



Questback Group Internal control and governance

Respondent Privacy Policy v.2.01

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Questback

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1. Introduction

This Policy for protection of Respondent Personal Data forms part of the process for managing Personal Data protection in Questback Group.

As a provider of Feedback management software, Questback enables its customers to perform surveys and other feedback management, and thereby processes Personal Data from Respondents to such surveys and other feedback management. When providing such services, Questback has the role of Processor, as defined in the GDPR, and it is Questback's obligation to ensure and facilitate that the existing applicable privacy regulations are observed, and that the data subjects' rights following the regulations is implemented.

Questback's policies for processing Personal Data as processor is described in *Questback Group Code of Privacy*, and in Questback's Binding Corporate Rules for Processors and sub-documents, including this document. The purpose of this document, is to provide an overview of how Questback performs its role as a Processor when processing Personal Data for Respondents in its provision of Software-As-A-Service to its customers.

What is Respondent Personal Data

Respondent Personal Data includes Personal Data provided by individuals who are invited to surveys set up by Questback's customers, including but not limited to:

- Customers' or Authorized entities' employees who are invited to Employee Surveys
- Customers' customers or prospects who are invited to customer surveys
- Individuals who are invited to market research or scientific surveys

As Questback does not have an overview of the data, Questback must assume that all data may fall under "Special Categories" in GDPR article 9, and process all data in accordance with this assumption.

High-level overview of the processing of Personal Data from Respondents

Questback provides feedback management on a Software-As-A-Service (SAAS) platform, this means that Questback's customers log in to Questback's servers through an URL and get access to the software. The software itself, and all Personal Data collected by the Customer, is stored in the same location.

Surveys, panels and communities, and distribution lists and other lists of respondents and potential respondents used for gathering feedback are collected, procured or created by Questback's customers. It is Questback's customer, the Controller's, responsibility to ensure that collection and processing of personal data in preparation for and in the course of conducting a survey is done in compliance with applicable law.

Personal Data may be used to design Surveys, to send out invitations to participate in Surveys and to assess the responses provided by Respondents. Surveys can also be produced without any Personal data, where a URL is made available for groups of people that are not named.

When a survey is published, Respondents get access to it, and can choose to provide responses to surveys. With new functionality introduced as part of Questback's GDPR compliance, respondents will as default be prompted to provide valid consent to process their personal data for the purpose and duration defined by Customer. Customers can also provide statutory information as required by GDPR Art. 13. Questback does not have control with the content of Surveys or responses.

Under an active contract, Questback's customer, the controller, has the obligation to ensure that deletion takes place in compliance with law. Questback provides, as default, a process simplifying such compliance.

If a Customer terminates its contract with Questback without having deleted the personal data in it before termination, Questback will delete all Personal Data in the customer's surveys upon the effective date of termination.

GDPR functionality in Questback's products

Questback's software includes functionality that, by default, simplifies Questback's customers compliance with requirements. The functionality includes, among other functionality, definition of purpose per survey, collection of valid consent from every respondent, documentation of such consent, automatic deletion of personal data when a retention time defined by customer is reached and easy deletion of personal data per respondent when required. Details about the functionality will be available in software documentation.

Questback products

Software - Questback provides feedback management software and support through access to software hosted in a secure environment (Software As A Service – SaaS). Questback offers two separate software products: **Essentials** and Enterprise Feedback Suite (**EFS**). Questback may provide offerings and solutions based on EFS or Essentials with different names, such as “Unipark” used for certain academic offerings. All information provided herein referring to software also applies to any solution or offering based on Essentials or EFS.

Support - Questback personnel provide support per telephone and e-mail during office hours. Such support relates to bugs or issues in the software and other day-to-day issues the customers may have with using the product. Depending on customer’s request, Support personnel may access personal data as part of providing support.

Services – Depending on contract with customer, Questback personnel may training advisory services, projects and other services. Such service provision may or may not include processing of personal data, depending on customer’s requirements, and the content of Data Processing Agreement.

Parties responsible for protection of Personal Data from Respondents

Questback’s customer is the Controller

Questback’s customer is considered the Controller and as such holds the main responsibility for compliance with applicable legislation. Furthermore, it is Questback’s customer’s obligation to ensure that a Data Processing Agreement is in place with Questback, that covers all relevant areas for Customer’s compliance.

