of the reporter**) and request correction of personal data that is inaccurate or incomplete in accordance with applicable law. Similarly, with some exceptions, reporters may also access information about the report and request corrections of their personal data in accordance with applicable law.

### **Who controls the data?**

Kantar is the data controller of the personal data you enter on the RTS Portal and as such has the responsibility for the way in which it is handled. The EthicsPoint portal and Hotline are provided by Kantar's supplier, Navex Global, but any processing of information in the course of investigating your report is carried out by Kantar staff. All personal information is controlled by Kantar and not by Navex. Navex will not make use of your data except to the extent needed to provide the service.

### **What is the legal basis of processing?**

We are providing the portal, and processing any personal data collected through it, because we are legally obliged to. In jurisdictions where there is no legal obligation that applies, we will process personal data because it is in the legitimate interests of Kantar to provide a protected channel for staff to raise their concerns.

### **How will the data be kept safe and will data be exported to other countries?**

Kantar has obtained contractual commitments from Navex Global that Navex will maintain stringent privacy and security practices. The personal data and information you provide will be stored in a database which is located on servers hosted by Navex. The Navex system is hosted in the EU.

### **How long will Kantar keep the data?**

Information will be kept in accordance with Kantar's data protection retention policies. Your report and your personal data will only be retained for as long as they are needed for the investigation of your allegations, for any legitimate follow-up to the investigation and for our internal audit and reporting purposes. Management reports for statistical purposes will not mention individuals. If an investigation is closed due to lack of evidence or if we conclude that the report was groundless or made maliciously then the detail of the report will be deleted within 365 days.

### **Can I remain anonymous?**

We need enough information from you to conduct a proper and fair investigation. You will appreciate that anonymity does hinder the investigation process.

Please also be aware that in some cases it may be possible for the investigators to ascertain your identity based on the facts.

You can read more about the issue of anonymity in the RTS Policy.

### **Your rights as a data subject**

These rights are set out in your Employee Privacy Notice. Kantar will fully support you in the rights you may have as a data subject under applicable law. Please contact Kantar's Data Protection Officer or central Privacy Team at [dataprotection@kantar.com](mailto:dataprotection@kantar.com) with any requests you have relating to the use, transfer, correction, or deletion of any of your personal data stored by this service or if you have any questions about this service.