

Privacy and Data Protection

Table of contents

1	About us	3
2	Personal data – definitions	3
3	Use of personal data	4
4	Processing of personal data	4
5	Processing of personal data of children	5
6	Processing of special categories of personal data	5
7	Security	5
8	Your legal rights	5
9	Retention of your personal data	6
10	Changes to this Privacy Policy	7
11	Contact information	7

1 About us

As one of the first market research and polling agencies in the Republic of North Macedonia, Indago constantly pursues further development of its own research tools and solutions and initiates new approaches to research. Indago is responsible for the processing of personal data that we collect from or about “you”. For example, we collect your personal data in the course of your participation in a market research activity, during a business relationship or when you visit our website. We process your personal data in compliance with the Law on Personal Data Protection of the Republic of North Macedonia, other statutory provisions and the principles of personal data protection defined in the General Data Protection Regulation (GDPR).

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.

2 Personal data – definitions

1. **“Personal data”** means any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as the first and last name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2. **“Processing of personal data”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, inquiry, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
3. **“Processing of personal data”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, inquiry, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
4. **“Controller”** means the natural or legal person, state administration body, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by a law or another regulation, the law or regulation shall stipulate the controller or the specific criteria for its nomination;
5. **“Processor of filing system”** means a natural or legal person, state administration body, public authority, agency or other body which processes personal data on behalf of the controller;
6. **“Recipient”** means a natural or legal person, state administration body, public authority, agency or other body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

7. **“Special categories of personal data”** are personal data revealing information on the racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation;

3 Use of personal data

We process your personal data to meet the purposes provided by:

- Law
- Agreement with you as a subject of personal data (for employment, for hiring consultants and external collaborators)
- Your free consent (participations in research activities)

Participation in market research is always voluntary. Indago does not collect and processes more or other types of personal data that are necessary to fulfill the respective purposes. We will only use personal data as set forth in this privacy policy unless you have specifically provided your consent to another use of your personal data. If we intend to use your personal data that we process with your consent for purposes other than communicated in such consent, we will inform you in advance and, in cases where the processing is based on your consent, use your personal data for a different purpose only with your permission.

4 Processing of personal data

1. Consent form / Research Data

If you choose to participate in our research activities, we collect all types of personal data. Research Data includes the following categories:

- Survey Data: your answers to online, paper & pencil or telephone surveys including sociodemographic information such as title, date of birth, age, gender, information regarding educational and income levels, occupation, marital status, number of children in household, etc.,
- Focus groups discussion, In-Depth Interviews (IDIs), and workshops

2. Personal Data provided to us by our clients

Indago as a market research company may receive your Contact Data from a client company that commissioned us to conduct a survey on their behalf with a specific group of people. For example, a client could send us a list of contacts for the purpose of the research. In this case, our customer is the controller of both your Contact Data and the data that is collected from you during the survey. In such cases, we will disclose to you the identity of the customer who provided your Contact Data to us.

3. Randomly selected participants in telephone surveys

We use telephone numbers from public directories and/or numbers that we automatically generated based on numbers from public sources, using industry approved algorithms. The random digit dialing (RDD) method is used to select the numbers to be rotated. The procedure involves randomly generating numbers. If the number is available and rings, then the interviewer receives a feedback signal and if someone answers the number the interviewer conducts a survey. This method of selection (RDD) takes into account all telephone numbers, and all have an equal chance of being interviewed. Consequently, we may call your number even if you did not make it publicly available. If you receive a phone call from Indago or one of our business partners and are asked to answer questions, for example, about certain brands and products, this does not necessarily mean that we have any of your personal data other than your telephone number in our possession. Your answers to telephone surveys will be treated anonymously and not stored together with your

telephone number. If you are randomly selected to take part in a survey and receive a call from us but refuse to participate and want us to refrain from calling you in the future, please let us know, and we will add your number to a blocking list.

4. Use of the Indago webpage (www.indago.mk)

This Privacy Policy also applies to your use of our website at www.indago.mk ("Website"), with the following privacy related mechanics and features.

- **Cookies:** Our Website uses cookies and other technologies to enhance the users' experience and improve the Website's performance, user friendliness and security.

5 Processing of personal data of children

Indago will not collect or process personal data of children under 18 years – or under a lower age – unless with parental consent, pursuant to applicable law. If we become aware that personal data from a child were inadvertently collected, we will delete such data without undue delay.

6 Processing of special categories of personal data

Research Data may include or reveal Sensitive Data and we may, in certain cases, process special categories of personal data concerning you ("sensitive data"). Special categories of personal data are personal data revealing information on the racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

7 Security

Indago takes data security seriously. We implement appropriate technical and organizational measures for the protection of personal data taking into account their nature, scope, the context in which they are processed, processing objectives, and privacy risks that may arise from the processing. Our information security policies and procedures are closely aligned with widely accepted international standards, the Law on Personal Data Protection of the Republic of North Macedonia, other statutory provisions, and the principles of personal data protection defined in the General Data Protection Regulation (GDPR). Additionally, the information security policies are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements.

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

8 Your legal rights

- **Right to withdraw consent:** Where the processing of personal data is based on your consent you may withdraw this consent at any moment
- **Right to rectification:** You may obtain from us rectification of personal data concerning you. You can exercise this right in cases when: you feel that your personal information is incorrect or incomplete and you think that your personal data should be supplemented in order to fulfill the purpose for which they are processed.
- **Right to restriction:** You may obtain from us restriction of processing of your personal data, if

- you contest the accuracy of your personal data for the period we need to verify the accuracy,
 - the processing is unlawful and you request the restriction of processing rather than erasure of your personal data,
 - we do no longer need your personal data but you require them for the establishment, exercise or defense of legal claims, or
 - you object to the processing while we verify whether our legitimate grounds override yours.
- **Right to access:** You have the right to request information from Indago regarding the personal data that we collect about you, including information as
 - why we process your personal data
 - which categories of personal data we process for you and
 - from which sources other than you personally, we collect your personal data
 - whether and under what conditions we share your personal data with third parties
 - how long do we keep your personal information
 - whether there is an automated decision-making process in our operations, including profiling.
 - **Right to portability:** You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to request that it be transferred to another controller. This right applies to personal data that: are processed on the basis of consent or agreement are processed in an automated way.
 - **Right to erasure:** You may obtain from us erasure of your personal data, where
 - you think that the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed
 - you no longer consent to the processing of your personal data
 - you have an objection to the processing of your personal data
 - you believe that your personal information has been processed illegally
 - **Right to object:** You have the right to file a complaint based on a specific situation related to the processing of your personal data. You can file a complaint for the processing of personal data which:
 - is based on public or legitimate interest, including profiling
 - is performed for the purposes of direct marketing and profiling related to direct marketing
 - is performed for the purposes of scientific or historical research or for statistical purposes

In this event we shall no longer process your personal data, unless we can demonstrate compelling legitimate grounds and an overriding interest for the processing or for the establishment, exercise or defense of legal claims.

9 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.

10 Changes to this Privacy Policy

Indago reserve the right, to update and make changes to this privacy policy at any time, in order to ensure consistent protection of the personal data. All changes will be published regularly and easily accessible to personal data subjects.

11 Contact information

Please direct your questions regarding the subject matter of data protection and any requests in the exercise of your legal rights to the following

email: [info@indago.mk], or

Blvd. VMRO No.1, ME, 1000 Skopje.

All requests will be brought to the attention of our Data Protection Officer [Diana]. You may also contact the Data Protection Officer directly by writing an email to diana.milenkovska@indago.mk.