Questback is the Processor

As Questback provides services and software to its customer in order for customer to be able to process data, Questback is the Processor in relation to such data. Questback processes Personal Data for its customers based on Data Processing Agreements as defined by the GDPR.

Questback will process data in accordance with the EU General Data Protection Regulations and its customer’s instructions in data processing agreements or otherwise.

2. Legal Basis for processing personal data for Respondents

Customer is the Controller of the Processing of Respondent Personal Data. Questback’s basis for processing will therefore in all cases be a Data Processing Agreement with Customer.

Customer’s basis for processing Respondent Personal Data for which it is the Controller is defined by the Customer itself. As consent will in many cases be the relevant legal basis, Questback provides functionality that allows customer to collect valid consent from its respondents.

If customer chooses not to collect personal data using the default settings, customer must document its legal basis for processing outside the software.

3. Categories of Data Subjects

Data provided by respondents to surveys set up by Questback’s customers. Such respondents may fall into categories listed below.

- Customer’s Employees.
- Customer’s Clients
- Panellist (market research)
- Community member (market research)
- Others (scientific research)
- Participants in Market research
- Participants in training or events

4. Types of Personal Data processed for Respondents

Depending on the character of the Survey and its objectives, almost every type of Personal Data may be processed for Respondent, in particular may include name, home address, home telephone or mobile number, email address, information concerning family, lifestyle and social circumstances including age, date of birth, marital status, number of children; employment details, education/qualification, business contact details.

Responses may furthermore include any area of information relevant to the survey in question.

5. The purpose and duration of the processing

The purpose will in all cases be defined by Customer. In order to collect valid consent from Respondents, Customer will as default be able to enter such purpose in the survey before it is published.

6. The subject-matter of the processing

Questback's processing of Respondent Personal Data will in all cases be performed in order to provide feedback from Respondents to its customers or to its own organization. Feedback can be relevant for shorter duration processes, or for processes where trends are studied for many years. The specifics will be defined for each specific survey or set of surveys.

7. The nature of the processing of Personal Data for Respondents

This section will outline how Respondent Personal Data is processed.

Storage of Respondent Personal Data

Questback will not store personal data outside the European Economic Area unless a suitable safeguard recognized under the GDPR to provide an adequate level of protection for personal data is in place.

Questback's customers may extract Respondent Personal Data, and store or process Respondent Personal Data in additional locations not known or controlled by Questback.

Access to Respondent Personal Data

Personnel with access to Respondent Personal Data is located as follows:

Role/ Department	Access to	Geography
Customer's authorized users. Number of people who have access and extent of such access is agreed in contract between customer and Questback. Customer alone has control with who has access, and location of the individual	Respondent Personal data in Questback's systems.	Known by Customer
Questback Essentials and/or EFS Support personnel, 1 st line support Norway	Respondent Personal data in Questback's systems.	Norway
Questback Essentials and/or EFS Support personnel, 1 st line support Finland	Respondent Personal data in Questback's systems.	Finland
Questback Essentials and/or EFS Support personnel, 1 st line support Sweden	Respondent Personal data in Questback's systems.	Sweden
Questback Essentials and/or EFS Support personnel, 1 st line support England	Respondent Personal data in Questback's systems.	England
Questback Essentials and/or EFS Support personnel, 1 st line support Germany	Respondent Personal data in Questback's systems.	Germany
Questback Essentials and/or EFS Support personnel, 1 st line support USA (Internal policy is in place to ensure that US support personnel does not access any EU customer data unless accepted in Data Processing Agreement, and appropriate safeguards are in place)	Respondent Personal data in Questback's systems. For European based customers, such access will only take place if an EU Model Clause contract is in place with customer	USA

Questback Essentials Support personnel Essentials, 2 nd line support	Respondent Personal data in Questback's systems.	Norway, Sweden, Finland
Questback Cloud Operations (2 nd line)	Respondent Personal data in Questback's systems.	Germany
R&D Function for Questback Group	All data in customer's area	Germany, Finland or Norway
External provision of IT Support to Questback in Norway (Third Party Sub-Processor: Fluidio)	Third party provider: Fluidio	Norway
Administrators	All data in the relevant customer's area in Essentials and EFS	Norway, Finland, UK, Germany
Questback reseller in Canada (relevant for customers of such reseller only)	All data in the relevant customer's area in Essentials	Canada
Questback reseller in the Netherlands (relevant for customers of such reseller only)	All data in the relevant customer's area in Essentials	The Netherlands, Belgium, Luxembourg
Questback reseller in Finland (relevant for customers of such reseller only)	All data in the relevant customer's area in Essentials	Finland
Questback reseller in France (relevant for customers of such reseller only)	All data in the relevant customer's area in Essentials	France
Questback reseller in Spain (relevant for customers of such reseller only)	All data in the relevant customer's area in Essentials	Spain
Questback resellers in Italy (relevant for customers of such reseller only)	All data in the relevant customer's area in Essentials	Italy
Questback reseller in Austria (relevant for customers of such reseller only)	All data in the relevant customer's area in Essentials	Austria
Questback reseller in Switzerland (relevant for customers of such reseller only)	All data in the relevant customer's area in Essentials	Switzerland
Questback reseller in South Africa (relevant for customers of such reseller only)	All data in the relevant customer's area in Essentials	South Africa
Questback reseller in Ireland (relevant for customers of such reseller only)	All data in the relevant customer's area in Essentials	Ireland
Questback reseller in England (relevant for customers of such reseller only)	All data in the relevant customer's area in Essentials	England

Additional access rights may be agreed in contracts with specific customers.

Access to data in order to provide support to customers

Respondent Personal Data may be accessed, stored or otherwise processed in additional locations or by additional individuals in order for Questback to provide Support, advisory services or professional Services to its Customers.

8. Retention and deletion of Respondent Personal Data

Questback as processor does not at any point define retention time for Respondent personal data, or provide advice to the controller about the duration of retention time. The retention time for Respondent Personal Data will be defined by the controller (Questback's customers) for each survey, as described below.

Default process: customer defines retention time in the software

With the new GDPR functionality that will be available to all Questback's customers before the GDPR comes into effect, Questback provides its customers with a default functionality to define purpose and retention time for all personal data it processes by use of Questback's software.

In practice, this means that customer will define the fields where it will collect personal data, and define the purpose for processing such data and the duration for the processing.

All the fields defined as personal data will be automatically deleted at the end of the retention time defined by customer.

Non-default process: Customer defines retention time manually

If the controller, Questback's customer, chooses to de-activate the default process, the controller may do so, and remain in control with the retention time, so that the controller itself deletes the personal data at times defined by the controller.

Process for personal data collected before May 2018

Data collected before the default process described above was available, remains under Controller's control, so that the controller itself deletes the personal data at times defined by the controller.

Customer may choose to delete entire surveys, or to manually delete the personal data elements in a survey only.

Request to delete Personal Data for a specific Respondent

When an individual respondent requires to be deleted from the software, Questback's customer will be able to perform such deletion in the software itself. For Essentials, the functionality is available in spring 2018. For EFS, customers will require assistance from Questback until such functionality is available in the system itself.

Customer will in such cases be responsible for ensuring that it maintains a list of the respondents who have required deletion, in order to fulfil their requirements towards respondent.

Deletion routines in Questback software upon customer's termination of Agreement with Questback

When an agreement between customer and Questback has expired or terminated, and the customer has not deleted Personal Data in the system, Questback will delete such data in accordance with its deletion routines.

9. Process in case of personal data breach

In cases of personal data breach, as defined in the GDPR, Questback will follow the steps herein.

Step 1 – route to the correct person

When an assumed personal data breach is discovered, the following personnel will be informed:

- General Counsel, or
- Privacy Officer, or
- Data Protection Officer

The process will be taken forward by the persons listed above, as agreed between them. An assessment will be done to define whether a personal data breach has in fact taken place. If this is not the case, the process will be ended at this stage.

Step 2 – inform customer

When the personnel above is informed of a personal data breach, and it is found that a personal data breach has in fact taken place the parties listed above will ensure that all affected customers are informed without undue delay. All customers must be informed within the timeframes set in contract and in GDPR.

Information will be provided to the correct authorized party in customer's organization, as defined in contract. Information will be provided in e-mail, unless otherwise agreed in contract.

Step 3 - Assess information to Data Protection Agency and data Subjects

Questback's Data Protection Officer will assess whether Questback has an obligation to inform Data Protection Agency or Data Subject, based on law or contract. If this is the case, Questback's Data Protection Officer will initiate process to inform.

10. Information security

All Respondent Personal Data is processed in accordance with the IT Security regulations in Questback IT Governance Policy as revised from time to time.

11. Training

To ensure that the process herein is followed, training for all personnel on a regular basis is provided.

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